



# City of Seattle Seattle Planning Commission

Gregory J. Nickels, Mayor  
Barbara E. Wilson, Acting Director

November 24, 2004

Honorable Council President Jan Drago  
Seattle City Council  
600 5<sup>th</sup> Avenue  
Seattle, WA 98104

Dear Council President Drago:

The Seattle Planning Commission (SPC) is pleased to share with you its comments and recommendations on the 2004 Ten Year Comprehensive Plan Update. As the *'stewards of the Comprehensive Plan'* we know that changes to this document are vital for shaping the future of Seattle. The Commission has reviewed the proposals contained within the 2004 Ten Year Comprehensive Plan Update and the amendment process including Council Amendments.

## **Overall Comments:**

**Overall, the Planning Commission supports the recommended updates for the Ten Year Comprehensive Plan.** The approach has been sound and the updates move Seattle in the right direction.

The Commission supports the City's commitment to the Urban Village strategy. The strategy follows the Growth Management Act's goal to **encourage development in urban areas where adequate public facilities already exist or can be provided efficiently.** We believe that the proposed updates strengthen its ability to provide **services and amenities that should accompany growth in designated urban centers and villages.** **The Commission supports strengthening such efforts by ensuring that infrastructure and capital improvements work concurrently with growth targets.**

The Planning Commission commends the City for conducting a transparent public process and review. DPD public outreach efforts were impressive even during a time when budget limitations put constraints on staff and resources. The Commission encourages the City to continue to engage the larger community in assessing and guiding how we address growth and its effects. It is important that the **City educate and guide the community in the ongoing challenges of growth and creating and maintaining a diverse, healthy community.**

The changes to the Plan go a long way to making the document clearer as a policy document and more accessible to a lay person. Specifically, **removing much of the redundancy in the Plan and the creation of a Readers Guide help make the Comprehensive Plan a more tangible and accessible document for residents, stakeholders and policy makers.**

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**Specific Comments:**

**1. Urban Village Element** – The Commission supports the reorganization of the Plan to include a specific element on the Urban Villages concept. It provides a needed overall context, confirms the City’s commitment to the Urban Village strategy and strengthens its ability to provide services and amenities that should accompany growth in designated urban centers and villages.

- ***Housing-to-jobs ratio, estimates and targets:*** Jobs and housing targets provide the city with a roadmap for managing its resources and capital expenditures. The Commission recommends that the terms “target” and “estimate” be carefully defined and the implications of the targets identified in the Comprehensive Plan. **The Commission suggests using the term “target” where the city wants growth and the term “estimate” in areas where jobs and housing growth is expected but not prioritized, such as outside of urban centers and villages.** The numbers should have significant implications for City policy. SPC continues to have several questions regarding the development and policy implications of the numbers listed in the chart on page 35 and 36 of the Urban Village element. **The Commission recommends that special attention be given to the meaning of these numbers and how they are derived.**
- ***South Lake Union Urban Center Designation:*** The Commission supports the re-designation of South Lake Union from a hub urban village to an urban center.

**2. Land Use Element** – The Commission is pleased to see a more clear and concise Land Use Element. Adding the new Urban Village element has helped to better clarify these two interrelated components. The Commission is particularly supportive of the attention paid to removing redundancy and providing more intent statements to make the land use section actions more explicit.

- ***Measuring and monitoring:*** SPC supports long-range monitoring. The development of a variety of indicators and measurements will be central to the ongoing evaluation and management of the Comprehensive Plan. The Commission supports and strongly encourages the City’s plan to develop citywide indicators in the coming year that include environmental as well as social indicators.
- ***Lowering Parking requirements:*** The Planning Commission supports the City’s proposal to lower the parking requirements in urban villages and urban centers. This policy helps to send the right message that urban centers should be enabled with a strong commitment to transit and pedestrianism. However, the parking requirements of the individual urban centers should be based on parking studies that account for local conditions and planning objectives.
- ***View Protection Policy:*** **The Commission does not support the City Council amendment and recommends that it be rejected.** The Commission believes that this **amendment language is ambiguous and adds another layer of redundancy** to view protection policies already outlined in the plan. The Plan, as well as other city policies, provides a complex and intensive effort at balancing the goals of view protection with density. **Adding another policy may have unintended consequences, may be misinterpreted and may cause undue confusion.** The Commission supports prioritizing the protection of public, rather than private, views.

- **Industrial Lands Policy:** Early in the amendment process the Planning Commission recommended that the amendments dealing with industrial lands be deferred until the City develops an industrial lands strategy. **The strategy should consider the City's overall objectives for maintaining and attracting industrial jobs and its role and opportunities within the regional context.** This is critical to making decisions regarding individual requests for zoning changes. The Planning Commission looks forward to playing a significant role advising the City on its overall industrial lands policy in 2005.

**3. Transportation Element** – The Commission applauds the City's effort in eliminating redundancy and reorganizing the Transportation Element to make the relationship of its policies more logical and easier to follow.

- **Relationship of the Comp Plan to the Transportation Strategic Plan (TSP):** The Planning Commission is particularly interested in the relationship between the Comprehensive Plan's Transportation Element and the Transportation Strategic Plan (TSP). The TSP is the 'functional plan that contains specific tools the City intends to use to carry out the Comp Plan's transportation-related policies'. **To ensure consistency, a mechanism is necessary to make certain that TSP changes support and implement Comp Plan policy statements.** The Commission has only had a cursory opportunity to review the latest draft of the TSP to assess its relationship to the Comprehensive Plan and consider the benefits and consequences of some of the implementation details being moved from the Comp Plan into the TSP. **Based on the Commission's review we make the following recommendations and observations:**
  - There is a challenge coordinating two different update schedules for Comp Plan and TSP. **SPC recommends adding specific policy language to the Comp Plan referencing the TSP and how TSP updates will be handled relative to the Comp Plan amendment or 10-year update schedule.**
  - **The TSP does a good job of referencing the Comp Plan. The Comp Plan should provide the same cross-referencing to the TSP. The Comp Plan should provide the same overview that exists in the October 12<sup>th</sup>, 2004 draft of the TSP located in that document on pages 6 and 7.** This will help clarify the connection and linkages between the Comp Plan and the TSP. **The Commission recommends that an index be created in the Comp Plan that helps navigate specific implementation and policies that relate to the TSP.** The Comprehensive Plan Reader's Guide may also provide an opportunity to link the Plan to the TSP.
  - **There is a strong need for maintaining positive consistency between the Comp Plan and TSP.** The Commission would like to be assured that the final TSP; 1) incorporates the traffic network specified in Comp Plan T10-15, 2) incorporates walking and bicycling transportation performance measures per T37, 3) includes detailed strategies and designations of truck streets and 4) determines LOS thresholds and how LOS values are altered and checked for consistency per T17.
  - T53 calls for consideration of the needs for local delivery and collection of goods at businesses by truck. **It is critical that the TSP details this and does not open the door to support increasing curb radii, street width, etc. in neighborhood commercial areas.**

- The revisions to T10, T12, and T15 are confusing, particularly the **relationship between major and minor arterials with major truck street, industrial access street, and commercial access street designations. Presenting this relationship in a more precise way will be helpful.** In addition, the designations in TSP **must ensure consistency and compatibility with land use and community design statements** elsewhere in Comp Plan.
- **Funding is an important mechanism for ensuring that the City's transportation investments are consistent with the Comp Plan.** The Commission supports T75 which links the CIP with TSP; TG28 and T70 that states funding and implementation of transportation investment be consistent with Comp Plan; and the revised T73 which is an important new policy emphasizing how impact fees may be used in a positive, forward-looking way.
- **Mode Split goals** – The Commission supports the use of **mode split goals as a more effective way to measure mobility** than Levels of Service standards. **The SPC also supports the establishment of these goals for each urban center where most growth is expected to occur and which are most appropriate for pedestrian uses.** The Commission concurs that the city-wide goal alone does not adequately target the change in travel behavior to the places where those changes are most likely to occur. **SPC supports applying LOS standards to non-motorized vehicles and pedestrians** whether in the Comp Plan or in the Transportation Strategic Plan. In stating the mode split goals 'to Seattle and Urban Centers', clarification is needed as to whether these are goals to or from areas outside Seattle. Setting the goals is an important step and requires additional analysis and evaluation, including objective goals and measurement. The Planning Commission would like to see this work as it takes place to ensure that it supports Comp Plan policies.

**4. Housing Element** – The proposed changes in the Plan Update are very minor. The Planning Commission does not have significant comments on the element and believes the Comp Plan goals and policies are good. However, the Commission would like to **strongly recommend the need for a coherent strategy from the City with regard to implementation of housing policy in Seattle.** The Commission believes that there is **no silver bullet approach** to housing affordability in Seattle but rather the City should undertake an **extensive effort at identifying the many challenges and defining the potential tools and strategic opportunities.** The City's approach to housing policy implementation should carefully assess where to **focus its housing and tailor housing strategies to meet the needs of individual communities.** In particular, the City should encourage higher density residential development where it is consistent with neighborhood plans and the urban village strategy. The City should also continue to pursue creative lower density housing choices such as cottage housing and detached accessory dwelling units in urban villages and where neighborhoods have expressed acceptance of such housing.

**5. Neighborhood Planning Element** – The Planning Commission **supports the incorporation of the Northgate neighborhood plan (Northgate Area Comprehensive Plan) into the Comp Plan.**

**6. Cultural Resources Element** – **SPC strongly supports both the inclusion of historic preservation in the guiding principles of the Comprehensive Plan** and its integration into various

specific elements of the Plan. The SPC urges continued efforts by the City to preserve historic resources and to determine what more is needed to protect historic resources, including landscapes.

**7. Environment Element – The Commission recommends the Council eliminate the ‘Precautionary Principle’ language because it is non-binding and cannot be implemented.** Instead the SPC **recommends inclusion of language that clearly links the effects of environmental quality on human health and to consider human health in developing City policy.** The Commission concurs with the recommendation to add a set of policies that address the city’s fresh and salt water habitats. SPC supports establishing a monitoring system to track key aspects of the Comp Plan in order to determine the extent to which it is producing a more sustainable urban environment and assess the overall environmental health of the city. This approach would allow corrective action to be taken as serious problems emerge.

Thank you for the opportunity to provide comments and we are happy to discuss these recommendations in more detail as you wish.

Sincerely,



George Blomberg, Chair  
Seattle Planning Commission

CC:  
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