

City of Seattle

**2020 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 15<sup>th</sup> for consideration in the next annual review cycle.** Any proposals received after May 15<sup>th</sup> will be considered in the future process for the following year. *(Please Print or Type)*

Applicant: **Katie Kendall on behalf of William Budigan** Date: **May 15, 2020**

Email: **kkendall@mhseattle.com**

Street Address: **701 5th Avenue, Suite 6600**

City: **Seattle** State: **WA** Zip: **98104** Phone: **206-812-3388**

Contact person (if not the applicant): **Same**

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):

**The properties fronting the west side of 15th Ave NE between NE 56th St and NE Ravenna Blvd, including Parcel Nos. 5226300005, 5226300010, 5226300014, 5226300015, 5226300020, 5226300025, 5226300030, and 5226300045. See map at the end of the application.**

*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: May 15, 2020

## **REQUIRED QUESTIONNAIRE: Comprehensive Plan Amendment Application**

Please answer the following questions. 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.

**The proposed amendment would extend the University District Urban Center (“Urban Center”) boundary to include eight lots along the western side of 15th Ave NE between NE 56th St and NE Ravenna Blvd (“Properties”) and change the Properties’ Future Land Use Map (“FLUM”) designation from “Multi-Family Residential” to “University District Urban Center.”**

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.

**N/A. The proposal does not propose to change the text of the Comprehensive Plan.**

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.

**The amendment would not require a change to the Seattle Municipal Code. All of the Properties are zoned LR3.**

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.”

Please see attached map. The application seeks to change the FLUM to expand the Urban Center to include following Properties. The current FLUM designation is Multifamily Residential.

The applicant owns the property at 5615 15th Ave NE.

Collectively, the Properties include the following parcels and corresponding addresses listed as well. The types and sizes of existing development, as indicated by King County online records, are also provided.

- Parcel No. 5226300005 (1412 - 1420 NE 56<sup>th</sup> Street)
  - 4120 sf lot; 2-story, 6-unit, 3104 net sf apartment building.
- Parcel No. 5226300010 (5607 15th Ave NE)
  - 4120 sf lot; 2-story, 5-unit, 3400 net sf apartment building.
- Parcel No. 5226300014 (5609 15th Ave NE)
  - 1802 sf lot; 3-story, 2576 net sf rooming house.
- Parcel No. 5226300015 (5611 15th Ave NE)
  - 2281 sf lot; 2-story, 2682 net sf rooming house
- Parcel No. 5226300020 (5615 15th Ave NE)
  - 4120 sf lot; 1.5-story, 2900 net sf duplex
- Parcel No. 5226300025 (5617, 5617A, 5617B, and 1519 15th Ave NE)
  - 4120 sf lot; 2-story, 4640 net sf rooming house
- Parcel No. 5226300030 (5625 15th Ave NE)
  - 12,360 sf lot; 4-story, 40-unit, 23,000 net sf apartment building.
- Parcel No. 5226300045 (1413 NE Ravenna Blvd NE)
  - 12,063 sf lot; 4-story, 38-unit, 17,625 net sf apartment building.

Together, the Properties comprise eight parcels containing more than 90 dwelling units along with three multi-story rooming houses. Including these developments in the Urban Center would significantly advance multiple goals of the Comprehensive Plan for the reasons described below and is consistent with the intent of Policy LU 1.5.

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

**N/A; this amendment proposes a change to the FLUM only.**

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.

**Please see the explanation provided at the end of this application.**

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 amendment would (1) better reflect the nature of existing development of the properties that includes two buildings that currently exceed maximum FAR limits, other apartments and rooming houses; (2) increase future housing capacity because of the greater height and FAR available to LR3-zoned apartment developments in the Urban Center; and (3) better align with the surrounding development in the neighborhood. Currently, LR3 zoning would allow a maximum height of 30 feet and a maximum floor-area-ratio (FAR) of 1.2 on the site. If the site were included within the Urban Center, LR3 zoning would allow up to 40 feet in building height and a FAR of 1.5. Changing the FLUM is the most efficient and least disruptive way to further these goals and reflect existing circumstances.**

**In addition, this Properties are proposed to be rezoned to LR3(M) under the proposed Mandatory Housing Affordability rezone for the University District, C.B. 119483. This potential future rezone, combined with a new Urban Center designation for these Properties, would add additional necessary housing capacity and allow the projects to contribute to affordable housing through providing affordable units on site or paying into the City's affordable housing fund. There is currently no requirement for an applicant to provide affordable housing if any of the Properties are redeveloped.**

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.

**We do not anticipate negative impacts due to the proposed amendment. First, the proposed inclusion of this half-block into the Urban Center better reflects existing development. Based on our review of King County property records, two properties on the half-block have an effective FAR above what is currently permitted in the zone: of approximately 1.86 FAR (Parcel 5226300030), and 1.46 FAR (Parcel 5226300045) respectively.<sup>1</sup> These buildings are indicative of the types of buildings permitted in the Urban Center in an LR3 zone, which has a FAR of 1.5. Secondly, there are no proposed development plans associated with this proposed amendment.**

**As explained in greater detail in response to Question 6, a positive benefit of this proposal is that the amendment would increase the housing supply and capacity in the Urban Center, consistently with numerous goals and policies in the plan. The Plan consistently recognizes that compact, dense neighborhoods such as this one facilitate**

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<sup>1</sup> The estimate of FAR is approximate as it is using King County net floor area and not chargeable gross floor area under the Seattle Municipal Code.

housing affordability, transit use, and access to services. In addition to furthering these goals, including the Properties in the Urban Center would provide greater consistency between existing development and applicable land-use designations and requirements.

In addition, eight properties across the street to the east (the “Eastern Properties” - Parcel Nos. 8615800065, 8615800070, 8615800075, 8615800075, 8615800076, 8615800077, 8615800078, 8615800080, and 8615800085, located along the east side of 15th Ave NE between NE 56th St and an alley) are zoned LR3(M). This zoning designation means that maximum height and FAR for the Eastern Properties already exceeds the development capacity available to the Properties. See SMC 23.45.510, Table A; SMC 23.45.514, Table A. Because the Eastern Properties are located directly between the Properties and an adjacent single-family neighborhood further to the east, this zoning disparity undermines the goal of creating a smooth transition between the Urban Center and nearby less-dense neighborhoods. See Policy LU 1.4. The amendment would address this disparity as well.

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/performancestrategybudget/regional-planning/CPPs.aspx>).

The proposal complies with the Comprehensive Plan’s goals and policies as explained below, with some responses addressing more than one goal or policy at the same time:

- **GS 1.1 Designate places as urban centers . . . based on the functions they can perform and the densities they can support.**

*Response: The City’s adopted growth strategy provides that urban centers are dense neighborhoods that offer a “diverse mix of . . . housing . . . opportunities,” and it requires the City to “ensure there are opportunities for all households to find housing and employment in” urban centers and urban villages. See Comprehensive Plan at 23. The Properties already contain a diverse mix of multifamily housing – including two large and two small apartment buildings, three rooming houses, and a duplex. The area containing the Properties is also consistent with the guidelines for designating urban centers as described in Growth Strategy Figure 1, at page 25 of the Comprehensive Plan. If the Properties are added to the Urban Center, the Center’s area (currently 752 acres) would remain well below the 960-acre maximum. The Properties (like other portions of the Urban Center) would be slightly further*

than 0.5 miles of the future U District light rail station, but they would also be very close to the future Ravenna Station, enabling them to contribute to the overall Center goals of facilitating multimodal connections to surrounding neighborhoods. The City's adopted Bicycle Master Plan also designates Ravenna Blvd NE and 15th Ave NE in the area of the Properties for the planned installation of protected or separated bike lanes.

Moreover, the City has already determined that the Properties exhibit the characteristics associated with an urban center. The Properties were assigned their current LR3 zoning designation in Ordinance 123495 (Att. B, Map 60). The same Ordinance established the current LR3 zoning criteria, meaning that in designating the Properties LR3, the City expressly found the Properties to be capable of "provid[ing] opportunities for a variety of multifamily housing types." SMC 23.34.020.A.1. This designation also required the City to find that the Properties are generally consistent with the characteristics listed in SMC 23.34.020.B, which include:

- containing "a mix of structures of low and moderate scale"
- being located "near neighborhood commercial zones with comparable height and scale"
- being "well served by public transit"
- providing a "transition in scale" between lower-density residential and more intensive commercial zones
- containing street widths that provide sufficient access and parking opportunities"
- being "well supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers, and [with] good pedestrian access to these facilities"

In addition to reflecting the Properties' established ability to support multifamily density and residential function, the LR3 designation is expressly intended to apply to areas capable of "accommodat[ing] redevelopment in areas within urban centers . . . in order to establish multifamily neighborhoods of moderate scale and density." SMC 23.34.020.A.2. Because the same SMC 23.34.020.B criteria are used to determine whether properties are appropriate for both of the LR3 zone's "dual functions," the current zoning designation likewise establishes that the City has already determined the Properties to be capable of accommodating redevelopment in an urban center.

- **GS 1.2 Encourage investments and activities in urban centers . . . that will enable those areas to flourish as compact mixed-use neighborhoods designed to accommodate the majority of the city's new jobs and housing.**
- **UC-G1 Stable residential neighborhoods that can accommodate projected growth and foster desirable living conditions.**
- **UC-G4 A community in which the housing needs and affordability levels of major demographic groups, including students, young adults, families with children,**

**empty nesters, and seniors, are met and which balances homeownership opportunities with rental unit supply.**

*Response: All of the Properties contain existing multifamily development or rooming houses. Including them in the Urban Center would increase the supply of diverse housing options and thus increase the Urban Center's ability to thrive as a mixed-use neighborhood. Because the Properties are collectively bordered both to the west and to the south by the current Urban Center boundary, their inclusion would not detract from the compact nature of the Urban Center overall.*

*Six of the properties could accommodate a greater number and/or size of dwelling units than they currently contain, and that capacity would only be increased by the greater FAR and height limits applicable to LR3-zoned apartment buildings within the urban center. See SMC 23.45.510, Table A; SMC 23.45.514, Table A. Therefore, including the Properties in the Urban Center would increase the ability of the urban center to accommodate new housing and flourish as a mixed-use neighborhood. As shown in Land Use Appendix Figure A-2, at page 421 of the Comprehensive Plan, the University District Urban Center currently has capacity for 8,406 additional housing units – the second lowest of the City's six urban centers and lower than the capacity of two hub urban villages. The Properties' current zoning would allow for additional housing capacity and thereby facilitate increased density in the urban center.*

- **GS 1.3 Establish boundaries for urban centers . . . that reflect existing development patterns; potential access to services, including transit; intended community characteristics; and recognized neighborhood areas.**

*Response: Because the current Urban Center boundary leaves the Properties out – despite the fact that the Properties share the same zoning and a similar mix of housing stock with neighboring properties to the south and west – the boundary's present location fails to reflect existing development patterns or the neighborhood area in which the Properties are located. Indeed, based on our review of King County property records two of the Properties currently exceed the maximum allowable FAR of 1.3 for LR3-zoned properties located outside of urban centers: the apartment building on Parcel 5226300045 has a net square footage of 17,625 sf and a lot size of 12,063 sf for an approximate FAR of 1.46; and the apartment building on Parcel 5226300030, which has a gross square footage of 23,000 s.f. and a lot size of 12,360 s.f. for an approximate FAR of 1.86.<sup>2</sup> These buildings are indicative of the types of buildings permitted in the Urban Center in an LR3 zone, which has a FAR of 1.5. Indeed, one apartment continues to exceed this FAR limit even in an Urban Center under the current zoning. Thus, adding these properties to the Urban Center would more accurately reflect their current characteristics than would keeping them separate. Overall, the Properties'*

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<sup>2</sup> As noted above, the estimate of FAR is approximate as it is using King County net floor area and not chargeable gross floor area under the Seattle Municipal Code.

*existing mix of development is consistent with the intended community characteristics of dense, varied housing. And as established by the LR3 designation as well as by adjacent properties already included in the urban center, the Properties enjoy good access to services, including transit.*

*In addition, as described above in response to Question 5, the amendment would better reflect existing development patterns and zoning designations by facilitating a smoother transition between the Urban Center and the lower-density residential neighborhoods to the east.*

- **GS 1.6 Plan for development in urban centers and urban villages in ways that will provide all Seattle households, particularly marginalized populations, with better access to services, transit, and educational and employment opportunities.**

*Response: Although the Properties already contain a mix of building types that provide a variety of housing option, the existing LR3 zoning allows for even more housing capacity than currently exists. Including the Properties in the Urban Center will ensure that any future redevelopment will contribute to increased housing stock in the Urban Center more generally. Increased housing supply provides a particular benefit to marginalized populations for whom denser and more affordable housing are needed and will facilitate access to services, transit, and educational and employment opportunities.*

*In addition, including the Properties within the Urban Center would increase the maximum allowable height and FAR only if the Properties were used for apartments. See SMC 23.45.510, Table A; SMC 23.45.514, Table A. Thus, the boundary expansion would specifically encourage additional development that would increase the supply of the most affordable type of housing.*

- **GS 1.7 Promote levels of density, mixed-uses, and transit improvements in urban centers and villages that will support walking, biking, and use of public transportation.**
- **UC-G3 An efficient transportation system that balances different modes, including public transit, pedestrian, bicycle, and automobile, and minimizes negative impacts to the community.**
- **UC-P8 In pursuit of Comprehensive Plan Policies Transportation Policies, emphasize comfortable, safe, attractive pedestrian and bicycle access throughout the center, especially those routes identified in citywide modal plans**
- **UC-P9 Take advantage of Sound Transit improvements and coordinate local transportation needs and impacts and facilitate intermodal connections, such as bus, streetcar, bicycle, pedestrian travel, and surface vehicle traffic.**
- **UC-P10 Work with King County Metro and Community Transit to create efficient bus circulation. Address bus layover impacts, bus routing, and transfer issues as well as street improvements to facilitate transit.**



*Response: The Properties already contain varying types of multifamily housing, comprising more than 90 individual dwelling units as well as rooming-house rooms on just half a block. This kind of residential density directly facilitates transit improvements and encourages walking, biking, and use of public transportation. Amending the boundary to include the Properties will ensure that this density directly contributes to the Urban Center. As noted above, the Properties will be within walking distance of two future light rail stations, and they front two streets designated for additional bicycle infrastructure by the Bicycle Master Plan.*

- **UC-G6 A community that builds a unique physical identity on its historical and architectural resources, attractive streets, university campus, and special features.**
- **UC-G12 A community where the historic resources, natural elements, and other elements that add to the community's sense of history and unique character are conserved.**

*Response: The diverse mix of building types and architecture on the Properties will contribute to the unique physical identity of the Properties' neighborhood and the urban center more broadly. Including the Properties in the Urban center boundary would allow only moderate increases in maximum height and FAR; it would not allow an increase in residential density or alter the setback requirements applicable to new developments, ensuring that the physical character of the neighborhood is conserved.*

- **UC-P1 In pursuit of Comprehensive Plan Housing element policies, encourage lower density housing types in the Roosevelt, University Heights, and Ravenna areas of the community, with options at a variety of affordability levels.**

*Response: The Properties' LR3 zoning limits them to the lower densities applicable to the area around NE Ravenna Blvd – indeed, LR3 is the second-least-intense zoning permitted in the entire Urban Center. The mix of multifamily dwelling units and rooming houses currently on the Properties will increase the variety of affordable housing options available in this area of the Urban Center, which currently contains a lower number of dwelling units than other areas due to its less-intensive zoning.*

- **UC-P7 Involve the community and contiguous neighborhoods in the monitoring of traffic, and the identification of actions needed to preserve the multimodal capacity of the principal arterial streets, to accommodate projected growth and protect residential streets from the effects of through-traffic.**

*Response: By designating the Properties LR3, the City has already determined that they have "street widths that are sufficient for two-way traffic and parking along at least one curb"; that they are "well served by public transit"; and that they have "direct access to arterial streets that can accommodate anticipated vehicular circulation, so that traffic is not required to use streets that pass through lower density residential zones." See SMC*

23.34.020.4, 5, 6. Because the Properties all face 15th Ave NE, which is an arterial, and are bounded to the rear by an alley separating them from other LR3-zoned properties, including them in the urban center will not contribute to traffic in lower-density residential zones.

- **UC-P12 Employ a variety of strategies to effectively provide for identified housing needs, including preservation of some existing housing while accommodating growth with a diversity of unit types, sizes, and affordability.**

*Response: Expanding the boundary to include the Properties would add 89 apartment units, three rooming houses, and two duplex units to the Urban Center, providing a high degree of diversity of unit types, sizes, and affordability on only 8 additional lots. The age and condition of existing development on the Properties vary, and the two larger apartment buildings are currently nonconforming with respect to residential density limitations. Thus, it is very likely that a significant amount of existing, dense housing on the Properties will be preserved even if some of the lots are redeveloped.*

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: Please attach any letters of support for the amendment or other documentation of community support or concerns. The City will provide public notice and opportunity for public comment, and environmental review for all applications. As it reviews docketed amendment proposals, the City may request additional community engagement by applicants on an as needed basis.*

**Response: The amendment would affect the immediate area only and would not have a citywide impact. The applicant has begun discussing the amendment informally with owners of neighboring Properties and has obtained support from at least one neighboring property thus far and is continuing outreach.**

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.

**Response: The amendment has not previously been considered by the Council.**

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## 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 legal under state and local law.

**Response: The amendment is legal.**

- 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.

**Response: A FLUM is a component of the Comprehensive Plan under GMA.**

2. It is consistent with the Countywide Planning Policies and the multi-county policies contained in the Puget Sound Regional Council's Vision 2040 Strategy.

**Response: The FLUM change is consistent with the CPPs and PSRC's Vision 2040 for similar reasons as explained above regarding the goals and policies of the Comprehensive Plan. Specifically, the amendment is consistent with policies including the following:**

- CPP EN-16 ("Directing growth to Urban Centers and other mixed use/ high density locations")
- CPP DP-4 ("Focus housing growth within countywide designated Urban Centers and locally designated local centers")
- CPP DP-30 ("Urban Centers will be limited in number and located on existing or planned high capacity transit corridors")
- CPP DP-31(b)(iii) (allow designation of urban centers in areas where zoning allows a minimum of 15 housing units per gross acre)
- CPP DP-32 (adopt policies to promote a "range of affordable and healthy housing choices" within the urban center)
- CPP H-4 ("Provide zoning capacity . . . sufficient to accommodate . . . housing growth targets in designated Urban Centers.")
- CPP H-5 ("Adopt policies, strategies and actions [that will address] housing supply, including affordable housing and special needs housing, within Urban Centers")
- Vision 2040 p. 68 ("Within the central Puget Sound region emphasis is placed on directing housing and jobs into centers — that is, places designated for higher densities and a mix of land uses.")
- Vision 2040 MPP-H-5 ("Expand the supply and range of housing, including affordable units, in centers throughout the region.").

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

**Response: The Properties can only be included in the Urban Center through a FLUM amendment; no zoning or regulatory change is sought.**

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

**Response: No budget or program decision could include the Properties in the Urban Center.**

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.

**Response: It is appropriate to consider the amendment via this amendment process. The amendment is consistent with the Properties' existing zoning; with well-established goals of the Comprehensive Plan; and with policies and goals established through the neighborhood planning process.**

- 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;

**Response: The Council has sufficient information to make an informed decision – in particular, as described above, the fact that the Council has already chosen to zone the Properties LR3 because they possess characteristics consistent with inclusion in an urban center.**

2. 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;

**Response: There is no reason why City staff cannot conduct sufficient analysis of this proposed change to conduct adequate public review. The amendment does not require changes to the Code or to the text of the Comprehensive Plan.**

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; and

**Response: The amendment is consistent with the vision of the Comprehensive Plan, which focuses on increasing housing supply, directing future growth, and facilitating dense, mixed-use, transit-friendly neighborhoods in urban centers. The diverse mix of housing and zoned capacity on the Properties will directly contribute to each of these goals.**

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

**Response: The amendment has not previously been proposed.**

- 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.

**Response: The amendment would only amend the FLUM; it would not change the substance of the neighborhood plan. See Comprehensive Plan, p. 197 (definition of “neighborhood plan” is “Goals and policies adopted in the Comprehensive Plan.”). However, as the request expands the boundary of the Urban Center, the amendment would change the map of the University Community Urban Center found in the 1998 University Community Urban Center Plan. The applicant has reached out to the neighbors whose properties would be subject to the amendment and intends to conduct the type of broader outreach contemplated by this criterion but has not begun the formal process of doing so.**

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

**Response: The amendment would increase the zoned capacity for the number and/or size of apartment units on all of the Properties. In particular, it would bring buildings on two of the properties either into or closer to compliance with existing FAR limitations, particularly if the Properties are rezoned LR3(M). This would increase the ability of a future owner to redevelop these properties without reducing housing supply in the area.**

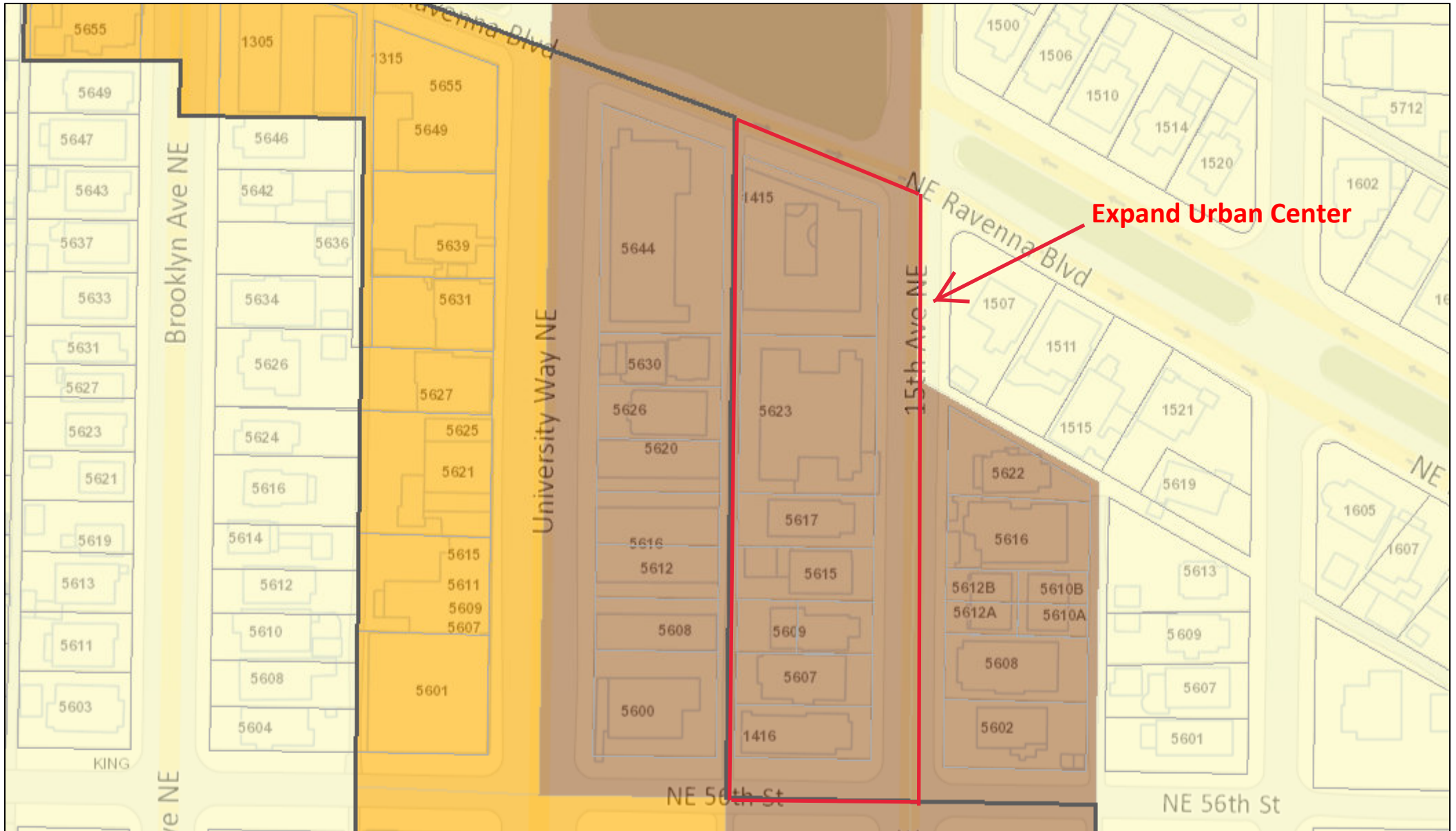
- G. A proposal that would change the boundary of an urban center, urban village, or manufacturing/industrial center requires an amendment to the Future Land Use Map (FLUM), regardless of the area’s size. However, an amendment that proposes to change the FLUM is not necessary and will not be considered 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.

**Response: This proposal requests a change to the boundary of the urban center and therefore a FLUM amendment is required. In addition, the amendment covers an area that is of a similar size or larger than full blocks in many parts of the City, including the blocks immediately to the south between NE 55th and NE 56th Streets. The Properties are adjacent to both multi-family and less-compatible single-family uses. The amendment is consistent with this criterion.**

**Expand the University Community Urban Center to include Properties west of 15th Avenue NE**



# SDCI GIS Web Map



5/14/2020, 2:26:12 PM

## Urban Centers Villages and Manufacturing Industrial Centers Zoning

Urban Center

Parcels

Override 1

Override 2

Override 3

