

(Date)

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

RE: 2019/2020 Comprehensive Plan Amendment Recommendations

Dear Councilmember Strauss,

The Seattle Planning Commission is pleased to provide our comments and recommendations on which proposed 2019-2020 Comprehensive Plan amendments should be adopted as part of the annual update process. Providing recommendations on annual Comprehensive Plan proposals is a mandate of the Commission and a responsibility we are pleased to fulfill as stewards of Seattle's Comprehensive Plan.

**The Planning Commission recommends adopting the following amendment proposals:**

Proposed Future Land Use Map (FLUM) Amendment: 4831 35th Ave SW

The applicant is requesting to amend the boundaries of the West Seattle Junction Hub Urban Village to include the Providence Mount Saint Vincent property. This large 9-acre parcel is one full block in size and is immediately adjacent to the West Seattle Junction Hub Urban Village on its north and west boundaries. The proposal would extend the boundaries of the hub urban village to include this parcel. The property is currently designated on the FLUM as Multi-Family Residential and is currently zoned LR3(M). Properties to the south and east are designated Single Family Residential on the FLUM. Expanding the boundaries of the Hub Urban Village to include this site would add capacity for Providence to expand the current uses on the property, including additional senior housing and space for a range of services to meet community needs. The current LR3(M) zoning allows a maximum height of 40 feet and a maximum floor-area-ratio (FAR) of 1.8 on the site. If the site were included within the Hub Urban Village, LR3(M) would allow building heights up to 50 feet and a FAR of 2.3. The applicant does not anticipate requesting a rezone of the property.

Hub Urban Villages as designated in the Seattle's Comprehensive Plan as dense, mixed-use, walkable communities that offer a balance of housing and employment. These areas are generally within a 10-minute walkshed of frequent transit and provide a mix of goods, services, and employment for their residents and surrounding neighborhoods. The current mix of residential and social services at the Providence site and its planned expansion of uses, in addition to its location within a 10-minute walk of future light rail, are consistent with the Comprehensive Plan's goal of establishing compact mixed-use neighborhoods to accommodate future growth.

The Planning Commission supports inclusion of the Providence campus within the West Seattle Junction Hub Urban Village. We recommend amending the FLUM to expand the boundary of the hub urban village and change this property's designation from Multi-Family to Hub Urban Village.

Proposed Amendment to Goals and Policies: To amend the Delridge Neighborhood Plan goals and policies as recommended in the North Delridge Action Plan, with minor technical revisions recommended by the Office of Planning and Community Development.

This proposal would amend the Delridge Neighborhood Plan to incorporate specific goals and policies from the North Delridge Action Plan into the Comprehensive Plan. The proposed Neighborhood Plan amendments incorporate the following community priorities from the North Delridge Action Plan:

- Supporting diverse and engaged communities
- Developing dynamic neighborhood destinations
- Improving access to affordable, healthy food
- Providing active transportation choices
- A healthy Longfellow Creek basin, and
- Parks and cultural facilities that support a healthy community

The Planning Commission was briefed on the North Delridge Action Plan and the resulting Neighborhood Plan amendments by the Office of Planning and Community Development (OPCD) in 2019. It is our understanding that OPCD and the Department of Neighborhoods have worked extensively with the Delridge community over the past several years to respond to conditions that have changed since completion of the original Delridge Neighborhood Plan in 1999. We support adoption of these amendments, especially with the knowledge that they were crafted incorporating data and input from a robust community engagement process.

**The Planning Commission recommends the following amendment proposals not be adopted:**

Proposed FLUM Amendment: 11316 and 11318 5th Ave NE

The applicant is requesting to extend the boundaries of the Northgate Urban Center to include these two parcels, which are immediately outside of the Urban Center boundary. The proposed FLUM change would facilitate a change from Single Family Residential to Multi-Family Residential use. The applicant is proposing a rezone of the properties from SF7200 to LR1.

The Planning Commission agrees with OPCD's recommendation that this proposal not be adopted at this time because it is inconsistent with the Comprehensive Plan definition and criteria for Urban Centers and because of the small size of area affected by the proposal. However, the Commission is a consistent advocate for neighborhoods that offer a diverse mix of uses, housing, and employment opportunities, especially in areas with proximity to high capacity transit. The Urban Centers are designated to receive the majority of the City's growth in jobs and housing. With the scheduled opening of the Northgate Link Light Rail Station in 2021, the Northgate Urban Center is positioned as a tremendous opportunity for future growth. To fully capture this opportunity, the City may consider expanding the criteria for an Urban Center designation from locations within 0.5 miles of high capacity transit to a new boundary designation that includes all properties within one mile of high capacity

transit. To this end, the Commission encourages a comprehensive review of the Urban Center definition and boundaries during the next Major Update to the Comprehensive Plan.

### **Docketed Amendments Not Analyzed by OPCD**

Of the eight proposed Comprehensive Plan amendments that were docketed by the City Council in Resolution 31896 for further analysis, OPCD declined to analyze or make recommendations on five of those amendments as part of the 2019-2020 annual amendment cycle. The Planning Commission offers its comments and recommendations on these amendments below. 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.

#### Alternative Name for Single Family Zones

The City Council has 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 ~~is~~ 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 cChanging 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.

#### Impact Fees

The City Council has requested potential amendments to Comprehensive Plan policies necessary to support implementation of an impact fee program for public streets, roads, and other transportation improvements; publicly owned parks, open space, and recreation facilities; and school facilities. The Planning Commission received a briefing on a proposed Comprehensive Plan Amendment related to

transportation impact fees in October 2018. We understand that the State Environmental Policy Act (SEPA) analysis of that proposed amendment was appealed to the Hearing Examiner and this amendment is now subject to ongoing City Council consideration. The Commission will look forward to the opportunity to review this amendment if/when it moves forward.

### Fossil Fuels and Public Health

The City Council has requested that OPCD, in consultation with the Seattle Department of Construction and Inspections, the Office of Sustainability, and the Environmental Justice Committee, draft potential amendments to the Environment, Land Use, or Utilities Elements that would clarify the City's intent to protect public health and meet its climate goals by limiting fossil fuel production and storage. OPCD has stated that the level of analysis to effectively identify and evaluate potential amendments is more appropriate for the Major Update to the Comprehensive Plan. The Planning Commission is generally supportive of goals and policies to reduce the impacts of climate change, including any strategies to reduce the use of fossil fuels. We will look forward to the opportunity to review such amendments in the future.

### 130th Street Station Urban Village

This docketed amendment proposes to establish an Urban Village around the planned 130<sup>th</sup> Street Link Light Rail Station, which would facilitate increased capacity for transit-oriented development and associated amenities. OPCD is currently engaged in a 130<sup>th</sup>/145<sup>th</sup> Street community planning process and will be developing several alternative planning approaches around the future 130<sup>th</sup> Street Station including potential designation of this area as an Urban Village. OPCD has stated that any amendments to the Comprehensive Plan that may result from this planning process could be considered in future annual amendment cycles or in the Major Update. The Planning Commission has been consistently supportive of a community planning process in this future light rail station area and we have been briefed on the progress of this planning process to date. We also support development of the station earlier than its currently scheduled 2031 opening date to avoid unnecessary transit delays and duplicative construction impacts to this community, as well as to expedite transit-oriented development opportunities in this growing community. The Commission will look forward to the opportunity to provide our input and feedback on any proposed Urban Village alternatives for the 130<sup>th</sup> Street Station area at the appropriate time.

While we are supportive of this amendment, we would like to see similar considerations at the Graham Street Station Area. The communities of color who reside in this Southeast Seattle neighborhood have been awaiting a station and accompanying development for more than a decade. They have done extensive community work and have prepared a Community Vision plan. See here for more information: <https://www.pugetsoundsage.org/wp-content/uploads/2019/03/PSS-GrahamStreetVision.pdf>

We understand that the future 130<sup>th</sup> Street Station is on a light rail line that has not been built yet, but this reason only further amplifies the continued disinvestment in the community of color around a future Graham Street Station. The Commission supports station area planning around this station

building upon the established community vision and recommends Graham Street also be studied as an Urban Village.

#### South Park Urban Village Designation

The City Council proposed an amendment to assess how the South Park neighborhood meets the criteria for Urban Village designation. OPCD has stated that an effort to determine whether the South Park neighborhood should be designated as an Urban Village is more appropriately addressed as part of the Major Update to the Comprehensive Plan. OPCD expects to review the Urban Centers and Villages Growth Strategy during that effort. The Planning Commission is supportive of a comprehensive review of the City's Urban Centers and Urban Villages, ~~including analysis and consideration of any new potential areas for such designation. We will look forward to providing our input and feedback on a potential South Park Urban Village designation during the Major Update. If an effort to review the South Park Urban Village moves forward, the Commission strongly recommends that community members and the relevant stakeholders are engaged throughout that process. We look forward to providing our input and feedback at the appropriate time.~~

We appreciate the opportunity to provide our comments and recommendations on the 2019-2020 Comprehensive Plan Amendments. 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