



City of Seattle

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April 12, 2006

Honorable Councilmember Peter Steinbrueck
Chair, Urban Development and Planning Committee
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

Dear Councilmember Steinbrueck:

The Planning Commission is pleased to provide you and the City Council with its comments and recommendations on the Mayor's 2006 Comprehensive Plan Amendments Threshold Resolution.

The Commission participates in the annual Comprehensive Plan amendment process in two stages: first, the Commission is briefed on the original amendment submissions and provides recommendations to the Council regarding which proposals it feels should be considered and further analyzed; and secondly, the Commission reviews the Mayor's final set of recommended amendments as they are submitted for Council approval in late summer and provides its recommendations regarding adoption of each proposed amendment.

The Commission's approval to include specific proposed amendments in the threshold resolution should in no way be interpreted as our approval of the specific proposal itself – it is only our agreement that the proposal should be further studied for possible inclusion as an amendment later in the year.

The Planning Commission generally supports the Mayor's Threshold Resolution for determining which proposals should be considered and further analyzed or deferred to a later date (or reviewed through a separate planning effort). However, the Commission would like to make the following points:

AMENDMENT A: Add triangle bounded by Aurora Avenue, Denny Way, and Broad Street to the Uptown Urban Center.

The Planning Commission agrees with including this proposed amendment for further study. This is a rapidly growing area and inclusion in the Uptown Urban Center may better enable this area to plan for growth.

AMENDMENT B: Replace South Lake Union Neighborhood Plan elements with new goals and policies developed to reflect ongoing community planning efforts.

The Planning Commission agrees with including this proposed amendment for further study. The Planning Commission is pleased with the work DPD staff has been doing in South Lake Union in preparation for consideration of new neighborhood goals and policies. The Planning Commission has been actively assisting staff by facilitating community meetings and reviewing guidelines and policies and will continue to be involved in this important planning process as the neighborhood plan revision continues.

AMENDMENT C: Add maps to the Urban Village Element showing all or a portion of the North Highline area south of current Seattle city limits as a Potential Annexation Area. City Council has requested information by September 1, 2006 in order to decide on whether they will support this amendment.

The Planning Commission agrees with including this proposed amendment for further study. The Planning Commission takes a regional view of growth management issues and recognizes that annexing unincorporated areas into local jurisdictions is an important goal of the Growth Management Act.

Amendment D: Amend the Future Land Use Map to designate one parcel in Southeast Seattle near the proposed Henderson Street light rail station for multifamily use.

The Planning Commission agrees with including this proposed amendment for further study. We suggest that analysis be done on the impacts of both rezoning to multifamily and mixed use.

As light rail construction continues in the Rainier Valley, the Planning Commission is interested in learning whether station area planning recommendations are being pursued as originally proposed and whether or not there may be value in reviewing those proposals and updating them, if necessary, for current conditions.

Amendment E: Amend goals and policies in the Land Use Element and possibly the Transportation Element to facilitate development of the ferry terminal on Colman Dock, which could include commercial development including lodging, an increase in permitted height, and/or residential.

The Planning Commission agrees with including this proposed amendment for further study with the following comments:

The Commission would like to see clear delineation between ferry terminal capacity, use changes, and height allowances. We recommend that the amendment be broken into three distinct parts so these issues can be dealt with each on its own merits. The Commission feels that it will be important to discuss this amendment in context of what is specifically needed for expansion of terminal capacity versus other uses at the site which may enhance the waterfront experience.

Amendment F: Amend goals and policies in the Land Use Element to facilitate replacement of the Alaskan Way Viaduct and the Seawall, and to reflect outcomes of the Waterfront Concept Plan.

The Planning Commission agrees with including this proposed amendment for further study with the following comments:

Analysis should consider application of regulations such as Shoreline Master Plan and Environmental Critical Areas to the downtown waterfront. When considering the costs of the potential alternatives for replacement of the Viaduct we encourage the City to look more broadly than just the straight construction costs of an enhanced waterfront. The overall economic analysis could include looking at

the development potential, increased revenue from increased public use and tourism, and benefits to the overall tax base. A broader economic scope will provide a better understanding of the economic cost and benefit for the city in the long run.

Amendment G: Amend the Future Land Use Map to redesignate land in the International District, between I-5 and Rainier Avenue South, south of South Jackson Street from "Industrial" to "Commercial Mixed Use."

The Planning Commission does not agree with including this proposed amendment for 2006. The Commission strongly reiterates its long-held position that an industrial lands strategy be developed and adopted, detailing the City's overall objectives for maintaining and attracting industrial jobs to Seattle, before any conversion of land from Industrial zoning to any other zone be contemplated. This area constitutes a large percentage of the industrial zoned land downtown and represents a significant expansion of other uses into the industrial zone.

An adopted industrial lands strategy is critical to having a rational basis for the City's decisions regarding individual requests for zoning changes such as this one, and should be in place to guide such decisions. The Commission is currently working with the Mayor's Office, several City departments, and City Council staff on laying the groundwork for developing such a strategy. Given the continuing pressure to convert industrial lands to other uses, the Commission urges the elevation of this effort in the City's work plan

There may be merit to the argument that this area lies outside of a designated manufacturing and industrial center and, therefore, may be more suited to be developed in some other use. That sort of decision-making is precisely the sort of situation the industrial lands strategy would be designed to evaluate from a comprehensive perspective.

AMENDMENT H: Amend the Future Land Use Map to redesignate two parcels south and west of the Magnolia Bridge "Commercial Mixed Use" for one and "Open Space" for the other.

The Planning Commission agrees with including this proposed amendment for further study.

AMENDMENT I: Amend the goals and policies of the Roosevelt Neighborhood Plan to reflect community planning in response to the new site of the proposed light rail station.

The Planning Commission agrees with including this proposed amendment for further study.

AMENDMENT J: Exempt a portion of the Duwamish Manufacturing/Industrial Center bounded by Colorado Avenue South, South Walker Street, Occidental Avenue South, and South Forest Street from size of limits on commercial space.

The Planning Commission agrees with postponing this proposed amendment until at least 2007. See the Planning Commission response to Amendment G above for further detail.

It is worth noting that the proposed changes in this amendment would impact land designated in Seattle's Duwamish Manufacturing/Industrial Center and thus should have to meet a higher threshold for conversion. While the Planning Commission is sensitive to the fact that the applicant is a valued employer that we want to retain within our jurisdiction, it is in the City's best interest to work with the applicant to find a site for this large expansion of commercial space in land appropriately designated for this purpose and use.

AMENDMENT K: Remove the Washington Oregon Shippers Cooperative Association (WOSCA) site and the Frye Property from the Duwamish Manufacturing/Industrial Center and incorporate them into the Downtown Urban Center.

The Planning Commission agrees with postponing the proposed amendment until at least 2007. See the Planning Commission response to Amendment G above for further detail.

AMENDMENT L: Permit the redesignation of vacant, industrially zoned parcels of ten or more acres that are located near the boundary of the Duwamish Manufacturing/Industrial Center to promote the redevelopment of contaminated sites that could provide transitional uses to abutting residential or pedestrian-oriented commercial uses.

The Planning Commission agrees with not considering this amendment further. However, the amendment request highlights the Commission's position that an overall industrial lands strategy should be in place because there may be specific opportunities within existing industrial zoning where such a transition would be feasible, or even desirable. The Commission feels that until an industrial lands strategy is in place it is difficult to understand the ramifications of continuing to diminish the city's industrial lands resource.

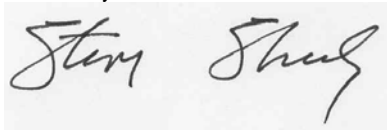
AMENDMENT M: Proposal to revise single-family goals and policies for rezoning SF9600 and SF7200 areas outside of any urban center or urban village to enable a greater variety of housing types and for affordable single-family housing.

The Planning Commission agrees with not considering this amendment further. Although the stated goals of this amendment request (i.e., enable a greater variety of housing types and affordable single-family housing) are also goals of the Planning Commission, this amendment proposal is too broad (both geographically and policy-wise) and such a sweeping change to City policies could result in unforeseen problems.

Nonetheless, the Commission continues to be concerned with the limited supply of land zoned to accommodate multi-family development. As the cost of housing increases and population growth continues, multi-family development will be an increasingly popular housing choice for many people. Seattle currently has a limited supply of land to accommodate such development.

Thank you for the opportunity to provide you with our recommendations regarding the Threshold Resolution. We look forward to providing you with assistance as the 2006 Comprehensive Plan amendment process moves forward.

Sincerely,



Steve Sheehy, Chair

cc: Mayor Greg Nickels
Seattle City Council Members
Tim Ceis, Deputy Mayor
Diane Sugimura, Director of DPD
John Rahaim, DPD
Tom Hauger, DPD

John Skelton, DPD
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