

**City of Seattle**  
**COMPREHENSIVE PLAN AMENDMENT APPLICATION**

Use this application to propose an amendment to the goals, policies, Future Land Use Map, appendices, or other components of the adopted City of Seattle Comprehensive Plan.

**Applications are due to the Seattle City Council (sent electronically to: [compplan@seattle.gov](mailto:compplan@seattle.gov)) no later than 5:00 p.m. on May 15th for consideration in the next annual review cycle.** Any proposals received after May 15th will be considered in the review process for the following year. *(Please Print or Type)*

Applicant: Joseph Brogan, Foster Pepper PLLC, for Robert Code

Date: 5/15/19

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City: Seattle

State: WA Zip: 98101

Phone: 206.447.6407

Contact person (if not the applicant):

Email:

Street Address:

City:

State:

Zip:

Phone:


Name of general area, location, or site that would be affected by this proposed amendment (attach additional sheets if necessary):

4501 SW Admiral Way & 4509 SW Admiral Way

*If the application is approved for further consideration by the City Council, the applicant may be required to submit a State Environmental Policy Act (SEPA) checklist.*

*Acceptance of this application does not guarantee final approval.*

Applicant  
Signature: \_\_\_\_\_



Date: \_\_\_\_\_

5/14/19

## REQUIRED QUESTIONNAIRE: Comprehensive Plan Amendment Application

Please answer the following questions and. If appropriate, attach any additional sheets, supporting maps or graphics. If you use separate sheets to provide your answers, then answer each question separately and reference the question number in your answer. The Council will consider an application incomplete unless all the questions are answered. When proposing an amendment, you must show that a change to the Comprehensive Plan is required.

1. Provide a detailed description of the proposed amendment and a clear statement of what the proposed amendment is intended to accomplish. Include the name(s) of the Comprehensive Plan Element(s) (Land Use, Transportation, etc.), maps, goals and/or policies you propose to amend.

**Proposed amendment:** Future Land Use Map change from Multi-family, Lowrise 1 to Multi-family, Lowrise 3, for both parcels. The applicant would also seek rezones from Lowrise 1 to Lowrise 3.

a. If the amendment is to an existing Comprehensive Plan goal or policy, and you have specific language you would like to be considered, please show proposed amendments in "line in/line out" format with text to be added indicated by underlining, and text to be deleted indicated with ~~strikeouts~~.

b. If you anticipate that the proposed Comprehensive Plan amendment would also require a change to the Seattle Municipal Code (SMC), please indicate the SMC section(s) that would need to be changed. If you have specific language you would like to be considered, please show proposed edits to the SMC in "line in/line out" format as described above.

c. If the amendment is to the Future Land Use Map, please provide a map that clearly outlines the area(s) proposed to be changed. List the address(es) for each property, the current land use category as shown on the Future Land Use Map and the proposed new land use category for each property in the area to be changed. Identify your relationship to the owner(s) of the property. Describe how the change is consistent with Policy LU1.5, which states "Require Future Land Use Map amendments only when needed to achieve a significant change to the intended function of a large area."

The proposed FLUM change would both recognize existing multi-family development and allow infill development within an area already characterized by a mix of multi-family development within a designated urban residential village. LU 1.3 provides, "In residential urban villages, a low to moderate density and scale of development" is appropriate.) The proposed designation maintains an appropriate transition from lots zoned Single-family to the south, while helping to integrate new projects into the residential urban village. The existing LR1 zoning is too limiting and a moderate density would better support the City's Urban

Village strategy. (A FLUM change may, in fact, not be needed as long as a rezone to a higher density lowrise zone is consistent with the broad “multifamily residential” FLUM designation. *See* LU 1.5. A map of the proposed FLUM change is attached.

2. For amendments to goals and policies only: Describe how the issue is currently addressed in the Comprehensive Plan. Why is a change needed?

3. Describe why the proposed change meets each of the criteria established in Resolution 31807 which sets criteria for Council to consider an amendment to the Comprehensive Plan.

The resolution criteria are listed below in ***bold italics*** with responses interlineated in ordinary type:

***A. The amendment is legal under state and local law.*** Nothing in state or local law prohibits the City from changing a FLUM designation from Lowrise 1 to Lowrise 3.

***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;***

The Comprehensive Plan guides development in the City, and City policy supports dense infill development in those areas equipped to handle it. The property is already designated and zoned for low-rise multifamily development, and nothing unique to the subject property suggests it should be limited to L1 since it is located in the Admiral Residential Urban Village.

Concentration of residential density in Residential Urban Villages reinforces the benefits of City investments in transit, parks, utilities and other infrastructure. Residential Urban Villages, like Admiral, have been determined to be the best places equipped to absorb more housing. (*See Seattle 2035* at 22).

The proposal supports at least the following Comprehensive Plan goals and policies:

- LU G1:

This Goal encourages “a development pattern consistent with the urban village strategy, concentrating new housing and employment in urban centers and urban villages....”

- GS 2.3:

This Growth Strategy seeks to “[a]ccommodate a substantial portion of the City’s growth in hub and residential urban villages.” Maintaining the lowest Lowrise density (LR1) is not consistent with this strategy. The LR3 designation would support “moderate density,” also deemed appropriate in residential urban villages. *See* LU 1.3.

- Admiral: A –P2

This policy calls for “maintain[ing] the character and integrity of the existing Single-family zoned areas by maintaining current single-family zoning outside the Admiral residential urban village.” The FLUM change would not change the boundaries of the Admiral Residential Urban Village, thereby protecting the character and integrity of the adjacent Single-family-zoned areas.

- H G2: meet housing needs by increasing housing supply
- H 2.4: encourage use of underdeveloped land for housing;

The amendment will enable development of apartments or other lowrise multifamily in an area currently designated and zoned for lowrise multifamily development within an Urban Village.

- H G3: Achieve a mix of housing types
- H 3.1: Implement strategies to accommodate an array of housing designs

There is no shortage of single-family housing in the vicinity, and the amendment would add to the mix of housing types.

- EN G3: Reduce Seattle’s greenhouse gas emissions

In-city multifamily housing is an efficient housing type. First, well-designed multifamily that complies with the current energy code requires far less energy per dwelling unit than a comparable number of less dense developments. Second, concentrating residents in-city, near amenities, bicycle infrastructure, and reliable transit encourages the use of alternatives to car trips and reduces vehicle miles.

***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;***

Multiple Countywide Planning Policies support dense, urban development, particularly in those areas the City has already determined are capable of handling such density. These include the following, for the same reasons described in Section B.1 above, with additional detail specific to CPPs below:

- DP-2: Promote housing at a range of urban densities;
- DP-3: encourage compact development and maximize use of existing capacity;
- DP-4: Concentrate housing within UGA;
- DP-5: Decrease GHG emissions through land use strategies;
- DP-6: Plan for development patterns that promote public health through opportunities for physical activity and social connectivity; and

- H-4: Provide zoning capacity sufficient to achieve housing targets

Even if Seattle has sufficient housing to meet its targets, its targets woefully understate the demand for housing created by the recent influx of residents. Additional housing stock is needed, and the subject properties are a great place to put it.

**3. *Its intent cannot be accomplished by a change in regulations alone;***

A FLUM amendment and rezone is necessary to achieve the target densities within this Urban Village.

**4. *It is not better addressed as a budgetary or programmatic decision; and***

We are unaware of any current effort to reexamine planning or zoning in this part of West Seattle.

**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.***

We are unaware of any broader push to re-examine planning for this neighborhood.

**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;***

Council has already considered the appropriate designation and zoning in the area of the subject property and concluded that lowrise multifamily is appropriate for the street and the area. The zoning for the subject parcels pre-dates designation of the area as Residential Urban Village.

**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***

Yes.

**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.***

The amendment is consistent with both the policy direction of the state to push residential density into the UGA, and the City's policy of directing residential growth to urban villages and other areas where the established context supports it.

**D. *If the amendment has previously been proposed, relevant circumstances have changed significantly so that there is sufficient cause for reconsidering the proposal.***

The amendment has not been proposed before.

***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.***

N/A.

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

N/A.

***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.***

N/A.

4. What other options are there for meeting the goal or objectives of the amendment? Why is a Comprehensive Plan amendment needed to meet the goals or objectives?

The goal of the proposal is to increase development capacity in an area the City has already determined is appropriate for densities higher than single-family. It is possible that the City has the authority to upzone the property without amending the FLUM, but the proposed amendment creates greater consistency, both internal to the Comp Plan and with an eventual rezone.

5. What do you anticipate will be the impacts of the proposed amendment, including impacts to the geographic area affected? Why will the proposed amendment result in a net benefit to the community? Please include any data, research, or analysis that supports the proposed amendments.

The amendment will benefit the community in a number of ways. First, it will enable a rezone to allow construction of multifamily housing at densities above those now achievable under the LR1 zoning. The denser housing will reduce transportation impacts as residents who might have lived farther from the core have opportunities to live closer in.

The aesthetics of development under the proposed amendment will maintain the transition between the SF 5000 zoning and the existing LR zoning, where there is now an incongruous pattern of multifamily development.

6. How does the proposed amendment support the existing goals and policies of the Comprehensive Plan? If the proposal would change existing goals and policies or add new goals and policies to the Comprehensive Plan, describe how the proposed amendment is consistent with the Washington State Growth Management Act (<http://apps.leg.wa.gov/rcw/default.aspx?cite=36.70A>), the Puget Sound Regional Council's Vision 2040 (<http://www.psrc.org/growth/vision2040/>), and the King County Countywide Planning Policies (<http://www.kingcounty.gov/depts/executive/performance-strategy-budget/regional-planning/CPPs.aspx>).

See discussion above, in response to B.1. The proposed amendment is consistent with the Comprehensive Plan's overall push to encourage infill development in those areas most capable of handling it, such as urban villages and areas with an established context of multifamily housing.

7. Is there public support for this proposed amendment? If the amendment would change the Future Land Use Map or a Neighborhood Plan, please list any meetings that you have held or other communication you have had with the community about the amendment. If the amendment would have a citywide impact, please list any organizations that you have discussed the amendment with. *Notes: You may attach letters of support for the amendment or other documentation. The City will provide public notice and opportunity for public comment, and environmental review for all applications.*

The applicant has not conducted a public outreach process but is willing to as part of docketing. However, the Council's recent work around MHA demonstrates strong public support for increased density and infill development generally.

8. Has the proposed amendment been considered before by the Council? If so, when was it considered and what was the outcome? If the amendment has been previously rejected, please explain either:

- How the proposal has changed since it was last rejected, or

- Changed circumstances since the proposal was last considered that support reconsideration of the proposal.

Council has not previously considered this proposal.

Submit the application electronically via email at [compplan@seattle.gov](mailto:compplan@seattle.gov)

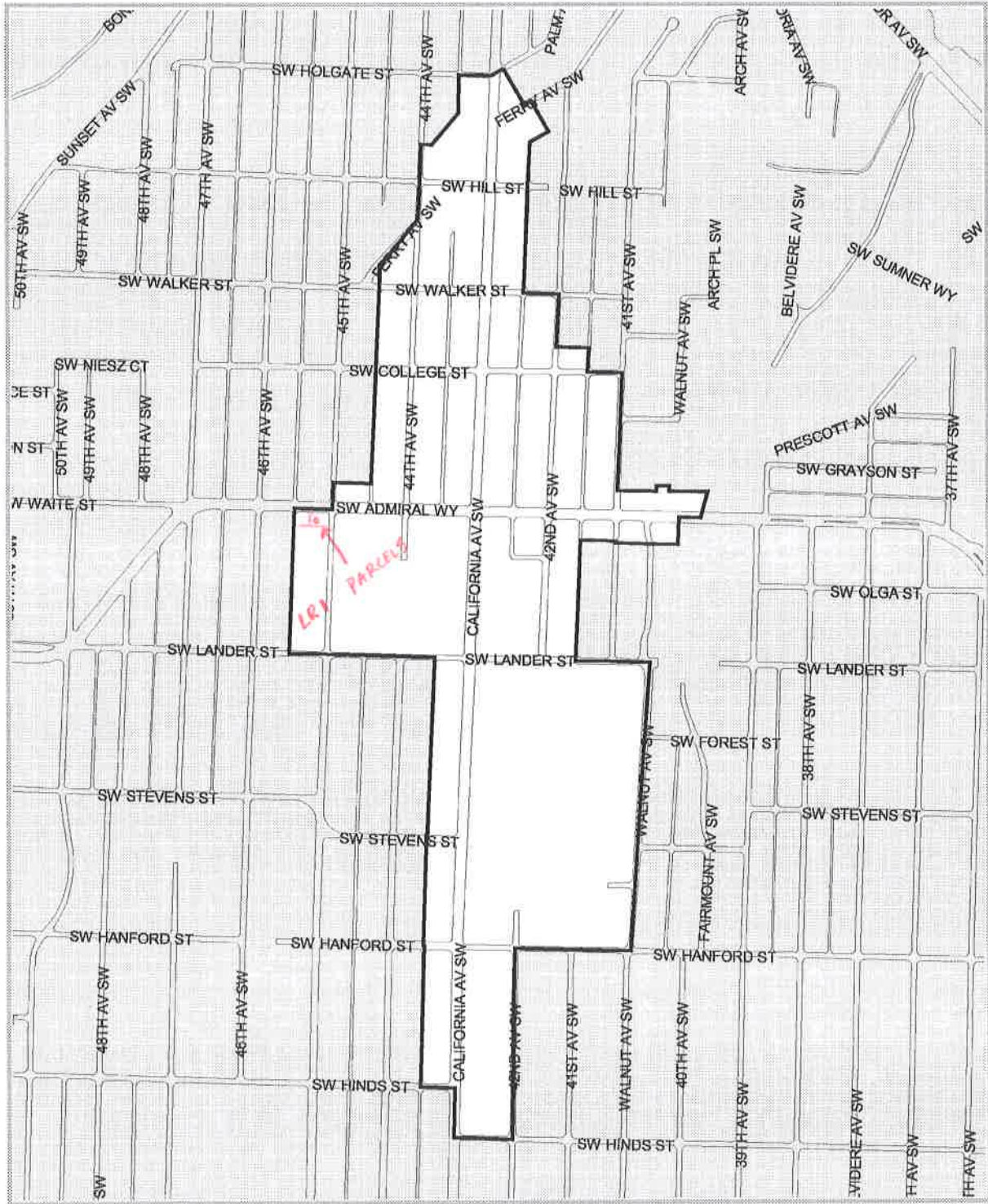
***Questions?***

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ADMIRAL  
Residential Urban Village



— VILLAGE BOUNDARY  
— EDGE OF PAVEMENT