

(Date)

Honorable Councilmember Abel Pacheco, Chair
Planning, Land Use, and Zoning Committee
via e-mail

RE: 2019/2020 Comprehensive Plan Amendments

Dear Councilmember Pacheco,

The Seattle Planning Commission is pleased to provide our comments and recommendations on which proposed 2019-2020 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

2. 11316 and 11318 5th Ave NE

The applicant is requesting to extend the boundaries of the Northgate Urban Center to facilitate a change from Single-Family Residential to Multi-Family Residential use. The two subject parcels are immediately outside of the Northgate Urban Center. The proposal would extend the boundaries of the urban center to include these parcels.

The Commission recommends this proposal for the docket. The proposal meets the criteria and as such warrants further study.

12: 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 parcel is one full block in size and is immediately adjacent to the boundaries of the West Seattle Hub Urban Village. The proposal would extend the boundaries of the hub urban village to include this parcel.

The Commission recommends this proposal for the docket. The proposal meets the criteria and as such warrants further study.

FLUM and Text Amendment

7. Stadium District

The applicant is requesting to amend the FLUM and the Land Use Element to create the Stadium District as a new independent land use designation. This proposal would replace the existing Stadium

Overlay. The proposed Stadium District would include the majority of land currently in the Stadium Overlay area, as well as property north of CenturyLink Field owned by the Public Stadium Authority. The proposal would remove land from the Downtown Urban Center and the Duwamish Manufacturing/Industrial Center on the FLUM.

The Commission recommends this proposal for the docket. The proposal meets the criteria and as such warrants further study. Creation of a Stadium District has been under consideration since 2013. Since then, the City Council has deferred consideration of the Stadium District pending decisions on industrial lands policies. The Commission recommends analysis of this proposal as a new standalone district in the context of a long-awaited policy discussion on the future of Seattle's industrial lands.

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

Future Land Use Map Amendments

1. 4501 and 4509 SW Admiral Way

The applicant is requesting to change the Future Land Use Map from Multi-family, Lowrise 1 to Multi-family, Lowrise 3 for both parcels.

The Commission does not recommend this proposal for the docket citing criterion G. According to this criterion, a proposal that would change the boundary of an urban center, urban village, or manufacturing/industrial center requires an amendment to the FLUM. These two parcels are in the Admiral Residential Urban Village. The applicant does not propose to change the boundary of the urban village. According to criterion G, an amendment that proposes to change the FLUM is not necessary and will not be considered when it would affect an area 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. These two parcels are less than a full block in size and are located adjacent to other land to the east and south designated as Lowrise 1. This adjacent land is compatible with the proposed designation. The subject parcels are also adjacent to land outside the urban village designated for Single-Family Residential use to the west (across an alley) and to the north. The proposed change to Lowrise 3 could be considered to be even less compatible with Single-Family Residential land use than the existing Lowrise 1 designation. The applicant has acknowledged that it is possible the City has the authority to upzone the property without amending the FLUM.

6. 2938 and 2944 Alki Avenue SW

The applicant is requesting to change the FLUM from Single-Family Residential to Multi-Family Residential, Lowrise for both parcels.

The Commission does not recommend this proposal for the docket citing criterion G. According to this criterion, an amendment that proposes to change the FLUM is not necessary and will not be considered when it would affect an area 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. These two parcels are less than a full block in size and are located adjacent to land to the west designated as Lowrise 1 and to the east designated as Lowrise 3. This adjacent land is compatible with the proposed designation.

Text Amendments

3. 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.

4. 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.

5. Transportation Network Companies (TNCs) and Delivery Trucks

The applicant is proposing to amend the Transportation Element to recognize impacts from Transportation Network Companies and E-commerce delivery trucks.

The Commission does not recommend this proposal for the docket citing criteria B5. This proposal would be better addressed through another process, specifically the next major update to the Comprehensive Plan.

8. 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. Although the applicant has provided narrative that relevant circumstances have changed, the Commission believes this evidence is not sufficient cause for reconsidering this proposal.

9. 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 village, 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.

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. 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.

13. 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. Although the applicant has provided narrative that relevant circumstances have changed, the Commission believes this evidence is not sufficient cause for reconsidering this proposal.

14. Trees

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 B5. This proposal would be better addressed through another process, specifically the next major update to the Comprehensive Plan.

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.