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Seattle Planning Commission

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June 27, 2014

Honorable Councilmember Mike O'Brien, Chair
Planning Land Use and Sustainability Committee
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

Dear Councilmember O'Brien,

The Seattle Planning Commission (SPC) is pleased to provide you with our comments and recommendations on which proposed Comprehensive Plan amendments 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 the application of Council adopted criteria, Guidelines for Amendment Selection, included in Resolution 31402[i].

SPC recommends to <u>not move forward</u> with the following six amendment proposals:

1. East Ballard Map Change –
   The applicant is requesting a change to the Future Land Use Map (FLUM) of several parcels within the BINMIC from "Industrial" to "Mixed Use Commercial".

Removing land from Industrial to non-Industrial requires a significant amount of review and outreach. The applicant references the Ballard Urban Design Framework (UDF) as a possible means for this outreach to occur. However, the scope of the current Ballard UDF does not encompass the BINMIC. The stated intent of the Ballard UDF is to provide a Design Framework for the Ballard Urban Village. Land use changes to the

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Ballard Manufacturing/Industrial Centers (BINMIC) falls outside the scope of the Ballard UDF process. The Ballard UDF scope and Advisory Group of stakeholders would need to be significantly broadened in order to make the necessary outreach for this Future Land Use Map amendment proposal transparent and thoughtful.

Additionally, this is a larger set of parcels that could significantly impact the BINMIC. The Council deferred an amendment in last year's cycle that would directly relate to conversion of Seattle's Manufacturing and Industrial Centers as well as changes in underlying zoning. Any updates to the Future Land Use Map regarding Manufacturing and Industrial Centers should wait until Council has adopted or denied those broader policies. The Commission recommends this amendment not be docketed as it is not consistent with docket setting Criterion A.5 and C.2 as noted in Resolution 31402

2. Pier One Map Change –

   The applicant is requesting a change to the Future Land Use Map (FLUM) of several parcels in the Duwamish Manufacturing/Industrial Center from "Industrial" to "Mixed Use Commercial".

This proposal was recently submitted and rejected by the City Council in 2012. When the Commission reviewed the amendment in 2012, we had also recommended the rejection of the FLUM change.

There has been tremendous work put into clarifying goals and policies for Manufacturing and Industrial Centers. Those polices should be considered by City Council prior to moving forward on the proposed Future Land Use Map changes.

The Commission recommends this amendment not be docketed as it is not consistent with docket setting Criterion A.5 and C.4 as noted in Resolution 31402.

3. Sky bridge Policy –

   The applicant has requested incorporation of a sky bridge policy within the existing Transportation Element.

The proposal was recently submitted and rejected by the City Council in 2013 as well as in previous cycles. The applicant has removed aerial trams from the amendment application this year, but this does not substantively change the proposal. In our previous recommendations to not send this proposal to the docket, the Commission outlined several reasons that remain important today.

"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 A.5). 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 D). 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." (Seattle Planning Commission Comprehensive Plan Docket Recommendations 2012)

The Commission recommends this amendment not be docketed as it is not consistent with docket setting Criterion A.5 and D as noted in Resolution 31402.

4. Live/Work Policy –

   The applicant has requested an amendment to the existing Land Use Element to limit live-work units, particularly where maintaining or creating a pedestrian-oriented businesses district is desired.

Live/Work is a type of use that is better regulated through the Seattle Municipal Code.

The Commission has been tracking the Pedestrian Zone Mapping Project. While not all neighborhood commercial districts are addressed in the mapping project, a number of districts are and live/work as an allowed use is part of that ongoing discussion. DPD staff has conducted an extensive public outreach process and any changes to neighborhood commercial zones that would affect the allowed uses should be a part of this broad work program.

The Commission recommends this amendment not be docketed as it is not consistent with docket setting Criterion A.3 as noted in Resolution 31402.

5. Open and Participatory Government –

   The applicant has requested an amendment to add an "Open and Participatory Government" Element to the Comprehensive Plan.

This is the sixth consecutive year of this amendment proposal, "Open and Participatory Government" as an element or appendix. While these recent applications are not identical, they are essentially the same and none of them were included on the docket (Criterion C.4). The Commission reiterates that the proposed amendment includes policies outside the scope of the Comprehensive Plan as defined by the Growth Management Act (Criterion A.1). In addition the Commission continues to believe that a coordinated plan related to open and participatory government would be better addressed as a budgetary or programmatic decision (Criterion A.4) or another process (Criterion A.5).

The Commission recommends this amendment not be docketed as it is not consistent with docket setting Criterion A.1, A.4, A.5 and C.4 as noted in Resolution 31402.

6. Congregate Housing –
   The applicant has requested an amendment to the existing Housing Element to limit congregate housing.

The proposed changes detail prescriptions that are inappropriate for the Comprehensive Plan given that the role of the Comprehensive Plan is to set forth broad policies and goals (Criterion A.1). Legislation was recently introduced concerning micro-housing and congregate housing, and the consideration of specific limitations on congregate housing would be better addressed through the current legislative process (Criterion A.5). Furthermore, the amendment is inconsistent with numerous goals and policies in the existing Housing Element of the Comprehensive Plan that—as guided by regional and county planning policies—encourage housing choice, diversity, and affordability[1] (Criterion C.3).
The Commission recommends this amendment not be docketed as it is not consistent with docket setting Criterion A.1, A.5 and C.3 as noted in Resolution 31402.

SPC recommends the following five amendment proposals <u>move forward</u> to docket setting.

In light of this year's Major Comprehensive Plan update the Commission recommends that all FLUM changes moving forward be addressed as single amendments and all policy changes moving forward be addressed with the understanding that the major rewrite of the Comprehensive Plan may impact the final adoption, deferment or denial of the applicants' proposal. The two policy items that the Commission recommends moving forward edit specific policies in the currently adopted Comprehensive Plan.

[1]Following are example of specific goals and policies in the existing Housing Element Policies with which the proposed amendment limiting congregate housing is inconsistent:
HG11 Strive for freedom of choice of housing type and neighborhood for all…; HG 11.5 Implement strategies and programs to help ensure a range of housing opportunities affordable to those who work in Seattle; H20 Promote and foster, where appropriate, innovative and non-traditional housing types…as alternative means of accommodating residential growth and providing affordable housing options; and HG15 Disperse housing opportunities for low-income households throughout the city and throughout King County.

7. West Seattle Church of the Nazarene –
   The applicant is requesting a Future Land Use Map change from "Single Family Residential" to "Multifamily Residential" within the Morgan Junction Residential Urban Village.

The Commission recommends this amendment proposal be docketed as it is consistent with docket setting Criterion A.1 and A.5 as noted in Resolution 31402. Changes to the Future Land Use map must be done through the Comprehensive Plan process and therefore this amendment fits under Criterion A.1 and cannot be addressed any other planning process (Criterion A.5).

8. University Playground/Urban Center –
   The applicant is requesting a Future Land Use Map change moving the boundary to exclude several blocks from the University Urban Center and to include a piece of privately owned property.

The Commission recommends this amendment proposal be docketed as it is consistent with docket setting Criterion A.1, A. 2, A. 3 and A.5 as noted in Resolution 31402. The area outlined in the application currently falls within the scope of the University Urban Design Framework, a current project of the DPD. In the 2013-2014 annual amendment cycle the City Council deferred the updated Neighborhood Plan Goals and Policies and asked the DPD to bring forward policy and land use changes together. The Draft Environmental Impact Statement has been completed and it is our understanding that the DPD will be bringing forward these deferred amendments for review once more. This amendment to the Urban Center boundary should be easily incorporated into the current work program and any changes to the Urban Center boundary should be brought forward together.

9. YWCA Seattle/King/Snohomish -
   The applicant is requesting a Future Land Use Map change moving the boundary to include a single parcel to the 23rd and Union-Jackson Residential Urban Village.

The Commission recommends this amendment proposal be docketed as it is consistent with docket setting Criterion A.1, C.1 and C.2 as noted in Resolution 31402. The area outlined in the application currently falls just outside the 23rd Union/Jackson Residential Urban Village. During the amendment cycle of 2013-2014 the DPD submitted neighborhood policy goals and Future Land Use Map changes for this area. While the resulting land use amendments did not include this parcel, the updated adopted vision and goals should assist the DPD in its efforts to study this Future Land Use Map change.

10. King County Justice Center –
    The applicant is requesting a change in the existing Land Use Element; a modification of policies addressing Small Institutions and Public Facilities.

The Commission recommends this amendment proposal be docketed as it is consistent with docket setting Criterion A.1 and A.3 as noted in Resolution 31402. The City is conducting a major update of the Comprehensive Plan this year and this amendment should be reviewed as part of that process.

11. Growth Monitoring and Evaluation Policies –
    The applicant is requesting a change in the existing Urban Village Element to include policies on growth monitoring and evaluation.

The Commission recommends this amendment proposal be docketed as it is consistent with docket setting Criterion A.1 and A.3 as noted in Resolution 31402. As previously stated, the City is conducting a major update of the Comprehensive Plan this year and this amendment should be reviewed as part of that process. While the major rewrite happens DPD should study how this amendment would fit within the structure of the new Urban Village Element.

We appreciate the opportunity to review amendments for docket setting and provide our recommendations. If you have any further questions please call either Co-Chair or Vanessa Murdock, Seattle Planning Commission Executive Director at (206) 733-9271.

Sincerely,

David Cutler
Co-Chair

Amalia Leighton
Co-Chair

cc:
Mayor Ed Murray
Seattle City Councilmembers
Robert Feldstein, Steve Lee; Office of Policy and Innovation

Kathy Nyland, Mayor's Office
Diane Sugimura, Nathan Torgelson, Susan McLain, Tom Hauger, Patrice Carroll, Kristian Kofoed, Nora Liu, Quanlin Hu, Dave LaClergue, Gary Johnson, Geoff Wentlandt; Department of Planning and Development
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Steve Johnson; Office of Economic Development
Steve Walker, Office of Housing
Rebecca Herzfeld, Sara Belz, Martha Lester; Eric McConaghy; Lish Whitson; Council Central Staff

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL

Commissioner Morgan Shook disclosed that his firm, ECONorthwest, is a consultant to the City's University District Urban Design Framework project, and as such includes work on the Environmental Impact Statement.

[1] **City of Seattle Criteria for Comprehensive Plan Amendment Selection (from Resolution 31402)**

A. 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;
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;
3. Its intent cannot be accomplished by a change in regulations alone;
4. It is not better addressed as a budgetary or programmatic decision; and;
5. It is not better addressed through another process, such as neighborhood planning.

B. The amendment is legal under state and local law.

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;
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;
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
4. The amendment has not been recently rejected by the City Council.

D. If the amendment would change a neighborhood plan, it either is the result of a neighborhood review process or can be reviewed by such a process prior to final Council consideration of the amendment.

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