



City of Seattle Seattle Planning Commission

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June 30, 2009

Honorable Councilmember Sally J. Clark
Chair, Planning, Land Use and Neighborhoods Committee
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

RE: Recommendations on Proposed 2009 Comprehensive Plan Applications

Dear Councilmember Clark,

The Seattle Planning Commission is an independent and objective volunteer body that advises City officials on broad goals, policies and plans for the physical development of the city. The Commission is the steward of Seattle's Comprehensive and neighborhood plans. We are pleased to provide you with our comments and recommendations on the proposed 2009 Comprehensive Plan Amendments.

We will participate in the 2009 Comprehensive Plan amendment process in two stages. At this first stage, we were briefed on the amendment submissions and now provide our recommendations regarding which proposals we feel should be considered and further analyzed. Later in the year, we will review the final set of proposed amendments and provide our recommendations regarding adoption of each. In the following recommendations, the Planning Commission used the well-established criteria for considering a Comprehensive Plan amendment *Guidelines for Amendment Selection*¹ that are also included in [Resolution 30976](#) adopted by Council on May 14, 2007.

The Commission's recommendation to include proposed amendments in the threshold resolution should not be interpreted as our approval of the specific proposal itself – it is instead our opinion that these amendments meet the criteria for Comprehensive Plan amendments and should be studied further for possible inclusion as an amendment later in the current amendment cycle. In addition, we have comments on several of the amendments and make suggestions for further analysis.

GENERAL RECOMMENDATIONS

Purpose of Seattle's Comprehensive Plan

We believe that a number of the applications for proposed 2009 amendments are not appropriate for consideration in the Comprehensive Plan. While some of the proposals may have merit as policy considerations, they are not appropriate for the mission and goal of the Comprehensive Plan. As the stewards of the Plan, we would like to ensure that it remains focused on Seattle's core values: community, environmental stewardship, economic opportunity and security, and social equity. This certainly should no

preclude City officials from considering these amendments in other policy venues and we have suggested other processes that might more effectively address several of the proposed amendments for the 2009 cycle. With that said, we understand that the City is under difficult budget challenges and will need to weigh their budget priorities very carefully.

The purpose of Seattle's Comprehensive Plan is to articulate a vision for how Seattle will accommodate residential and employment growth over the next 20 years, while promoting the values of its citizens, a vibrant economy and livable neighborhoods. The Plan, titled "Toward a Sustainable Seattle," was adopted in 1994 to comply with the requirements of the Washington State Growth Management Act. The Plan does this by encouraging most new growth to locate in places designated as either urban centers or urban villages. It contains growth targets for each urban center and urban village related to Seattle's share of regional growth that is anticipated in the coming 20 years. The Plan also includes policies that describe how the City intends to serve this growth with transportation and other infrastructure. The Comprehensive Plan is part of a hierarchy of related plans that include:

- Vision 2040 prepared by the Puget Sound Regional Council (which addresses growth in the four-counties of the central Puget Sound region),
- Countywide Planning Policies (which provides guidance to the comprehensive plans of all jurisdictions in King County) and
- Seattle's neighborhood plans (which tailor the City's Comprehensive Plan policies for individual neighborhoods). The goals and policies of the neighborhood plans are contained within the Comprehensive Plan.

RECOMENDATIONS ON PROPOSED AMENDMENTS

1. Establish a working group to recommend strategies to reduce light pollution.

Commission Recommendation & Comments: Do not include on 2009 Amendment Docket

The proposed amendment does not address a framework level policy as is appropriate for the Comprehensive Plan and would be more suitably addressed as a budgetary or programmatic decision (Guideline A.4.) or through another process (Guideline A.5). The intent of addressing the issue of light pollution does have merit as a livability issue as well as an urban habitat issue and a LEED certification issue.

2. Adjust the boundary of the Rainier Beach Residential Urban Village to include the area south of S. Henderson St. between MLK Way S and the Chief Sealth Trail.

Commission Recommendation & Comments: Include on 2009 Amendment Docket

While we believe this proposal meets the criteria to move forward for further analysis, we recommend that that the boundary adjustment be considered in the context of the neighborhood status reports currently being prepared by DPD. In addition, the analysis should consider the entire station area and have thorough community and neighborhood review.

3. Establish a placeholder for consideration of Comprehensive Plan amendments proposed through the North Beacon Hill neighborhood plan update process, to the extent they become ready for action in 2010.

Commission Recommendation & Comments: Include on 2009 Amendment Docket

In order to proceed in a timely manner on the current efforts in updating the North Beacon Hill neighborhood plan, we concur with placing this on the 2009 docket. The light rail station located in this neighborhood opens on July 18 and the current efforts in updating the neighborhood plan have clearly addressed this significant occurrence.

4. *Establish a placeholder for consideration of Comprehensive Plan amendments proposed through the North Rainier neighborhood plan update process, to the extent they become ready for action in 2010.*

Commission Recommendation & Comments: Include on 2009 Amendment Docket

In order to proceed in a timely manner on the current efforts in updating the North Rainier neighborhood plan, we concur with placing this on the 2009 docket. The light rail station located in this neighborhood opens on July 18 and the current efforts in updating the neighborhood plan have clearly addressed this significant occurrence.

5. *Establish a placeholder for consideration of Comprehensive Plan amendments proposed through the MLK at Holly (Othello) neighborhood plan update process; to the extent they become ready for action in 2010.*

Commission Recommendation & Comments: Include on 2009 Amendment Docket

In order to proceed in a timely manner on the current efforts in updating the MLK at Holly (Othello) neighborhood plan, we concur with placing this on the 2009 docket. The light rail station located in this neighborhood opens on July 18 and the current efforts in updating the neighborhood plan have clearly addressed this significant occurrence.

6. *Amend the FLUM in the Roosevelt Residential Urban Village in anticipation of zoning proposal developed by the Department of Planning and Development in consultation with the Roosevelt neighborhood plan.*

Commission Recommendation: Include on 2009 Amendment Docket

7. *Amend the Roosevelt Neighborhood Planning Element and the FLUM to redesignate certain properties in the southeast area of the Roosevelt Residential Urban Village from single family residential and multi-family residential to commercial/mixed use.*

The proponent has informed the Planning Commission that they have withdrawn this proposal from consideration from the 2009 docket and until the EIS is complete.

8. *Amend goals and policies to increase emphasis on ecological protection and restoration, address the requirement to complete a shoreline restoration plan, prohibit new overwater structures that are not water dependent, and include more details on when non-water-oriented uses would be allowed on waterfront lots. (Shoreline Master Plan Update)*

Commission Recommendation & Comments: Include on 2009 Amendment Docket

9. *Amend the FLUM to redesignate areas east of I-5 between S Main St and S Dearborn St, and west of I-5 between S Dearborn and the urban center's southern boundary from Commercial/Mixed-Use to Downtown Mixed Residential and Downtown Mixed Commercial.*

Commission Recommendation & Comments: Include on 2009 Amendment Docket

Should this proposal move forward onto the 2009 Amendment docket, we urge the City to consider the impacts to surrounding industrial zoned land, the impacts on the Port of Seattle, and the essential and efficient movement of freight in the surrounding area. The designations for South Downtown on the Future Land Use Map must be approached keeping in mind the delicate balance between the intentions for nearby industrial zoned land and the intentions for the way the City views and treats Urban Centers. There is a delicate balance that needs careful and nuanced analysis. We applaud the City efforts working closely with the International District and Little Saigon neighborhoods about the vision for this area and hope that Council continues to consider the impacts to these culturally significant and important communities and the work of the Livable South Downtown efforts.

10. *Amend the Northgate Neighborhood Planning Element to guide design through neighborhood-specific design guidelines. Support to increase height and density and rezone from multifamily to mixed-use along NE Northgate Way, provided that impacts are mitigated by property owners or developers.*

Commission Recommendation & Comments: Include on 2009 Amendment Docket

Should this proposal move forward onto the 2009 Amendment docket, we urge the City to pay particular attention to the impacts on the existing market rate affordable housing in this area, encourage the opportunities presented by the future light rail station, and consider how to best prioritize both city and private investments in projects to help mitigate the impact of increased height and density.

11. Adopt a policy to incorporate the precautionary principle to assess current and potential alternatives to city action.

Commission Recommendation & Comments: Do not include on 2009 Amendment Docket

In 2004, Council amended the Comprehensive Plan Environment Element to explicitly reference the “precautionary principle.” We believe that the current policies outlined in the Comprehensive Plan, in addition to other regulations such as SEPA, already adequately address the intent of the proposal.

12. A proposal to remove land in the Interbay area from the BINMIC (north of Dravus to Emerson, approximately between 15th on the East, and west of 17th on the West).

Commission Recommendation & Comments: Include on 2009 Amendment Docket

The Commission has repeatedly expressed concern about rezoning industrial land to non-industrial designations without consideration of a long-term Industrial Land Strategy. It is our understanding that the City has recently completed much of the work outlined in the Council Resolution 31026 and is close to developing a policy that establishes a rational framework for the treatment of industrial land. This amendment has been carried over from the 2008 amendment process so that this work could be complete. Now that this work is moving forward we believe it is appropriate to evaluate the proposal.

13. Create a new element of the Comprehensive Plan entitled “Open and Participatory Government.”

Commission Recommendation & Comments: Do not include on 2009 Amendment Docket

The Planning Commission is dedicated to the principles and practice of transparent, open and participatory government but we do not feel that the Comprehensive Plan is the appropriate document for this proposal. (The purpose of Seattle’s Comprehensive Plan is to articulate a vision for how Seattle will accommodate residential and employment growth over the next 20 years, while promoting the values of its citizens, a vibrant economy and livable neighborhoods.) We note that per Guideline A.4, the proposed requirements outlined in the application are best dealt with through the various rules and regulation that deal more specifically with open government such as the Open Public Meetings Act, RCW, Seattle Municipal Code, and by the application of the Seattle ethics code or through budgetary and programmatic decision-making processes. It is also our understanding is that the City Council is currently engaged in considering the City of Seattle’s policies and practices concerning open and participatory government.

Additionally, based on Guideline for Amendment Selection C.4, we would not be in favor of moving this forward onto the docket. A very similar proposal was rejected by Council last year and we do not see that this proposal has been significantly updated from the one rejected by Council in 2008. Resolution 31049 indicates that Council will develop an “open and participatory government plan” outside of the Comprehensive Plan. While the resolution also states that Council’s review will include consideration of possible amendments for this year, it is our understanding that Council does not intend to propose any amendments at this time.

14. Add a goal requiring a reduction in vehicle miles traveled in and through the city, and a policy favoring highway projects that produce little or no such increase.

Commission Recommendation & Comments: Do not include on 2009 Amendment Docket

We support programs and strategies aimed at reducing greenhouse gas emissions and as such supported an amendment in last year’s cycle that resulted in an update to Transportation Policy 17 that focused on reducing miles driven. While the Commission recognizes and supports regional efforts to reduce vehicle

miles traveled (VMT), it is our understanding that the City is currently analyzing how to implement new guidelines recently adopted at the state level.

15. Add a policy discouraging extra-heavy transit buses and solid waste trucks that unacceptably damage Seattle's roads and bridges.

Commission Recommendation & Comments: Do not include on 2009 Amendment Docket

Based on the *Guidelines for Amendment Selection C.4* we do not see that this proposal has been significantly updated from the one considered last year. In addition, last year we concurred with DPD and Council Central staff's analysis that existing policies T8 and T70 provide appropriate guidance in the Comprehensive Plan to address this matter. While we agree that preventing road damage caused by extra-heavy vehicles could be beneficial to the City, the proposal would be more appropriately addressed through budgetary or programmatic decisions or other process, such as the Transportation Strategic Plan, and therefore does not meet the requirements of Guidelines A.4. and A.5.

16. Amend the FLUM to redesignate an area east of Harbor Ave SW and North of SW Spokane St, known as the Harbor Avenue Corridor Property, from Industrial to Commercial/Mixed-Use and remove the area from the Duwamish MIC.

The proponent has informed the Planning Commission that they have withdrawn this proposal from consideration from the 2009 docket.

17. Amend Sand Point amendments to allow housing and limited commercial use in Building 9 at the former Sand Point Naval Station.

Commission Recommendation & Comments: Include on 2009 Amendment Docket

The Commission continues to strongly urge the City to consider removing the Sand Point amendments from the Comprehensive Plan. We understand that a carefully negotiated compromise was forged that included the adoption of Ordinance 118622 that places incredibly specific details into the Comprehensive Plan. We recognize that because of Ordinance 118622, the proponent has no other process in which to propose changes and therefore we are recommending that this application move forward. With that said, the existing Sand Point amendments are not appropriate 'framework' policies for the Comprehensive Plan.

18. Amend the FLUM to redesignate a one block area, bounded by 15th Ave NW to the east, NW 50th St to the north, 17th Ave NW to the west, and NW 49th St to the south, from Industrial to Commercial/Mixed Use.

Commission Recommendation & Comments: Include on 2009 Amendment Docket

The Commission has repeatedly expressed concern about rezoning industrial land to non-industrial designations without consideration of a long-term Industrial Land Strategy. It is our understanding that the City has recently completed much of the work outlined in the Council Resolution 31026 and is close to developing a policy that establishes a rational framework for the treatment of industrial land. This amendment has been carried over from the 2008 amendment process so that this work could be complete. Now that this work is moving forward we believe it is appropriate to evaluate the proposal.

19. Amend the FLUM to redesignate the Yesler Terrace site from Multifamily Residential to Commercial/Mixed Use.

Commission Recommendation & Comments: Include on 2009 Amendment Docket

This proposal meets the criteria for moving forward for further analysis. The Commission has been briefed on the project several times and also has a Planning Commission representative on the Citizen Review Committee so we are closely tracking the current efforts as SHA moves forward with their plans to redevelop Yesler Terrace.

20. *Promote housing affordability in coordination with the Seattle Transit Plan, create a new policy to consider access to transit and transportation costs when developing affordable housing, and promote attached and detached accessory dwelling units.*

Commission Recommendation & Comments: Include on 2009 Amendment Docket

These proposals are based on the Planning Commission's Affordable Housing Action Agenda released in February 2008, which included a careful analysis of ways the Comprehensive Plan can be strengthened in order to provide more affordable housing in the city of Seattle.

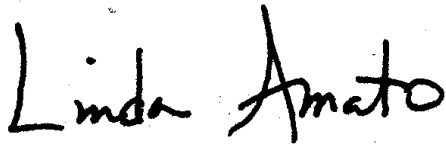
21. *Add new goals to encourage cultural districts, and to allow regulations and incentives to be adopted for them.*

Commission Recommendation & Comments: Include on 2009 Amendment Docket

This proposal meets the criteria for moving forward for further analysis. Should this proposal move forward onto the 2009 Amendment docket, we urge the City to pay particular attention to how design guidelines, a pedestrian overlay or other overlay districts are reconciled and prioritized.

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 2009 – 2010 Comprehensive Plan amendment process moves forward. Please contact me or our Director, Barbara Wilson at (206) 684-0431 if you have further questions.

Linda Amato, Chair



Seattle Planning Commission

cc: Mayor Greg Nickels
Seattle City Councilmembers
Tim Ceis, Nathan Torgelson, Mayor's office
Rebecca Herzfeld, Ketil Freeman, Council Central Staff
Diane Sugimura, Ray Gastil, Tom Hauger, Mark Troxel, DPD
Grace Crunican, Tracy Krawczyk, SDOT
Adrienne Quinn, Rick Hooper, Office of Housing
Stella Chao, Kimberlee Archie, Department of Neighborhoods

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL:

- Commissioner Mark Johnson disclosed that his firm, ESA Adolfson, is preparing the EIS for the Northgate rezone.
- Commissioner Michelle Zeidman disclosed that she is working with Sound Transit to revise their plan related to transit oriented development.
- Commissioner Marty Kaplan disclosed that he is currently a candidate for City Council and his firm, Martin Henry Kaplan Architects, works on projects in commercial and multifamily zones.
- Commissioner Amalia Leighton disclosed that her firm, SvR, is working on the Yesler Terrace project.
- Commissioner Leslie Miller disclosed that she is a member of the Southeast District Council and OSCAT (Othello Station Community Advisory Team).
- Commissioner Josh Brower disclosed that his firm, Tupper Mack Brower, represents clients who own and/or develop commercial property in Seattle.
- Commissioner Chris Fiori recused himself from any discussion about proposed amendments 6 and 20.
- Commissioner Colie Hough-Beck disclosed that her firm, Hough-Beck & Baird, works with the Port of Seattle, which could be impacted by proposed amendment 16.

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:

- A. The amendment is appropriate for the Comprehensive Plan:
 - 1. The amendment is consistent with the role of the Comprehensive Plan under the State Growth Management Act;
 - 2. The amendment is consistent with the Countywide Planning Policies;
 - 3. The intent of the amendment cannot be accomplished by a change in regulations only;
 - 4. The amendment is not better addressed as a budgetary or programmatic decision; or
 - 5. The amendment is not better address through another process, such as neighborhood planning.

- B. The amendment is legal – the amendment meets existing state and local laws.

- C. It is practical to consider the amendment:
 - 1. The timing of the amendment is appropriate and Council will have sufficient information necessary to make an informed decision.
 - 2. 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.
 - 3. 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.
 - 4. The amendment has not been recently rejected by the City Council.

- D. 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.

- E.