



City of Seattle

Seattle Planning Commission

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June 20, 2012

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

RE: Docket Setting for Proposed 2012-2013 Comprehensive Plan Applications

Dear Councilmember Conlin,

The Seattle Planning Commission (SPC) is pleased to provide you with our comments and recommendations about the proposed Comprehensive Plan amendments that should be placed on the docket for further analysis; we have also outlined areas we suggest be considered as the review process moves forward. Our recommendations are based on our responsibility as stewards of the *Seattle Comprehensive Plan* and thorough application of Council adopted criteria, *Guidelines for Amendment Selection*¹, that are included in Resolution 30976.

Seattle's Comprehensive Plan – Purpose

Seattle's Comprehensive Plan (Comp Plan) provides the vision for a vibrant economy and livable neighborhoods as Seattle welcomes new residents and jobs. The Comp Plan does this by directing most new growth to places designated as urban centers or urban villages. It includes policies that describe how the City intends to provide the necessary transportation and other infrastructure to support new jobs and housing.

Updating the Comprehensive Plan - New Challenges, New Opportunities

In addition to this annual amendment process, the City is engaged in a major update of the Comp Plan as mandated by Washington state law. This update provides an opportunity for the community to revisit and realign framework goals and policies to meet new and significant challenges facing Seattle.

The Commission has been working to identify big challenges and issues that should be addressed in the update process:

- The anticipated arrival of 75,000 new households and 115,000 new jobs to the city in the next 20 years is an opportunity to enhance neighborhoods and to improve the safety and vitality of the community.
- Seattle needs significant investments in basic service infrastructure, civic institutions and public realm. These investments must align with future growth.
- Seattle must prepare for climate change and reduce greenhouse gas emissions.
- As demographics and economic circumstances change, the City needs to continue to focus on providing housing that is affordable to a range of ages, incomes, and household sizes.

In addition we believe that, through the update process, the Comp Plan can be made more accessible and transparent by doing the following:

- Make the linkages between the Comp Plan and implementing plans and regulations easier to understand and navigate.
- Resolve conflicts between existing goals and policies and simplify numeric goals.
- Streamline the document, eliminate redundancies, and move to a web-based format.

This update does have some implications with regard to the annual amendment cycle because the City may change and alter the overall approach to the Comprehensive Plan. We have kept this in mind in the 2012/2013 amendment cycle docket setting as reflected in our recommendations and comments below.

RECOMMENDATIONS ON PROPOSED AMENDMENTS

1. Department of Planning and Development (DPD) proposes specific amendments to the Broadview - Bitter Lake – Haller Lake and Rainier Beach neighborhood plans and placeholders for future policies related to climate action, urban design and healthy food.

Commission Recommendation & Comments: INCLUDE in 2012/2013 amendment docket

SPC recommends separating the five different topics into discrete amendments:

- (1) goals and policies related to the Climate Action Plan update,
- (2) a new Urban Design Element,
- (3) goals and policies related to healthy food,
- (4) Broadview-Bitter Lake-Haller Lake Neighborhood Plan update, and
- (5) Rainier Beach Neighborhood Plan update.

We also recommend considering how these five separate amendments fit into the major update to the Comprehensive Plan and its related functional plans.

2. Seattle Planning Commission (SPC) proposes a placeholder for policies to guide implementation of the transit communities framework.

Commission Recommendation & Comments: INCLUDE in 2012/2013 amendment docket

The Commission released its report *Seattle Transit Communities – Integrating Neighborhoods with Transit* in November 2010. Since that time, the Commission has been strongly encouraged by City officials, stakeholders, and civic organizations to advance the concepts, ideas, and actions outlined in the report. This Comprehensive Plan amendment is the first step toward achieving a Citywide Transit Communities Policy/Strategy.

The Comprehensive Plan currently has numerous goals and policies that generally relate to transit communities including the Urban Village Strategy, which is “Seattle’s strategy for accommodating future growth and creating a sustainable city...” The proposed Transit Communities policy will refine the strategy to more explicitly address how to leverage investments in transit by aligning land use strategies and policies and directing public investments toward implementing the essential components of livability.

Line in/line out changes are pending and will be made available to City Council and DPD as soon as possible. In addition, a robust public education and engagement process is planned throughout the summer/ early fall to introduce the concepts of the Transit Community policy as well as engage a diverse group of voices in the details of the policy.

3. The Port of Seattle proposes the addition of a discussion section to the Container Port Element.

Commission Recommendation & Comments: INCLUDE in 2012/2013 amendment docket

This proposal is consistent with the Criteria for Comprehensive Plan Amendment Selection as outlined in Resolution 30976 adopted by Council on May 14, 2007. More detailed analysis will provide clarity about the appropriateness of the proposed additions.

4. The Lake Union Association proposes several amendments to the Economic Development Element to support the recreational boating industry.

Commission Recommendation & Comments: DO NOT INCLUDE in 2012/2013 amendment docket

While the Commission recognizes the value of the recreational boating industry in Seattle’s economy, we would prefer that the proposed amendment be considered within the scope of the major update to the Plan (criteria 1.e.). As the applicant notes, this industry draws tourists to Seattle, as well as provides recreational and employment opportunities for people who live here. The Commission suggests that the proposed amendment be given more broad consideration as the major update to the Plan proceeds.

5. The North Seattle Industrial Association proposes to change the name of all Manufacturing / Industrial Centers to “Maritime / Industrial Centers.”

Commission Recommendation & Comments: DO NOT INCLUDE in 2012/2013 amendment docket

The proposed amendment would make Seattle’s Comprehensive Plan inconsistent with the regional designation of Manufacturing /Industrial Centers (MICs), which would make the Plan inconsistent RCW 36.70A.100 that calls for plans to be coordinated and consistent (criteria 1.a.). Seattle’s MICs were designated through the 1995 update to Vision 2020, and were reaffirmed through the adoption of VISION 2040; not all MICs identified in this plan support maritime industries. Any proposed change to the name of these regionally designated centers would have to be made at the regional level.

Additionally, the proposed amendment is not consistent with Countywide Planning Policies (criteria 1.b.), which also identifies specific goals and policies for Manufacturing/Industrial Centers.

6. The International Longshore and ILWU proposes an amendment and several regulatory changes to prohibit new stadiums in industrial zones that would interfere with adjacent industrial uses.

Commission Recommendation & Comments: INCLUDE in 2012/2013 amendment docket

This proposal is consistent with the Criteria for Comprehensive Plan Amendment Selection as outlined in Resolution 30976 adopted by Council on May 14, 2007.

7. Port 106, LLC proposes to amend the FLUM for property addressed as 1600 W. Armory Way in Interbay to remove the area from the Ballard North End MIC and to change the FLUM designation for the area from Industrial to Commercial / Mixed Use.
8. MoxBay LLC proposes to amend the FLUM to remove an area northwest of the intersection of 15th Avenue West and W. Bertona Street in Interbay from the Ballard North End MIC and to change the FLUM designation for the area from Industrial to Commercial / Mixed Use.
9. Ballard II, LLC proposes to amend the FLUM for an area east of 15th Avenue West between NW 51st Street and NW 48th Street to remove the area from the Ballard North End MIC and to change the FLUM designation for the area from Industrial to Commercial / Mixed Use.

Commission Recommendation & Comments: DO NOT INCLUDE in 2012/2013 amendment docket

Proposed amendments 7 and 9 were considered last year. In our recommendations submitted to Council on January 24, 2012 we concurred with DPD that the proposed amendments should be considered as part of a broader analysis of the 15th Avenue Corridor study. We hold that this planning work, underway with DPD and SDO, is the appropriate process to consider these proposed amendments (criteria 1.e). We recognize that the amendment proponents are frustrated by the slower than anticipated start and progress to date in this planning effort. The City should obtain the necessary resources in order to review these proposals in the appropriate context.

The Commission notes that the proposed amendments would require a change to the Manufacturing/Industrial Center boundary in addition to the FLUM change described within the application. Changing a MIC calls for a higher level of vetting and stakeholder and community engagement than has taken place to date, which is another reason why these proposals should be considered during the 15th Avenue Corridor study (criteria 4).

10. Mr. Knoke propose to add a Pinehurst Urban Village, and he proposes to amend the boundaries of the Northgate Urban Center and Broadview / Bitter Lake / Haller Lake urban village to capitalize on the potential for a light rail station at NE 130th Street.

Commission Recommendation & Comments: DO NOT INCLUDE in the 2012/2013 amendment docket

The proposed amendment, while intriguing, would be better addressed through another process, particularly the major update to the Comprehensive Plan (criteria 1.e.). Designation of two new urban villages and changes to the FLUM of this magnitude would require a more significant planning process as rezones from single-family to other designations typically must initially be identified in a neighborhood plan (criteria 4). The Commission does recognize the importance of coordinating land uses with transit investments and encourages the City to continue coordination with Sound Transit in selecting the location of the light rail station. We also recognize that an urban village designation could influence the siting of the light rail station because it would demonstrate that the area would be a designated growth area to support the light rail transit investment.

Additionally, the proposed amendment does not meet criteria 3.a. or 3.b. The timing of the amendment is such that City staff would not have adequate time to analyze and develop an appropriately detailed plan, rezone analyses, Land Use Code changes, or public review and participation process. City Council would not have sufficient information to make an informed decision about the proposed amendment by early 2013 given the significant FLUM changes proposed.

11. The Eastlake Community Council proposes to amend the Urban Trails System Figure to include a proposed I-5 connector between SR 520 and the Mercer off-ramps in the Eastlake neighborhood.

Commission Recommendation & Comments: DO NOT INCLUDE in 2012/2013 amendment docket

The proposed amendment would be better addressed through another process, particularly the update to the Bicycle Master Plan, which is currently underway (criteria 1.e.). Furthermore, the Commission reiterates the concern, as noted in our Recommendations for the 2011-2012 Comprehensive Plan Amendments, that “the Urban Trails System Map is no longer relevant nor useful as a component of the Comp Plan. 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.” While we recognize that the Urban Trails System was updated in [Ordinance 123854](#) we hold that functional implementation plans, such as the Bicycle and Pedestrian master plans, are the appropriate documents to address these issues, particularly for identifying specific trail connections or segments of missing sidewalks, which cannot be adequately identified on small-scale maps such as Transportation Figure 1.1.

12. Mr. Leman proposes that the Comprehensive Plan include an open and participatory government element or appendix.

Commission Recommendation & Comments: DO NOT INCLUDE in 2012/2013 amendment docket

This is the fifth consecutive year in which the proponent has proposed a new “Open and Participatory Government” element or appendix. While the applications are not identical, they are essentially the same and have not been included on the docket in recent years (criteria 3.d.). The Commission reiterates that the proposed amendment includes policies outside the scope of the Comprehensive Plan as defined by the Growth Management Act (criteria 1.a.).

13. Mr. Leman proposes to amend a policy in the neighborhood planning elements as follows:
N-3 Either community organizations or the City may initiate neighborhood plans with City support, to the extent provided in the City's annual budget. For those neighborhoods that wish to, the City is receptive to continuing the model of the 1990s under which it funds neighborhood organizations to the neighborhood planning process under City contract and according to City guidelines and oversight.

Commission Recommendation & Comments: DO NOT INCLUDE in 2012/2013 amendment docket

The proposed amendment would be better addressed as a budgetary decision (criteria 1.d). It might also be appropriate to consider within the broader context of the major update of the Comprehensive Plan currently underway (criteria 1.e). In recent years the City has taken a broader approach to neighborhood planning which focuses on considering a suite of planning tools (i.e. station area planning, urban design frameworks); the major update will be a great opportunity to clarify the types of planning efforts and appropriate funding sources for planning efforts, including neighborhood planning.

14. Mr. Leman proposes to establish policy DT-TP 8, which “[d]iscourage[s] pedestrian grade separations, whether by skybridge, aerial tram, or tunnel, to maintain an active pedestrian environment at street level,” as applicable to all other urban centers.

Commission Recommendation & Comments: DO NOT INCLUDE in 2012/2013 amendment docket

The proposed amendment would take a policy that explicitly applies to the Downtown Urban Center and create a new policy in the Transportation Element that would apply citywide; this sort of change would be better addressed through a different process on a neighborhood scale (criteria 1.e). The Commission notes that the University of Washington station in the University District Urban Center will include a pedestrian bridge over Montlake Boulevard and that there has long been an interest in creating a pedestrian bridge over I-5 at the Northgate station that would connect to North Seattle Community College. These examples illustrate the need for making context-specific, comprehensive policy decisions based on design, safety, impact to the pedestrian character, and a whole host of considerations (criteria 4). In addition, as noted by the applicant, skybridges are currently subject to the permitting process of SMC 15.64 and reviewed by the Seattle Design Commission.

15. The City Neighborhood Council proposes: “Any changes in the housing and jobs targets for Seattle as a whole and for the individual urban villages and urban centers shall be adopted by ordinance as part of the annual Comprehensive Plan Amendment cycle.”

Commission Recommendation & Comments: DO NOT INCLUDE in 2012/2013 amendment docket

The text of this amendment indicates that DPD has “been changing these jobs and housing targets administratively, without an ordinance...” This is incorrect; all changes to growth targets have been adopted by ordinances amending the Plan. Perhaps as part of the major update, the process for adopting planning estimates can be more clearly explained (criteria 1.e). However, the major update is likely to refer to “planning estimates” rather than “growth targets”, the latter tends to frame growth as something to be accepted or tolerated rather than celebrated and embraced. It seems imprudent to adopt an amendment based on a false assumption that reinforces a negative perspective on growth.

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 2012/2013 Comprehensive Plan amendment process moves forward. Please contact me or our Director, Barbara Wilson at (206) 684-0431 if you have further questions.

Sincerely,



David Cutler, Vice Chair*
Seattle Planning Commission

** SPC Chair Miller is currently on an official Leave of Absence from the Commission so as stipulated by SPC bylaws, the Vice Chair assumes all duties of the Chair including signatory of official SPC letters and position papers.*

cc: Mayor Mike McGinn
Seattle City Councilmembers
Daryl Smith, Ethan Raup, Julie McCoy, David Hiller, Rebecca Deehr; Mayor's Office
Rebecca Herzfeld, Peter Harris, Council Central Staff
Diane Sugimura, Marshall Foster, Tom Hauger, Patrice Carrol, DPD
Peter Hahn, Tracy Krawczyk, SDOT
Rick Hooper, Office of Housing
Bernie Matsuno, Department of Neighborhoods

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL:

- Commissioner Kadie Bell disclosed that her firm, Griffin, Hill & Associates, LLC, is working on urban design in the Broadview-Bitter Lake-Haller Lake neighborhood.
- Commissioner Catherine Benotto disclosed that her firm, Weber Thompson, designs projects and advises clients on development projects throughout the City that could be affected by proposed Comp Plan changes.
- Commissioner Luis Borrero disclosed that his firm, DRiVE, advises clients and projects that could be affected by the proposed changes in the Comprehensive Plan.
- Commissioner Josh Brower disclosed that his firm, Veris Law Group PLLC, represents single and multi family developers throughout the city of Seattle and industrial businesses in the Ballard-Interbay-Northend Manufacturing/Industrial Center. In addition, Commissioner Brower recused himself from all discussion regarding proposed amendment #5.
- Commissioner David Cutler disclosed that his firm, GGLO, designs projects and advises clients that may be impacted by amendments to the Comprehensive Plan.
- Commissioner Colie Hough Beck disclosed that her firm, HBB, works on commercial, multifamily, and public infrastructure projects throughout the city and that the City of Seattle and Port of Seattle are both clients. She abstained from discussion for proposed amendments #1 and #3.
- Commissioner Mark Johnson disclosed that his firm, ESA, has the Port of Seattle and Sound Transit as clients who could be affected by some of the proposed amendments.
- Commissioner Bradley Khouri disclosed that his firm, b9 Architects, designs projects in the city of Seattle that could be affected by proposed changes in the Comprehensive Plan.
- Commissioner Jeanne Krikawa disclosed that her firm, The Underhill Company, is on a consultant for team for a Sound Transit project. She recused herself from discussion about proposed amendment #10.
- Commissioner Amalia Leighton disclosed that her firm, SvR Design, is working on a project in the Broadview-Bitter Lake-Haller Lake neighborhood.
- Commissioner Chris Persons disclosed that his firm, Capitol Hill Housing, develops affordable housing throughout the City and could be affected by the proposed changes in the Comprehensive Plan.
- Commissioner Matt Roewe disclosed that his firm, Via Architecture, works on municipal planning and private development that could be affected by the proposed changes in the Comprehensive Plan. He also abstained from the discussion of proposed amendment #1 dealing with Rainier Beach.
- Commissioner Morgan Shook disclosed that his firm, BERK, works on municipal planning and private development that could be affected by the proposed changes in the Comprehensive Plan.
- Commissioner Sarah Snider disclosed that her firm, LMN, does urban design and various types of architectural projects in the Seattle metropolitan area that could be affected by these amendments and is currently completing work for the Ballard Blocks LLC. She recused herself from the discussion related to proposed amendment #9.

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:
 - a. The amendment is consistent with the role of the Comprehensive Plan under the State Growth Management Act;
 - b. The amendment is consistent with the Countywide Planning Policies;
 - c. The intent of the amendment cannot be accomplished by a change in regulations only;
 - d. The amendment is not better addressed as a budgetary or programmatic decision; or
 - e. 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:
 - a. The timing of the amendment is appropriate and Council will have sufficient information necessary to make an informed decision.
 - b. 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.
 - c. 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.
 - d. 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.