

(Date)

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

RE: 2022-2023 Comprehensive Plan Amendments

Dear Councilmember Strauss,

The Seattle Planning Commission is pleased to provide our comments and recommendations on which proposed 2022-2023 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 the following amendment proposals not move forward to the docket for further analysis:

Future Land Use Map (FLUM) Amendments

3. 4822 South Holly Street

The applicant is proposing to amend the FLUM designation of this parcel from Neighborhood Residential to Multi-Family Residential. The Commission does not recommend this proposal for the docket citing criterion G, which states “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.” This parcel is in a Neighborhood Residential area and is less than a full block. All adjacent parcels are designated on the FLUM as Multi-Family Residential.

Text Amendments

1. Essential Daily Needs

The applicant is proposing to amend the Land Use Element to allow for uses that serve residents’ everyday needs within a quarter mile of their homes. Although there is strong support among Planning Commissioners for the intent of this amendment, per the criteria for docketing proposed amendments for further study, Commissioners believe this proposal would be better addressed through another process (criterion B5), specifically the Major Update to the Comprehensive Plan currently underway. The Planning Commission have included a recommendation to study the benefits and impacts of essential daily needs policies in our forthcoming scoping comment letter on the Comprehensive Plan Major Update Environmental Impact Statement.

2. Equitable Urban Forest Canopy

This amendment would provide a comprehensive strategy for an equitable urban forest canopy within all Seattle neighborhoods. A similar application was submitted and not docketed during the 2020-2021 Comprehensive Plan amendment cycle. The Commission does not recommend this proposal for the docket citing criterion B5. This proposal would be better addressed through another process, specifically tree protection regulations and the Major Update to the Comprehensive Plan.

4. Urban Freight Delivery

This amendment would amend the Transportation element to address Transportation Network Companies and delivery trucks. This application was submitted and not docketed during the 2019-2020 Comprehensive Plan amendment cycle. The applicant provided supplemental information to be considered for the 2022-2023 cycle. The Commission does not recommend this proposal for the docket citing criterion B5. This proposal would be better addressed through another process, specifically the Seattle Transportation Plan.

5. Interbay and East Magnolia

This proposed amendment would align future transit services to Interbay and East Magnolia anticipated between 2035 and 2040 with transit-oriented development, including mixed uses. The Commission does not recommend this proposal for the docket citing criterion B5. This proposal would be better addressed through another process, specifically the Industrial and Maritime Strategy and West Seattle and Ballard Link Extensions station area planning.

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 Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

Rick Mohler and Jamie Stroble
Co-Chairs, 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.