



City of Seattle

Seattle Planning Commission

February 15, 2019

Honorable Councilmember Rob Johnson, Chair
Planning, Land Use, and Zoning Committee
via e-mail

Dear Councilmember Johnson,

The Seattle Planning Commission is pleased to provide our comments and recommendations on the proposed 2019 Seattle Comprehensive Plan amendments. 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.

Resolution 31762, the 2017 Comprehensive Plan Docketing Resolution, recommended that *“the Executive provide recommendations for potential amendments to Comprehensive Plan policies and maps to facilitate the implementation of the Mandatory Housing Affordability Program (MHA) citywide, consistent with Resolution 31612, including amendments to the Growth Strategy, Land Use, Housing, Neighborhood Planning, or other elements or maps in the Plan, as appropriate...”* Concurrent with the citywide MHA legislation that is under consideration by the City Council, adoption of the 2019 Comprehensive Plan amendments is necessary to incorporate changes proposed by that legislation. The amendments ensure consistency with citywide policies and support the implementation of MHA, which is a critical step in the City's plan to address housing affordability.

Two separate types of amendments are proposed: (1) Future Land Use Map (FLUM) changes to reflect expansions to existing urban village boundaries, and (2) changes to neighborhood plan policies included in the Comprehensive Plan. The Planning Commission strongly endorses adoption of these amendments to support implementation of MHA and to achieve the goal of producing 6,000 new affordable housing units through MHA. We offer more detailed comments below.

Urban Village Boundary Expansions

The first set of proposed amendments would expand the boundaries of the following ten urban villages to provide more housing options within a ten-minute walkshed from frequent transit nodes: 23rd & Union-Jackson, Ballard, Columbia City, Crown Hill, North Beacon Hill, North Rainier, Othello, Rainier Beach, Roosevelt, and West Seattle Junction. We offer our strong support for adoption of these amendments. These neighborhoods have very good transit, as defined in the Comprehensive Plan. The Planning Commission has been a consistent proponent for expanding urban villages to the full extent of their frequent transit walksheds. We would like to note that the Aurora-Licton Springs urban village is not currently included in the list proposed for boundary expansions. This urban village now has frequent transit service provided by the Rapid Ride E Line and should therefore be subject to full implementation of MHA, including expansion of its urban village to capture its frequent transit walkshed. The proposed urban village boundary expansions would also rezone single-family areas contained within them to allow for increased development capacity in these designated

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neighborhoods. The Seattle 2035 Comprehensive Plan states that areas with urban center and urban village FLUM designations are generally appropriate for a greater diversity of uses and densities than areas outside of urban villages. The Comprehensive Plan's urban center and urban village designations are intended to focus growth in areas best able to accommodate that growth. The Planning Commission supports rezoning single-family areas within urban villages to allow for increased housing flexibility and affordability. Implementation of MHA would encourage growth in these areas, support a greater variety of housing types, and allow more Seattle residents to live within walking distance of very good transit, services, and amenities.

Neighborhood Plan Goal and Policy Changes

The second set of proposed amendments would revise the neighborhood plans of the following neighborhoods: Aurora-Licton, Fremont, Morgan Junction, North Rainier, Northgate, Roosevelt, Wallingford, West Seattle Junction, and Westwood/Highland Park. These amendments are primarily intended to revise neighborhood plan policies that promote the retention of single-family zoning in urban villages. While the proposed MHA legislation will primarily rezone existing commercial and multifamily areas, single-family zones within urban villages would also be rezoned to increase development capacity and require affordable housing contributions from new development. These amendments are necessary to maintain consistency between the Comprehensive Plan and neighborhood plan policies and allow the proposed implementation of MHA in these urban centers and villages.

The Planning Commission understands that the Office of Planning and Community Development (OPCD) and Department of Neighborhoods (DON) has conducted extensive community engagement around the proposed MHA legislation, as well as separate engagement to inform the specific neighborhood plan policy amendments. Eight of the proposed neighborhood plan amendments would replace language about protecting single-family zones with new language about maintaining the physical character of historically lower-density areas of the urban village and encouraging housing choices such as cottages, townhouses, and low-rise apartments. The Planning Commission supports adoption of these amendments. While we have reservations regarding specific language used in the amendments, we acknowledge that the new language is better than previously adopted policies. Allowing some neighborhoods to include language about maintaining single-family character and/or zoning provides continued privilege for these neighborhoods while other neighborhoods accept more density consistent with the goals of the Comprehensive Plan and MHA. We encourage OPCD, DON, and community stakeholders to craft revised neighborhood plan policies that will not only provide for consistency with MHA but will allow for future increased housing flexibility in low-density residential zones.

The following policy is proposed for the Morgan Junction Neighborhood Plan: "Consider community planning to address land use, housing and other issues if the growth rate in the urban village accelerates to become significantly higher than anticipated in the Comprehensive Plan." The Planning Commission has reservations regarding the Morgan Junction amendment as proposed. We believe the Comprehensive Plan should reflect parity among neighborhoods. Allowing the Morgan Junction neighborhood plan to adopt much more specific policy language than the other proposed neighborhood plan changes is inequitable. Neighborhood plans should not include policy language that requires the City to focus on their specific neighborhood. The Comprehensive Plan includes individual growth estimates for each urban village. Language similar to that included in the proposed Morgan Junction amendment regarding community planning to address growth rates exists in the Seattle 2035 Comprehensive Plan and is therefore applied citywide including Morgan Junction.

Moving Forward


The Planning Commission is pleased to support the proposed 2019 Comprehensive Plan amendments as described above. These amendments are necessary to implement citywide MHA and to create consistency between the Comprehensive Plan and the MHA legislation. Once MHA is adopted and as Seattle grows, it will continue to be important that all neighborhoods have the same foundation for growth to ensure that

the city is growing equitably. The Commission recognizes that neighborhood planning is resource-intensive and community engagement is an essential and important component of the planning process. As we stated above, we appreciate the efforts of OPCD and DON to engage the neighborhoods during the MHA outreach process and more specifically, to update the various neighborhood plan policies to implement MHA. Specific communities may not have had the same degree of involvement as others during these community engagement efforts. We encourage a continuing dialogue with all neighborhoods and timely engagement with particular neighborhoods that are experiencing substantial growth. Some neighborhoods may require additional effort to build capacity for properly engaging the community. We recommend OPCD and DON dedicate sufficient resources to proactive community outreach and engagement in those neighborhoods.

As we advance toward the next major update to the Comprehensive Plan, the Planning Commission will continue to request alternatives to specific language with which we have concerns. When conducting community planning or establishing goals and policies, the word “character” means different things to different people. We encourage the use of more descriptive terms that reflect the existing and desired conditions of the built environment. Similarly, the word “significant” is very subjective when describing growth or changes to a community. This word either needs to be defined or replaced with a more specific, objective, or measurable term.

We appreciate the opportunity to review these proposed Comprehensive Plan amendments and provide our recommendations. If you have any further questions, please call either me or Vanessa Murdock, Seattle Planning Commission Executive Director, at (206) 733-9271.

Sincerely,



Tim Parham, Chair
Seattle Planning Commission

cc:

Mayor Jenny Durkan
Seattle City Councilmembers
Sam Assefa, David Driskell, Michael Hubner; Office of Planning and Community Development
Ketil Freeman, Eric McConaghy, Lish Whitson; Council Central Staff

Of the eight Commissioners present at the February 14, 2019 Planning Commission meeting, seven voted to approve this letter and one abstained.
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