

July 15, 2019

## MEMORANDUM

**To:** Planning, Land Use and Zoning Committee  
**From:** Eric McConaghy and Lish Whitson, Council Central Staff  
**Subject:** 2019-2020 Comprehensive Plan Docket

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On Wednesday, July 17, the Planning, Land Use and Zoning Committee (PLUZ) will hold a public hearing and discuss proposals to amend the Comprehensive Plan as part of the 2019-2020 amendment process. These proposals were received from individuals and organizations as part of the City's annual Comprehensive Plan amendment process. Most years, the Council reviews requests for amendments based on criteria contained in [Resolution 31807](#). In May, the Council received 14 proposals to amend the Comprehensive Plan. Those proposals are contained in [Clerk File 321272](#). The proposals were forwarded to the Seattle Planning Commission (SPC) and the Office of Planning and Community Development (OPCD) who have reviewed the proposals and provided recommendations.

This memo (1) provides background on the Comprehensive Plan docketing process, including identification of previously docketed amendments that will carry over into the 2019-2020 process, (2) explains the criteria Council uses to determine whether proposed amendments should be selected for consideration, (3) provides initial recommendations, discussion and review of the applications in light of the criteria. There are three attachments:

- Attachment 1 summarizes recommendations from the SPC, OPCD and Central Staff;
- Attachment 2 is OPCD's letter to the Council; and
- Attachment 3 is the SPC's letter to the Council.

Following the July 17 PLUZ Committee meeting, Central Staff will work with Councilmember Pacheco's office to introduce a Comprehensive Plan docket resolution for 2019-2020. The Committee is currently scheduled to vote on that resolution at its August 7 meeting.

### Background

With a few limited exceptions, the City Council may amend the Comprehensive Plan once a year. Resolution 31807 provides the framework for the annual process for reviewing the Comprehensive Plan. It also sets out the criteria to determine what amendments should be considered in an annual review cycle.

The Comprehensive Plan is a foundational, long-term document that is intended to guide the City's growth over the next twenty years. Washington State law limits amendments to the plan and requires a deliberative process to amend the plan. The City's criteria are intended to limit potential amendments to those that are legal, can be accommodated within the time available,

and are generally consistent with the City's overall policies for growth. Larger shifts in policy direction are generally considered as part of a "major update" which State Law requires every eight years.

Generally, the docketing process occurs in four steps. First, in the spring, the Council issues a call for amendment proposals. Anyone can submit a proposal. In the summer, the Council reviews amendment applications and establishes by resolution a docket of the amendments the Council will consider. This is often referred to as the "docket setting" resolution. That fall, OPCD reviews the amendments and conducts environmental analysis, making a recommendation to the Council regarding which amendments should be made. Finally, the following winter, the Council receives recommendations from the SPC, considers the merits of proposed amendments, and acts on a bill amending the Comprehensive Plan.

#### Selection Criteria for Annual Comprehensive Plan Docketing

The Council applies a variety of criteria in deciding whether to include a proposed amendment in the docket setting resolution. A decision to include a proposed amendment in the resolution does not constitute Council approval of a proposed amendment. Rather, a decision to include a proposed amendment means that the Council has determined that the subject matter is appropriate for the Comprehensive Plan and consideration of the proposed amendment can be practically accomplished during the amendment cycle. Criteria applied by the Council included in Resolution 31807 are as follows:

- A. The amendment is legal under state and local law.
- 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;
  - 2. It is consistent with the Countywide Planning Policies and with the multi-county policies contained in the Puget Sound Regional Council's regional growth 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 activities identified in departmental work programs under way or expected soon, within which the suggested amendment can be considered alongside other related issues.
- 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 Seattle Municipal Code, and to conduct sufficient analysis and public review; and
  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.
- D. If the amendment has previously been proposed, relevant circumstances have changed significantly so that there is sufficient cause for reconsidering the proposal.
- 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.
- F. The amendment is likely to make a material difference in a future City regulatory or funding decision.
- 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.

#### Previously docketed items continuing into 2019-2020

A number of proposals have been added to the Comprehensive Plan docket through Council resolutions in 2018 and 2019. The following proposals have not been completed and may continue as part of the 2019-2020 docket resolution.

#### *Industrial Lands*

In 2016, in [Resolution 31682](#), the Council asked the Executive to work with stakeholders to provide recommendations for potential amendments to the Comprehensive Plan to support the City's Manufacturing/Industrial Centers, including a potential Stadium Area designation on the Future Land Use Map. The Mayor convened an Industrial Lands Advisory Panel consisting of industrial stakeholders to discuss and recommend for potential amendments to the Comprehensive Plan. That group developed [draft recommendations](#), but final recommendations were never sent to the Council. The docketing resolution for the 2017-2018 docket, [Resolution 31762](#), repeated the request and asked the Executive to review additional changes to industrial lands that had been proposed by property owners. Only one of those amendments (related to Seattle Pacific University) has been resolved.

Central Staff and the Seattle Planning Commission recommend continuing to work on these proposals as part of the Comprehensive Plan Docket. OPCD recommends not continuing to

docket this amendment, stating that: “The City is in the process of initiating a citywide planning process with significant stakeholder engagement to evaluate current industrial lands policies, economic development, and infrastructure to support industrial and maritime uses. Consideration of policy amendments to strengthen long-term viability of Manufacturing Industrial Centers and property-specific proposals to remove land from industrial land use designations should occur as a part of that process. In addition, considering the ongoing work of the Interbay Public Development Authority to evaluate potential redevelopment of the Armory property, consideration of the FLUM amendment for that site may not be timely.”

#### *Mandatory Housing Affordability-related amendments*

In March, the Council adopted [Resolution 31870](#) alongside the Mandatory Housing affordability legislation. That Resolution includes three request for consideration of changes to the Comprehensive Plan:

- Section 7 requested that OPCD recommend a new name for Single-family areas.
- Section 8.E. requested review of the designation of South Park as an urban village.
- Section 11.A. requested development of a proposal to establish an urban village at N 130<sup>th</sup> Street and Interstate 5.

OPCD has recommended not studying the first two items as part of the 2019-2020 docketing process stating that they are more appropriately studied as part of the major update to the Comprehensive Plan, which is required to be adopted by 2023.

Work is underway regarding planning for the area around the planned light rail station at N 130<sup>th</sup> and I-5. That work is not likely to be complete in time for Council action on the 2019-2020 docket. The Growth Management Act does not require that adoption of Comprehensive Plan policies for a new subarea plan be considered alongside other Comprehensive Plan amendments.

#### *Delridge Neighborhood Plan*

The Council adopted [Resolution 31880](#) in April 2019, which requests OPCD to review amendments to the Delridge Neighborhood Plan that were proposed by the North Delridge Action Community Team. Those recommendations are intended to be considered alongside any other changes proposed as part of this docketing process. OPCD expects to be ready to make a recommendation regarding these amendments in time for the 2019-2020 amendment process.

#### Docket-Setting Schedule

The Council received fourteen proposals for amendments by May 15. The proposed amendments can be found in [Clerk File 321272](#). The SPC and OPCD sent comments and recommendations on the proposed amendments to the Council on July 12 and July 15, respectively. These are attached to this memorandum. On July 17, PLUZ will receive a briefing and hold a public hearing on the proposed amendments. Following the July 17 meeting, Central

Staff will prepare a Resolution containing the Committee’s preliminary decision. The Committee will discuss and may vote on that Resolution at its August 6 meeting.

### **Discussion and Preliminary Recommendations**

The table in Attachment 1 summarizes the proposed amendments and the recommendations of the SPC, OPCD, and Central Staff. For two proposals there are unanimous recommendations to include the proposal in the docket, either on their own or as part of a broader policy review. For one proposal, there is a difference of opinion. There are unanimous recommendations to not docket eleven proposals. The amendments are numbered in the order that they were received.

#### Amendments recommended to move forward

Proposed amendment 2 would amend the Future Land Use Map, and various other maps in the Comprehensive Plan to include two parcels (11316 and 11318 5<sup>th</sup> Avenue NE) on the east side of 5<sup>th</sup> Avenue NE to the Northgate Urban Center boundary. These two parcels abut the Northgate Urban Center. Including the parcels within the Urban Center

Proposed amendment 12 would amend the Future Land Use Map and various other maps in the Comprehensive Plan to include the Providence Mount Saint Vincent property (4831 35<sup>th</sup> Avenue SW in the West Seattle Junction Hub Urban Village.

#### Amendments with mixed recommendations

Proposed amendment 7 would create a new “stadium district” as a designation on the Future Land Use Map, removing areas from the Duwamish Manufacturing/Industrial Center and the Downtown Urban Center to include the stadium district. The amendment would also adopt policies that would guide development in the stadium district. The Office of Planning and Community Development studied a stadium district and made recommendations in 2013: <https://www.seattle.gov/opcd/ongoing-initiatives/stadium-district-study>. This proposal was incorporated into the Industrial Lands study discussed above.

OPCD has indicated that recommendations regarding a stadium district will not be ready in time for Council review and action in 2020. Instead, the proposal would be studied in the context of a forthcoming industrial and maritime strategy planning process.

#### Amendments not recommended to move forward

Seven proposed amendments (3, 4, 8, 9, 10, 11, and 13) have been proposed in the past and have either been docketed and then not recommended for adoption or not docketed. The applicant has not indicated any changed circumstances that would warrant reconsideration of these amendments.

Amendments 1 and 6 are amendments to the Future Land Use Map. They do not meet the conditions in Criteria D, they are each smaller than a block and are proposing FLUM designations that are consistent with the abutting zoning. Consequently, FLUM amendments

are not necessary and the applicants may apply for a rezone without a Comprehensive Plan amendment. In addition, for Amendment 1, no FLUM change was proposed.

Amendment 5 proposes to amend the transportation element to call out transportation network companies (TNCs) and delivery trucks as specific uses that should be balanced with other transportation uses.<sup>1</sup> Central staff believes these issues are better addressed through management of streets and curb space through the City’s transportation plans and regulations, including [Streets Illustrated](#), the [Freight Master Plan](#) and application of the City’s [curb use priorities](#). SPC and OPCD state that they would be better addressed through the next major update to the Comprehensive Plan.

Amendment 14 proposes to amend various policies in the Comprehensive Plan to support trees. The proposed amendment cites various existing policies in the plan that discuss trees and City goals for tree canopy, and recommends repeating them in other parts of the plan. Generally, as drafted these proposed policies are not appropriate for the Comprehensive Plan, as they are too detailed and are best considered in the context of changes to regulations.<sup>1</sup> For example, one proposed change suggests amending Environment policy E1.2 as follows:

E1.2 Strive to increase citywide tree canopy coverage to 40% over time following 2018 recommendations in policy and codes made by Seattle’s Urban Forestry Commission.

This type of language is not appropriate for a twenty-year plan that is intended as “a guide to help it make decisions about managing growth equitably over the next twenty years.” Instead, OPCD and Central Staff agree that these issues are better addressed through review of the City’s regulations related to trees. SPC states that they would be better addressed through the next major update to the Comprehensive Plan.

### **Next Steps**

Following the July 16 PLUZ Committee meeting, we will finalize a resolution and prepare it for introduction and referral to the PLUZ Committee for discussion and possible vote on August 7.

### **Attachments:**

1. Summary of recommendations from the SPC, OPCD and Central Staff
2. Letter from the Office of Planning and Community Development to the Council
3. Letter from the Seattle Planning Commission to the Council

cc: Kirstan Arestad, Central Staff Director  
Aly Pennucci, Supervising Analyst

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<sup>1</sup> Note: the proposal as submitted does not reflect the current adopted Comprehensive Plan, if the amendment moves forward, additional work would be needed to reconcile the proposal with the current text of the Comprehensive Plan.

**Summary of Recommendations on Proposed Comprehensive Plan Amendments**

#	Amendment Proposal	Short Description	Applicant	Recommendation		
				Planning Commission	Office of Planning & Community Development	Central Staff
1	4501-4509 SW Admiral Way	Change Future Land Use Map (FLUM) from Lowrise 1 to Lowrise 3	Joe Brogan	Do not docket (Criterion G)	Do not docket (Criterion G)	Do not docket (Criterion G)
2	11316-11318 5 <sup>th</sup> Ave NE	Extend Northgate Urban Center to facilitate a change from Single Family to Multifamily	Alex Skoulis	Docket	Docket	Docket
3	Heavy Vehicles	Amend the Transportation Element to minimize damage to streets from heavy vehicles	Chris Leman	Do not docket (Criterion D)	Do not docket (Criterion D)	Do not docket (Criterion D)
4	Open and Participatory Government	Add an Open and Participatory Budget element or appendix	Chris Leman	Do not docket (Criterion D)	Do not docket (Criterion D)	Do not docket (Criterion D)
5	Transportation Network Companies (TNCs) and Delivery Trucks	Amend the Transportation Element to recognize impacts from TNCs and delivery trucks	Megan Kruse	Do not docket (Criterion B5)	Do not docket (Criterion C2)	Do not docket (Criteria B3, B4 and B5)
6	2938-2944 Alki Avenue SW	Amend the FLUM to change from Single Family to Multifamily	Steve Gillespie	Do not docket (Criterion G)	Do not docket (Criterion G)	Do not docket (Criterion G)
7	Stadium District	Create a Stadium District as a new designation on the FLUM	Washington State Public Stadium Authority, Washington State Major	Docket in the context of ongoing work on industrial lands	Do not docket (Criteria C1 and C2)	Docket in the context of ongoing work on Industrial lands

Attachment 1 - Summary of recommendations from the SPC, OPCD and Central Staff

#	Amendment Proposal	Short Description	Applicant	Recommendation		
				Planning Commission	Office of Planning & Community Development	Central Staff
			League Baseball Stadium Public Facilities District			
8	Yards and Trees	Amend the Land Use Element to clarify policies related to yards and trees	Chris Leman	Do not docket (Criterion D)	Do not docket (Criteria B3 and D)	Do not docket (Criterion D)
9	Pedestrian Grade Separations	Amend the Transportation Element to discourage pedestrian grade separations such as skybridges, aerial trams or tunnels	Chris Leman	Do not docket (Criterion D)	Do not docket (Criterion D)	Do not docket (Criterion D)
10	Rezoning and Conditional Uses	Amend the Land Use Element to require zone and rezone criteria and public notice, outreach and inclusiveness	Chris Leman	Do not docket (Criterion D)	Do not docket (Criterion D)	Do not docket (Criterion D)
11	Development Monitoring (L61)	Amend the Plan to require monitoring of development and a special review procedure related to development.	Chris Leman	Do not docket (Criterion D)	Do not docket (Criterion D)	Do not docket (Criterion D)
12	Providence Mount St. Vincent, 4831 35 <sup>th</sup> Ave SW	Amend the boundaries of the West Seattle Junction to include the Providence Mount Saint Vincent property	John Milne	Docket	Docket	Docket
13	Demolition and Displacement	Amend the Land Use Element to discourage	Chris Leman	Do not docket (Criterion D)	Do not docket (Criterion D)	Do not docket (Criterion D)



Attachment 1 - Summary of recommendations from the SPC, OPCD and Central Staff

#	Amendment Proposal	Short Description	Applicant	Recommendation		
				Planning Commission	Office of Planning & Community Development	Central Staff
		demolition of residences and displacement of residents				
14	Trees	Amend various sections of the Comprehensive Plan to support the protect trees	David Moehring	Do not docket (Criterion B5)	Do not docket (Criterion B3)	Do not docket (Criteria B3, B4, and B5)

**To:** Councilmember Abel Pacheco, Chair, Planning, Land Use, and Zoning Committee

**Date:** July 15, 2019

**Subject:** Council Docketing Resolution for Comprehensive Plan Annual Amendments 2019-2020: OPCD Recommendations

**From:** Samuel Assefa, Director, Office of Planning and Community Development

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This memo provides docketing recommendations on the 14 amendment proposals submitted by community members in the 2019-2020 Comprehensive Plan amendment process. OPCD has reviewed these proposals for consistency with the criteria established by City Council Resolution 31807 and recommends three proposals for docketing. In addition, this memo recommends next steps on five Comprehensive Plan amendment related issues raised in recent Council resolutions.

In brief, OPCD recommends that three amendments/issues be further analyzed, and pending that analysis, considered for possible adoption. They are:

*Proposed Amendments recommended for docketing*

- Extend Northgate Urban Center Boundary
- Adjust Boundaries of West Seattle Junction

*Council resolution issues recommended for additional analysis*

- North Delridge Neighborhood Action Plan

## **Proposed Amendments**

### ***Proposals Recommended for Docketing***

OPCD recommends that the following proposed amendments to the Comprehensive Plan be docketed for further consideration:

1. Extend Northgate Urban Center Boundary: The proposed Future Land Use Map amendment will extend the boundary of the Northgate Urban Center north to include two adjacent lots, currently designated Single Family Residential. The amendment satisfies the City Council's criteria for docketing.
2. Adjust Boundaries of West Seattle Junction: The proposed Future Land Use Map amendment would extend the boundaries of the West Seattle Junction Hub Urban Village to include property owned by Providence St. Joseph Health located at 4831 35<sup>th</sup> Avenue SW, which is currently designated Multi-Family Residential. The amendment satisfies the City Council's criteria for docketing.

### ***Proposals Not Recommended for Docketing***

OPCD recommends the following Comprehensive Plan amendment proposals not be docketed:

1. Future Land Use Map amendment for property located at 4501-4509 Admiral Way. The proposal requests an amendment to the Future Land Use Map to enable a zoning change from LR1 to LR3. The property in question is currently designated Residential Urban Village, which can accommodate the zoning change without amending the FLUM. No FLUM amendment is necessary.
2. Future Land Use Map amendment for property located at 2938-2944 Alki Avenue SW. The proposed Future Land Use Map amendment would change the future land use designation of two parcels from Single Family Residential to Multi-Family Residential. This property currently is less than a full block and is adjacent to land that is designated for the proposed zoning. No FLUM amendment is necessary for the change in zoning that the applicant is seeking.
3. TNC Placeholder. This proposal would amend the Transportation Element to include balancing limited street capacity among competing uses including Transportation Network Companies (car share) and e-commerce vehicles. This amendment is more appropriate for the 2023 Comprehensive Plan update because it will require more public outreach and staff analysis than can be feasibly accomplished in this annual amendment cycle.
4. Heavy Vehicles. This proposal would amend the Transportation Element to add policies intended to minimize damage to streets from heavy vehicles. This amendment is substantively the same as an amendment submitted in prior years and rejected by the City Council in 2008.
5. Open and Participatory Government. This proposal would amend the Comprehensive Plan by establishing a new element or appendix to establish policies to outline goals, objectives, and policies for decision processes that maximize the possibility of public input before decisions are made. This amendment is substantively the same as an amendment submitted in prior years and rejected by the City Council in 2008.
6. Yards and Trees. This proposal would amend the Land Use Element to revise policies LU 5.6, LU 5.7, and LU 5.8. Language would be amended to LU5.6 that expand the purpose its guidance to establish setbacks in residential areas to include the planting or maintenance of large trees. Language would be added to LU5.7 to require yards for every multifamily lot. LU 5.8 would be amended to include the value of trees in addressing public health and urban wildlife. The City has regulations regarding the placement and maintenance of trees and is currently reviewing and updating these codes. Additionally, this amendment is substantively the same as an amendment submitted in prior years and rejected by the City Council.
7. Pedestrian Grade Separations. This proposal would add a new policy to the Transportation Element that discourages pedestrian grade separations (skybridges, aerial

- tram, tunnel) in all Urban Centers and Urban Villages. This amendment is substantively the same as an amendment submitted in prior years and rejected by the City Council.
8. Rezoning and Conditional uses. This proposal would amend the Land Use Element to add two new policies that provide direction for rezoning and conditional uses. The first would direct the City to establish zone criteria and procedures to guide decisions about what zone is appropriate in any given location to advance city goals. The second would ensure that rezoning and conditional use decisions are made with ample public notice and public outreach. This amendment is substantively the same as an amendment submitted in prior years and rejected by the City Council.
  9. Development Monitoring. This amendment would restore policies in section L61 of the 1994 City Comprehensive Plan, that were subsequently removed from the plan by amendment in the late 1990s. These policies commit the City to monitor development activity and take active steps (i.e. provide additional resources, reduce development activity, or establish annual growth targets) when growth exceeds growth targets. This amendment is substantively the same as an amendment submitted in prior years and rejected by the City Council.
  10. Demolition and Displacement. This proposal would restore policies removed from the Comprehensive Plan in the 2016 update that discouraged the demolition of existing affordable housing. This amendment is substantively the same as an amendment submitted in prior years and rejected by the City Council.
  11. Trees. This proposal would amend the Land Use Element Policy E 1.2, Environment Element policy T.4., and Parks Element policy P3.3 to include policy language related to urban forest and tree preservation. The actions described in the amendment application are more appropriately addressed through Seattle's Municipal Code.
  12. Stadium District: The proposal would change the Future Land Use Map to create a new Stadium District land use designation in areas around the professional baseball and football/soccer stadiums that are currently designated within the Greater Duwamish Manufacturing Industrial Center and the Downtown Urban Center. The proposal would add four new goals and associated policy statements to clarify the preferred future functions, land uses, including housing and lodging and employment uses. Due to the interrelationship of this proposal with citywide industrial lands policies and Mayor Durkan's forthcoming industrial and maritime strategy planning process, it is premature to consider this proposal. Stadium district stakeholders will be included in that process, and the merits of the proposal will be evaluated at that time. Mayor Durkan is sending separate correspondence to City Council in regard to this proposal and the forthcoming planning process.

### **Comprehensive Plan Related Issues from Council Resolutions**

With transmittal of 2019-2020 Comprehensive Plan amendment applications to OPCD, Council central staff also called attention to several prior Council resolutions that included requests for the Executive to develop or analyze proposals for amending the Comprehensive Plan along with

other docketed amendments. Each is described below, along with a brief description of OPCD's recommended approach to addressing the proposal.

***Issues recommended to move forward for additional analysis***

1. Resolution 31880, Section 3:

*The Council requests that the Office of Planning and Community Development review the draft Comprehensive Plan amendments included as Attachment C to this resolution, complete environmental review of the proposed amendments, and recommend amendments to the Delridge Neighborhood Plan goals and policies in the Seattle 2035 Comprehensive Plan to implement the North Delridge Action Plan alongside any other Comprehensive Plan amendments docketed for consideration in 2020.*

Recommendation: Move forward for additional analysis. OPCD intends to evaluate and make a recommendation on proposed amendments to the Delridge Neighborhood Plan consistent with the recommendations contained in the North Delridge Action Plan as part of the 2019-2020 docket.

***Issues not recommended to move forward for additional analysis***

1. Resolution 31762, Section 3:

Includes direction to strengthen industrial land use policies and identified several specific proposed amendments to the Future Land Use Map to redesignate industrial lands.

*Consistent with Resolution 31682, the Council requests that the Executive provide recommendations of potential amendments to Comprehensive Plan policies related to industrial lands including policies to strengthen the long-term viability of Manufacturing/Industrial Centers and a re-evaluation of the Stadium District for Council consideration in 2018. In developing these recommendations, the Executive should consider, analyze, and suggest improvements to the following amendments proposed by individuals and organizations, in addition to the amendments docketed in Resolution 31682:*

1. *Application to amend the Future Land Use Map to remove the Interbay Armory property from the Ballard-Interbay-Northend Manufacturing Industrial Center (BINMIC) and designate it a "Commercial/Mixed-Use" area.*
2. *Application to amend the Future Land Use Map to remove property located at 1819-1893 15<sup>th</sup> Avenue West and 1855-2033 15<sup>th</sup> Avenue West from the BINMIC and designate it "Mixed Use/Commercial."*

3. *Application to amend the Future Land Use Map to remove Pier One, located at 2130 Harbor Avenue SW, from the Greater Duwamish Manufacturing/Industrial Center and designate it Mixed Use/Commercial.*

Recommendation: Do not analyze at this time. The City is in the process of initiating a citywide planning process with significant stakeholder engagement to evaluate current industrial lands policies, economic development, and infrastructure to support industrial and maritime uses. Consideration of policy amendments to strengthen long-term viability of Manufacturing Industrial Centers and property-specific proposals to remove land from industrial land use designations should occur as a part of that process. In addition, considering the ongoing work of the Interbay Public Development Authority to evaluate potential redevelopment of the Armory property, consideration of the FLUM amendment for that site may not be timely.

2. Resolution 31870, Section 8:

*E. Specific to the South Park Residential Urban Village, the Council requests the following actions:*

1. *OPCD is requested to assess how the neighborhood meets the criteria for urban village designation and provide a report to Council as part of the 2019-2020 Comprehensive Plan docketing process.*

Recommendation: Do not analyze at this time. The City will be adopting a major update to the Comprehensive Plan by June 2023. As part of the update, OPCD expects to review the Urban Centers and Villages Growth Strategy. South Park is more appropriately addressed as part of this work.

3. Resolution 31870, Section 7: Recommend a new name for single-family zoning.

*The Council requests that OPCD make a recommendation for an alternative name for single family zones, such as Neighborhood Residential, and propose Comprehensive Plan amendments as part of the 2019-2020 Comprehensive Plan Docket to implement this change, as appropriate.*

Recommendation: Do not analyze at this time. Given the potential relationship to other policies, level of analysis, and level of public engagement necessary, this proposal may be more appropriately addressed through the major update to the Comprehensive Plan in 2023.

4. Resolution 31870, Section 11A:

*Specific to N 130th Street and Interstate 5, OPCD and other City departments are requested to support community-based planning work to develop a proposal to establish an urban village with transit supportive development capacity and urban village-level amenities, such as transit-oriented development, childcare, and housing.*

Recommendation: Do not analyze at this time. Currently, OPCD is engaging in a community planning process that will study a range of options including the potential of establishing an urban village at this location. This planning process is anticipated to extend beyond the time frame of the 2019-2020 Comprehensive Plan amendment docket.

### **Next Steps**

Once approved by Council, a docketing resolution is expected to include a request for OPCD and the City Planning Commission to conduct the necessary policy analysis, environmental review, and community engagement to return recommendations on adoption of each proposed amendment by 2020.



July 12 2019

Honorable Councilmember Abel Pacheco, Chair  
Planning, Land Use, and Zoning Committee  
*via e-mail*

RE: 2019/20 Proposed Amendments to the Comprehensive Plan - Docket recommendations

Dear Councilmember Pacheco,

The Seattle Planning Commission is pleased to provide our comments and recommendations on which proposed 2019-2020 Comprehensive Plan amendments should be placed on the docket for further analysis. Our recommendations are offered as stewards of the Seattle Comprehensive Plan and based on the application of Council-adopted criteria, Guidelines for Amendment Selection, included in Resolution 31807 (Attachment A).

**The Planning Commission recommends moving forward the following amendment proposals to the docket for further analysis:**

Future Land Use Map (FLUM) Amendments

2. 11316 and 11318 5th Ave NE

The applicant is requesting to extend the boundaries of the Northgate Urban Center to facilitate a change from Single-Family Residential to Multi-Family Residential use. The two subject parcels are immediately outside of the Northgate Urban Center. The proposal would extend the boundaries of the urban center to include these parcels.

The Commission recommends this proposal for the docket. The proposal meets the criteria and as such warrants further study.

12: 4831 35th Ave SW

The applicant is requesting to amend the boundaries of the West Seattle Junction Hub Urban Village to include the Providence Mount Saint Vincent property. This large parcel is one full block in size and is immediately adjacent to the boundaries of the West Seattle Hub Urban Village. The proposal would extend the boundaries of the hub urban village to include this parcel.

Commissioners

Michael Austin, *Chair*  
Patti Wilma, *Vice-Chair*  
Sandra Fried  
David Goldberg  
Veronica Guenther  
Grace Kim  
Al Levine  
Rick Mohler  
Kelly Rider  
Julio Sanchez  
Amy Shumann  
Lauren Squires  
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Vanessa Murdock  
*Executive Director*  
Connie Combs  
*Policy Analyst*  
John Hoey  
*Senior Policy Analyst*  
Robin Magonegil  
*Administrative Analyst*



The Commission recommends this proposal for the docket. The proposal meets the criteria and as such warrants further study.

### FLUM and Text Amendment

#### 7. Stadium District

The applicant is requesting to amend the FLUM and the Land Use Element to create the Stadium District as a new independent land use designation. This proposal would replace the existing Stadium Overlay. The proposed Stadium District would include the majority of land currently in the Stadium Overlay area, as well as property north of CenturyLink Field owned by the Public Stadium Authority. The proposal would remove land from the Downtown Urban Center and the Duwamish Manufacturing/Industrial Center on the FLUM.

The Commission recommends this proposal for the docket because the proposal meets the criteria and as such warrants further study. Creation of a Stadium District has been under consideration since 2013. Since then, the City Council has deferred consideration of the Stadium District pending decisions on industrial lands policies. The Commission recommends analysis of this proposal as a new standalone district in the context of a long-awaited policy discussion on the future of Seattle's industrial lands.

**The Planning Commission recommends the following amendment proposals not move forward to the docket for further analysis:**

### Future Land Use Map Amendments

#### 1. 4501 and 4509 SW Admiral Way

The applicant is requesting to change the Future Land Use Map from Multi-family, Lowrise 1 to Multi-family, Lowrise 3 for both parcels.

The Commission does not recommend this proposal for the docket citing criterion G. According to this criterion, a proposal that would change the boundary of an urban center, urban village, or manufacturing/industrial center requires an amendment to the FLUM. These two parcels are in the Admiral Residential Urban Village. The applicant does not propose to change the boundary of the urban village. According to criterion G, an amendment that proposes to change the FLUM is not necessary and will not be considered when it would affect an area 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. These two parcels are less than a full block in size and are located adjacent to other land to the east and south designated as Lowrise 1. This adjacent land is compatible

with the proposed designation. The subject parcels are also adjacent to land outside the urban village designated for Single-Family Residential use to the west (across an alley) and to the north. The proposed change to Lowrise 3 could be considered to be even less compatible with Single-Family Residential land use than the existing Lowrise 1 designation. The applicant has acknowledged that it is possible the City has the authority to upzone the property without amending the FLUM.

6. 2938 and 2944 Alki Avenue SW

The applicant is requesting to change the FLUM from Single-Family Residential to Multi-Family Residential, Lowrise for both parcels.

The Commission does not recommend this proposal for the docket citing criterion G. According to this criterion, an amendment that proposes to change the FLUM is not necessary and will not be considered when it would affect an area 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. These two parcels are less than a full block in size and are located adjacent to land to the west designated as Lowrise 1 and to the east designated as Lowrise 3. This adjacent land is compatible with the proposed designation.

Text Amendments

3. Heavy Vehicles

The applicant is proposing to amend the Transportation Element to minimize damage to streets from heavy vehicles.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was originally proposed in the 2016-2017 amendment cycle but was not docketed citing criteria that it would be better addressed through another process, specifically the Seattle 2035 Comprehensive Plan update. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

4. Open and Participatory Government

The applicant is requesting to add an Open and Participatory Government Element or appendix to the Comprehensive Plan.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was originally proposed in the 2008-

2009 amendment cycle but was not docketed citing criteria that the content proposed in the application are best dealt with through the Seattle Municipal Code, the Seattle ethics code, or through budgetary and programmatic decision-making. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

#### 5: Transportation Network Companies (TNCs) and Delivery Trucks

The applicant is proposing to amend the Transportation Element to recognize impacts from Transportation Network Companies and E-commerce delivery trucks.

The Commission does not recommend this proposal for the docket citing criteria B5. This proposal would be better addressed through another process, specifically the next major update to the Comprehensive Plan.

#### 8. Yards and Trees

The applicant is proposing to amend the Land Use Element to clarify policies related to yards and trees in multifamily areas.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal was previously submitted and docketed in 2017-2018 cycle but was not adopted by City Council in 2018. The rationale for not adopting this proposal was that much of the proposed language is inconsistent with existing Comprehensive Plan policies or misunderstands the more general policy level at which the Plan operates. Although the applicant has provided narrative that relevant circumstances have changed, the Commission believes this evidence is not sufficient cause for reconsidering this proposal.

#### 9. Pedestrian Grade Separations

The applicant is proposing to amend the Transportation Element to discourage pedestrian grade separations such as skybridges, aerial trams, or tunnels in all urban centers and urban village, not just the downtown.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal was previously submitted and docketed in the 2012-2013 cycle but was not adopted by City Council in 2013. The rationale for not adopting this proposal was pedestrian grade separations are addressed in the Seattle Municipal Code and those regulations are consistent with the general policy intent of the Comprehensive Plan. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

#### 10. Rezones and Conditional Uses

The applicant is proposing to amend the Land Use element to adopt policies related to establishing zone and rezone criteria to guide zoning decisions and ensuring that zoning decisions are done with public notice, outreach, and inclusiveness with a regard for local conditions, community preferences and neighborhood plans.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal was previously submitted and docketed in 2017-2018 cycle but was not adopted by City Council in 2018. The rationale for not adopting this proposal was existing Comprehensive Plan policies or glossary entries appropriately address the issues raised in the proposed amendments. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

#### 11. Development Monitoring

The applicant is proposing to amend the Comprehensive Plan to require monitoring of development and a special review procedure related to development.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was originally proposed in the 2016-2017 amendment cycle but was not docketed citing criteria that it would be better addressed through another process, specifically the Seattle 2035 Comprehensive Plan update. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

#### 13. Demolition and Displacement

The applicant is proposing to amend the Land Use element to include a policy to discourage the demolition of residences and displacement of residents.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal was previously submitted and docketed in 2017-2018 cycle but was not adopted by City Council in 2018. The rationale for not adopting this proposal was limiting demolition would be inconsistent with the City's adopted Growth Strategy and existing policies appropriately guide the City's policies related to displacement. Although the applicant has provided narrative that relevant circumstances have changed, the Commission believes this evidence is not sufficient cause for reconsidering this proposal.

14. Trees

The applicant is proposing to amend various sections of the Comprehensive Plan to support the retention and expansion of the urban forest and tree canopy cover.

The Commission does not recommend this proposal for the docket citing criteria B5. This proposal would be better addressed through another process, specifically the next major update to the Comprehensive Plan.

We appreciate the opportunity to review amendments for docket setting and provide our recommendations. If you have any questions, please do not hesitate to contact me or Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,



Michael Austin  
Chair, Seattle Planning Commission

cc:

Mayor Jenny Durkan  
Seattle City Councilmembers  
Lish Whitson, Eric McConaghy; Council Central Staff  
Sam Assefa, Sara Maxana, Michael Hubner; Office of Planning and Community Development

<b>SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURES &amp; RECUSALS:</b>
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None
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## **ATTACHMENT A**

### **City of Seattle Criteria for Comprehensive Plan Amendment Selection (from Resolution 31807)**

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

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;
2. It is consistent with the Countywide Planning Policies and with the multi-county policies contained in the Puget Sound Regional Council's regional growth 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 activities identified in departmental work programs under way or expected soon, within which the suggested amendment can be considered alongside other related issues.

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 Seattle Municipal Code, and to conduct sufficient analysis and public review; and
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.

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

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.

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

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.