



# City of Seattle

## Seattle Planning Commission

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July 12, 2013

Honorable Councilmember Richard Conlin, Chair  
Planning, Land Use and Sustainability Committee  
Seattle City Council  
PO Box 34025  
Seattle, WA 98124-4025

### RE: Docket Setting 2013-2014 Comprehensive Plan Applications

Dear Councilmember Conlin,

The Seattle Planning Commission (SPC) is pleased to provide you with our comments and recommendations about the proposed Comprehensive Plan amendments that should be placed on the docket for further analysis; we have also outlined areas we suggest be considered as the review process moves forward. Our recommendations are based on our responsibility as stewards of the Seattle Comprehensive Plan and thorough application of Council adopted criteria, Guidelines for Amendment Selection<sup>1</sup>, included in Resolution 30976.

**SPC concurs with DPD to not move forward at this time with the proposal to amend the Future Land Use Map (FLUM) to reflect a Commercial/ Mixed Use designation to replace the existing Industrial designation for the area described as the “Ballard Blocks.”**

The second phase of Interbay/Ballard Land Use Corridor Study is currently underway and will include a robust community engagement process. It will also consider this property in the context of a broader sub-area planning process. We agree with DPD that reviewing the property in this context is a better venue for evaluating possible redesignation of the site.

**SPC recommends moving forward the following eight proposals for further analysis;**

## 1. Central Area neighborhood plan

DPD proposes amendments to the Central Area neighborhood plan, including Future Land Use Map changes and placeholders for future policy amendments stating the objective to *“update goals and policies to reflect the current aspirations of the neighborhood’s residents and business owners, including potential Future Land Use Map (FLUM) and zoning changes at the key nodes of 23rd at East Union Street, East Cherry Street, and East Jackson Street”*

**SPC Comments:** DPD is conducting intensive community outreach and focused sub-area studies in the Central Area along 23rd Avenue. We look forward to reviewing the final studies at the end of the year in order to make an informed recommendation about the proposals.

## 2. Duwamish Manufacturing/Industrial Center (MIC) and Stadium Transition Overlay District

DPD is proposing potential changes to the Future Land Use Map (FLUM) and is inserting placeholder policy amendments to the Duwamish Manufacturing/Industrial Center (MIC) and Stadium Transition Overlay District. The central objective outlined in the placeholder is described as “policies related to protection of land for industrial uses” and “determine whether the Stadium Transition Overlay District should be maintained or changed to another zoning category”. DPD has outlined potential recommendations as follows;

- greater restrictions on non-industrial uses in the Duwamish Manufacturing/Industrial Center (MIC)
- restricting further IC zoning in the MIC
- stronger restrictions on removal of land from the MIC
- clarity on whether to continue to classify the Stadium Transition area as an Overlay District or maintain its policies in another zoning category while retaining its existing policy direction and focus.

**SPC Comments:** Removing the Stadium Transition Overlay from the MIC is a significant decision and its implications must be fully understood before moving forward. In particular the potential significant changes in allowable uses in this area need to be evaluated in terms of their impact to port operations, and the health and welfare of Seattle’s industrial and manufacturing economy. In addition, there needs to be a clearer understanding of the nexus between the adjacent industrial uses and freight corridors fronting onto potential new pedestrian oriented uses.

We await the results of two separate but intricately related studies called for by a memorandum of understanding between Seattle, King County, and ArenaCo. In addition, the Draft EIS for the Arena should help the City better understand the broader impacts and implications of any proposed FLUM or policy changes.

And finally, before moving ahead with changes to the Stadium Transition Overlay District we would like to see significant progress on two freight mobility related studies (Port Access Study and Freight Master Plan). These studies, in combination with the Arena EIS will help the city better understand what the proposed changes would mean for transportation including freight rail, trucks, automobiles, transit, bicyclists, and pedestrians, as well as other important factors anticipated to change travel patterns and mode splits.

### **3. University Community Urban Center**

DPD proposes amendments to the University community urban center neighborhood plan, including Future Land Use Map changes, placeholders for future policy amendments related to open space, economic development, diversity of housing types, and building form, and amendments to infrastructure and facility data.<sup>1</sup>

***SPC Comments:*** We are eager to be updated on status of both the draft Urban Design Framework and the EIS. Both of these documents will allow for a better evaluation and an assessment of the feasibility of proposed amendments. We look forward to reviewing the final studies at the end of the year in order to make an informed recommendation about the proposals. We also note that the two proposed modifications to the urban center (see items 6 and 7 below) boundary should be evaluated as a part of this effort.

### **4. Ballard Interbay**

DPD proposes to change the FLUM to remove an area west of 16th Avenue West, east of the railroad tracks, and north of West Dravus Street from the Ballard/Interbay MIC and change the designation from industrial to mixed-use commercial.

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<sup>1</sup> Note to DPD: We found the map included in the materials regarding the 3 separate proposals related to the University community urban center to be confusing and difficult to use as an evaluation tool.

**SPC Comments:** DPD is conducting intensive community outreach and focused sub-area studies in the Ballard Interbay Corridor Area. We look forward to reviewing the final studies at the end of the year in order to make an informed recommendation about the proposal.

## 5. Interbay Armory area

The proposal is to redesignate the Armory site from Industrial to Commercial/Mixed Use. This would also amend the FLUM for property south of Armory Way and west of 15th Avenue West to remove it from Ballard/Interbay MIC and change the designation from industrial to mixed-use commercial.

**SPC Comments:** DPD is conducting intensive community outreach and focused sub-area studies in the Ballard Interbay corridor area. The Commission has had several briefings on this work including the preliminary recommendations that were recently released for public comment. Those preliminary recommendations include a recommendation from DPD not to change the existing zoning designation for the Armory site specifically. The Commission has raised questions regarding the potential for this site especially in several of the proposed scenarios. This site could play a role in a new vision for this area and should be considered in a broader land use context. We wonder if there may be a special planning or zoning tool in place to plan this area. With regard to this specific proposal, more analysis is needed to better understand the infrastructure (transportation, drainage, etc.) needs and other investments that would make this change viable. This site currently does not have the infrastructure to support mixed use commercial development. We look forward to following DPD's work and will consider the broader land use corridor studies at the end of the year in order to make an informed recommendation about the proposal.

## 6. Modify the boundary of the University Community Urban Center

The Roosevelt Neighborhood Association (RNA) proposes to change the FLUM to expand the boundary of the University Community Urban Center to include the Blessed Sacrament Parish south of Northeast 53rd Street and east of 8th Avenue Northeast.

**SPC Comments:** We note that the RNA and Nancy Bocek and neighbors are making contradictory proposals about the boundary of the University District Urban Center. We are also aware that the City is involved in an extensive sub area planning effort. We note that this process may shed further light on this matter and we look forward to reviewing the recommendations. As stated above, the two proposed

modifications to the urban center (see items 3 and 7) boundary should be evaluated as a part of this broader effort.

#### **7. Modify the boundary of the University Community Urban Center**

Nancy Bocek and neighbors propose to change the FLUM to remove the area west of the middle of the block between 9th Avenue Northeast and 10th Avenue Northeast and north of Northeast 47th Street from the University Community Urban Center.

**SPC Comments:** As stated above this proposal seems contradictory to the one proposed by the RNA. It is our hope that further analysis, including the community engagement process for the current work to develop the University District Urban Design Framework will help to provide more clarity about the boundaries of the Urban Center. As noted previously this modification must be reconciled and evaluated as part of the larger ongoing planning efforts for the urban center.

#### **8. Redesignate Talaris property**

Amend the Future Land Use Map to redesignate a Single Family area to Multi-family for the Talaris property (the former Battelle campus). Mr. Carson proposes changing the FLUM designation of property bounded on the north by Northeast 45th Street and on the west by 38th Avenue Northeast.

**SPC Comments:** This proposal is making a case that the legacy landscape as well as the conference center and green space easement for the public provides the benefit and rationale for the proposed changes. We find the proposal to be compelling. However, there is no mechanism in the current proposal to guarantee the property owner would be contractually tied to follow through on the plans detailed in the proposal should the FLUM change move forward. Furthermore, it's our understanding that the 2004 EIS only considered single family zoning options so it remains a question as to whether a new EIS would be needed. At a minimum we would like to see further study on transportation and public infrastructure impacts of changing the property from one zoning designation to another. And finally, analysis is needed on how the environmentally sensitive areas may be impacted through redevelopment.

Thank you for the opportunity to provide you with our recommendations regarding the Threshold Resolution and the docketing. We look forward to providing you with assistance as the 2013/2014

Comprehensive Plan amendment process moves forward. Please contact me or our Director, Barbara Wilson at (206) 684-0431 if you have further questions.

Sincerely,



David Cutler, Chair  
Seattle Planning Commission

cc: Mayor Mike McGinn  
Seattle City Councilmembers  
Daryl Smith, Ethan Raup, Alison Van Gorp; Mayor's Office  
Diane Sugimura, Marshall Foster, Tom Hauger, Kristian Kofed; DPD  
Peter Hahn, Tracy Krawczyk, SDOT  
Rick Hooper, Miriam Roskin; Office of Housing  
Steve Johnson, Brian Surratt, Office of Economic Development  
Bernie Matsuno, Department of Neighborhoods  
Rebecca Herzfeld, Peter Harris, Eric McConaghy; Council Central Staff

**SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL:**

- Commissioner Catherine Benotto disclosure that her employer, Weber Thompson, designs projects and advises developers throughout the City that may be affected by these proposed changes.
- Commissioner Josh Brower disclosed that his firm, Veris Law Group PLLC, represents single and multifamily developers throughout the city and industrial businesses in the Ballard-Interbay-Northend Manufacturing & Industrial Center. Commissioner Brower represent the Seattle Planning Commission on both the Duwamish Industrial Lands Advisory Group and the Stadium District Study advisory group
- Commissioner David Cutler disclosed that his firm, GGLO, designs projects and advises clients that may be impacted by amendments to the Comp Plan.
- Commissioner Colie Hough-Beck disclosure that the firm she work for, HBB works on public and private projects throughout Seattle that may be affected by these amendments.
- Commissioner Bradley Khouri disclosed that his firm, b9 architects, does work throughout the city of Seattle that may be affected by the proposed updates to the Comprehensive Plan.
- Commissioner Grace Kim is owner of Schemata Workshop, an architectural firm that does work in various neighborhoods in the City of Seattle.
- Commissioner Amalia Leighton disclosed that her employer, SvR Design, provides engineering and landscape architecture services to public and private clients throughout the city.
- Commissioner Matt Roewe disclosed that his firm, Via Architecture, works on municipal planning and private development projects that could be affected by the proposed changes to the Comp Plan.
- Commissioner Morgan Shook disclosed that his firm, BERK, works on municipal planning and private development projects that could be affected by the proposed changes to the Comp Plan.

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**i City of Seattle Criteria for Comprehensive Plan Amendment Selection (from Resolution 31402)**

The following criteria will be used in determining which proposed Comprehensive Plan amendments will be given further consideration:

A. The amendment is appropriate for the Comprehensive Plan because:

- It is consistent with the role of the Comprehensive Plan under the State Growth Management Act;
- It is consistent with the Countywide Planning Policies and the multi-county policies contained in the Puget Sound Regional Council's Vision 2040 strategy;
- Its intent cannot be accomplished by a change in regulations alone;
- It is not better addressed as a budgetary or programmatic decision; and
- It is not better addressed through another process, such as neighborhood planning.

B. The amendment is legal under state and local law.

C. It is practical to consider the amendment because:

- The timing of the amendment is appropriate and Council will have sufficient information to make an informed decision;
- City staff will be able to develop within the time available the text for the Comprehensive Plan and, if necessary, amendments to the Municipal Code, and to conduct sufficient analysis and public review;
- 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; and
- The amendment has not been recently rejected by the City Council.

D. If the amendment would change a neighborhood plan, it either is the result of a neighborhood review process or can be reviewed by such a process prior to final Council consideration of the amendment.

E. The amendment is likely to make a material difference in a future City regulatory or funding decision.

Note: Parties proposing a Comprehensive Plan Amendment are asked in their application to describe how the proposed change meets the criteria for considering an amendment to the Comprehensive Plan. (The criteria above were copied from the Comprehensive Plan Amendment Application for 2013-2104.)