

September 4, 2020

## MEMORANDUM

**To:** Land Use and Neighborhoods Committee  
**From:** Eric McConaghy and Lish Whitson, Analysts  
**Subject:** 2020-2021 Comprehensive Plan Docket

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On Wednesday, September 9, the Land Use and Neighborhoods Committee (Committee) will hold a public hearing and discuss proposals to amend the [Seattle Comprehensive Plan](#). In 2020, the Council received proposals as part of the City's annual Comprehensive Plan amendment process from members of the public and the Office of Planning and Community Development (OPCD). In addition, there are a number of amendment proposals that were previously docketed by the City Council under [Resolution 31896](#) and previous resolutions, but have not been resolved.

Most years, the Council provides an opportunity for members of the public to submit amendment proposals. The Council determines which of those requests for amendments are appropriate for additional review and analysis based on criteria contained in [Resolution 31807](#). In May, the Council received 11 proposals to amend the Comprehensive Plan from members of the public. Those proposals are included in [Clerk File 321701](#). The proposals were forwarded to the Seattle Planning Commission (SPC) and 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 may carry over into the 2020-2021 process, (2) explains the criteria Council uses to determine whether proposed amendments should be selected for consideration, and (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 the SPC letter to the Council; and
- Attachment 3 is OPCD's letter to the Council;

Following the September 9 Committee meeting, Central Staff will work with Councilmember Strauss to prepare a 2020-2021 Comprehensive Plan docket resolution for introduction. The Committee is currently scheduled to vote on that resolution at its September 23 meeting.

### Background

Seattle 2035, Seattle's Comprehensive Plan, is the City's core policy document to guide the City's growth. Under the Washington State Growth Management Act, with a few limited exceptions, the City may only amend the Comprehensive Plan once a year. Most years, the City

Council solicits proposals for amendments to the plan from members of the public and City Departments and develops a “docket” of amendments to be considered the following year.

The Comprehensive Plan is a foundational, long-term document that is intended to guide the City’s growth over twenty years. Washington State law limits amendments to the plan and requires a deliberative public 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. The next major update must be adopted by June 2024.

Generally, the docketing process occurs in four steps:

1. In the spring the Council issues a call for amendment proposals. Anyone can submit a proposal.
2. 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.
3. That fall, OPCD reviews the amendments and conducts environmental analysis, making a recommendation to the Council regarding which amendments should be made.
4. 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.

Given the impact of the COVID-19 emergency on the Council’s capacity to review legislation this past summer, the timeline for the 2020-2021 docketing and amending process will need to deviate from that outlined in Resolution 31807. Instead of the December 31 deadline for recommendations from OPCD that is included in Resolution 31807, OPCD will be requested to provide a response to the docket by the end of March 2021, and the SPC will be asked to respond to any proposed amendments by the end of May 2021.

### **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 2020-2021

The Executive has not completed review of several items that were docketed under Resolution 31896 for potential consideration in 2020. The Land Use and Neighborhoods Committee may consider docketing the following items from Resolution 31896:

- Impact Fee amendments;
- An alternative name for single-family areas;

- Designation of the South Park Urban Village;
- Designation of an urban village near a future light rail station at N 130th Street and Interstate 5; and
- Amendments related to fossil fuels and public health.

As discussed in OPCD's letter, except for the amendment related to N 130<sup>th</sup> Street and Interstate 5, they have recommended against docketing these amendments for consideration in 2021 because that will take a longer time to analyze. The SPC recommends faster action on these amendments. In particular, the SPC recommends moving forward with consideration of an alternative name for single-family areas prior to the next major update to the Comprehensive Plan in 2024.

### **Discussion and Preliminary Recommendations**

The table in Attachment 1 summarizes the proposed amendments and the recommendations of the SPC, OPCD, and Central Staff.

#### Amendments recommended to move forward

Amendment 1 is recommended to move forward for more study by the SPC, OPCD and Central Staff. Amendment 1 would affect eight properties fronting the west side of 15th Ave NE between NE 56th St and NE Ravenna Blvd. It would amend the Future Land Use Map (FLUM) to extend the boundary of the University District Urban Center to include the properties and to change their FLUM designation from Multi-Family Residential to University District Urban Center. The parcels are zoned Lowrise 3 (LR3) without a Mandatory Housing Affordability requirement. In 2019, as part of Resolution 31870, the Council requested that OPCD conduct analysis of potential zoning increases in the University District Urban Center. That work would have included potential changes to the subject properties, but it has not been completed.

#### Amendment with mixed recommendations

Amendment 2 would amend the Transportation Element and FLUM to address the effects of the West Seattle High-Rise Bridge emergency closure. The proposal lists a wide range of changes related to the closure. Many of these proposals are regulatory in nature and would not affect the Comprehensive Plan. However, Central Staff recommend moving Amendment 2 forward because the Comprehensive Plan may need policy modifications to address the major, unexpected and potentially long-term impact to mobility in Seattle caused by the bridge closure. Considering whether changes to the Comprehensive Plan are merited due to this significant impact to the City's infrastructure is prudent.

SPC and OPCD disagree. They conclude that the proposal would be better addressed through the budgetary and programmatic processes currently being coordinated by the Seattle Department of Transportation.

## Amendments not recommended to move forward

Amendment 3 proposes to cease the practice of issuing potential landslide area covenants on properties undergoing development in Seattle's Environmental Critical Areas. Generally speaking, potential landslide area covenants are signed by property owners acknowledging that their property is located in or contains a potential landslide area as described in the Seattle Municipal Code (SMC) and is subject to the relevant provisions of the SMC and the rules and regulations adopted by the Director of the Seattle Department of Construction and Inspections (SDCI). The signing property owner agrees on behalf of themselves, heirs, successors and assigns to accept any and all risks of loss, damage and injury associated with use of the property; development or construction on the Property; or any combination thereof. Also, by signing the covenant the property owner waives future claims against the City. This proposed amendment would not affect the Comprehensive Plan as these covenants are provided for in the SMC. It is not recommended for the docket.

Eight proposed amendments (4, 5, 6, 7, 8, 9, 10 and 11) have been proposed in the past and have either been docketed and then not recommended for adoption or not docketed. The applicants have not indicated any changed circumstances that would warrant reconsideration of these amendments.

## Other Amendments proposed by Councilmembers and Departments

### *Trees*

Councilmember Strauss proposes to include a request that OPCD - in consultation with the Urban Forestry Commission, Office of Sustainability and the Environment and the Seattle Department of Construction and Inspections - review the goals and policies in the Comprehensive Plan related to trees. This work would be done concurrently with work currently underway to review and update the City's tree regulations.

### *130<sup>th</sup> and I-5 Station Area*

OPCD continues to work with the community surrounding the future light rail station at NE 130<sup>th</sup> Street and Interstate 5. They have proposed to make some preliminary changes to the FLUM and Comprehensive Plan policies to respond to this future land use station. Completion of a full plan and recommendations regarding an urban village at this location are likely to take more than six months to complete.<sup>1</sup>

### *Industrial and Maritime policies*

As part of the last major update to the Comprehensive Plan, adopted in 2015, the Council asked OPCD to work with stakeholders in maritime and industrial areas to consider updates to the

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<sup>1</sup> Under the Growth Management Act, the Council can adopt a new neighborhood plan and associated Comprehensive Plan amendments at any time. New subarea plans are exempt from the general requirement that the City only consider Comprehensive Plan amendments once a year.

Comprehensive Plan's industrial and maritime policies. In 2019, Mayor Durkan convened a group of stakeholders to advise the City on this work.

The Mayor's Office, OPCD, the Office of Economic Development, and the Seattle Department of Transportation continue to work with stakeholders in maritime and industrial areas to develop consensus around a package of changes to the Comprehensive Plan's maritime and industrial policies. While most of this work is likely to require more than six months to complete, OPCD anticipates that they may bring forward some preliminary amendments to the Comprehensive Plan for consideration as part of the 2021 amendments.

### **Next Steps**

Following the September 9 Committee meeting, we will finalize a resolution based on the Committee's direction and prepare it for introduction and referral to the Committee for discussion and possible vote on September 23.

### **Attachments:**

- Attachment 1. Summary of Recommendations on Proposed Comprehensive Plan Amendments
- Attachment 2. Letter from the Office of Planning and Community Development to the Council
- Attachment 3. Letter from the Seattle Planning Commission to the Council

cc: Aly Pennucci, Supervising Analyst

## Summary of Recommendations on Proposed Comprehensive Plan Amendments

#	Amendment Proposal	Short Description	Proposer	Recommendation		
				Seattle Planning Commission (SPC)	Office of Planning & Community Development (OPCD)	Central Staff
A. Amendments proposed by members of the public						
1	Eight properties fronting the west side of 15th Ave NE between NE 56th St and NE Ravenna Blvd	Amend the Future Land Use Map (FLUM) to extend the boundary of the University District Urban Center to include the properties and to change their FLUM designation from Multi-Family Residential to University District Urban Center	Katie Kendall on behalf of William Budigan	Docket	Docket	Docket
2	West Seattle High-Rise Bridge Emergency Closure	Amend the Transportation Element and FLUM to address the effects of the West Seattle High-Rise Bridge emergency closure	Deb Barker	Do not Docket (Criterion B5)	Do not Docket (Criterion B5)	Docket
3	Potential Landslide Area Covenants	Cease use of Potential Landslide Area Covenants	James Chesko	Do not docket (Criterion B3)	Do not docket (Criterion B3)	Do not docket (Criterion B3)
4	Pedestrian Grade Separation	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)
5	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 (Criterion D)	Do not docket (Criterion D)

#	Amendment Proposal	Short Description	Proposer	Recommendation		
				Seattle Planning Commission (SPC)	Office of Planning & Community Development (OPCD)	Central Staff
6	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)
7	Demolition and Displacement	Amend the Land Use Element to discourage demolition of residences and displacement of residents	Chris Leman	Do not docket (Criterion D)	Do not docket (Criterion D)	Do not docket (Criterion D)
8	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)
9	Development Monitoring	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)
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	Trees	Amend various sections of the Comprehensive Plan to support the protect trees	Dave Moehring	Do not docket (Criterion D)	Do not docket (Criterion D)	Do not docket (Criterion D)
B. Amendments docketed in 2019 for consideration in 2020, but not yet resolved						
1	Impact Fee amendments	Support implementation of an impact fee program for: public streets, roads, and other transportation improvements; publicly owned parks, open	City Council	Docket	Do not Docket (Criterion C2)	Docket



#	Amendment Proposal	Short Description	Proposer	Recommendation		
				Seattle Planning Commission (SPC)	Office of Planning & Community Development (OPCD)	Central Staff
		space, and recreation facilities; and school facilities				
2	Alternative name for single-family areas	Consider changing the name of "single-family areas" to "neighborhood residential areas"	City Council	Docket	Do not Docket (Criterion C2)	Docket
3	Designation of the South Park Urban Village;	Review whether South Park meets the criteria to be considered an urban village	City Council	Docket	Do not Docket (Criterion C2)	Docket
4	Designation of an urban village near a future light rail station at N 130th Street and Interstate 5	Work with the community to create an urban village around the future 130 <sup>th</sup> and I-5 light rail station.	City Council	Docket	Do not Docket (Criterion C2)	Docket
5	Amendments related to fossil fuels and public health.	Limit fossil fuel production and storage	City Council	Docket	Do not Docket (Criterion C2)	Docket
C. Amendments proposed by Councilmembers and City Departments						
1	Trees	Review policies related to trees	Councilmember Strauss	N/A (not submitted for consideration)	N/A (not submitted for consideration)	Docket
2	130 <sup>th</sup> and I-5	Consider preliminary changes to the Future Land Use Map and policies related to the 130 <sup>th</sup> and I-5 station area	OPCD	N/A (not submitted for consideration, see B4)	Docket	N/A (see B4)

#	Amendment Proposal	Short Description	Proposer	Recommendation		
				Seattle Planning Commission (SPC)	Office of Planning & Community Development (OPCD)	Central Staff
3	Industrial and Maritime policies	Consider preliminary changes to policies related to Industrial and Maritime areas	OPCD	N/A (not submitted for consideration)	Docket	Docket

August 31, 2020

**TO:** Council Member Dan Strauss, Chair, Land Use and Neighborhoods Committee  
**FROM:** Samuel Assefa, Director, Office of Planning and Community Development  
**SUBJECT:** Council Docketing Resolution for Comprehensive Plan Annual Amendments for 2021:  
OPCD Recommendations

This memo provides recommendations for amendments to the City's Comprehensive Plan to include on the docket for Council consideration in 2021. OPCD has reviewed 11 proposals submitted by community members for consistency with the criteria established by City Council Resolution 31807 and recommends one of these for docketing. In addition, OPCD has reviewed six previous Council-generated proposals to study amendments to the Comprehensive Plan and recommends two of these, with modifications, for docketing for 2021.

In summary, OPCD recommends that three amendment topics be further analyzed, and pending that analysis, considered for possible adoption. They are:

*Proposed amendment from the community recommended for docketing*

- Extend University District Urban Center Boundary

*Proposals in prior Council resolutions recommended for additional analysis, with modifications*

- Future Land Use Map amendment and policy amendments to support transit-oriented development in the immediate vicinity of the planned 130<sup>th</sup> Street Link Light Rail Station
- Identification of amendments to industrial land use and related policies that advance initial implementation of the Industrial and Maritime Strategy

Finally, this memo also identifies two additional areas of ongoing work – racially equitable recovery and planning for a “15-minute city” – around which OPCD may recommend comprehensive plan amendments in 2021.

**Amendments Proposed by Community**

Under the state Growth Management Act, the City may amend its comprehensive plan up to once each year. Council Resolution 31807 establishes a schedule and criteria for docketing proposed amendments on an annual cycle for consideration by the City Council. On May 15, 2020 the application period closed for community members to submit proposals to amend the plan in 2021. Eleven amendments were proposed by the community. OPCD has reviewed these proposals for consistency with the established criteria and recommends one amendment for docketing. Consistent with CR 31807, OPCD will analyze the proposed amendment, conduct environmental review, and transmit recommended amendments to Council in 2021.

**Recommended for Docketing**

OPCD recommends that the following proposed amendment to the Comprehensive Plan be docketed for further analysis and consideration for adoption:

1. Extend University District Urban Center Boundary

The proposed Future Land Use Map amendment expands the boundary of the University District Urban Center east to include the half block that fronts on the west side of 15<sup>th</sup> Avenue NE and between NE 56<sup>th</sup> Avenue and NE Ravenna Avenue.

The amendment satisfies the City Council's criteria for docketing.

**Not Recommended for Docketing**

OPCD recommends the following Comprehensive Plan amendment proposals not be docketed for 2021:

1. Heavy Vehicles

This proposal would amend the Transportation Element to add policies intended to minimize damage to streets from heavy vehicles.

This amendment is substantially the same as an amendment submitted in prior years and not docketed by the City Council.

2. 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 substantially the same as an amendment submitted in prior years and not docketed by the City Council.

3. Potential Landslide Area Covenants

This proposal seeks to amend the Comprehensive Plan to cease the practice of requiring potential landslide area covenants in environmentally critical areas.

This amendment does not address a Comprehensive Plan policy and is more appropriate to achieve through a regulatory change or Director's Rule.

4. 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 LU 5.6 to expand the purpose of its guidance to establish setbacks in residential areas to include the planting or maintenance of large trees. Language would be added to LU 5.7 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.

This amendment is substantially the same as an amendment submitted and considered in prior years and not adopted by the City Council.

5. 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 substantially the same as an amendment submitted and considered in prior years and not adopted by the City Council.

6. Rezones and Conditional uses

This proposal would amend to Land Use Element to add two new policies that provide direction for rezones 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 be to ensure that rezones and conditional use decisions are made with ample public notice and public outreach.

This amendment is substantially the same as an amendment submitted and considered in prior years and not adopted by the City Council.

7. 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 substantially the same as an amendment submitted in prior years and not docketed by the City Council.

8. 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 substantially the same as an amendment submitted and considered in prior years and not adopted by the City Council.

9. Trees

This proposal would amend the Land Use Element policy E 1.2, Environment Element policy T 4.5, and Parks Element policy P 3.3 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.

This amendment is substantially the same as an amendment submitted in prior years and not docketed by the City Council.

10. West Seattle Bridge

The proposed amendment identifies actions the City can take in response to the West Seattle Bridge closure. Currently SDOT is developing a multi-faceted response regarding repair / replacement of the West Seattle Bridge. This effort includes a robust public participation process, including formation of the West Seattle Bridge Community Task Force and a Technical Advisory Panel, and engagement with the broader community through Reconnect West Seattle efforts. SDOT has implemented quick, critical transportation improvements since the closure and as part of Reconnect West Seattle, and is working with the communities to identify and prioritize improvement projects, neighborhood mitigation proposals, and other ideas to help people choose a different mode, as able. This process may not result in the exact measures proposed by the applicant, but will address the goals of these actions in terms of identifying transportation mitigation, shifting people out of their cars, and development of a finance plan for the bridge.

This package of amendments is not recommended for docketing because the actions can either be accomplished through regulation alone or are better addressed as a budgetary or programmatic decision. None of the proposed actions would necessitate an amendment to the Comprehensive Plan.

### **Amendments Proposed for Analysis by Prior City Council Resolution**

With transmittal to OPCD of community applications proposing amendments to the Comprehensive Plan in 2021, Council central staff also called attention to potential amendments identified in several prior Council resolutions or that were previously docketed. Each is described below, along with a brief description of OPCD's current approach to addressing the proposal, including a recommendation on docketing for 2021.

### **Recommended for Docketing, With Modifications**

1. 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.*

Currently, OPCD is engaging in a community planning process around the planned Link Light Rail 130<sup>th</sup> St. Station. This work includes studying a range of potential land use changes and policy options that support transit-oriented development and may result in a recommendation to establish an urban village at this location. Completion of a plan for the full station area with recommended changes to the Comprehensive Plan requires more community input and environmental review than can be feasibly completed in time for adoption in 2021.

However, as an interim action to further the City's commitment to TOD around the 130<sup>th</sup> St. Station, the Executive is proposing to docket a future land use map amendment and rezoning of affected properties along with supportive policy language for one block adjacent and to the east of the 130<sup>th</sup> St. Station. Sound Transit is currently constructing Lynnwood Link and is considering accelerating construction of the 130<sup>th</sup> St. Station with a potential opening as early as 2025. Adopting an initial plan amendment and rezone in 2021 will enable early development of transit supportive land uses to support the new transit investment in anticipation of an early opening.

This station area planning process includes substantial public engagement. Outreach to date includes:

- Interviews with 50+ representatives of local schools, churches, community organizations and social service providers
- Community Open House at Ingraham HS attended by 100+ people
- Online Community Survey completed by 750+ people
- Community Workshop at North Seattle Church of Nazarene attended by 90+ people
- Project information at 20+ community events
- Monthly emails to 400+ subscribers
- Key Documents published: Background Report, Open House Summary and Survey Results
- Online engagement during the pandemic: a series of four online community conversations June through September

2. Resolution 31762, Section 3:

Includes direction to strengthen industrial land use policies and identifies 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 15th 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.*

The Mayor's Office convened a citywide stakeholder group and four subarea stakeholder groups to work with City departments (OED, OPCD, SDOT, OSE) in developing an Industrial and Maritime Strategy. The strategy is to be broad in scope encompassing workforce training, transportation investments, public safety, environmental, and land use policies with the goal of creating accessible living wage jobs. Among the outcomes of this process will be a land use policy framework that can guide key land use decisions on the 3 previously docketed land use changes above, planning for station areas within industrial areas, and other land use decisions relating to industrial land.

Regarding policies for industrial land uses, pending finalization of stakeholder outreach processes, we anticipate possible consolidation of some industrial land use policies. In addition, we anticipate:

- Potential strengthening of policy protections for core industrial areas near major infrastructure and in areas necessary for supporting water dependent uses
- Introduction of new policy content to improve equitable access to well-paying jobs
- A proactive land use approach for encouraging maritime, manufacturing, and logistics-connected employment in transit-oriented development near existing or high capacity transit nodes within manufacturing / industrial centers
- Introduction of new policy language to encourage a healthy, walkable, and visitor-oriented land use vision for industrial areas near urban villages or residential populations

This work was scheduled for completion in the summer of 2020, however, delays resulting from the COVID-19 response and new considerations for this work that align with the City's COVID recovery efforts mean that this work will not be completed until the 4<sup>th</sup> quarter of 2020. To complete this work, a revised workplan that centers racial equity and youth engagement will inform final recommendations.

As this work proceeds, the Executive will work with industrial and maritime stakeholders to identify potential recommendations for high-level Comprehensive Plan policy amendments in 2021, with the

bulk of implementation actions, including further Comprehensive Plan amendments, considered for adoption in 2022 or with the major Comprehensive Plan update in 2024.

### **Not Recommended for Docketing**

1. Resolution 31870, Section 2:

*Impact fee amendments. Consistent with [Resolution 31762](#), the Council requests that the Executive provide recommendations of potential amendments to Comprehensive Plan policies necessary to support implementation of an impact fee program for: public streets, roads, and other transportation improvements; publicly owned parks, open space, and recreation facilities; and school facilities. This may include amendments to update or replace level-of-service standards or to add impact fee project lists in the Capital Facilities Element and amendments to other elements or maps in the Comprehensive Plan, as appropriate.*

The City Council conducted SEPA on proposed Comprehensive Plan amendments related to transportation impact fees and issued a DNS in November 2018, which was appealed to the Hearing Examiner. The Examiner issued its decision in October 2019, requiring some additional work to be done. The Council has yet to complete that work. OPCD does not anticipate working on this issue for the 2021 amendment cycle.

2. Resolution 31870, Section 5:

*Amendments related to fossil fuels and public health. The Council requests that OPCD, in consultation with the Seattle Department of Construction and Inspections, the Office of Sustainability, and the Environmental Justice Committee, draft, evaluate, undertake environmental review and provide recommendations for potential amendments to the Environment, Land Use or Utilities Elements that would clarify the City's intent to protect the public health and meet its climate goals by limiting fossil fuel production and storage.*

This amendment is more appropriate for the 2024 Comprehensive Plan update because it will require more public outreach and staff analysis than can be feasibly accomplished, given limited resources and competing priorities, in this annual amendment cycle.

3. 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.*

The City will be adopting a major update to the Comprehensive Plan by June 2024. 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.

4. 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 2020-2021 Comprehensive Plan Docket to implement this change, as appropriate.*



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 2024.

**Ongoing Work: Racially Equitable Recovery**

The COVID-19 emergency has revealed Black, Indigenous, and People of Color (BIPOC) communities to be disproportionately impacted and at a greater risk of harm from the pandemic and its impacts. Voices of community, amplified through recent and ongoing protests, have heightened the urgency of a City response to COVID-19 that recognizes and addresses systemic racism, toward recovery that supports a more racially equitable future for Seattle.

The Seattle 2035 Comprehensive Plan, which currently contains a number of policies that promote racial equity, is an evolving tool for the City to set policy direction on land use, housing, capital facilities, transportation, and other areas of policy in a way that supports and enables the City to take actions around equitable recovery and anti-racism.

For the remainder of 2020 and into 2021, the Executive will continue to lead efforts to work with BIPOC communities to identify community needs and recommended actions. In doing so, OPCD will work to identify any additional potential amendments to the Comprehensive Plan that may be considered for adoption in 2021. We will explore the potential for amendments that support community ownership and wealth building, affordable housing, and recommendations that may emerge from an ongoing racial equity analysis of the growth strategy in Seattle 2035 (response to SLI-29-4-B-1). This work may include Comprehensive Plan amendments as a potential tool to support community ownership and provide flexibility for a range of uses at independent/BIPOC-led community centers.

**Ongoing Work: Toward Connected Complete “15-minute” Neighborhoods**

The response to COVID-19 has also highlighted the importance of the city’s neighborhoods as places where people live and increasingly work and seek to meet a wide range of daily needs. A “15-minute city,” which was recently highlighted as a key recommended strategy in the C40 Cities Green and Just Recovery Plan, has attracted interest as a framework for city planning where a variety of affordable housing choices, everyday stores and services, health care, parks, and educational and cultural institutions are all located within an easy walk or bike ride from each other.

Through the balance of 2020 and into 2021, OPCD will be exploring planning for a “15-minute” City of Seattle as a potential framework for the next major Comprehensive Plan update due in 2024. Such work would incorporate the heightened role of station areas around future transit investments and identify additional areas where 15-minute city concepts are applicable. This work could, for example, guide investments in multimodal transportation, local community amenities and facilities, neighborhood businesses, a variety of housing types and choices, and other strategic land use changes. As the City works towards the major update, the Executive may recommend incremental amendments to the Comprehensive Plan, as early as 2021, through the annual amendment process.



City of Seattle  
**Seattle Planning Commission**

August 14, 2020

Honorable Councilmember Dan Strauss, Chair  
Land Use and Neighborhoods Committee  
*via e-mail*

RE: 2020/2021 Comprehensive Plan Amendments

Dear Councilmember Strauss,

The Seattle Planning Commission is pleased to provide our comments and recommendations on which proposed 2020-2021 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

1. Extend the University District Urban Center

The applicant is requesting to extend the boundary of the University District Urban Center to include eight lots along the western side of 15th Ave NE between NE 56th St and NE Ravenna Blvd and change the FLUM designation from Multi-Family Residential to University District Urban Center.

The Commission recommends this proposal for the docket. The proposal meets the criteria and as such warrants further study. In particular, this application meets the intent of criterion G, which requires an amendment to the FLUM for any proposal that would change the boundary of an urban center, urban village, or manufacturing/industrial center, regardless of the area's size, to be considered for docketing.

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

Text Amendments

2. West Seattle High Bridge emergency closure

Commissioners  
Michael Austin, *Chair*  
Patti Wilma, *Vice-Chair*  
Sandra Fried  
David Goldberg  
Katherine Idziorek  
Grace Kim  
Patience Malaba  
Rick Mohler  
Kelly Rider  
Julio Sanchez  
Amy Shumann  
Lauren Squires  
Jamie Stroble  
Rian Watt

Staff

Vanessa Murdock  
*Executive Director*  
Connie Combs  
*Policy Analyst*  
John Hoey,  
*Senior Policy Analyst*  
Robin Magonegil  
*Administrative Analyst*

The applicant is proposing to amend City policies to assist in mitigating the emergency closure of the West Seattle High Bridge.

The Commission does not recommend this proposal for the docket citing criteria B4 and B5. This proposal would be better addressed through a budgetary or programmatic decision or 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.

### 3: Potential Landslide Area Covenants

The applicant is proposing to cease the practice of issuing Potential Landslide Area Covenants to properties in Seattle's Environmental Critical Areas.

The Commission does not recommend this proposal for the docket citing criteria B3. The intent of this proposal can be accomplished by a change in regulations. Potential Landslide Area Covenants are addressed in the Seattle Municipal Code and those regulations are consistent with the general policy intent of the Comprehensive Plan regarding Environmental Critical Areas.

### 4. 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 villages, 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.

### 5. 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. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

## 6. 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.

## 7. 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. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

## 8. 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.

## 9. 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.

#### 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. Tree Canopy and Urban Forest

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 D. This proposal has been previously submitted and rejected. It was originally proposed in the 2019-2020 amendment cycle but was not docketed citing criteria that it would be better addressed through another process, specifically the next major update to the Comprehensive Plan. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

### **Previously Docketed Amendments**

Of the eight proposed Comprehensive Plan amendments that were docketed by the City Council in Resolution 31896 for further analysis, the following five were not analyzed as part of the 2019-2020 annual amendment cycle:

- Impact fee amendments
- An alternative name for single-family areas
- Designation of the South Park Urban Village
- Designation of an urban village near a future light rail station at N 130th Street and Interstate 5
- Amendments related to fossil fuels and public health

We have concerns about waiting until the next Major Update of the Comprehensive Plan in 2024 for consideration of these proposed amendments and encourage the City Council to move forward on them sooner where appropriate. We would like to call your attention to the Commission's specific comments on one of these docketed amendments below.

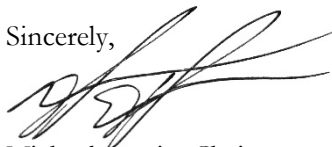
Alternative Name for Single Family Zones

The City Council proposed an amendment that would recommend an alternative name for single family zones, such as Neighborhood Residential, and amend the Land Use Element of the Comprehensive Plan to implement this change. OPCD has stated this amendment could be more appropriately addressed through the next Major Update to the Comprehensive Plan, with the rationale that it is a bigger change outside of the scope of the annual amendments. The Planning Commission has concerns about waiting until the 2024 Major Update to the Comprehensive Plan to address an alternative name for single family zoning. The name 'single family' zoning has been a misnomer since 1994 when the city passed Accessory Dwelling Unit legislation allowing two households to live on a single family zoned parcel and is not representative of the households that currently live in those zones. This name is also linked to Seattle's former use of race-based zoning as an exclusionary practice. The Commission applauds and supports the City Council in the proposed amendment that would recommend changing the name of the zoning earlier than the Major Update. This change could also serve to inform the policy process considering alternatives to single family zoning.

The Planning Commission has been a consistent advocate for reexamining Seattle's land use policies to expand the range and affordability of housing choices. Our 2018 *Neighborhoods for All* and recent *A Racially Equitable & Resilient Recovery* reports both emphasized the benefits of allowing more housing and increasing housing choices in single family zones. The Commission applauds the City Council for including funding in the 2020 budget to analyze a variety of housing types in single family zones in the Environmental Impact Statement (EIS) on the Major Update to the Comprehensive Plan. We look forward to providing our input on this subject throughout the process to update the Comprehensive Plan. In the meantime, the Commission recommends moving the effort to rename single family zoning forward sooner than the beginning of the Major Update.

We appreciate the opportunity to review the proposed 2020-2021 Comprehensive Plan 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, Michael Hubner; Office of Planning and Community Development

**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.