

(Date)

Honorable Councilmember Dan Strauss, Chair
Land Use and Neighborhoods Committee
via e-mail

RE: 2020/2021 Comprehensive Plan Amendments

Dear Councilmember Strauss,

The Seattle Planning Commission is pleased to provide our comments and recommendations on which proposed 2020-2021 Comprehensive Plan amendments should be placed on the docket for further analysis. Our recommendations are offered as stewards of the Seattle Comprehensive Plan and based on the application of Council-adopted criteria, Guidelines for Amendment Selection, included in Resolution 31807 (Attachment A).

The Planning Commission recommends moving forward the following amendment proposals to the docket for further analysis:

Future Land Use Map (FLUM) Amendments

1. Extend the University District Urban Center

The applicant is requesting to extend the boundary of the University District Urban Center to include eight lots along the western side of 15th Ave NE between NE 56th St and NE Ravenna Blvd and change the FLUM designation from Multi-Family Residential to University District Urban Center.

The Commission recommends this proposal for the docket. The proposal meets the criteria and as such warrants further study. In particular, this application meets the intent of criterion G, which requires an amendment to the FLUM for any proposal that would change the boundary of an urban center, urban village, or manufacturing/industrial center, regardless of the area's size, to be considered for docketing.

The Planning Commission recommends the following amendment proposals not move forward to the docket for further analysis:

Text Amendments

2. West Seattle High Bridge emergency closure

The applicant is proposing to amend City policies to assist in mitigating the emergency closure of the West Seattle High Bridge.

The Commission does not recommend this proposal for the docket citing criteria B4 and B5. This proposal would be better addressed through a budgetary or programmatic decision or another process, such as activities identified in departmental work programs under way or expected soon, within which the suggested amendment can be considered alongside other related issues.

3: Potential Landslide Area Covenants

The applicant is proposing to cease the practice of issuing Potential Landslide Area Covenants to properties in Seattle's Environmental Critical Areas.

The Commission does not recommend this proposal for the docket citing criteria B3. The intent of this proposal can be accomplished by a change in regulations. Potential Landslide Area Covenants are addressed in the Seattle Municipal Code and those regulations are consistent with the general policy intent of the Comprehensive Plan regarding Environmental Critical Areas.

4. Pedestrian Grade Separations

The applicant is proposing to amend the Transportation Element to discourage pedestrian grade separations such as skybridges, aerial trams, or tunnels in all urban centers and urban villages, not just the downtown.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal was previously submitted and docketed in the 2012-2013 cycle but was not adopted by City Council in 2013. The rationale for not adopting this proposal was pedestrian grade separations are addressed in the Seattle Municipal Code and those regulations are consistent with the general policy intent of the Comprehensive Plan. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

5. Yards and Trees

The applicant is proposing to amend the Land Use Element to clarify policies related to yards and trees in multifamily areas.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal was previously submitted and docketed in 2017-2018 cycle but was not adopted by City Council in 2018. The rationale for not adopting this proposal was that much of the proposed language is inconsistent with existing Comprehensive Plan policies or misunderstands the more general policy level at which the Plan operates. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

6. Open and Participatory Government

The applicant is requesting to add an Open and Participatory Government Element or appendix to the Comprehensive Plan.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was originally proposed in the 2008-2009 amendment cycle but was not docketed citing criteria that the content proposed in the application are best dealt with through the Seattle Municipal Code, the Seattle ethics code, or through budgetary and programmatic

decision-making. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

7. Demolition and Displacement

The applicant is proposing to amend the Land Use element to include a policy to discourage the demolition of residences and displacement of residents.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal was previously submitted and docketed in 2017-2018 cycle but was not adopted by City Council in 2018. The rationale for not adopting this proposal was limiting demolition would be inconsistent with the City's adopted Growth Strategy and existing policies appropriately guide the City's policies related to displacement. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

8. Heavy Vehicles

The applicant is proposing to amend the Transportation Element to minimize damage to streets from heavy vehicles.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was originally proposed in the 2016-2017 amendment cycle but was not docketed citing criteria that it would be better addressed through another process, specifically the Seattle 2035 Comprehensive Plan update. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

9. Development Monitoring

The applicant is proposing to amend the Comprehensive Plan to require monitoring of development and a special review procedure related to development.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was originally proposed in the 2016-2017 amendment cycle but was not docketed citing criteria that it would be better addressed through another process, specifically the Seattle 2035 Comprehensive Plan update. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

10. Rezones and Conditional Uses

The applicant is proposing to amend the Land Use element to adopt policies related to establishing zone and rezone criteria to guide zoning decisions and ensuring that zoning decisions are done with public notice, outreach, and inclusiveness with a regard for local conditions, community preferences and neighborhood plans.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal was previously submitted and docketed in 2017-2018 cycle but was not adopted by City Council in 2018.

The rationale for not adopting this proposal was existing Comprehensive Plan policies or glossary entries appropriately address the issues raised in the proposed amendments. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

11. Tree Canopy and Urban Forest

The applicant is proposing to amend various sections of the Comprehensive Plan to support the retention and expansion of the urban forest and tree canopy cover.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was originally proposed in the 2019-2020 amendment cycle but was not docketed citing criteria that it would be better addressed through another process, specifically the next major update to the Comprehensive Plan. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

Previously Docketed Amendments

Of the eight proposed Comprehensive Plan amendments that were docketed by the City Council in Resolution 31896 for further analysis, [the following](#) five were not analyzed as part of the 2019-2020 annual amendment cycle:

- [Impact fee amendments](#)
- [An alternative name for single-family areas](#)
- [Designation of the South Park Urban Village](#)
- [Designation of an urban village near a future light rail station at N 130th Street and Interstate 5](#)
- [Amendments related to fossil fuels and public health](#)

We have concerns about waiting until the next Major Update of the Comprehensive Plan in 2024 for consideration of these proposed amendments and encourage the City Council to move forward on them sooner where appropriate. [We would like to call your attention to the Commission's specific comments on one of these docketed amendments below.](#)

Alternative Name for Single Family Zones

The City Council proposed an amendment that would recommend an alternative name for single family zones, such as Neighborhood Residential, and amend the Land Use Element of the Comprehensive Plan to implement this change. OPCD has stated this amendment could be more appropriately addressed through the next Major Update to the Comprehensive Plan, with the rationale that it is a bigger change outside of the scope of the annual amendments. The Planning Commission has concerns about waiting until the 2024 Major Update to the Comprehensive Plan to address an alternative name for single family zoning. The name 'single family' zoning has been a misnomer since 1994 when the city passed Accessory Dwelling Unit legislation allowing two households to live on a single family zoned parcel and is not representative of the households that currently live in those zones. This name is also linked to Seattle's former use of race-based zoning as an exclusionary practice. The Commission

applauds and supports the City Council in the proposed amendment that would recommend changing the name of the zoning earlier than the Major Update. This change could also serve to inform the policy process considering alternatives to single family zoning.

The Planning Commission has been a consistent advocate for reexamining Seattle's land use policies to expand the range and affordability of housing choices. Our 2018 *Neighborhoods for All* report emphasized the benefits of allowing more housing and increasing housing choices in single family zones. The Commission applauds the City Council for including funding in the 2020 budget to analyze a variety of housing types in single family zones in the Environmental Impact Statement (EIS) on the Major Update to the Comprehensive Plan. We look forward to providing our input on this subject throughout the process to update the Comprehensive Plan. In the meantime, the Commission recommends moving the effort to rename single family zoning forward sooner than the beginning of the Major Update.

We appreciate the opportunity to review amendments for docket setting and provide our recommendations. If you have any questions, please do not hesitate to contact me or Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

Michael Austin
Chair, Seattle Planning Commission

ATTACHMENT A

City of Seattle Criteria for Comprehensive Plan Amendment Selection (from Resolution 31807)

A. The amendment is legal under state and local law.

B. The amendment is appropriate for the Comprehensive Plan because:

1. It is consistent with the role of the Comprehensive Plan under the State Growth Management Act;
2. It is consistent with the Countywide Planning Policies and with the multi-county policies contained in the Puget Sound Regional Council's regional growth strategy;
3. Its intent cannot be accomplished by a change in regulations alone;
4. It is not better addressed as a budgetary or programmatic decision; and
5. It is not better addressed through another process, such as activities identified in departmental work programs under way or expected soon, within which the suggested amendment can be considered alongside other related issues.

C. It is practical to consider the amendment because:

1. The timing of the amendment is appropriate, and Council will have sufficient information to make an informed decision;
2. City staff will be able to develop within the time available the text for the Comprehensive Plan and, if necessary, amendments to the Seattle Municipal Code, and to conduct sufficient analysis and public review; and
3. The amendment is consistent with the overall vision of the Comprehensive Plan and well-established Comprehensive Plan policy, or the Mayor or Council wishes to consider changing the vision or established policy.

D. If the amendment has previously been proposed, relevant circumstances have changed significantly so that there is sufficient cause for reconsidering the proposal.

E. If the amendment would change a neighborhood plan, there is evidence that proponents of the amendment, or other persons, have effectively communicated the substance and purpose of the amendment with those who could be affected by the amendment and there is documentation provided of community support for the amendment.

F. The amendment is likely to make a material difference in a future City regulatory or funding decision.

G. A proposal that would change the boundary of an urban center, urban village, or manufacturing/industrial center requires an amendment to the Future Land Use Map (FLUM), regardless of the area's size. However, an amendment that proposes to change the FLUM is not necessary and will not be considered when it would affect an area that is less than a full block in size and is located adjacent to other land designated on the FLUM for a use that is the same as – or is compatible with – the proposed designation.