



City of Seattle

Seattle Planning Commission

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June 15, 2010

Honorable Councilmember Sally J. Clark, Chair
Committee on the Built Environment
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

RE: Recommendations on Proposed 2010-2011 Comprehensive Plan Applications

Dear Councilmember Clark,

As stewards of the Seattle Comprehensive Plan, we are pleased to provide you with our comments and recommendations on the proposed amendments to the Plan that should be placed on the docket for further analysis and have outlined areas we feel should be considered as the review process moves forward. Our recommendations are based on well-established criteria, *Guidelines for Amendment Selection*, that are also included in [Resolution 30976](#) adopted by Council on May 14, 2007.

PURPOSE OF SEATTLE'S COMPREHENSIVE PLAN

The [Comprehensive Plan](#) articulates a vision for how Seattle will accommodate residential and employment growth over the next 20 years, while promoting the values of its citizens, a vibrant economy and livable neighborhoods. It does this by accommodating most new growth in places designated as either urban centers or urban villages, and contains growth targets for each urban center and urban village related to Seattle's share of regional growth that is anticipated in the coming 20 years. It includes policies that describe how the City intends to serve this growth with transportation and other infrastructure.

The Comprehensive Plan is part of a hierarchy of related plans that include:

- [Vision 2040](#) prepared by the Puget Sound Regional Council (which addresses growth in the four-counties of the central Puget Sound region)
- [Countywide Planning Policies](#) (which provides guidance to the comprehensive plans of all jurisdictions in King County)
- [Seattle's neighborhood plans](#) (which tailor the City's Comprehensive Plan policies for individual neighborhoods). The goals and policies of the neighborhood plans are contained within the Comprehensive Plan.

GENERAL RECOMMENDATIONS

• Not Appropriate For Inclusion In The Comprehensive Plan

While some of the proposals may have merit as policy considerations, they are not appropriate for the mission and goal of the Comprehensive Plan. This certainly should not preclude City officials from considering these amendments in other policy venues and we have suggested other processes that might more effectively address several of the proposed amendments for this cycle.

- **Seven-Year Comprehensive Plan Update**

Some of this year's proposed amendments would be more appropriately addressed through the seven-year update than the current amendment cycle. The seven-year update of the Plan, which will begin later this year, is an opportunity to create a more succinct and useful document that will guide Seattle into a sustainable future.

RECOMMENDATIONS ON PROPOSED AMENDMENTS

1. Placeholders submitted by DPD that will be developed this summer related to:

A. State-required update to Seattle's Shoreline Master Program

Commission Recommendation & Comments: Include on 2010 Amendment Docket

The update to the Shoreline Master Program should be considered in the 2010 amendment cycle because it is required by State law. We would also like to note that this is the first major update to the Shoreline Master Program since the Comprehensive Plan was adopted.

B. Targets for reductions in Vehicle Miles Traveled (VMT) on Seattle's road network

Commission Recommendation & Comments: Include on 2010 Amendment Docket

While the Commission approves the inclusion of this proposed amendment, we caution that specific metrics related to reductions in VMT need to be addressed in a regional context.

Additionally, VMT targets and might be more appropriately addressed through the update process for the Transportation Strategic Plan, which identifies a variety of policies related to reducing household dependence on automobiles. The seven-year update of the Comprehensive Plan also provides an opportunity create a truly sustainable city, including reductions in VMT, and the City might explore further how best to address global climate change during this process.

Per-capita reductions in VMT should be considered as one strategy to reduce greenhouse gas emissions from auto travel among many strategies such as increased fuel efficiency and use of electric vehicles. Overall State VMT targets must be specifically considered in our local context and should strongly account for balancing our GMA goals. Seattle's goal to significantly increase jobs and housing in the city reduces sprawl and all that comes with it, but creates much more significant challenges in achieving 'jurisdictional VMT goals' whereas 'per capita VMT goals' may actually decrease as Seattle continues to implement transit oriented community goals and policies.

C. Authorizing master planned communities on large sites, such as Seattle Housing Authority's Yesler Terrace site

Commission Recommendation & Comments: Include on 2010 Amendment Docket

The Commission supports this approach as an effective implementation tool for development projects. The redevelopment of Yesler Terrace is certainly one of many projects in Seattle that would greatly benefit from this 'planned action' mechanism.

D. A new State-required container port element

Commission Recommendation & Comments: Include on 2010 Amendment Docket

As required by the State Growth Management Act, the new container port element is appropriate to consider in the 2010 amendment cycle. We look forward to working with City Council and City staff to ensure that this new element helps define our path to a sustainable future.

E. Goals and policies related to the neighborhood plan updates for the North Beacon Hill, North Rainier and MLK@Othello neighborhood plans

Commission Recommendation & Comments: Include on 2010 Amendment Docket

The Commission continues to support the update to these three neighborhood plans; we look forward to seeing the proposed amendments adopted into the Comprehensive Plan, recognizing the tremendous outreach effort that occurred last year.

2. *A new policy in the Transportation Element related to extra heavy buses, trucks used by City agencies and contractors, solid waste vehicles and fire trucks.*

Commission Recommendation & Comments: Do Not Include on 2010 Amendment Docket

The Commission believes that Comprehensive Plan policies T8 (*Establish a street system that can accommodate the weight of heavy vehicles and reduce the damage such vehicles can cause*) and T70 (*Pursue strategies to finance repair of road damage from heavy vehicles in a way that is equitable for Seattle's taxpayers*) provide appropriate guidance to address this matter and thus this amendment should not be on the docket. We reiterate our concurrence with the Mayor's 2008 Recommended Comprehensive Plan amendments report that states:

"While preventive measures are generally prudent, the factors involved in fleet selection for transit, utilities, and construction are complex. The proposed policy's objectives regarding the type and weight of transit buses and solid-waste haulers can best be achieved through budgetary or programmatic decisions by transit agencies, the Seattle Department of Transportation and Seattle Public Utilities, or by amendments to the Transportation Strategic Plan."

We note that the Right of Way Improvements Manual requires pavement design appropriate for corridors that "accommodate a high volume of heavy vehicles." Therefore, the proposed amendment does not meet the threshold criteria because it would be better addressed through a budgetary or programmatic decision (1.4) and the proposed amendment has recently been rejected by City Council (3.4).

3. *Create a new element or appendix of the Comprehensive Plan entitled "Open and Participatory Government."*

Commission Recommendation & Comments: Do Not Include on 2010 Amendment Docket

The Planning Commission is dedicated to the principles and practice of transparent, open and participatory government but the Comprehensive Plan is not the appropriate document for this proposal. The proposed requirements outlined in the application are best dealt with through the various rules and regulations that deal more specifically with open government such as the Open Public Meetings Act, RCW Chapter 42.36 (Appearance of Fairness Doctrine), Seattle Municipal Code, and by the application of the Seattle ethics code or through budgetary and programmatic decision-making processes (1.4 and 1.5). Additionally, the City Council is currently engaged in revising the City of Seattle's policies and practices concerning open and participatory government.

A similar proposal was rejected by Council in 2009 and 2008 and we do not see that this proposal is significantly different (3.4). The Commission does not agree that City Council has "no reasonable choice but to consider this proposed amendment" because we continue to believe that a coordinated plan related to open and participatory government would be better addressed as a budgetary or programmatic decisions (1.4) or another process (1.5).

4. *Add new policies related to the reduction of vehicle miles traveled within and through Seattle.*

Commission Recommendation & Comments: Do Not Include on 2010 Amendment Docket

The City is currently engaged in an effort to develop its policies and identify targets for reduction in Vehicle Miles Traveled (VMT) on Seattle's road network. Therefore the Commission recommends that this proposed amendment be considered as the City further explores the proposed amendment listed above (see 1.B for more detailed recommendations).

5. *A new policy in the Urban Village Element related to citizen review of residential and job growth targets prior to adoption by City Council.*

Commission Recommendation & Comments: Do Not Include on 2010 Amendment Docket

The Commission concurs that the current process of setting residential and job targets should be more clearly communicated and accessible to the general public. We strongly encourage more transparency, accessibility and civic engagement at the both the regional and countywide levels. However, it is important to understand that the targets are negotiated through the Growth Management Policy Board and at the countywide level through the Growth Management Planning Council. Citizens can also get directly involved in the outreach process by working with their elected officials. Seattle's residential and employment growth targets are adopted as part of a statewide process that includes opportunities for public review and comment at a regional and countywide level (1.5). In addition, because the Growth Management Planning Council approved updated growth targets last year and Council recently approved and ratified the countywide growth targets in Resolution 31211, the Commission believes that the timing of the proposed amendment is not appropriate (3.1).

6. *New and amended polices related to concurrency, public participation in establishing growth targets, and 1-for-1 replacement of affordable housing.*

Commission Recommendation & Comments: Do Not Include on 2010 Amendment Docket

This application includes changes to approximately 30 goals and policies and would create six new goals or policies within the Comprehensive Plan, some of which are inconsistent with well-established Comprehensive Plan policy (3.3). In addition, the proposal appears to be attempting to redefine and set much higher standards for concurrency than are currently defined by State law (1.1). Some elements of this proposal would be more appropriately considered as part of the seven-year update to the Plan (1.5 and 3.1).

7. *Alternative goals and polices that replace and/or complement goals and policies proposed by DPD for the update to the North Beacon Hill Neighborhood Plan.*

Commission Recommendation & Comments: Do Not Include on 2010 Amendment Docket

The North Beacon Hill Neighborhood Plan has recently been the subject of extensive public outreach and involvement, which resulted in DPD's proposed neighborhood plan update which will be considered under proposed amendment 1.E above. An active neighborhood planning process is the appropriate venue in which to offer amendments to the neighborhood planning element of the Comprehensive Plan (1.5 and 4). We encourage all parties to stay involved in the update process and to work with elected officials to influence the final outcome.

8. *Several amendments to the Roosevelt Neighborhood Plan goals and policies and a FLUM amendment that would support a future rezone in the vicinity of the intersection of 15th Ave NE and NE 65th Street. The proposed amendment would also amend Land Use Policy 59.*

Commission Recommendation & Comments: Include on 2010 Amendment Docket

The proposed amendment would change the FLUM for approximately 14 parcels, and revise three goals and two policies within the Roosevelt Neighborhood Planning Element. The Commission recommends that this narrowly focused update to the Roosevelt Neighborhood plan is practical to review and consider within this year's amendment cycle (3.1 and 3.2). Should this application move forward for further review, we strongly encourage DPD to pay close attention to the impact of an overall station area planning effort that should be considered because of the coming light rail station.

We note that the proposed amendment to Land Use Policy 59 has citywide implications. The Commission strongly supports reexamining this policy and made this recommendation in other policy papers including our Affordable Housing Action Agenda. This proposed amendment

highlights the tension between LU59 with the overall vision of the Comprehensive Plan to encourage job and housing growth in places well served by transit. Single family zoned land in close proximity to transit, such as light rail stations, should be considered for higher intensity land uses.

9. *A new policy to the Greater Duwamish neighborhood plan that would promote a wider range of uses in the south downtown sub-area. These uses would include high-tech research and development uses, high technology office uses, larger administrative office uses, and larger retail uses along the 1st Avenue S and 4th Avenue S corridors.*

Commission Recommendation & Comments: Do Not Include on 2010 Amendment Docket

Seattle's Industrial Lands policy has been recently reviewed and found to be achieving the goals outlined for our Manufacturing and Industrial Centers. The proposed amendment would depart from these well-established Comprehensive Plan goals and policies (3.3). Specifically, the City's analysis of the definitions of uses, including research and development (R&D), concluded that they are appropriate for industrial zones. Additionally, a thorough inventory of industrially zone land, including the proposed area, concluded that the vast majority of land is being used by industrial businesses. The Commission supports the City's industrial land policy and sees no reason to depart from this overall vision. One of the recommendations from our report on The Future of Seattle's Industrial Lands states:

"The City should clearly articulate the difference between R&D that has a valid and compelling need to be located in an industrial area versus those that act more as a typical office use. Only R&D that has a clear and compelling reason to be in industrial areas should be permitted..."

The proposed amendment would encourage uses within the Duwamish Manufacturing Industrial Center that are essentially indistinguishable from other office and commercial uses and have no clear need to be located in industrial zones. There is currently an over abundance of commercial vacancy in Seattle whereas vacancy rates for industrial land remain consistently low.

Even if this proposed amendment was consistent with the overall vision of our manufacturing and industrial centers, changes to the definitions of allowed uses within in the Land Use Code would be better achieved by a change in regulation, not the Comprehensive Plan (1.3).

10. *A FLUM amendment to expand the boundary of the 23rd@Jackson Residential Urban Village to include the block on the east side of Martin Luther King Jr.*

Commission Recommendation & Comments: Include on 2010 Amendment Docket

The proposed amendment would expand the 23rd@Jackson Residential Urban Village boundary to include approximately eight parcels, currently zoned single family, which would set the stage for a future rezone. The Commission recommends that this proposal be included in the 2010 docket. We would like to see more evidence of public outreach and support from the community for this change (3.2).

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 2010-2011 Comprehensive Plan amendment process moves forward. Please contact me or our Director, Barbara Wilson at (206) 684-0431 if you have further questions.

Sincerely,



Josh Brower, Chair
Seattle Planning Commission

cc: Mayor Mike McGinn
Seattle City Councilmembers
Ethan Raup, Julie McCoy, Rebecca Deehr; Mayor's Office
Rebecca Herzfeld, Ketil Freeman, Council Central Staff
Diane Sugimura, Marshall Foster, Tom Hauger, DPD
Peter Hahn, Tracy Krawczyk, SDOT
Rick Hooper, Office of Housing
Stella Chao, Kimberlee Archie, Department of Neighborhoods

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL:

- Chair Brower disclosed that he is a resident of Beacon Hill. He also disclosed that his law firm, Tupper Mack Brower, PLLC, represents developers of single and multi-family housing throughout Seattle and that he represents maritime and industrial business in the BINMIC.
- Vice Chair Miller disclosed that she is a voting member of the Southeast District Council, a steering committee member of the Othello Station Community Advisory Committee, represents ROSA on the South Precinct Advisory Committee and is a steering committee member of Othello Park Now.
- Commissioner Cutler recused himself from the discussion of proposed amendment 8. He also disclosed that his firm, GGLO works with clients who own and develop property in Seattle.
- Commissioner Fiori disclosed that his firm, Heartland, is working for SHA on the Yesler Terrace project and has a project near the proposed rezone in the Roosevelt urban village; he also lives in the neighborhood.
- Commissioner Hough-Beck disclosed that her firm, works with the Port of Seattle, on commercial & residential projects throughout Seattle.
- Commissioner Johnson disclosed that his firm, ESA Aldofson, works on projects that could be affected by proposed rezones.
- Commissioner Kaplan disclosed that his firm, Martin Henry Kaplan Architects, works on projects that could be affected by proposed rezones.
- Commissioner Leighton disclosed that her firm, SvR, is working for SHA on the Yesler Terrace project which could be affected by proposal 1.c. She also disclosed that she served as co-chair of NPAC from August 2009 through January 2010.
- Commissioner Persons disclosed that he is the executive director of Capitol Hill Housing (CHH), a Seattle Public Development Authority that builds, owns and manages affordable housing in Seattle and White Center. CHH has a potential interest in the development of the Yesler Terrace site and have routine business dealings with the Seattle Housing Authority. As a municipal corporation, CHH is subject to open public meetings and public records requirements.

i Guidelines for Amendment Selection

The City Council considers a variety of factors in determining whether a proposed Comprehensive Plan amendment will be placed on the amendment docket for a given year. Among those factors are the following:

1. The amendment is appropriate for the Comprehensive Plan:
 1. The amendment is consistent with the role of the Comprehensive Plan under the State Growth Management Act;
 2. The amendment is consistent with the Countywide Planning Policies;
 3. The intent of the amendment cannot be accomplished by a change in regulations only;
 4. The amendment is not better addressed as a budgetary or programmatic decision; or
 5. The amendment is not better address through another process, such as neighborhood planning.
2. The amendment is legal – the amendment meets existing state and local laws.
3. It is practical to consider the amendment:
 1. The timing of the amendment is appropriate and Council will have sufficient information necessary to make an informed decision.
 2. Within the time available City staff will be able to develop the text for the amendments to the Comprehensive Plan and, if necessary, the Municipal Code, and conduct sufficient analysis and public review.
 3. The proposed amendment is consistent with the overall vision of the Comprehensive Plan and well-established Comprehensive Plan policy, or the Mayor or Council is interested in significantly changing existing policy.
 4. The amendment has not been recently rejected by the City Council.
4. There has been a neighborhood review process to develop any proposed change to a neighborhood plan, or a neighborhood review process can be conducted prior to final Council consideration of the amendment.