



City of Seattle

Seattle Planning Commission

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February 14, 2014

Honorable Councilmember Mike O'Brien, Chair
Planning Land Use and Sustainability Committee
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

RE: Recommendations on Proposed 2014 Comprehensive Plan Amendments

Dear Councilmember O'Brien,

The Seattle Planning Commission is an independent and objective volunteer body that advises City officials on broad goals, policies, and plans for the physical development of the city. 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. This letter offers the Commission's recommendations and comments on the proposed 2014 Comprehensive Plan Amendments.

Purpose of the Seattle Comprehensive Plan

The Comprehensive Plan, *Toward a Sustainable Seattle*, was adopted in 1994 to comply with the requirements of the Washington State Growth Management Act. The Comprehensive Plan articulates Seattle's 20-year vision for how the city will grow consistent with its core values of community, environmental stewardship, economic opportunity and security, and social equity. The Comprehensive Plan does this through an urban village strategy that directs most housing and employment growth to urban centers and villages.

Changes to the Comprehensive Plan adopted in 2013 place increased emphasis on aligning land use and public investment to foster vibrant neighborhoods within transit communities. Transit communities are complete, compact, connected places generally within a 10-minute walk to reliable, frequent transit. Under the urban village strategy, transit communities and areas designated as urban centers or urban villages will accommodate the majority of the city's growth and receive priority for City investments.

Other important changes made in recent years include the addition in 2012 of a Container Port Element in response to a state GMA requirement to establish policies that define and protect core areas of port-related industrial uses within the city.

Planning Commission Recommendations on the 2013-2014 Annual Amendments

1. Central Area Neighborhood Plan

Planning Commission recommendation: Adopt

The Commission supports updating the Central Area Neighborhood Plan goals and policies to facilitate implementation of the 23rd Ave Action Plan. We understand that the proposed goals and policies were identified through extensive community outreach and endorsed at a community workshop.

The Commission concurs with the proposed Future Land Use Map (FLUM) change and land use policy updates that will encourage increased density near 23rd Avenue's transportation nodes. These changes will advance the transit communities policies added last year to the Land Use Element of the Comprehensive Plan. The Commission suggests considering incorporating the Southwest corner of 23rd Avenue and East Jefferson Street (currently being used as an overflow parking lot for the Medgar Evers Community Center) in the FLUM change. Generally the Commission is supportive of activating both sides of the street whenever possible and taking the land use changes across the street one parcel.

The Commission supports updating the housing goal and policies in the Central Area Neighborhood Plan as proposed in the current amendment. These policies are essential to support the demographic and income diversity in the neighborhood. There are several new and revised housing policies for which we would like to highlight our support:

- Preserving and encouraging the production of affordable multifamily housing in the Central Area is important for reducing potential displacement of existing residents.
- The policy emphasizing a variety of unit sizes, "including affordable family-sized units with amenities for families" is precisely in-line with the Commission's recommendations in our just-released Family-Sized Housing White Paper. Housing large enough for families with children is essential for attracting and retaining families with a spectrum of incomes.
- The policy to target affordable housing investments near high-frequency transit offers several benefits, including the reduction of transportation costs for low-income households.
- Leveraging publicly owned properties to produce affordable housing will not only activate key properties in the area, but also help prevent displacement from the neighborhood.

The Commission also concurs with the updated Transportation, Economic Development, and Parks and Open Space goals and policies for the neighborhood. Furthermore, we support inclusion of the new Human Services and Community Building goal and policies, including those focusing on families and young people. This is a large demographic in the area and programs and services for young people are key for family-friendly neighborhoods.

2. Ballard/Interbay Northend Manufacturing/Industrial Center (BINMIC)

Planning Commission recommendation: Adopt

The proposed amendment would change the Future Land Use Map category for a small, three-parcel area on 16th Avenue West in Interbay. Current uses on the parcels include a grocery store and recently renovated office building.

The Commission believes the proposal to change the FLUM category from Industrial to Commercial/Mixed Use is appropriate for these parcels: these parcels are not likely to redevelop as industrial, and the FLUM boundary is currently drawn down the middle of an existing commercial structure. At the same time, the Planning Commission remains strongly supportive of the city's general policy of retaining industrial land for industrial purposes.

3-A. Manufacturing/Industrial Center Policies

Planning Commission recommendation: Address in Major Comprehensive Plan Update

Industrial uses are vital to both the livelihood of workers in these industries as well as our broader economy. The Commission has long been concerned with the continued pressures faced by industrial uses, as noted in our 2007 report, [*The Future of Seattle's Industrial Lands*](#). These proposed policies support the City's broad policy of protecting and retaining industrial land for industrial purposes.

The new policy this amendment proposes for the Urban Village element identifies four criteria, all of which must be met, in order to remove land from Manufacturing/Industrial Centers (M/ICs). The proposed criteria provide an appropriately narrow combination of conditions in which land may be removed from a Manufacturing/Industrial Center.

The new proposed policy for the Land Use Element would prohibit new Industrial Commercial (IC) zoning within Manufacturing/Industrial Centers. The Planning Commission concurs that rezoning additional land to Industrial Commercial should not be allowed in the Manufacturing/Industrial Centers and supports adding the policy to the Land Use Element.

The Commission is generally very supportive of these policies but would propose deferring the decision to the major Comprehensive Plan update scheduled for 2014-2015 for the following reasons:

- This issue is complex enough to warrant review at the same time as the major update when all other large issues and policies will be examined and modified if necessary.
- The proposed stadium district goals and policies amendment which the Commission recommends deferring would be inconsistent with the proposed changes and would require flexibility in the language that may make the final amendment confusing; and
- The Industrial Lands Advisory Committee was made up solely of Duwamish MIC representatives and the scope of their work was based on the effects of the stadium therefore BINMIC and Georgetown were not properly involved in this decision making.

3-B, 3-C. Stadium District Goals and Policies; FLUM

Planning Commission recommendation: Defer

On December 5, 2013, the Commission sent a [letter to Council on the Stadium District Amendment](#) impressing the need for more information and recommending that the amendment be removed from consideration this year. The Planning Commission is recommending deferring the Stadium District amendment for the following reasons.

- Removing land from Duwamish Manufacturing/Industrial Center and making the proposed policy changes could exacerbate pressures on industrial businesses and Port operations, and could have broader economic impacts.
- The implications of the proposed policy changes should be more fully understood before moving forward. Deferring the amendment will give the City the chance to apply insights from the analyses that will be part of the Industrial Areas Access Study and the Freight Master Plan. An economic study, with comparisons of job creation, tax revenue, and other benefits, should also be done before decisions are made on the Stadium District.

4. University Community Urban Center Plan

Planning Commission recommendation: Defer

During the last two years, DPD has been engaging residents, businesses, and the University of Washington in planning for a University District study area that includes the portion of the University Community Urban Center west of 15th Ave NE. DPD has completed an Urban Design Framework for the study area and is in the process of preparing an EIS evaluating a range of options for distributing greater height and density in the area. The Commission has participated and continues to be supportive of this work.

It is our understanding that DPD is anticipating proposing an additional, more substantive, set of changes during the next amendment cycle once alternatives in the EIS have been evaluated. Therefore the Commission recommends deferring the amendments until the next amendment cycle so the full set of changes to the Urban Center Plan policies can be presented and considered in a more integrated way.

Remaining Proposals

There were three amendment applications from parties other than DPD that had originally been docketed, but that were not included in 2014 Annual Amendments ordinance that the Mayor submitted to Council. These were:

- Interbay Armory Area proposal,
- University Community boundary contraction, and
- University Community boundary expansion.

DPD and the Planning Commission had suggested these be included on the Council's docket because they met the basic screening criteria for amendment applications. However, we agree with DPD that it did not make sense for these to move further this year.



David Cutler, Co-Chair
Seattle Planning Commission



Amalia Leighton, Co-Chair
Seattle Planning Commission

cc:

Mayor Ed Murray

Robert Feldstein, Steve Lee, Kathy Nyland; Office of Policy and Innovation
Seattle City Councilmembers

Diane Sugimura, Marshall Foster, Tom Hauger, Patrice Carroll, Kristian Kofoed, Nora Liu, Quanlin Hu, Susan McLain, Dave LaClergue, Gary Johnson, Geoff Wentlandt; Department of Planning and Development

Goran Sparrman, Tracy Krawczyk, Kevin O'Neill; Seattle Department of Transportation

Bernie Matsuno; Department of Neighborhoods

Steve Johnson; Office of Economic Development

Steve Walker, Office of Housing

Rebecca Herzfeld, Sara Belz, Martha Lester; Eric McConaghy; Lish Whitson; Council Central Staff

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL

Commissioner Josh Brower disclosed that his firm, Veris Law Group PLLC, represents clients who own maritime and industrial lands and who own or operate maritime and industrial businesses throughout the city, some of which may be impacted by this proposal.

Commissioner Colie Hough Beck disclosed that the firm she works for HBB has as a client the Port of Seattle.