

*Comp Plan 10-Year Update
Planning Commission Review Comments - 06/01/2004*

Sections

Comments

Land Use Element

GENERAL COMMENTS:

The Land Use element changes generally are well written and coherent; they make good sense and seem to reduce the complexity and jargon in this section.

Indicators:

There was considerable discussion in the public comment sessions about the need for the city to develop a variety of urban indicators that could be useful in ongoing evaluation and management of the comprehensive plan. In the Environmental case, those indicators should include water and air quality measures and for the Land Use element indications could be social indicators. The goal is to monitor and respond appropriately to changes that could lead to major problems. To some extent the concern for this issue could be linked with the issue of the precautionary principle. It was recommended that a special task force be formed in DPD to look into the general issue of urban indicators and Comp. Plan responses to emerging problems.

Public Facilities Planning:

The absence of clear policy concerning the City's responsibility for planning and providing public facilities in high growth areas has led to problems in the past, especially in Belltown where there is a serious lack of public open space and other public services are clearly apparent. The Commission urges the City to consider a stronger commitment and approach to anticipating and planning for public facilities in areas that are targeted for significant growth.

Recommendation:

Consider adding a policy statement as follows:

"A public facility master plan will be developed and maintained in response to housing and jobs growth estimates that would seek to provide for a range of public facilities. Such facilities might include but not be limited to parks and open space, community centers, libraries, fire stations, schools, etc. that would ensure such facilities are available to citizens who live in high growth areas of the city."

SPECIFIC COMMENTS:

LG2 and LG3

Recommendation: Consider combining these into a single statement that covers both areas.

LU17

Public comment reveals concern about whether this policy restricts higher density development to existing urban villages. Clarification of this issue here would be of value to the public.

Recommendation: Add language explaining the rationale for this policy and intent regarding growth inside and outside of urban villages/centers.

LU22

This policy appears to be unduly restrictive to the maintenance of the character of existing neighborhoods.

Recommendation: Consider changing the term "...character..." to "...quality..." .

LU 25 - 33

Concern was expressed in the public meeting about cell tower developments in neighborhoods, with a recommendation for the City to develop a master plan for cell tower distribution so that each neighborhood takes its share of cell towers rather than have towers concentrated in certain areas and neighborhoods.

Recommendation: Consider developing more comprehensive approach to cell tower distribution; add any appropriate language here regarding the City's approach.

LG 19

The issue of "...immediately accessible open spaces..." raises a concern for the provision of such public amenities by the City of Seattle. This statement raises some red flags including defining what constitutes "...immediately..." and how "...open space..." is defined. R

Recommendation: Change or remove the term "...immediately..."

LU107

This section is good as far as it goes, but it seems that it does not go far enough in terms of the need for public facilities in high-density multifamily zones. See comments at the end of this section for a recommended strategy.

D-3 Environmentally Critical Areas

Recommendation: Move this entire section to the Environmental Element

GENERAL COMMENTS:

The Transportation Element has been significantly improved. In particular the Planning Commission is encouraged by the close coordination in revising the Comp Plan Element and the City's Transportation Strategic Plan.

The following are proposed changes that may help to further improve the Transportation Element;

Relationship to TSP: Since the Commission has not yet seen the TSP, it has some concern about how clearly this functional plan will provide direction to priority areas and needs consistent with Comp Plan goals and policies. It appears that the TSP will do the heavy lifting in terms of policy and actions so it is important to note that relationship.

Recommendation: The element should include specific explanation of the relationship of the TSP to the Comp Plan. This should include a discussion of the status of the TSP - whether it is considered an Action under GMA and be subject to its procedural requirements.

Organization: There is still a fair amount of redundant and overly general language. We recommend a more ruthless approach to "editing".

Recommendation: Restructure the element to clarify and simplify the whole thing a bit.

Change from the current goal categories:

- a. Improve the Environment
- b. Increasing Transportation Choices Through Demand Management
- c. Building Urban Villages: Land Use and Transportation
- d. Make the Best Use of Streets We Have...
- e. Measuring Level of Service
- f. Managing the Parking Supply
- g. Making Transit a Real Choice
- h. Bicycling and Walking
- i. Connecting the Region
- j. Promoting the Economy: Moving Goods and Services
- k. Conserving Transportation Resources: O & M
- l. Investing in the Transportation System

Replace with this recommended structure:

- a. Building Urban Villages: Land Use and Transportation
- b. Promoting the Economy: Moving Goods and Services
- c. Increasing Transportation Choices (eliminate rest of title)
 - 1) Bicycling and Walking (sub goal and simplify policies)
 - 2) Making Transit a Real Choice (sub goal and simplify policies)
 - 3) Managing the Parking Supply (sub goal and simplify policies)
 - 4) Demand Management (sub goal and simplify policies)
- d. Make the Best Use of Streets We Have...
- e. Measuring Level of Service
- f. Conserving Transportation Resources: O & M
- g. Improve the Environment
- h. Connecting the Region
- i. Investing in the Transportation System

Recommendations:

Non-Motorized Vehicles/Pedestrian LOS: The Commission questions why the Comp Plan does not work toward LOS standards for non-motorized vehicles and pedestrians. **In the long term this will be essential to moving away from prioritizing only what we can measure. With more communities addressing this, it is time for the City to make a commitment to this in the Comp Plan.**

Freight Mobility: The City needs to make sure that policies re: Freight Mobility are adequate. This is another area that is critical to making large and small transportation policy and funding decisions and needs a strong, clear policy framework.

High Capacity Transit: The City should consider adding language to this element that calls for amending neighborhood plans where needed to support and integrate high capacity transit.

Funding: The funding charts in the amendment are confusing and do not tell the important part of the story. If this is included in the TSP, then the GMA concurrency requirements may make the TSP an integral part of the Comp Plan.

SPECIFIC COMMENTS

Goal A: Discussion: Singling out the car, as opposed to motorized vehicles, is probably an unnecessary simplification that can be misleading.

T2 "Environmental Management System" - Clarification is needed as to how this would interact with the Transportation System Plan (TSP).

T1, T3, TG1, TG3 - Many goals/policies appear to overlap and could potentially be consolidated

T3 and T4 could be combined.

T6 through T8 are about coordination with other agencies to address environmental issues. Combine and move to regional section.

TG5 "personal motorized vehicle" is better language than "car"

T12 Eliminate as it duplicates other policies in land use and transit sections

T14 In general, 2020 percentage goals for SOV's, non-SOV's and carpools appear to be worse than existing conditions which seems rather counter-intuitive for many of the urban centers - Bicycle & other future goals seem low

T14 It is unclear why these specific mode split goals are included in the Comp Plan as opposed to the TSP like other specific measures highlighted in the Comp Plan text. In addition, the mode split goal is a bit confusing without some explanation. Are the year 2000 goals actual measures, or are they model estimates? Some methods issues arise that indicate that this "policy" would be better housed in the TSP.

T18 (old policy #) -- deleted? Seems neighborhood traffic control devices used to minimize cut-through traffic should remain in the comp plan rather than the TSP....

T21 Similar language keep surfacing across policies, there is duplication somewhere that can be streamlined (T10, T15).

D. Making the Best Use of Streets We Have... This section is a very good addition, and is probably the most important part of the element. A priority or ranking should be established when determining the allocation of competing goals. If it has already been done this should be clarified.

T22 Has a priority or ranking been established? Clarify this.

TG10 "Accommodate all new trips in Downtown with non-SOV modes." This addition raises many questions. In general, we question the use of these kinds of statements that are hard to establish in terms of real measurable performance.

TG13 This is a goal that appears to duplicate previous policy language (T17).

TG17 Clarify which takes priority: Neighborhood & business vitality vs. auto trip reduction (in terms of parking supply)?

T30 We question whether, in fact, T30 and T31 are not somewhat incompatible. In any case, there is considerable uncertainty about what the real intent is when these are taken in combination.

T33 The transit LOS is still the same as Arterial LOS. This may be a necessary limitation at the moment, but represents something of a problem. LOS standard thresholds for transit should differ from those used in determining LOS for general purpose traffic. The thresholds should be smaller than general-purpose.

T37 Clarify which objective takes priority. Develop a ranking system

T39 Use of the word "significant" renders this policy too vague to be useful. Define conditions, or eliminate language.

T41 This is a very good addition.

T51 Does this belong in the finance section?

T54 Once again, the word "appropriate" is too vague for policy.

T57 This policy raises the question of what to do with many stairways. Policy is to keep the right-of-way, but no maintenance funding has been available. Eventually something must be done with deteriorating facilities (this goes beyond stairways). Is the Comp Plan to provide guidance on these issues?

T61 It is not clear why this policy is here. If we are to have such a policy shouldn't it be grouped with other measurement/monitoring policies (Measuring LOS).

T63 Eliminate the word "demand" in the policy and replace it with "system".

T67 This policy could be further clarified. Many would suggest that the HOV system was originally intended to provide enhanced performance for HOVs, and not non-SOVs. The distinction appears trivial at first, but is important upon closer consideration. To preserve the performance access may need to be restricted to "true" HOVs (registered carpools, vanpools, and transit). If this distinction is recognized then the language may need to be adjusted.

T68 Other language should be substituted for "non-SOV" users here. (I.e. Expansions of capacity should be primarily for improving total system operational efficiency in a manner that also recognizes the real capacity constraints of surface streets in Seattle destinations.)

T74 Possibly combine T74 and T75.

T76 Possibly combine T76, T77, and T78

T81 Eliminate the specific reference to the commercial parking tax. Also, add to last bullet "that reflect the costs that system users impose and the benefits they receive."

Transit: There does not appear to be any mention of promoting transit priority on roadway facilities (such as arterial HOV lanes, transit signal queue jumps, etc). Consider adding this where appropriate

GENERAL COMMENTS

This section is well done. The changes make sense, simplify the language and make it easy to understand. The revisions are improvements, reducing repetition and stitching together many of the plan elements. It is suggested that cross-references remain as guidance to readers/users. This will strengthen the integration of the plan and direct users to other elements as appropriate.

Recommendation: The section in the Land Use element on “...Environmentally Critical Areas...” should be moved to the Environmental Element. This would ensure that all environmental issues are consolidated into one section.

We agree with the call for developing environmental indicators to strengthen this section as was raised in the public workshop. It is clear that **there is a need for developing some means for monitoring the environment of the city so that problems can be detected early and responded to in a timely way.** We would support the suggestion to use the Cascadia Watch Score Card as a good place to begin to develop such indicators.

Incorporation of the “**precautionary principle**” introduces several important considerations (specific notes below). From the perspective of the comprehensive plan and supporting materials, the principle of precaution is already present. City decision-makers have sufficient opportunity and responsibility for analyzing and evaluating essential primary and secondary effects resulting from proposed actions. The sum of existing review standards applied by local, state, and federal participants is thorough and comprehensive. Inserting additional levels of review would require commitment and resources. It may be more effective to reference the principle as a guide and rely on coordinated actions.

Finally, **the linkage between the Comprehensive Plan and the Seattle Shoreline Master Program is not clear and should be noted or referenced specifically.**

SPECIFIC COMMENTS

EG1: The proposed policy recites the necessary elements. However, capital improvements and operations should be noted separately. Implementation of capital projects and operation/maintenance of existing programs presents the opportunity for achieving coincident environmental and economic benefits. The comprehensive plan needs to support and promote balancing environmental benefits with city business.

E2: Similar to EG1 note, this statement should be more active in tone. If the City makes land use decisions, transportation improvements, and promotes economic development, these actions must reflect balance between improved infrastructure, jobs, and environmental conditions--coincident benefits must result.

E4: This includes unnecessary jargon. Revise to clarify the point that impervious surface, landscape restoration, and non-structural solutions to disturbed/developed surface conditions make sense for environmental, planning/design, implementation, and long-term operation/maintenance.

E6: This needs to be more specific. Some questions need clarification such as; Would these partnerships be environmental initiatives? Would they include partnerships in planning/design city infrastructure projects? Would there be partnerships in environmental outreach or assistance with planning compensatory projects (e.g., restoration and cleanup actions)?

E7: This needs to be stated in a more active way as well. We recommend inserting Elliott Bay and Duwamish Waterway and substituting "marine near shore environments in the city" for Puget Sound.

E10: This policy is a general statement consistent with the precautionary principle. It may be useful to keep or restate the following six polices, which are headed elsewhere, as examples and for guidance to readers.

EG1: Compliance is central to environmental review. It may be that a statement indicating the need to comply with existing regulations, monitor compliance, and report results should appear as a specific policy. This pertains to city programs as well as the city's role as a regulator. Compliance is an important/essential element in environmental stewardship.

U10a, U10b, and U12a: If these policies are headed to Utilities Element, the policies should be lined-out.

U9b: Line-out, if being transferred to Utilities Element. Note: "Planting Trees" is too limited, the City should make a broad policy statement regarding landscape restoration in urban environment, in particular making certain that City stands behind establishing native vegetation and requiring linking landscape restoration to active programs and proposed development, including benefits to storm water, impervious surface, buffers, and air quality.

GENERAL COMMENTS:

DPD Staff have done an excellent job of pulling together into a new section those parts of the Land Use element related to the Urban Village concept. It is well written, straightforward and the editorial additions and deletions seem good. Additionally, we support using the word growth estimates rather than targets, as it more accurately reflects what it is.

There is repeated use of the term "pedestrian facilities," usually in conjunction with "bicycle/or," to describe connections between urban villages/centers/etc., as if this were the only way they can be connected in a non-auto dependent way. We understand the term to refer to dedicated trails such as the Burke-Gilman. This ignores the fact that the best and most numerous pedestrian connections are "good streets" designed and built for multiple users, pedestrian, bike, and auto. So, for example, Policy L15, Item 10, should in my view refer not to "green streets" (which is a very specific designation) but to "better streets," with some explanation of what that means (possibly "Streets that Work.")

SPECIFIC COMMENTS:

UVG14 Our only comment on this policy is encourage staff to work with PSRC to ensure consistency between the City's Comp Plan language on urban centers with the PSRC's definitions.

UVG 17 Provide more clarity to 'parks' by specifying passive, multi-use 'green' park space. The current example of the Ballard urban village park space debate (between a more passive park/green space and incorporating a skateboard park) shows the need to distinguish what types of park space and uses is intended.

UV36 There may be inconsistency between the term "anchors" used in the first part of this statement and the removal of "anchor" terminology in subsequent sections. There seems to be a general move to get rid of this term in the Comprehensive Plan update which is fine, but should be done consistently.

PROPOSED 2004-2024 HOUSING ESTIMATES

The Commission has some concerns about the allocation of housing units by centers and villages in this section. In particular the allocation for South Lake Union seems unrealistically high in light of the development capacity of the area. We were told that the numbers were generated by a major property owner's analysis, which we would recommend be verified by the City or other objective party. The effect of these estimates should be analyzed in terms of possible significant spillover effects from general development of South Lake Union that would tend to increase development in surrounding areas. This may be especially true for west

Capitol Hill, Eastlake, Denny Triangle and the south part of Queen Anne.

Recommendation: We recommend that there be a “one page” description added to these estimates that comment on how allocations were developed. We also recommend considering increasing a more balanced allocation, increasing them for the adjacent neighborhoods identified above with a corresponding decrease in the allocations for South Lake Union.

Another potential concern is the implication of these allocations on community investment, especially in terms of public open space, transportation infrastructure, services, etc. This concern focuses on what needs to be done by the City of Seattle in order to prepare for and provide services for these additional housing units and their occupants within the neighborhood. The addition of this many housing units seems to have very significant implications across the board and calls for a much more detailed analysis and explanation within this amendment process. (Note: if this were a planned development it would trigger an EIS) It should also be referenced in other elements of the Comp Plan where appropriate such as the Urban Village element.

UV 39 and UV43 are also very good, saying how the estimates will be used in planning and how change will be monitored.

UV51

We suggest adding native and naturalized vegetation as appropriate. Otherwise, that’s the end of bulb beds and the Woodland Park Rose garden.

Housing Element

GENERAL COMMENTS

The proposed changes to the Housing Element make it much clearer and add another solution to consider in realizing the City’s commitment to affordable housing.

The discussion at the beginning of the Encouraging Housing and Diversity and Quantity is very well done. It discusses the issue of affordable housing and infill development in lay terms that a citizen should be able to understand let alone a developer. It clearly outlines where the residential growth is projected. For citizens who are interested in protecting single family neighborhoods, it will be clear that the City is protecting existing neighborhood quality and meeting growth needs through previously identified Urban Villages and Centers.

SPECIFIC COMMENTS:

We are still not sure if ground-related housing is understood. The opening discussion does define the term, but it is referred to a few times. We would suggest a reference or footnote would be appropriate. In the discussion section when it defines ground related housing the definition includes single family homes. Then H10 (4-5) says: "Encourage a range of Housing types including, but not limited to: Single Family-Housing; ground-related housing to provide an affordable alternative to single-family homeownership...."

The discussion section on page 4-4 it reads: "Ground related housing types include townhouses, duplexes, triplexes, ground-related apartments, small cottages, accessory units and single-family homes." This may be confusing to some if SF is included in the definition in the earlier reference and distinguished as different later.

H-16 The change of wording from gentrification to displacement of existing of low-income residents only is a good change. The clarification between gentrification and displacement is helpful.

Hx This new policy is a good addition. One of the biggest concerns is net loss of affordable housing units. We support ensuring this is in the Comp Plan and the requiring it to be a goal that has to be met.

H30 The specification that the City will promote production and preservation of low-income housing with incentives even outside of downtown is a positive development. It is important not to direct all low-income housing to one area. With the proposed improvements to the City's transportation system and increasing transit options, there is more opportunity to disperse the development.

Under the Discussion on Encouraging Housing Diversity and Quality, moderate and higher density housing is said to be more affordable than ground-related housing due to the smaller size of the units. We disagree with this statement: (1) Smaller is always more affordable regardless of housing type. (2) Moderate and higher density housing units are not always smaller than ground-related units. (3) As between ground-related and moderate to higher density units, greater affordability does not always occur, and when it does it is a function of density not size.

H16: "gentrification" is deleted as ambiguous, but it is still used in the Discussion as well as other places in the document (H31 for example).

Hx: (Encourage the replacement of...) This is a nice-sounding policy but it is not clear that there is any possible way to implement it.

**Economic
Development**

H29: Existing housing that is preserved for low-income occupancy should not count toward meeting the policy goals for additional low-income units. Very often, residential properties that are rehabilitated and preserved for low-income populations, are already housing those populations even though they are not restricted or dedicated to that purpose. They are just dilapidated and therefore do not command high rents. Their rehabilitation is to be encouraged, but it should not count as meeting the goals of this policy, since this does not add to the stock of housing available to the low-income populations

GENERAL COMMENTS

The deletion of some of the language does help the readability of this element. One key question is whether it is possible to define quality of life, a term used in this element. Perhaps it is just obvious but a lot is based upon enhancing it, so it would be nice to be able to be more specific about what it is.

The linkage of the Economic Development goals and policies listed to other elements of the Comprehensive Plan helps the reader get the larger comprehensive picture. (I.E. Discussion on 5-2)

The new goals listed particularly assist in strengthening the consistency with other elements within the Comp Plan. Finally the added goals and policies add value to the existing goals and policies and assist in clarifying them.

SPECIFIC COMMENTS:

EDG11 - Discussion - The new language of this section is very good

Pg 5-2 Existing Goal EDG7 Proposed Goal Number: EDG9 - there is a strike through suggesting it will read: Maintain Seattle's competitive in international trade. Should the word edge remain?

**BINMIC - public
access**

BINMIC- Street ends: Having a blanket prohibition of public access to street ends doesn't make seem to make sense; there will always be exceptions and uses should always be pursued, as long as there is a clear and meaningful priority given to needs of the industrial uses.

Recommendation: We do not recommend approving this amendment as it is written.

<p>South Wallingford</p>	<p>W-P4 Why does it call for formulating a design review process? There already is one. Is it necessary to amend the plan to allow them to have their own guidelines, since most areas already have them?</p>
<p>Interbay</p>	<p>The Planning Commission is aware that the City and Port of Seattle have very recently agreed to a withdrawal of this amendment, with a commitment to jointly study the future of this area. We fully support this and offer the following comments as input to the study that will take place.</p> <p>The review of the City’s industrial lands is definitely needed. This should include assessment of both current uses, which in the case of Interbay are not entirely maritime-related. It should also consider tools like an overlay for areas that appear to be becoming more mixed their uses. This would define specific types of industry and activities that are appropriate and will be encouraged, such as businesses that need large footprints. This study should also address the appropriateness of housing in industrial areas that are transitioning. This should be based not just on highest and best use, but more importantly how it relates to the City’s urban village strategy, transportation and public facilities goals and policies.</p>
<p>Precautionary Principle</p>	<p><u>GENERAL COMMENTS</u></p> <p>Overall the Planning Commission appreciates the goals of the groups that sponsored the Precautionary Principle amendment. We agree that it is appropriate to find ways to recognize public health as a dimension of planning policies and to take steps to articulate this in the City’s Comprehensive Plan.</p> <p>A major concern expressed in the Comp Plan public workshop and in Commission discussions is the potential for a generally worded precautionary principle/policy to result in no action because of the lack of knowledge about public health and safety outcomes. Clearly, there are many unintended results from just about any action and some of those may have public health implications. While the “best available science” may be available in some instances, in many there is little or no information that would help you judge the efficacy of any given action. Adopting such a policy would seem to be problematic. At the same time the concern for public health and safety is real and important.</p> <p>The present proposal might take the form of discussion intended to emphasize coordinated decision-making, using existing authorities and fresh emphasis, as an alternative to a new policy. The proposed policy sounds like much of what we have available for design, planning, and decision-making at present. Perhaps the spirit of this sort of public decision-making requires emphasis beyond the letter of present performance.</p>

- Adopting a specific precautionary principle policy would require commitment of resources for (1) goal setting, (2) alternatives assessment, (3) performance measurement, (5) cost/benefit analyses, and (4) sustainability assessments. This would be a substantial commitment.
- Implementation of the proposed policy is important to consider. Justification and documentation would be required and additional decision-making process should be anticipated.

Perhaps a better policy direction would be to develop a set of urban indicators that could assess the environmental health of the city, which would allow corrective action to be taken as serious problems emerge. It is also recommended that the experiences of San Francisco with this policy be monitored to assess its impact on that city. To that end the Commission offers the following comments.

While the intent and concepts of the precautionary principle have merit, it would be more useful to insert those ideas in more specific ways rather than adding a broad ranging policy that may be subject to misinterpretation and cause unintended consequences. Moreover, these specific provisions can better serve to:

- Raise appreciation and understanding of public health goals, leading to a more protective public response to increasing the health of the city's citizens.
- Incorporate science based information into public decision making where public health is concerned.
- Better coordinate activities directed under the comprehensive plan, most notably dealing with land use, environmental quality and transportation with activities dealing specifically with preventative public health.

The following measures are proposed for incorporating the intent of these principles into the Comprehensive Plan.

1. Consider titling the *Environment Element* the *Environment and Human Health Element*. This element will still focus on environmental quality but it makes sense to reference the fact that the two are closely connected.
2. Add language in selected goals and policies to name human health as a value along with environmental quality. *Steve Gilbert has provided a list of suggestions that Tom and his team will consider.*

3. Include a few public health indices as part of the Scorecard indicators being proposed by Peter Steinbrueck.
4. Reference the "use of best available science" in addressing issues directly related to public health. *Some caution is appropriate with this but I think we can make it work.*

VIEW POLICY

There is no reference regarding where this statement should be added. The logical location would be land use, although the only references to views are in L257. While the View Policy is important, it is not clear if something detailed is needed in the Comprehensive Plan. We would appreciate seeing a staff analysis of this, particularly regarding how this would fit as a broad policy statement in the Comp Plan and what it is supported by in land use regulations.

This proposal sets up conflicts, is vague, would be difficult if not impossible to enforce. In our opinion, the City should continue to focus on public views. Even this is difficult as we note from recent discussions about the impact of the Monorail. The dilemma is that everything in Seattle restricts someone's view and we cannot get into protecting private views without restricting people's right to develop.

JOBS HOUSING BALANCE

There is some confusion about how establishing goals for living closer to work encourages people to do that. It is difficult to see how this would have any meaning given the fact that people cannot move every time their job changes and make housing choices based on a variety of individual criteria.

The Commission does appreciate the need to pay attention to the jobs-housing balance, but believe that much more information and analysis is needed to determine what are the most effective ways to bring about a better balance.

Council
Amendments
3 - 5*

HISTORIC PRESERVATION

This is a long-overdue addition, incorporating historic preservation into other elements of the plan. It is particularly important to incorporate it into the economic development and sustainability elements, to emphasize its importance to these areas. The commission supports all of these changes.

The revisions add clarity to the various elements and appear consistent among policies within the elements

The new Cultural Resources Element goal is an important one, reinforcing the need to recognize these resources.

CAPITAL FACILITIES

In the first goal delete the word "valuable". If something is considered a historic resource, defining it as valuable with no definition could lead to confusion.

SUSTAINABILITY

Sensible addition to Comp Plan but not clear where or how this will be incorporated.

Council
Amendments
6-7*

NORTHGATE GOALS/POLICIES

While the Commission supports inclusion of the Northgate Goals and Policies into the Comprehensive Plan, it has some concerns about doing this at the same time that a number of significant policy studies are underway. It seems reasonable to put a place holder in the Comp Plan, but have a clear commitment to making changes to reflect conclusions of the CTIP, Open Space/Pedestrian Circulation, and other plans that may result in updates to the plan.

The rezone should be considered within the context of the overall work that is going on in Northgate. Given the recent establishment of the Northgate Stakeholders group, the Commission would raise the question about who is seeking this and who in the community should be asked to weigh in on it.

*Council Amendments: 1) City Creeks; 2)View Policy; 3) Living Closer to Work; 4) Historic Pres.; 5) Sustainability; 6) Northgate Goals/Policies; 7) Northgate Rezone