



City of Seattle

Seattle Planning Commission

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January 24, 2012

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

RE: Recommendations for 2011-2012 Comprehensive Plan Amendments

Dear Councilmember Conlin,

As you are aware, the Planning Commission is the steward of the *Seattle Comprehensive Plan*. The purpose of Seattle's Comprehensive Plan (Comp Plan) is to provide the vision for how Seattle will welcome the anticipated new residents and jobs coming in the next 20 years in a way that promotes a resilient economy and livable neighborhoods. The Comp Plan does this by directing most new growth toward urban centers and urban villages. It includes policies that describe how the City intends to direct jobs and housing growth while providing the necessary transportation and other infrastructure that the Commission considers essential components of livability. We are pleased to provide you with our comments and recommendations on the proposed amendments.

In addition to this annual amendment process, the City is engaged in a larger update of Seattle's Comp Plan mandated by Washington state law. This update will provide an opportunity for Seattle to revisit and realign framework goals and policies to meet new and significant challenges facing Seattle. The Commission has been working collaboratively with executive staff to begin identifying important challenges and issues that should be addressed in the update process.

Especially because of the current efforts to update and streamline the Comp Plan, to be completed in 2015, the Commission is holding any additions to the Plan to a very high bar. As your steward of the Comp Plan, SPC encourages the Council to use the same strict threshold for any changes to the Comp Plan that fall outside the scope of the major update.

RECOMMENDATIONS ON PROPOSED AMENDMENTS

A. Container Port Element

Commission Recommendation & Comments: **Adopt as Proposed**

State law (RCW 36.70A) requires Seattle and other cities with a qualifying marine container port in their jurisdiction to include a container port element in their comprehensive plans recognizing the vital contribution that the marine cargo economic sector makes to the city, regional and state overall economy, tax base and family wage job base. In 2010, during one of the biggest recessions in history, the Port of Seattle

posted record numbers in cargo shipments both in imports and exports. This was one of the few bright spots in the regional economy. Cargo handled at the Port of Seattle's seaport generates over 135,000 jobs for Washington, and creates more than \$2 billion in annual business revenue for the region.

This new element of the Comp Plan specifically recognizes the value, contribution, and importance of Seattle's marine cargo sector by ensuring that city land use, transportation, and economic development policies and investments are aligned to support and strengthen this sector.

The Planning Commission spent a significant amount of time reviewing and analyzing this proposal in the 2010/2011 cycle and forwarded a host of technical edits and suggested changes to City staff for consideration. We support this adopting this amendment as proposed.

B. Lake-to-Bay Loop Addition to the Urban Trails System Map

Commission Recommendation & Comments: Do Not Approve

While the Commission strongly supports the Lake-to-Bay Loop as an essential pedestrian and bicycle route that deserves attention and resources, our analysis and review of this amendment leads us to conclude that in its current format, the Urban Trails System Map is no longer relevant nor useful as a component of the Comp Plan. First, our analysis revealed that "urban trail" is not defined anywhere in the Comprehensive Plan. Additionally, the map is obsolete and wrought with inconsistencies; it also fails to provide any kind of policy or capital investment planning direction.

Recognizing the potential value of a Lake-to-Bay Loop, in light of the pending update to the Comp Plan **we propose that the Urban Trails Map be removed or at the very least reconfigured** in a way that distinguishes between trails and roads and brings it in concurrence with more recently developed maps established for planning and capital investments in both the Pedestrian Master Plan and Bicycle Master Plan.

C. Updated Policies to be Consistent with the Urban Forest Management Plan

Commission Recommendation & Comments: Approve

The proposal appropriately seeks to provide clearer direction and consistency in City policies in managing the urban forest. We support the use of the proposed citywide average as a measurement for tree canopy coverage. We look forward to working closely with you this year to develop new tree regulations that will help Seattle achieve the goals outlined in the Comp Plan and the Urban Forest Management Plan. *(Note: there is a small typographical error in the proposed language in the revised policy E23. The first comma should be removed.)*

D. Policy for Long-term Homeless' Encampments

Commission Recommendation & Comments: Do Not Approve

The Commission recognizes that the City wants to think and act in a pragmatic way on the issue of transitional encampments. We concur that long-term homeless encampments are one of the least desirable solutions to homelessness while we recognize that hosted, well-run encampments with clear and specific operating rules have provided some individuals with a supportive and stable environment than current alternatives.

With regard to the proposed amendment, it is our determination that there is no need to amend the Comprehensive Plan. The city already has a legislative solution that allows for the permitting of a "Transitional Encampment" in any zone in the city, including industrial zones, because encampments are defined as a special and not residential use, the latter of which is not permitted in an industrial zone.

However, the Planning Commission feels that industrial zones do not make good places for siting long-term homeless encampments. These areas of the city often lack access to other goods and services needed by the

people who live in them, and are more likely to expose individuals to the public safety hazards sometimes associated with industrial business operations. We also have a fundamental problem with the message it sends if the city puts its homeless population “out of sight” from other residents in an industrial site.

E. Roosevelt Residential Urban Village Future Land Use Map Amendment

Commission Recommendation & Comments: Approve

We concur that the proposed change is consistent with the Urban Village, Housing and Neighborhood Planning goals and policies. We support this change to the future land use map and would support the future proposal to rezone this area in the land use code.

F. Modify Potential Annexation Area(s)

Commission Recommendation & Comments: Approve

We support the addition of the “Sliver by the River” to Seattle’s Potential Annexation Area (PAA) and look forward to continuing to work with the City to determine whether or not this area is annexed by Seattle. We also support updating the North Highline PAA to reflect that the specified area has been annexed by the City of Burien.

G. Minimize Damage from Heavy Vehicles

Commission Recommendation & Comments: Do Not Approve as Proposed

Acknowledging the need for resilient infrastructure, we find that the language of the amendment as proposed is vague, and, moreover, as currently worded its implementation could have unintended consequences. The proposed policy removes what was previously implied in Policy T8, which is that streets are a necessary element of urban infrastructure and that, in this role, they should accommodate the variety of vehicle types and weights that are necessary for the provision of a robust bus transit system; efficient movement of freight and cargo; and the collection of garbage, recycling, and yard waste. Seattle’s Transportation Strategic Plan provides specific strategies for achieving the goals of the street system. Other functional plans, such as the Transit Master Plan, more specifically guide roadway design standards consistent with their intended function. The Commission is concerned that the proposed policy could leave opportunity to argue against the need for heavy freight corridors, transit vehicles, and other vehicles that provide essential services to city residents.

As such, the Commission proposes the following revised policy T8:

“Design a resilient street system that accommodates freight, transit needs and city services in order to prevent and reduce excessive road damage.”

H. “South of Charles” Future Land Use Map Amendment

Commission Recommendation & Comments: Do Not Approve

We concur with DPD’s recommendation not to approve this proposal. This area was recently analyzed as part of the Livable South Downtown Planning Study. After several land use options were thoroughly explored and many thousands of hours of stakeholder and public outreach were conducted, this area was rezoned from IG2 zoning to IC allowing for heights up to 160 feet and FAR up to 3.5. Much greater intensity of office uses are allowed as well as industrial use, including ‘clean tech’, research and development, and an assortment of other uses already allowed and defined in the land use code. In addition, the decision was to retain this area within the MIC designation. The new zoning for this area was passed one year ago after five years of study, analysis, and outreach, and we feel it imprudent to reverse the resulting decision.

I. Per Capita Emission Reduction Goal and Added Reduction Targets for the Transportation, Buildings and Solid Waste Element

Commission Recommendation & Comments: Defer

We concur with DPD's recommendation that this proposal be deferred to ongoing work on the Climate Action Plan (CAP) in order to more fully vet the information outlined in the technical feasibility studies with experts, stakeholders, and the community in reaching and defining the CAP and Comp Plan policies.

J. Ballard II, LLC Future Land Use Map Amendment

Commission Recommendation & Comments: Do Not Approve

We concur with DPD's recommendation. The Planning Commission has been deeply engaged in the analysis and review of Seattle's industrial zoning policies for many years and will continue to work closely with the City on the 15th Avenue corridor study that is considering appropriate uses along this corridor and whether changes to the boundary of the BINMIC or to the current zoning are appropriate.

K. Port 106 Future Land Use Map Amendment

Commission Recommendation & Comments: Do Not Approve

We concur with DPD's recommendation. As stated above we will continue to work closely with the City on the 15th Avenue corridor study that is considering appropriate uses along this corridor and whether changes to the boundary of the BINMIC or to the current zoning are appropriate.

L. AnMarCo Future Land Use Map Amendment

Commission Recommendation & Comments: Do Not Approve

We concur with DPD's recommendation, but we would support an analysis of the existing IG2 zoning to consider whether IC zoning would be more appropriate as a transition between the residential and industrial uses. Such close proximity to the Port operations and its round-the-clock light and noise would make this property inappropriate for residential use. However, we recognize that this site is unique in that it is situated on a shoreline, directly adjacent to heavy industrial port operations on one side and restaurants on the other. Directly behind this site just beyond the Port's sound barrier improvements and within a few feet are residential properties. All of these factors suggest that although residential uses would be inappropriate here, the heavy industrial uses associated with the current IG2 zoning designation should be reconsidered.

We recognize that such an analysis is not currently within the scope of DPD's 2012/2013 work plan and note that either the budget would need to be revised to accommodate such a review by the City, or the land owner could apply for a contract rezone.

M. Mozzami Future Land Use Map Amendment

Commission Recommendation & Comments: Do Not Approve

We concur with DPD's recommendation. In particular, we were concerned by the proponent's lack of public outreach in proposing this amendment.

Thank you for the opportunity to provide you with our recommendations regarding the 2011/2012 Comprehensive Plan amendment process. Please contact me or our Director, Barbara Wilson, at (206) 684-0431 if you have further questions.

Sincerely,



Leslie Miller, Chair
Seattle Planning Commission

cc: Mayor Mike McGinn
Seattle City Councilmembers
Darryl Smith, Ethan Raup, David Hiller, Michelle Scoleri, Rebecca Deehr; Mayor's Office
Ben Noble, Rebecca Herzfeld, Ketil Freeman, Council Central Staff
Diane Sugimura, Marshall Foster, Tom Hauger, Patrice Carroll; DPD
Peter Hahn, Tracy Krawczyk; SDOT
Bernie Matsuno, Department of Neighborhoods
Rick Hooper, Office of Housing
Steve Johnson, Office of Economic Development

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL:

- Commissioner Josh Brower disclosed that his firm, Veris Law Group PLLC, represents single and multi family developers throughout the city of Seattle.
- Commissioner David Cutler disclosed that his firm, GGLO, designs projects and advises clients that may be impacted by amendments to the Comprehensive Plan. He added that GGLO is also working with the Roosevelt Development Group on a project within the Roosevelt Urban Village boundary.
- Commissioner Mark Johnson disclosed that his firm, ESA, has the Port of Seattle and Sound Transit as clients.
- Commissioner Colie Hough Beck disclosed that her firm, HBB, works on commercial, multifamily, and infrastructure projects throughout the city and that the Port of Seattle is a client.
- Commissioner Martin Kaplan disclosed that his firm, MHK Architects, works on projects throughout the city. He added that he has served on the stakeholder group for the Lake-to-Bay Loop.
- Commissioner Jeanne Krikawa disclosed that her firm, The Underhill Company, is on a consultant for team for a Sound Transit project.
- Commissioner Amalia Leighton disclosed that her firm, SvR Design Company, works on both public and private projects throughout the city and that the Port of Seattle has been a client.
- Commissioner Chris Persons disclosed that his firm, Capitol Hill Housing, develops affordable housing throughout the City.
- Commissioner Sarah Snider disclosed that her firm, LMN, does urban design and various types of architectural projects in the Seattle metropolitan area.

Housing Element goals/policies related to Homelessness

H45 Pursue a comprehensive approach of prevention, transition and stabilization services to decrease potential homelessness, stop recurring homelessness and promote long-term self-sufficiency.

- a. Encourage efforts to expand the supply of extremely low-income, permanent housing to meet the needs of those for whom the cost of housing is a chief cause of homelessness.
- b. Strive to develop a continuum of housing opportunities, ranging from emergency shelters to transitional housing to permanent housing, in order to assist homeless households regain and maintain stable, permanent housing.
- c. Strategically invest in emergency and transitional housing for specific homeless populations.

H46 In recognition of the fact that for certain people housing support services can mean the difference between housing stability and homelessness, coordinate housing planning and funding, where appropriate, with the following types of housing support services:

- Services that respond to emergency needs of the homeless (such as emergency shelters).
- Services that assist clients to secure housing (such as rent and security deposit assistance, housing relocation assistance).
- Services that help clients to maintain permanent housing (such as landlord/ tenant counseling, chore services, in-home health care, outpatient mental health treatment, employment counseling and placement assistance).

H47 Work in partnership among various levels of government and with other public agencies to address homeless and low-income housing needs that transcend jurisdictional boundaries.

- a. Work with the federal and state governments to increase public support for housing.
- b. Work with the Seattle Housing Authority to address the low-income housing needs of Seattle residents.
- c. Work with other jurisdictions in King County to pursue production of assisted low-income housing throughout the region and an equitable distribution of the cost of providing housing and human services to very-low-income households, including the regional problem of homelessness. Pursue the development of new funding sources, including a regional housing levy or other sources of funding for low-income housing and related supportive services that may be used throughout the region.
- d. Continue providing local resources (such as levies, bond issues and the City's general fund) to meet housing needs, leveraging funds from other sources where appropriate.
- e. Continue to lobby the state government to enact tax incentives and to increase housing funds to encourage the preservation of existing low-income housing.