

## **Director's Report**

### **2016 to 2017 Amendments to the Seattle Comprehensive Plan**



**Office of Planning and Community Development  
June 2017**

## **Director's Report: Comprehensive Plan Annual Amendments 2016-2017**

The State of Washington's Growth Management Act limits the City to amending the Comprehensive Plan ("Plan") once a year. The City's regular process for annual amendments starts with the City Council receiving proposed amendments from the public and the Executive, and then, through a Council-adopted Resolution, directing the Executive and the Planning Commission to further analyze some or all of those proposals for possible incorporation in the Plan.

In August 2016, the City Council adopted Resolution 31682 docketing proposals for further analysis. Five proposals would amend the Plan's Future Land Use Map (FLUM). Two would change goals or policies in the Plan. Of those two, one is to amend language in the Chinatown/International District Neighborhood Plan and the other would direct the City to consider the potential air quality-related effects resulting from certain land use actions.

In addition, the Council's docket resolution requested the Executive consider recommendations from the Industrial Land Use Advisory Panel related to several proposals requesting a change in FLUM designation for industrial parcels. The docketing resolution also directed the Executive to evaluate amendments proceeding from the Housing Affordability and Livability Agenda (HALA) initiative.

Below is a description of each proposal identified for further analysis with additional detail about the Executive's recommendations for each. Maps showing the locations of the suggested FLUM amendments follow this section.

### **1. Proposed FLUM Amendments**

#### **PROPOSAL: 1150 EASTLAKE AVENUE E. AND 1208 EASTLAKE AVE E.**

##### **Background and Analysis**

The applicant's amendment proposal addresses would change the FLUM designation for 1208 Eastlake Avenue E. in two ways: 1) change the designation from Industrial to Commercial/Mixed Use and (2) move the boundary of the South Lake Union Urban Center to encompass this parcel, which is currently located within the Eastlake Residential Urban Village.

This parcel is zoned Industrial Commercial (IC)-45 and has a Shoreline environment designation as Urban Maritime (UM), and is considered an "upland" lot. This parcel is adjacent to over 21 acres of Industrial General 1 zoned parcels along the shoreline. Relevant Plan policies relating to industrial lands include Land Use Element Policy 10.2, which calls for "Preserv[ing] industrial land for industrial uses", and Policy 10.22 which specifically addresses IC zones, maintaining that development density in those zones should be limited to "reflect transportation and other infrastructure constraints." These policies may change based on the anticipated recommendations from the Mayor's Industrial Land Use Advisory Panel.

As to the first proposal, the Council's revisions to the Plan in 2016 mean that all parcels located either within an urban center or a residential urban village now have the same FLUM designation. Therefore, this proposal is no longer necessary or relevant, and Council does not need to address it.

The second proposal would adjust the boundaries of the Urban Center and Residential Urban Village, moving the parcel from the Eastlake Residential Urban Village into the South Lake Union Urban Center.

The applicant's proposal reflects the intention to apply for a rezone to the same zoning as the neighboring parcel at 1150 Eastlake, that is, Seattle Mixed 125.

"The changes would ultimately result in a rezoning of the Property to a zone consistent with the Comprehensive Plan designation that would align with the Neighboring Parcel's zoning." (Amendment application, Alexandria Real Estate Equities, May 13, 2016)

Thus, the Council's decision to adjust the boundary could lead to a likely request for a contract rezone to Seattle Mixed (SM). Considering that consequence, Council's decision about adjusting the boundary between the residential urban village and the urban center boundary should be informed by the specific Plan policies that guide land use and boundary adjustments:

**GS 1.3** Establish boundaries for urban centers, urban villages, and manufacturing/industrial centers that reflect existing development patterns; potential access to services, including transit; *intended community characteristics*; and recognized neighborhood areas.  
(emphasis added)

Council's consideration of "intended community characteristics" can be informed by the Plan's direction for SM zones and, by contrast, the Plan's direction for parcels with an Urban Maritime designation within Residential Urban Villages (RUV) such as Eastlake, as well as by relevant policies in the Eastlake Neighborhood Plan. Policy EL-P12 in that Plan, for example, encourages "strengthening and enhancing the neighborhood's existing maritime uses."

As a guide to the intended community characteristics of Seattle Mixed parcels, the Plan describes Seattle Mixed as a "pedestrian-oriented commercial area" with "development standards that produce more walkable environments and are better for housing development." The result of the Council's boundary adjustment, followed by approving the applicant's rezone to SM-125, would be a development that is likely to include residential development within a mixed-use structure.

Considering these consequences, Council's consideration of the request for a boundary adjustment should be guided by Plan policies describing the intended community characteristics of development in RUVs. LU 1.3, for example, calls for a low to moderate density and scale of development in RUVs. Policies in neighborhood plans are also relevant to intended characteristics, and Policy EL-P12 of the Eastlake Neighborhood Plan identifies as a priority the "strengthening and enhancing [of] the neighborhood's existing maritime uses and habitat."

As another consideration, the residential uses that would be allowed by the applicant's intended SM-125 zone are not favored in parcels with certain types of Shoreline designations, including Urban Maritime (UM). Generally, the purpose of UM-designated parcels is to provide for water-dependent and water-related industrial and commercial uses on smaller lots. (Plan, SA G36) A wider range of uses is allowed on upland lots, such as this, but with specific guidance from the Plan that those uses be complementary and not conflict with the water-dependent uses on the waterfront lots. Upland lot uses should "support water-dependent and water-related uses on waterfront lots [and] avoid...potential incompatibility with those uses." (Plan, SA P1(2), SA P4)

LU 2.3 is also relevant: “Allow residential use outright or as a conditional use in all zones except industrial zones and those shoreline areas where residential uses may conflict with the intended function of the shoreline environment.”

The applicant indicated an intention to schedule meetings with the Eastlake Community Council, but has not reported any results from those meetings to OPCD.

## **Recommendation**

OPCD does not recommend approval of the second proposal. The Plan provides clear guidance about boundary adjustments being informed by intended community characteristics. The applicant’s stated intention to apply for a rezone to Seattle Mixed would create development with different characteristics than those called for by the Eastlake neighborhood plan and policies guiding development on Shoreline parcels with Urban Maritime designations. Council does not need to address the first proposal since it was made moot by the adoption of the Seattle 2035 Comprehensive Plan FLUM.

## **PROPOSAL: 1625 S. COLUMBIAN WAY**

The proposal seeks to amend the FLUM from a Single Family (SF) designation to either a Multi-Family or Commercial / Mixed Use designation.

### **Background and Analysis**

#### Area description, zoning and uses

The proposed site is 2.64 acres and triangular in shape. It is bound by South Columbian Way, South Snoqualmie St. and 16th Ave South, which is an alley. The surrounding area includes single family structures and institutional uses such as schools, both public and private, and the Veteran’s Administration campus, which is east of the site across Columbian Way. To the north is a small area zoned Neighborhood Commercial with land uses including an open-air produce stand, a small grocery store, and a café.

The site is zoned SF 5000. It directly borders a large area zoned SF 7200, and the majority of the surrounding parcels are zoned SF 5000, with the exceptions being the small area of Neighborhood Commercial zoning to the northwest and the Major Institution overlay occupied by the Veteran’s Administration Hospital to the east. The existing use on the site is the Torah Day School housed in a former church. The site is not within any urban center or village or Station Area Overlay District.

The Plan provides specific guidance as to when FLUM amendments are necessary in Land Use Policy 1.5: “Require Future Land Use Map amendments only when needed to achieve a significant change to the intended function of a large area.” The applicant has indicated an intent to pursue a rezone to a low-rise multifamily zone. Such zones allow only residential uses. This would not be a significant change from the largely residential function and use allowed by the current single-family zoning. Further, while the site is somewhat larger than typical parcels in the SF zones, it is only one parcel and should not be considered a ‘large area’.

The FLUM is intended to give general direction about the City's future land use pattern. As such, it is distinct from the City's zoning map, and thus is not intended to be a parcel-by-parcel representation of zoning. This purpose is stated in Policy 1.5 and supports the City's practice to not use the FLUM for indicating allowed uses or densities on individual parcels. The characteristics of this site do not meet the criteria in LU 1.5 and a FLUM change would not be appropriate.

Another consideration is Plan policy 8.1, which guides the Council's designation of multi-family areas:

LU 8.1 Designate as multifamily residential areas those places that either are predominantly occupied by multifamily development or are within urban centers or urban villages.

The applicant's parcel is neither within an urban center or village boundary nor is it predominantly occupied by multi-family development, and a multifamily designation would thus not be appropriate.

The question as to the appropriate designation of this site relates more to zoning than to a FLUM decision. SDCI may consider an application for a rezone when no FLUM amendment is necessary. Therefore, if Council decides to not change the FLUM the applicant can still pursue a contract rezone to be considered by Council at a later date.

### **Recommendation**

OPCD does not recommend a FLUM change. Maintaining the current FLUM designation does not prevent the applicant from pursuing a rezone.

### **PROPOSAL: 1807 20TH AVENUE SOUTH**

The applicant makes two proposals: 1) to amend the FLUM designation of three parcels to multi-family from the current designation as single-family and 2) to amend language in the North Rainier Neighborhood Plan that currently limits rezones of single-family zoned parcels. The applicant's parcels are located within the North Rainier Hub Urban Village.

### **Background and Analysis**

Council's adoption of a new version of the FLUM as part of its action on Seattle 2035 in October 2016 established the same FLUM designation for all parcels within Hub Urban Villages. The parcels to which the applicant's amendment pertains are within the North Rainier Hub Urban Village. The applicant's second proposal is to amend language in the North Rainier Neighborhood Plan, but the applicant has not provided any evidence of engagement with the neighborhood or demonstration of support for this proposal.

### **Recommendation**

The applicant's first proposal to amend the FLUM is unnecessary because the 2016 adopted Comprehensive Plan created one FLUM designation for all parcels within urban centers/urban villages. As to the second proposal, the applicant has not provided any evidence of recent communication with the neighborhood or support for this potential change. Therefore, OPCD does not recommend this proposal for adoption.

## **PROPOSALS: 844 NW 48TH STREET, 1616 W. BERTONA STREET**

The applicant for 844 NW 48<sup>th</sup> Street requests a change to the FLUM designations of six parcels within the Ballard-Interbay North Manufacturing-Industrial Center (BINMIC) from Industrial to Commercial/Mixed Use. The applicant for 1616 W. Bertona seeks Council approval to change the FLUM designation of two parcels from Industrial to Commercial / Mixed Use and also to remove the parcels from the BINMIC.

### **Background and Analysis**

Resolution 31682 directed the Executive to consider these two proposals to amend the FLUM in the context of the Mayor's Industrial Lands Advisory Panel:

“Section 2. Manufacturing/industrial amendments. The Executive is requested to provide recommendations for 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. The review should examine the locational needs, potential for use conflicts, and adjacency issues associated with emerging and innovative industrial uses, such as custom and craft producers with a retail component and other mixed-use development that includes light industrial activity. *As part of that review, the Executive should consider the proposed amendments for NW 48th Street and W Bertona Street contained in Clerk File 319807 and provide a recommendation to the Council on whether those proposals would be consistent with any changes in policy direction for the Ballard/ Interbay Manufacturing/ Industrial District.*” (emphasis added)

The Industrial Land Advisory Panel was convened in 2016 and continues to meet to discuss industrial land use issues. The Panel is currently scheduled to conclude its deliberations and make recommendations to the Mayor in August 2017.

### **Recommendation**

OPCD recommends postponing decisions on these requests until the Advisory Panel’s recommendations are finalized so that the implications of those recommendations for these sites can be determined and applied to these proposed amendments.

## **2. Proposed Amendments to Goals and Policies**

### **PROPOSAL: AMEND GOALS AND POLICIES OF THE CHINATOWN/I.D. NEIGHBORHOOD PLAN**

OPCD has proposed amendments that implement the Cultural and Economic Vitality Goal within the Chinatown/International District Urban Center Village neighborhood plan. The substantive changes are revised or new language for Policies P1, P6, P8 and P9. Other changes reflect re-numbering.

#### **Background and Analysis**

OPCD has been actively engaged with the Chinatown/I.D. community, working with the Interim Community Development Association and the Seattle Chinatown International District Preservation and Development Authority (SCIDpda). That engagement produced these proposed amendments to the neighborhood plan section of the Plan. Since the adoption of Council's docketing resolution, the community has suggested changes to the original language of the amendments, and the version below reflects those suggestions. The revised language has the same general intent as that adopted in Council's docketing resolution.

#### **Recommendation**

The following amendments are supported by the community, and the Executive recommends approval.

#### **Proposed amendments to the Chinatown/ID Neighborhood Plan**

##### **Chinatown/International District**

###### **CULTURAL & ECONOMIC VITALITY GOAL**

**ID-G1** Thriving businesses, organizations, and cultural institutions.

###### **CULTURAL & ECONOMIC VITALITY POLICIES**

**ID-P1** Work with the Chinatown/International District community to strategically coordinate plans, programs and projects to better support thriving businesses, organizations, and cultural institutions in Chinatown, Japantown, and Little Saigon areas.

**ID-((P4)) P2** Support marketing activities that promote neighborhood businesses, events, and cultural opportunities.

**ID-((P2)) P3** Work with the Chinatown/International District community to develop business improvement strategies to encourage greater customer patronage of individual businesses.

**ID-((P3)) P4** Encourage new business development and location within the neighborhood.

**ID-((P4)) P5** Emphasize nighttime activity to tap into a new market for businesses.

**ID-((P5)) P6** ~~((Support development of a)) Enable greater access for the neighborhood's residents and employees to the neighborhood's multipurpose community recreation center, library ((with space for community programs and associations)) and other public amenities.~~

**ID-((P6)) P7** Improve utility infrastructure, when appropriate, to support community needs.

**ID-P8** Work with the Chinatown/International District to develop anti-displacement strategies to maintain or, if possible, increase availability of affordable commercial space in Chinatown, Japantown, and Little Saigon areas.

**ID-P9** Work with the Little Saigon community on strategies to strengthen its culturally-based neighborhood identity.

The remaining changes to the Chinatown/I.D. plan are limited to re-numbering and are shown in Attachment 2 to the Ordinance.

## **PROPOSAL: AIR QUALITY EFFECTS ON SENSITIVE LAND USES**

The docketing resolution directed OPCD to work with the Seattle King County Public Health Department and the Puget Sound Clean Air Agency to evaluate and provide recommendations for potential amendments to the Comprehensive Plan to consider the health impacts of allowing or increasing residential development adjacent to high volumes of air pollution.

### **Background**

Seattle/King County Public Health and the Puget Sound Clean Air Agency have provided guidance and research findings to assist in assessing the potential effects of housing development near corridors with high volumes of vehicle traffic, the King County Airport, major rail yards, freight routes, and point sources of pollution.

Vehicle emissions are a major source of this region's air pollutants, particularly carbon monoxide, oxides of nitrogen and particulate matter. Those pollutants are known to cause adverse health effects on people, especially children, older adults, and people with pre-existing cardiopulmonary disease. Research on how pollution from roadways can affect human health have mostly focused on roadways that carry high volumes of traffic, such as four-lane roads and freeways. Exposure to these concentrations of air pollution can lead to:

- Reduced lung function among adults who already suffer from asthma
- Prevalence of respiratory symptoms and asthma among children
- Increases in student absences from school
- Negative effects on cognition, especially early in life

The relationship between traffic and health impacts can be affected not only by the volumes of

traffic and proximity to it, but also by the mix of vehicles, wind speed and wind direction. Roads that carry relatively high volumes of large diesel trucks produce more particulate matter that is responsible for a number of the negative health impacts.

Similar results have been published about the air pollution produced at airports and its impacts on nearby residents. For instance, in one study children living near Logan Airport in Boston were estimated to have three to four times the likelihood of undiagnosed asthma, compared with children in the low exposure area, after accounting for socioeconomic and other factors. In addition, adults living near the airport were almost twice as likely to have chronic obstructive pulmonary disease, compared to adults in the low exposure area.

The research literature does not make specific recommendations about how local governments should respond to these findings. However, the State of California Air Resources Board drew on that research in producing its publications, *Air Quality and Land Use Handbook*, a report providing guidance to local governments' decisions about locating sensitive land uses near pollution sources. The guidance defines sensitive land uses as residences, schools, day care centers, playgrounds, and medical facilities. Its recommendations include:

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day
- Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week)
- Avoid siting new sensitive land uses within 1,000 feet of a major rail service and maintenance yard

## Analysis

The California Air Resources Board guidelines focus on roadways with traffic volumes of 100,000 or more vehicle trips per day. In Seattle, only I-5 and I-90 exceed 100,000 trips per day. The segment of SR 99 on the 1<sup>st</sup> Ave. S. Bridge had about 95,000 trips per day in 2013.

Several locations within 500 feet of these routes in Seattle contain existing multifamily or commercial zones that would allow additional housing. These include the Northgate, University District, South Lake Union, Capitol Hill/First Hill and Downtown urban centers; the Green Lake, Roosevelt, Eastlake, 23/Jackson, North Beacon Hill and North Rainier urban villages; as well as some areas along I-90 outside urban centers and villages and on both sides of I-5 near Georgetown. A potential new urban village near the proposed light rail station at N. 130<sup>th</sup> St. could also be a place where more housing would be considered near the freeway. The Interbay area along 15<sup>th</sup> Ave W. between about Nickerson and Dravus is within 1,000 feet of a major rail yard, and the Georgetown neighborhood is less than 1,500 feet from the King County Airport runway.

Recognizing that variables other than the volume of traffic and proximity to that traffic are not the only factors affecting exposure, the California report includes the following notes to accompany the guidelines:

- Recommendations are based primarily on data showing that the localized air pollution exposures addressed here can be reduced as much as 80% with the recommended separation.
- To determine the actual risk near a transportation facility, a site-specific analysis would be required.
- Risk from diesel particulate matter will decrease over time as cleaner technology phases in.
- These recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists.
- Site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses.

## **Recommendation**

The Executive recommends that the following policy be added to the Land Use Element of the Comprehensive Plan:

LU 1.6 Consider and seek to reduce the potential health impacts of air pollution on residential populations and other sensitive uses near corridors with high volumes of vehicle traffic, the King County Airport, major rail yards, freight routes, and point sources of pollution.

This policy would direct the City to consider air quality impacts on people who would be living in new housing or using new facilities located in areas where there are high levels of air pollution. This could apply, for instance, when the City is considering actions that would increase the number of housing units near an air pollution source, or when it is considering the siting of a new school or daycare facility in such a location. One way the City could implement this would be to prepare a map that shows the pollution sources of concern and a buffer area around them to indicate locations where further study might be warranted prior to making decisions that would allow certain uses. Further study could recognize that variations in local conditions, such as topography, wind direction, wind speed and site design could produce different levels of impact on the sensitive uses. Some locations or projects may lend themselves to measures that could reduce exposure to air pollutants. Given the variety of conditions in areas that may be exposed to high volumes of air pollution contemplated under this policy, it would be appropriate to review projects in the identified areas on a case-by-case basis.

## **AMENDMENTS PREVIOUSLY DOCKETED**

Section 1 of Resolution 31682 (the Council's docketing resolution for these amendments) referred to amendments previously docketed through Council work programs. These include amendments related to the Housing Affordability and Livability Agenda (HALA). The Council adopted a work program related to HALA in 2015 through Resolution 31612. Although those HALA-related Comp Plan amendments were anticipated to be forwarded to the Council in 2017, work continues on those proposals, and thus no Executive recommendations related to those amendments are included in this Report.