

September 15, 2021

## MEMORANDUM

**To:** Land Use and Neighborhoods Committee  
**From:** Lish Whitson and Eric McConaghy, Analysts  
**Subject:** Council Bills 120154 and 120155: 2021 Comprehensive Plan Amendments

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On September 22, the Land Use and Neighborhoods Committee (Committee) will discuss and hold public hearings on [Council Bill \(CB\) 120154](#) and [CB 120155](#), both related to Seattle 2035, the City's Comprehensive Plan. CB 120154, as proposed by the Mayor, would make three sets of amendments to the Comprehensive Plan. CB 120155, as proposed by Councilmembers Mosqueda and Strauss, would make multiple amendments to the plan to change the name of "single family areas" to "neighborhood residential areas." The amendments in the two CBs were among the Comprehensive Plan amendments docketed through [Resolution 31970](#) in 2020 for consideration and possible action in 2021.

This memorandum briefly describes the amendments to the Comprehensive Plan proposed in CB 120154, describes all amendments docketed in 2020 via Resolution 31970, and reports on the status for all docketed amendments with the recommendations of the Office of Planning and Community Development (OPCD) and the Seattle Planning Commission (SPC).

Please, see the [Central Staff memorandum to the Committee](#) dated July 21, 2021, for the in-depth discussion of CB 120155.

### **CB 120154**

The first and second set of amendments in CB 120154 would:

1. Amend the Future Land Use Map (FLUM) to expand the University District Urban Center boundaries to include the half block of adjacent land bounded by 15th Avenue NE to the east, NE Ravenna Avenue to the north, NE 56th Avenue to the south, and an alley that is the boundary to the University District Urban Center to the west.
2. Implement an early recommendation from the [130th and 145th Station Area Plan](#), including:
  - a. Amendments to the FLUM changing approximately 8 acres comprising a one-block area immediately to the east of the future NE 130th Avenue Link light rail station from single-family residential to multi-family residential and commercial/mixed-use; and
  - b. Amendments to the Growth Strategy and Land Use elements to support changes to zoning in residential and commercial areas near future light rail stations outside of urban villages.
3. The third set of proposed amendments would add policies to the Land Use element of the Comprehensive Plan related to manufacturing and industrial areas.

The amendments to the comprehensive plan related to manufacturing and industrial areas are still under environmental review and should be removed from the bill prior to Council action. The Council may not act on these amendments prior to completion of environmental review. The amendment found in Attachment 1 to this memorandum would remove these policies from Attachment 3 of CB 120154. The Committee should adopt this amendment prior to final action on CB 120154.

### **Amendments Docketed in 2020 via Resolution 31970**

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 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 Council adopted the 2021-2021 docket via Resolution 31970. Resolution 31970 includes three categories of amendments:

1. Items for review and analysis by OPCD with a report in 2021;
2. Additional items for review and analysis by OPCD; and
3. Additional items that the Council anticipated considering in 2021

The following discussion describes the amendments by category and the actual 2021 outcomes for the docketed amendments to date.

#### **1. 2020-21 Docket: Items for review and analysis by OPCD with a report in 2021**

Via Resolution 31970, the Council requested OPCD to review, analyze, develop recommendations, complete environmental review, conduct public outreach, and send a recommendation to the Council in 2021 on six potential amendments:

- 1A. Expanding the boundary of the University Community Urban Center to include the west side of 15th Avenue Northeast between NE 56th Street and NE Ravenna Boulevard;
- 1B. Review of policies and maps in the Comprehensive Plan to determine whether any changes are warranted due to the failure of the West Seattle Bridge;
- 1C. Review of goals and policies in the Comprehensive Plan regarding trees;
- 1D. Amendments to change the name of single-family areas in the Comprehensive Plan and Single-family zones in the Land Use Code to a name such as "neighborhood residential;"
- 1E. Preliminary changes to the Future Land Use Map and goals and policies related to the station area around the future 130th and I-5 light rail station; and
- 1F. Preliminary changes to industrial and maritime area policies coming out of work to develop a new Industrial and Maritime Strategy.

OPCD only analyzed four of the six amendments (amendments 1A, 1C, 1E and 1F of the above list). Of the four amendment proposals OPCD analyzed, the Mayor’s proposal in CB 120154 includes amendments based on OPCD’s analysis of three of them (1A, 1E and 1F). OPCD did not recommend amendments related to trees at this time (amendment 1C) because the City is currently developing an update to the Urban Forestry Plan (UFP) with the Urban Forestry Commission (UFC). After the adoption of the updated UFP, OPCD plans to work with the Office of Sustainability and the Environment (OSE) and the UFC on possible tree amendments as part of the 2024 major update to the Comprehensive Plan.

OPCD did not analyze two amendments (amendments 1B and 1D).

OPCD declined to study the West Seattle Bridge amendment proposal (amendment 1B) because a faster timeline for repairing the bridge was identified after adoption of Resolution 31970. OPCD found the time between adoption of any amendments warranted by the failure of the bridge and the expected timing for replacement of the bridge in 2022 would be too brief for amendments to be necessary to support changes to the Comprehensive Plan related to the bridge closure.

OPCD did not analyze the proposal to change the name “single-family areas” to “neighborhood residential” (amendment 1D) because the department found that the proposal would be more appropriately addressed through the major update to the Comprehensive Plan in 2024. Councilmembers Mosqueda and Strauss are sponsoring CB 120155 to change the name of single-family areas to “neighborhood residential.”

See the Director’s Report on the 2021 Annual Amendments to the Seattle Comprehensive Plan (Attachment 2), for OPCD’s full report on its work and its recommendations.

## 2. 2020-21 Docket: Additional items for review and analysis by OPCD

In the second section of Resolution 31970, Council communicated its intent to consider certain amendments when review, analysis, environmental review, and public engagement is complete. The amendments were organized into four topics:

- 2A. Review of whether the South Park urban village meets the criteria for an urban village;
- 2B. Completion of the work around the N 130th Street and Interstate 5 light rail station, including consideration of whether a new urban village should be designated in the area;
- 2C. Amendments related to reducing the impacts of fossil fuel production and storage on public health and climate goals; and
- 2D. Completion of the City’s Industrial and Maritime Strategy.

Per the Resolution, the Council would have considered these as part of the 2021 amendments if the necessary review had been completed during the 2020-21 annual cycle.

Otherwise, the Resolution communicates the Council's request to OPCD for an update on the status of these amendments or timeline for their completion.

Regarding amendment items 2B and 2D, OPCD is continuing work on these topics and recommended amendments as described earlier in this memo. OPCD did not analyze items 2A and 2C stating that they would be more appropriately addressed as part of the major update to the Comprehensive Plan. See the Director's Report for more detail.

Council did include amendment items 2A and 2C as part of the 2021-22 Comprehensive Plan amendment docket, adopted August via [Resolution 32010](#).

### 3. 2020-21 Docket: Additional items that the Council anticipated considering in 2021

At the time of adoption of Resolution 31970, the Council was reviewing one set of amendments dealing with impact fees. Rather than requesting OPCD to undertake this work, the Council intended to review and analyze this topic with a goal to have a proposal available for consideration in 2021.

Work with a consultant on an updated rate study and project list for transportation impact fees is ongoing. A future project list could include projects authorized under either the Growth Management Act impact fee authority or the City's authority as a Transportation Benefit District. Council is not prepared at this time to consider impact fee amendments but did docket them as part of Resolution 32010.

### Seattle Planning Commission Recommendations

For the entire collection of the 2020-21 docketed amendments, Resolution 31970 included the Council's request to the SPC to review all amendment proposals by OPCD or the Council in 2021 and send their recommendations to the Council. On August 13, 2021, SPC reviewed the amendments proposed in 2021 and sent a letter to the Council with their recommendations (Attachment 3).

In their letter to the Council, SPC recommended the amendments included in the Mayor's proposal, CB 120154, for approval:

- FLUM amendment to extend the University District Urban Center;
- 130<sup>th</sup> Street Station FLUM and Comprehensive Plan text amendments; and
- Industrial land text amendments – new policies

SPC also expressed strong support for strengthening protections for industrially zoned lands and for the name change for single-family areas. Please, see Attachment 2 for SPC's complete set of recommendations and commentary.

**Next Steps**

The Committee will hold public hearings on Council Bills 120154 and 120155 on September 22. The Committee is currently scheduled to vote on the bills at its September 24 meeting.

**Attachments:**

1. Amendment 1: Substitute for Attachment 3 to CB 120154
2. OPCD Director's Report, 2021 Annual Amendments to the Seattle Comprehensive Plan
3. Seattle Planning Commission 2020-2021 Comprehensive Plan Amendment Recommendations

cc: Esther Handy, Director  
Aly Pennucci, Policy and Budget Manager

Attachment 1 – Amendment 1: Substitute for Attachment 3 to CB 120154

Eric McConaghy

**Date: September 2, 2021**

**Version: 1**

**Amendment 1**

**to**

**CB 120154 - OPCD 2020-2021 Comprehensive Plan Annual Amendments ORD**

**Sponsor: CM Strauss**

Substitute Attachment 3 to CB 120154

This substitute Attachment 3 to CB 120154, version2, does not include the text amendments to the Comprehensive Plan dealing with industrial areas that were included in the Attachment 3, version 1, as transmitted by the Mayor. Changes compared to version 1 of Attachment 3 to 120154 are tracked in the substitute in red. Otherwise, the substitute Attachment 3 is the same as transmitted.

**Effect: No changes to industrial land policies would be affected with the approval of CB 120154.**

## Comprehensive Plan Text Amendments

### Citywide Planning

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### Growth Strategy

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### Urban Village Strategy

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### POLICIES

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**GS 1.7** Promote levels of density, mixed-uses, and transit improvements in urban centers and villages, and other residential and commercial areas near future light rail stations that will support walking, biking, and use of public transportation.

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### Urban Design

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### Built Environment

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**GS 3.20** Consider taller building heights in key locations to provide visual focus and define activity centers, such as near light rail stations in urban centers and urban villages and other residential and commercial areas near future light rail stations.

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### Land Use

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### Multifamily Residential Areas

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### POLICIES

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**LU 8.4** Establish evaluation criteria for rezoning land to multifamily designations that support the urban village strategy and transit-oriented development, create desirable multifamily residential neighborhoods, maintain compatible scale, respect views, enhance the streetscape and pedestrian environment, and achieve an efficient use of the land without major impact on the natural environment.

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**Industrial Areas**

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**POLICIES**

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~~**LU 10.28** Permit commercial uses in industrial areas to the extent that they reinforce the industrial character, and limit specified non-industrial uses, including office and retail development, in order to preserve these areas for industrial development.~~

~~**LU 10.29** Ensure predictability and permanence for industrial activities in industrial areas by limiting changes in industrial land use designation. There should be no reclassification of industrial land to a non-industrial land use category except as part of a City-initiated comprehensive study and review of industrial land use policies or as part of a major update to the Comprehensive Plan.~~

~~**LU 10.30** Recognize the unique development opportunity that the Washington National Guard Armory in the BINMIC represents. Work with the State of Washington or other future owners of this site to develop a comprehensive industrial development plan. Goals for this plan include green infrastructure, consolidated waste management programs, and workforce equity commitments.~~

# **Director's Report and Analysis on the Mayor's Recommended Comprehensive Plan 2021 Annual Amendments**



Office of Planning and Community Development

July 2021



## **Director's Report and Analysis on the Mayor's Recommended Comprehensive Plan 2021 Annual Amendments**

### **Section 1 – Introduction**

This document describes the Mayor's recommendations for amending the City's Comprehensive Plan, Seattle 2035. The Washington State Growth Management Act (GMA) permits, with some exceptions, the City to amend its Comprehensive Plan once a year. As required by the GMA, the Comprehensive Plan (Comp Plan or Plan) includes goals and policies that guide City actions for managing future population, housing, and employment growth over a 20-year period. The Mayor recommends adoption of several amendments contained in the City Council Resolution 31970, which docketed potential amendments for consideration in 2021. The annual amendment process is described in City Council Resolution 31807 which was adopted on April 23, 2018, and consists of several phases (with adjusted timing this year due to the COVID-19 pandemic):

- The City Council accepted applications seeking Comprehensive Plan amendments from April 1, 2020 to May 15, 2020.
- Adoption of a Docketing Resolution. The Council adopted resolution 31896 on September 29, 2020, identifying amendments to be “docketed” for further consideration in the 2020-2021 cycle. This resolution also included proposed Comprehensive Plan amendments identified for future consideration by the City Council in previous legislative actions.
- Analysis of proposed amendments by the Office of Planning and Community Development (OPCD) and the Seattle Planning Commission, with recommendations to the Council for action on selected amendments. This report constitutes a summary of the analysis conducted by OPCD and its recommendations to Council.
- Consideration of recommended amendments by the City Council commencing in September of 2021.

### **Section 2 – Background on Seattle's Comprehensive Plan and Amendment Process**

The City first adopted a Comprehensive Plan in 1994 and conducted a major update of the Plan in 2015, extending the Plan's horizon to 2035, and planning for revised 20-year growth estimates. GMA requires that all comprehensive plans include seven chapters, or “elements” – land use, transportation, housing, capital facilities, utilities, parks and open space, and economic development. GMA also requires that certain cities, including Seattle, have elements in their plans that address marine container ports. In addition to the required elements, Seattle has chosen to include elements related to growth strategy, environment, arts and culture, community well-being, community

engagement, and shorelines in the City's Plan. Currently the City is preparing to launch a major update of the Comprehensive Plan with new growth estimates to be adopted in 2024.

Through its annual amendment process, the City has amended the plan nearly every year since it was first adopted. Unlike the major updates, the annual amendment process does not incorporate new growth estimates and is narrower in scope.

### **Section 3 – Docketed Amendments Recommended for Adoption**

Based on OPCD's evaluation, the Mayor recommends the following amendments be adopted into the City's Comprehensive Plan:

- Future Land Use Map amendment to expand the University District Urban Center boundaries to include the half block of adjacent land bounded by 15<sup>th</sup> Avenue NE to the east, NE Ravenna Avenue to the north, NE 56<sup>th</sup> Avenue to the south, and an alley that is the boundary to the University District Urban Center to the west.
- Future Land Use Map and text amendments changing approximately 8 acres comprising a one-block area immediately to the east of the future NE 130<sup>th</sup> Avenue Link light rail station from single-family residential to multi-family residential and commercial / mixed-use and amending locational criteria for these land use designations to include areas near transit stations outside of urban villages.
- Initial amendments to industrial land use policies to implement the Industrial and Maritime Strategy stakeholder recommendations. The first amendment is to limit future land use map amendments that remove land for Manufacturing / Industrial Centers (M/ICs) to major updates of the Comprehensive Plan or as part of a comprehensive study evaluating all industrial land in Manufacturing / Industrial Centers. The second is to establish the City's intent to work with the State of Washington to conduct a master planning process for future industrial redevelopment of the Interbay National Guard Armory site located in the Ballard-Interbay-Northend Manufacturing / Industrial Center (BINMIC).

## **University District Urban Center Future Land Use Map Amendment**

**Proposal:** Expand the University District Urban Center boundary to include the half block of adjacent land bounded by 15<sup>th</sup> Avenue NE to the east, NE Ravenna Avenue to the north, NE 56<sup>th</sup> Avenue to the south, and an alley that is the boundary to the University District Urban Center to the west (Exhibit A).

**Element:** Growth Strategy and Land Use (Future Land Use Map)

**Submitted by:** Katie Kendal on behalf of William Boudigan

### **Background**

The area subject to the proposed Future Land Use Map (FLUM) change is a half block of property currently designated multi-family residential on the FLUM and zoned LR3. Development on the land consists of predominantly multi-family structures that front on 15<sup>th</sup> Avenue NE. Immediately west of the subject area, properties that are currently part of the University District Urban Center on the FLUM are zoned LR3 and are developed with a mix of multifamily structures. To the east, across 15<sup>th</sup> Avenue NE property is designated multi-family residential on the FLUM and is zoned LR3(M) except for one parcel at the north end of the block that is designated single-family residential and zoned SF5000. The block that faces 15<sup>th</sup> Ave NE south of NE 56<sup>th</sup> St is within the University District Urban Center on the FLUM and is zoned LR3. This area is also predominantly developed with multi-family structures. To the north, across Ravenna Avenue NE land is designated multi-family residential on the FLUM and is zoned LR3(M).

Expansion of the University District Urban Center boundary to include the subject area will result in a slight increase of development capacity above its current designation. Although the zoning will remain LR3 without a mandatory housing affordability (MHA) suffix, this zone permits heights for apartments to increase from a height limit of 30 feet outside an urban center to a height of 40 feet if located in an urban center. Maximum Floor area ratio in this zone for apartments increases from 1.3 outside of an urban Center to 1.5 inside an urban center. The current maximum density of 1 dwelling unit per 800 square feet of lot area for apartments will not change. The applicant is seeking inclusion of the subject area in the Urban Center to provide future redevelopment options and will be seeking a contract rezone in the future to add an M suffix to the zoning designation. With an M suffix, permitted height would increase to 50 feet and permitted FAR would increase to 2.3. Applying an M suffix to the zone means that any future project would need to provide some affordable housing as part of the development of make a fee contribution to affordable housing.

### Height and FAR Limits in LR3 Zone

Housing Type/FAR Limit	Current Condition (outside Urban Center with no MHA suffix)	Proposed Condition (inside Urban Center without MHA suffix)	Proposed Condition with future contract rezone to add an MHA suffix.
Cottage Housing	22 feet	22 feet	22 feet
Rowhouse or Townhouse development	30 feet	30 feet	50 feet
Apartments	30 feet	40 feet	50 feet
Floor Area Ratio	1.2 (except 1.3 for apartments)	1.2 (except 1.5 for apartments)	2.3

### Public Engagement

The applicant has sent notices of this proposal to all addresses within 300 feet of the area subject to the proposal and asked that comments be sent to OPCD. The notices informed recipients of the proposed action, directed them to a web site with background information, and provided an opportunity to comment. This comment period runs concurrent with the SEPA comment period from July 8 to July 22, 2021.

### Analysis

The Comprehensive Plan defines urban centers as the densest Seattle neighborhoods. They act as both regional centers and local neighborhoods that offer a diverse mix of uses, including housing and commercial activities. These areas provide a mix of goods, services, and employment for their residents and surrounding neighborhoods. Properties inside urban centers are generally within .5 miles of frequent transit.

The location of the proposed FLUM change is approximately .5 miles from the new U District station on the Sound Transit North Link light rail line, with service anticipated in October 2021, and frequent bus service is provided a half block away on University Way NE.

This FLUM change makes possible increased density (following a contract rezone) that advances the goals for urban centers. Comprehensive Plan policies that support the proposed FLUM are addressed in the table below:

Comprehensive Plan Policy	Proposed FLUM Amendment
GS 1.2 Encourage investments and activities in urban centers and urban villages that will enable those areas to flourish as compact mixed-use neighborhoods designed to accommodate the majority of the city's new jobs and housing.	The existing uses and zoning for the subject area are consistent with the residential density expected for an urban center. This FLUM also make possible a contract rezone that would apply an MHA suffix thereby making increased density possible.

<p>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.</p>	<p>The development pattern in area subject to the proposed FLUM change is currently multi-family residential consistent with an urban center designation. The area is close to transit and access to services consistent with an urban center designation.</p>
<p>GS 1.6 Plan for development in urban centers and urban villages in ways that will provide all Seattle households, particularly marginalized populations, with better access to services, transit, and educational and employment opportunities.</p>	<p>The proposed FLUM may result in increased residential density and housing supply that is close to services, jobs, educational opportunities, and frequent transit.</p>
<p>GS 1.7 Promote levels of density, mixed-uses, and transit improvements in urban centers and villages that will support walking, biking, and use of public transportation.</p>	<p>The area subject to the proposed FLUM is well served by transit, is walkable and bikeable to major employment and educational opportunities and commercial services</p>

**Recommendation:** Amend the Future Land Use Map to expand the boundary of the University District Urban Center and change the designation from multi-family residential to urban center.

## 130<sup>th</sup> Street Station Future Land Use Map and Text Amendments

**Proposal:** FLUM and text amendments in the City's Comprehensive Plan that would affect property adjacent to the proposed 130<sup>th</sup> Street Link light rail station (Exhibit B).

**Element:** Growth Strategy and Land Use (including FLUM)

**Submitted by:** OPCD

### Background

This proposal addresses land use policy to leverage and support the significant regional transit investment in light rail by encouraging denser, transit-oriented development in an area immediately adjacent to the proposed 130<sup>th</sup> Street Link light rail station. The FLUM amendment affects 8.4 acres immediately east of the station site and is shown in Attachment B. The FLUM amendment changes the future land use designation of the subject area from single-family residential to multi-family residential and commercial / mixed-use. Any future development with uses or densities greater than single family will require a zone change. Text amendments to the Comprehensive Plan extend the criteria for designating multi-family residential and commercial / mixed-use land uses to station areas, such as this one, that are outside of urban villages.

In November 2008, voters approved the \$17.8 billion Sound Transit 2 (ST2) ballot measure. The plan includes transit investments in the central Puget Sound region ranging from bus rapid transit (BRT) to light rail expansion and station access improvements. Among these investments, light rail will be extended from University of Washington to Lynwood. In 2016 voters approved the \$54 billion Sound Transit 3 (ST3) ballot measure to further expand light rail and BRT options. This plan includes a light rail infill station at 130th Street intended at that time to open in 2031.

In September 2018, the Sound Transit Board approved funding to accelerate preliminary engineering to determine if the 130th Street Station could be built earlier and open in 2024 with the rest of the Lynwood Link Extension. In February 2020, the Board reviewed the preliminary engineering and cost estimates and approved funding to complete the station design and make changes to the guideway design to accommodate an integrated station at 130th Street. The Board will make a final decision about completing and opening the 130th Street Station in 2021.

OPCD initiated a station area planning process in 2019 for areas surrounding both the 130<sup>th</sup> Street station and light rail and BRT investments along the 145<sup>th</sup> Street corridor to the north. Station area planning brings together community members (everyone who lives, works, and visits in the surrounding neighborhoods) and government agencies to envision future changes for an area surrounding a future high-capacity transit station. It focuses on the area generally within a half mile (about a 10-minute walk) of a planned light rail station or a quarter mile (about a 5-minute walk) of a BRT station. The process also considers broader neighborhood, citywide, and regional needs. This process includes an analysis of existing conditions, community outreach and engagement, and coordination with city and other public agencies to develop recommendations for the future station area.

### Public Engagement

OPCD has worked closely with community stakeholders throughout this planning process. Key public engagement milestones include:

- March 2019 - an open house and online survey to identify issues and gather ideas from the community
- September 2019 – a community workshop (in-person and online) to consider different patterns of future growth in the station area
- September 2020 – a public hearing for docketing potential amendments to the Comprehensive Plan
- June to October 2020 – a series of four online Community Conversations to share information and solicit feedback on various planning topics: Vision, Mobility, Zoning & TOD, Affordable Housing & Livability
- January 2021 - Online Open House for the Draft Plan

In January of 2021 OPCD released the Draft 130th and 145th Station Area Plan for public comment ([130th and 145th Station Area Planning - OPCD | seattle.gov](#)). A short-term recommendation included in this plan is to implement a FLUM change and rezone for the area adjacent to the 130<sup>th</sup> Street station while continuing to study a broader set of FLUM changes and rezones for the full station area. This short-term action would encourage transition of key parcels directly adjacent to the station from existing single-family use to transit supportive, higher density residential and commercial uses.

### Analysis

The proposed FLUM amendment includes 8.4 acres of land immediately east of the proposed station. This site is developed with a church and administrative office and several single-family residences. Taken together, the location adjacent to a future light rail station and relatively low-density development means this location is a significant transit-oriented development opportunity.

Existing Comprehensive Plan land use policies are supportive of the kind of transit supportive development proposed here, but current restrict such use designations to urban centers and villages. Currently, this area does not meet Comprehensive Plan policies for the multi-family residential and mixed-use commercial land use designations. Proposed policy text amendments, which accompany the FLUM change, would expand the criteria for these land use designations to include areas near any transit station, including outside of urban centers and villages. Currently no other existing or proposed transit station is located outside of an urban center or village. It is possible, that in the future the location of the 130<sup>th</sup> station will support designation of the area as an urban village.

OPCD recommends the following text changes to policies in the Growth Strategy and Land Use elements as indicated (proposed changes are underlined):

- GS 1.7 Promote levels of density, mixed-uses, and transit improvements in urban centers and villages, and other residential and commercial areas near future light rail stations that will support walking, biking, and use of public transportation.

- GS 3.20 Consider taller building heights in key locations to provide visual focus and define activity centers, such as near light rail stations in urban centers and urban villages and other residential and commercial areas near future light rail stations.
- LU 8.4 Establish evaluation criteria for rezoning land to multifamily designations that support the urban village strategy and transit-oriented development, create desirable multifamily residential neighborhoods, maintain compatible scale, respect views, enhance the streetscape and pedestrian environment, and achieve an efficient use of the land without major impact on the natural environment.

The above amendments to Comprehensive Plan policies are necessary to facilitate the FLUM amendment.

**Recommendation:** Adopt the 130<sup>th</sup> Station Area FLUM amendment and related text amendments.

## Industrial Land Comprehensive Plan Amendments

**Proposal:** Amend industrial land use goals and policies for Seattle's industrial land.

**Element:** Land Use

**Submitted by:** OPCD

### Background

In December 2019, the Mayor launched the Seattle Industrial and Maritime Strategy initiative to strengthen and support Seattle's industrial and maritime sectors and the living wage jobs they provide. This is a comprehensive strategy that addresses land use, workforce development, transportation, and public safety. Guided by neighborhood and citywide stakeholders (see public engagement section, below) this strategy includes a mix of near-term and long-term implementation actions across City departments.

The majority of Seattle's industrial lands are in designated Manufacturing/Industrial Centers (M/IC), a designation in the City's Comprehensive Plan and a regional designation of the Puget Sound Regional Council and the King County Comprehensive Plan. This designation provides strong land use protections and places strict limits on the types of non-industrial land uses permitted. The Industry and Maritime Strategy land use goals focus on industrial land in the M/ICs by providing a policy framework that meets the needs of future industry, responds to emerging opportunities such as planned light rail stations, and also enhances protections for these industrial lands.

These proposed Comprehensive Plan text amendments represent the first of two implementation actions of the Industry and Maritime Strategy relating to land use. Following completion of an Environmental Impact Statement (EIS) in 2022, OPCD will propose amendments to the Comprehensive Plan creating a new industrial land use framework and an ordinance that implements this framework by amending the zoning map and revising development regulations.

### Public Engagement

The planning process for the Industry and Maritime Strategy was guided by several stakeholder groups appointed by the Mayor that reflect the range of interests in supporting Seattle's industrial and maritime sectors. Four neighborhood stakeholder groups (Ballard, Interbay, SODO, and Georgetown/South Park) brought forward neighborhood specific concerns and ideas relating to the four strategy categories listed above. The composition of these groups includes industrial businesses, developers, and neighborhood residents. A citywide stakeholder group brought forward citywide concerns and ideas relating to the strategy categories and synthesized the input of the neighborhood stakeholders. This process concluded in May of 2021 with stakeholders approving a set of 11 specific strategies.

### Proposed Amendments and Analysis

Two Comprehensive Plan text amendments are recommended for adoption in 2021:

1. A new policy that limits any FLUM amendment that takes land out of a Manufacturing / Industrial Center (M/IC) to either be adopted as part of a major update (which is currently set for every 8 years) to the City's Comprehensive Plan or as the result of a comprehensive

study of industrial lands that evaluates changes to industrial land designations within the context of the overall policy objectives for and supply of the City's industrial land in M/ICs.

2. A new policy that signals the City's intent to consider any changes in land use on the Washington State National Guard Armory in Ballard-Interbay-Northend M/IC (BINMIC) and the WOSCA site in the Greater Duwamish M/IC through a master planning process for industrial redevelopment of these sites.

1. Limits on FLUM amendments

In recent years, several annual amendment proposals have sought to remove land from M/ICs. Industrial land is finite in supply and consideration of any one proposal to remove land from an M/IC should occur through a comprehensive review of the city's industrial land use needs. These amendments include a new policy to establish higher thresholds for when such an amendment can be considered:

LU 10.3 Ensure predictability and permanence for industrial activities in industrial areas by limiting removal of land from a designated manufacturing / industrial center. There should be no reclassification of industrial land to a non-industrial land use category except as part of a City-initiated comprehensive study and review of industrial land use policies or as part of a major update to the Comprehensive Plan.

There are a number of M/ICs in the Puget Sound region, designated by the Puget Sound Regional Council, based on specific criteria including land use, zoning, and employment in industrial sectors. These industrial centers are found throughout the Puget Sound region and vary somewhat in their mix of uses. In recent years annual amendment applications to remove land from M/ICs, while not adopted, have sent a signal that land use designations in the M/ICs can change. This contributes to the kind of speculative market pressure on industrial lands that results in industrial land uses being priced out of their locations or disincentivizing investment in new industrial uses. This policy will advance the current goal of preserving industrial land for industrial use and send a clear market signal that will deter the type of speculation that deters investments in industrial activity.

2. Interbay Armory and the WOSCA site

The Washington National Guard Armory site currently owned by the State of Washington is home to a National Guard readiness center and is intended to provide a base for emergency response throughout the greater Seattle area. The site, however, consists primarily of fill material and is subject to severe liquefaction in the event of a major earthquake. For this reason, the National Guard is seeking relocation and the State will explore reuse of this site to partially finance the Guard's relocation. The State commissioned a study to evaluate alternative redevelopment scenarios including residential/commercial, residential/industrial, and all industrial alternatives. The State is considering establishing a public development authority to facilitate relocation of the National Guard and the sale/redevelopment of the Armory site.

The Armory site is approximately 25 acres in size bounded by the BNSF railroad to the west and south, Armory Way to the north, and a strip of commercial uses parallel to 15th Avenue West to the east. Currently this area is zoned IG1 and is within the boundaries of the BINMIC. The Armory site represents an important redevelopment opportunity, not just because of its size and proximity to industrial infrastructure such as freight corridors and proximity to port facilities (T91 and Fisherman's Terminal), but also because of its proximity to future light rail stations that are within walking distance of the site. These factors combined (size, location, access to light rail) and the fact that it is under single ownership mean that redevelopment could advance the goals of the Industrial and Maritime Strategy in significant ways.

The Washington-Oregon Shippers Cooperative Association ( WOSCA) site is currently owned by the Washington State Department of Transportation (WSDOT) and was used for construction and staging for SR99 replacement. The site is at the north end of the Greater Duwamish M/IC, adjacent to T46 to the west and 1<sup>st</sup> Avenue to the east. The site will be surplus by the State. The WOSCA site is approximately 4.2 acres in size, about 120 feet deep by about 1,375 feet long. The WOSCA site is currently zoned IC-65. In recent years proposals for this site have included industrial use, office development permitted by current zoning, and introduction of a broad range of uses including open space, residential, and retail. Both sites are within designated Manufacturing Industrial Centers.

The proposed amendments include a policy to establish the City's preferred approach to future redevelopment of these sites:

LU 10.24      Recognize the unique development opportunities that the Washington National Guard Armory in the BINMIC and the WOSCA site in the Greater Duwamish MIC represent. Work with the State of Washington and Washington State Department of Transportation or other future owners of these sites to develop a comprehensive redevelopment that reflects its location within a manufacturing / industrial center. Goals for these plans include features such as green infrastructure, district energy and waste management programs, and workforce equity commitments.

**Recommendation:** Adopt the proposed industrial land use policies.

## Section 4 – Docketed Amendments Analyzed and not Recommended at this Time.

### Trees

**Element:** Land Use, Environment

**Submitted by:** City Council

**Proposed Amendment:** The City received two applications to amend policies related trees, tree protection, and urban forest canopy, in the Comprehensive Plan. While similar to amendment applications that were considered and either not approved or not docketed in previous years, these were docketed by the City Council for consideration by the executive.

In consultation with the Urban Forestry Commission, Office of Sustainability and the Environment and Seattle Department of Construction and Inspections (SDCI) review of policies in the Comprehensive Plan related to trees and urban forests, to identify opportunities to better support the urban tree canopy. In developing recommendations, the Executive should consider whether there are any changes proposed in the amendment petitions listed in subsections 5(C) and 5(I) of this resolution, that would be appropriate to be included in the Comprehensive Plan. Following consultations with OSE and SDCI, OPCD does not recommend these amendments for adoption at this time.

OPCD is working with OSE, SDCI, and the Urban Forestry Commission to update the City's Urban Forestry Plan which takes a comprehensive look at programs and policies that will expand and sustain Seattle's urban forest. Following final adoption of the Urban Forestry Plan, OPCD will work with OSE and the Urban Forestry Commission to identify how the plan can be supported by amendments to the Comprehensive Plan as part of the 2024 major update.

Consistent with docket, OPCD analyzed each of element of the amendment applications referenced in the Council resolution for consideration in 2021. Below are specific items in each of the proposals and OPCD's reason for not recommending adoption currently.

The following three policy amendments were from a 2020 Comprehensive Plan amendment proposal received from Chris Lehman:

- LU 5.6: Establish setbacks in residential areas ~~as needed~~ to allow for the preservation or planting of large trees; for adequate light, air, and ground-level open space; to help provide privacy; to promote public health and urban wildlife; for compatibility with the existing development pattern; and to separate residential uses from more intensive uses.

Analysis: Setback regulations are not an appropriate approach to preserving or planting large trees. Setbacks may make it more difficult to preserve large trees since preservation often

requires the flexibility to push development capacity away from where a large tree is already located (which may not be a setback). Similarly, larger setbacks could make it more difficult to accommodate new trees on other parts of the property. For example, larger side or front setbacks could push development toward rear yards which may be a better place to preserve or plant large trees.

- LU 5.7: Employ development standards in residential zones that address the use of the ground level of new development sites to fit with existing patterns of landscaping, especially front yards in single-family residential areas, yard areas in every multifamily lot, and to encourage permeable surfaces and vegetation.

Analysis: Multifamily zones do not have yard requirements and instead have setbacks. Side and rear yards for multifamily lots reduce flexibility to achieve intended development capacities. As part of the major update OPCD will consider ways to support tree canopy in multifamily neighborhoods.

- LU 5.8: Establish tree and landscaping requirements that preserve and enhance the City’s physical and aesthetic character and recognize the value of trees and landscaping in addressing public health, urban wildlife, stormwater management, pollution reduction, heat island mitigation, and other issues.

Analysis: This statement is consistent with existing city policy and does not provide additional policy direction. Contribution of trees to public health and urban wildlife will be addressed in the major update in 2024 that incorporates recommendations of the Urban Forestry Master Plan.

The following 2020 amendment proposals were submitted by David Moehring.

#### Environment Element

- Amend Policy E1.2 to “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.”

Analysis: This proposed language does not clarify or improve existing policy language. It is not appropriate for Comprehensive Plan policies to cite or reference 2018 recommendations when they may be updated or replaced within the 20-year planning period.

#### Transportation Element

- T.4.5 to state: “Enhance the public street tree canopy and landscaping in the street right-of-way. Similarly, require citywide environmental accountability of the owners and developers of private property to enhance the yards with tree canopy and landscaping facing the street.”

Analysis: It is inappropriate to establish policies for development of private property in the Transportation element. Requiring accountability for any action is not appropriate for the Comprehensive Plan and instead should be reflected in development regulations.

- Amend Seattle’s Title 23 and Title 25 codes to require for new property developments “at least a 400 square foot contiguous planting area of at least 10 feet in any direction for which to plant one or more drought resistant trees considered native to Washington.”

Analysis: This is regulatory language that is inappropriate for the Comprehensive Plan but may be appropriate in the Seattle Municipal Code.

#### Parks and Open Space Element

- Policy P3.3 Enhance wildlife habitats by restoring urban forests and expanding the tree canopy on City-owned and privately-owned land.

Analysis: This section explicitly pertains to park property so it would be inappropriate to add policies about private property in this chapter of the Comprehensive Plan.

#### Glossary

- Urban Forest: The trees and lower-growing plants (of at least 8-feet in mature growth height) that are found on public and private property within the city. This includes developed parks and natural areas, as well as the trees along streets and within yards of privately-owned properties /redundant already encompasses yards in private ownership.

Analysis: The “urban forest” is defined by the City and most other organizations as including lower-growing plants that are less than 8 feet in height. These lower-growing plants are an important part of the larger ecological system. Consequently, the proposed changes would be inconsistent with these definitions and would limit the scope of our urban forestry work.

## **Section 5 – Docketed Amendments not Analyzed, No Recommendation at this Time.**

There are several proposed Comprehensive Plan amendments that were docketed by Council in Resolution 31970 but have not been analyzed by OPCD and for which OPCD is not making any recommendation at this time. Each is briefly described below, with an explanation of why OPCD has not analyzed the proposal as part of the 2020-2021 annual amendment cycle.

### **West Seattle Bridge**

**Element:** Land Use and Transportation

**Submitted by:** City Council

**Proposed amendment:** West Seattle Bridge. In consultation with the Seattle Department of Transportation and the Seattle Department of Construction and Inspections (SDCI), review of the Transportation and Land Use Elements to assess whether any changes should be made due to the closure of the West Seattle Bridge.

**Reason for not analyzing:** At the time this amendment was docketed the timeline for replacing or repairing the West Seattle Bridge was unknown. It was possible replacement could take up to 10 years and this would result in substantial impacts to West Seattle. The intent of the proposed amendment was to identify opportunities to strengthen Comprehensive Plan policies that might support this City's long-term mitigation of these impacts. Following adoption of the docketing resolution (Resolution 31970) it was announced that the West Seattle Bridge would be repaired and returned to service in 2022. OPCD did not see a need to conduct the review described in docketing resolution because of the relatively short period between adoption of any potential amendments and return of the bridge to service.

### **Alternative Name for Single-Family Zones**

**Element:** Land Use

**Submitted by:** City Council

**Proposed Amendment:** Recommend an alternative name for single-family zones, such as Neighborhood Residential, and propose Comprehensive Plan amendments to implement this change, as appropriate.

**Reason for not analyzing:** Given the potential relationship to other policies, level of analysis, and level of public engagement necessary, this proposal is more appropriately addressed through the major update to the Comprehensive Plan in 2024.

### **Fossil Fuels and Public Health**

**Element:** Environment, Land Use, or Utilities Elements

**Proposed Amendment:** 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 of 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 productions and storage.

**Reason for not analyzing:** The level of analysis to effectively identify and evaluate potential amendments does not align with OPCD work plan and staffing capacity currently. Work to propose and evaluate such amendments is more appropriate for the major update to the Comprehensive Plan in 2024

### **South Park Urban Village Designation**

**Element:** Growth Strategy

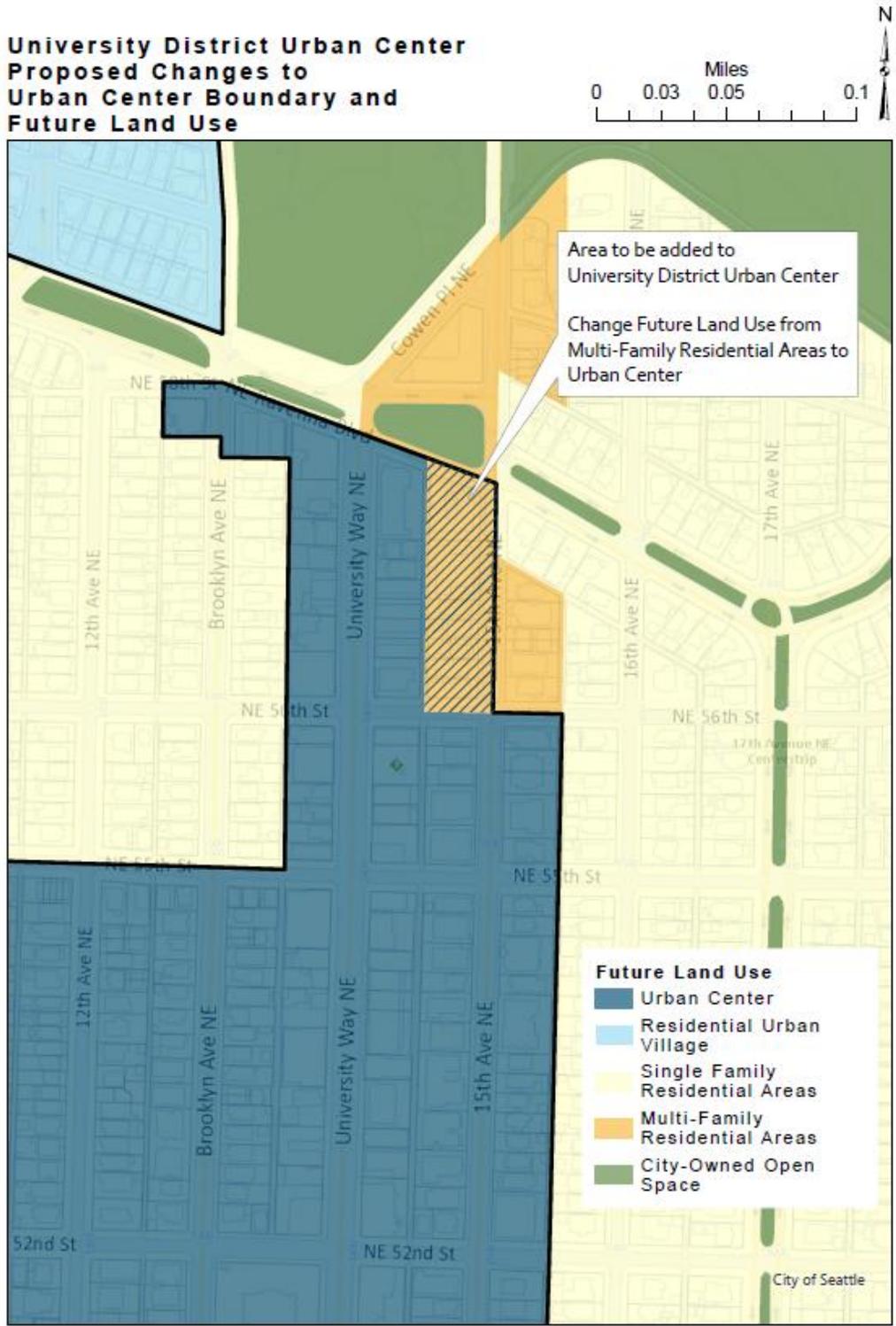
**Submitted by:** City Council

**Proposed Amendment:** Assess how the South Park neighborhood meets the criteria for Urban Village designation and provide a report to Council.

**Reason for not analyzing:** The City will be adopting a major update to the Comprehensive Plan in 2024. As part of the update, OPCD expects to review the Urban Village strategy. Whether the South Park neighborhood should continue to be designated as an Urban Village is more appropriately addressed as part of this more comprehensive work.

Exhibit A

University District Urban Center FLUM









August 13, 2021

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

RE: 2020-2021 Comprehensive Plan Amendment Recommendations

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 adopted as part of the annual update process. Providing recommendations on annual Comprehensive Plan proposals is a mandate of the Commission and a responsibility we are pleased to fulfill as stewards of Seattle's Comprehensive Plan.

**The Planning Commission recommends adopting the following amendment proposals:**

Proposed Future Land Use Map (FLUM) Amendment: Extend the University District Urban Center

The applicant is requesting to extend the boundary of the University District Urban Center to include the half block of adjacent land bounded by 15th Avenue NE to the east, NE Ravenna Avenue to the north, NE 56th Avenue to the south, and an alley that is the boundary to the University District Urban Center to the west. This proposed amendment would change the FLUM designation from Multi-Family Residential to University District Urban Center.

The area is currently zoned LR3 and consists of predominantly multi-family structures. Expansion of the University District Urban Center boundary to include this area will result in a slight increase of development capacity above its current designation. The applicant is seeking inclusion of the subject area in the Urban Center to provide future redevelopment options and has indicated an interest in applying for a contract rezone to a zoning designation with an M suffix to provide Mandatory Housing Affordability (MHA) affordable housing benefits. Applying an M suffix to the zone means that any future project would need to provide some affordable housing as part of the development or make a fee contribution to affordable housing.

The Planning Commission supports amending the FLUM to expand the boundary of the University District Urban Center and change the designation from Multi-Family Residential to Urban Center. The Comprehensive Plan defines Urban Centers as the densest Seattle neighborhoods. They act as both regional centers and local neighborhoods that offer a diverse mix of uses, including housing and commercial activities. These areas provide a mix of goods, services, and employment for their

Commissioners  
Rick Mohler, *Co-Chair*  
Jamie Stroble, *Co-Chair*  
Mark Braseth  
McCaela Daffern  
Roque Deherrera  
David Goldberg  
Matt Hutchins  
Patience Malaba  
Radhika Nair  
Alanna Peterson  
Dhyana Quintanar  
Julio Sanchez  
Lauren Squires  
Kelabe Tewolde  
Rose Lew Tsai-Le Whitson

Staff  
Vanessa Murdock  
*Executive Director*  
Olivia Baker  
*Policy Analyst*  
John Hoey,  
*Senior Policy Analyst*  
Robin Magonegil  
*Administrative Analyst*

residents and surrounding neighborhoods. This amendment meets the goals for an Urban Center of promoting dense, mixed-use, walkable communities.

The Commission also recommends adoption of this amendment due to the proximity of the proposed expansion area to high-frequency transit. The location of the proposed FLUM change is approximately 0.5 miles from Sound Transit's new U District station on the North Link line, with service anticipated in October 2021, and frequent bus service is provided a half block away on University Way NE.

#### 130th Street Station FLUM and Text Amendments

This proposal would amend the FLUM and Comprehensive Plan text to encourage denser, transit-oriented development in an area immediately adjacent to the proposed 130th Street Link light rail station. The proposed FLUM amendment affects 8.4 acres immediately east of the station site. The FLUM amendment would change the future land use designation of the subject area from Single-Family Residential to Multi-Family Residential and Commercial/Mixed Use. Proposed text amendments to the Comprehensive Plan would extend the criteria for designating Multi-Family Residential and Commercial/Mixed Use land uses to station areas, such as this one, that are outside of Urban Villages.

Sound Transit is currently constructing Lynnwood Link, which will extend light rail service from the University of Washington to Lynwood. The Sound Transit 3 plan includes a light rail infill station at 130th Street. Originally planned for construction by 2031, the timing of this station is unclear at this time due to the Sound Transit Board's ongoing realignment process. The Board will make a final decision about the schedule for completing and opening the 130th Street Station in 2021.

The Office of Planning and Community Development (OPCD) has engaged in a long-range planning effort for areas surrounding both the 130th Street station and light rail and bus rapid transit (BRT) investments along the 145th Street corridor to the north. Station area planning focuses on the area generally within a half mile (about a 10-minute walk) of a planned light rail station or a quarter mile (about a 5-minute walk) of a BRT station. This work includes studying a range of potential land use changes and policy options that support transit-oriented development. This amendment would serve as an initial implementation of the station area plan by making land use and policy changes to allow multi-family and mixed uses on 8.4 acres of land adjacent to the proposed 130th Street light rail station.

Existing Comprehensive Plan land use policies are supportive of the kind of transit-oriented development proposed by this FLUM amendment but restrict such use designations to Urban Centers and Urban Villages. This area does not currently meet Comprehensive Plan policies for the proposed Multi-Family Residential and Mixed Use/Commercial land use designations. The policy text amendments are necessary to facilitate the FLUM amendment and would expand the criteria for these land use designations to include areas near any transit station, including outside of Urban Centers and Urban Villages.

Below are the proposed text changes to policies in the Growth Strategy and Land Use elements (proposed changes are underlined):

- GS 1.7 Promote levels of density, mixed-uses, and transit improvements in urban centers and villages, and other residential and commercial areas near future light rail stations that will support walking, biking, and use of public transportation.
- GS 3.20 Consider taller building heights in key locations to provide visual focus and define activity centers, such as near light rail stations in urban centers and urban villages and other residential and commercial areas near future light rail stations.
- LU 8.4 Establish evaluation criteria for rezoning land to multifamily designations that support the urban village strategy and transit-oriented development, create desirable multifamily residential neighborhoods, maintain compatible scale, respect views, enhance the streetscape and pedestrian environment, and achieve an efficient use of the land without major impact on the natural environment.

The Planning Commission recommends adopting the 130th Station Area FLUM amendment and related text amendments. These amendments demonstrate the City's commitment to transit-oriented development by encouraging transition of key parcels directly adjacent to the station from existing single-family use to transit supportive, higher density residential and commercial uses. In addition to the proposed FLUM and text amendments, the Planning Commission strongly supports ongoing study of a broader set of FLUM changes and rezones for the full station area. In 2020, the Commission expressed its support for a separate docketed amendment to establish an Urban Village around the planned 130th Street Link Light Rail Station, which would facilitate increased capacity for transit-oriented development and associated amenities. We continue to support this proposal and will look forward to the opportunity to provide our input and feedback on any future Urban Village alternatives for the 130th Street Station area at the appropriate time.

#### Industrial Land Comprehensive Plan Amendments

Mayor Durkan recently announced the final Industrial and Maritime Strategy recommendations. The eleven recommendations address land use, workforce development, transportation, the environment, and public safety. A new land use framework that implements the recommended land use strategies will be studied in an Environmental Impact Statement (EIS). These proposed Comprehensive Plan text amendments represent the first of two implementation actions of the Industry and Maritime Strategy relating to land use. Following completion of the EIS in 2022, OPCD will propose additional amendments to the Comprehensive Plan creating a new industrial land use framework and an ordinance that implements this framework by amending the zoning map and revising development regulations.

Two Comprehensive Plan text amendments are recommended for adoption in 2021:

1. A new policy that limits any FLUM amendment that takes land out of a Manufacturing/Industrial Center (M/IC) to either be adopted as part of a major update to the Comprehensive Plan or as the result of a comprehensive study of industrial lands that evaluates changes to industrial land designations within the context of the overall policy objectives for and supply of the City's industrial land in M/ICs.
2. A new policy that signals the City's intent to consider any changes in land use on the Washington State National Guard Armory in Ballard-Interbay-Northend M/IC (BINMIC)

and the WOSCA site in the Greater Duwamish M/IC through a master planning process for industrial redevelopment of these sites.

Below are the proposed text changes to policies in the Land Use element (proposed changes are underlined):

- LU 10.3 Ensure predictability and permanence for industrial activities in industrial areas by limiting removal of land from a designated manufacturing/industrial center. There should be no reclassification of industrial land to a non-industrial land use category except as part of a City-initiated comprehensive study and review of industrial land use policies or as part of a major update to the Comprehensive Plan.
- LU 10.24 Recognize the unique development opportunities that the Washington National Guard Armory in the BINMIC and the WOSCA site in the Greater Duwamish MIC represent. Work with the State of Washington and Washington State Department of Transportation or other future owners of these sites to develop a comprehensive redevelopment plan that maximizes public benefits and reflects its location within a manufacturing/industrial center. Goals for these plans include features such as green infrastructure, district energy and waste management programs, and workforce equity commitments.

The Planning Commission strongly supports strengthening protections for industrially zoned lands within Seattle by establishing higher thresholds to remove industrial land designations and eliminating the potential to remove land from the M/ICs during the annual Comprehensive Plan amendment process. We have reviewed several Comprehensive Plan amendment applications in recent years requesting changes to industrial designations to allow other uses. We have consistently expressed our support for maintaining the M/IC boundaries and opposition to encroachment by other uses. In addition to the intent of this amendment, we also support removing existing zoning loopholes, especially for auto-dependent uses such as big box stores, storage facilities, strip commercial development, and surface parking lots. Interim strategies should be implemented for stronger protection of industrial land while the broader strategies are being analyzed and considered for adoption. We recommend interim land use actions to close existing loopholes in the zoning code until major changes are adopted.

The Planning Commission has not been briefed in recent years on any development plans for the WOSCA site specifically but has reviewed a proposed amendment to the Comprehensive Plan for creation of a Stadium District that would include this site. We look forward to learning more about this site as the master planning process evolves. The Commission followed the recent stakeholder advisory committee process for the future of the Interbay Armory site currently owned by the State. The southern portion of the Ballard/Interbay/Northend M/IC has seen a significant amount of development in recent years including big box stores, storage facilities, and other auto-dependent commercial uses. The Commission encourages the City to ensure that the master planning process for the Armory site does not allow any additional uses of this type. Sound Transit's Ballard Link Extension project proposes to locate two future light rail stations in Interbay less than a mile apart. The Armory site is within the walkshed of both future light rail stations. The Planning Commission will review station area plans for these stations and will pay particular attention to any plans for the Armory site. We encourage environmental review to consider a range of significant issues including

public health impacts related to the site's proximity to an active rail yard, liquefaction risk, sea level rise impacts, and emergency access during a tsunami.

**The Planning Commission recommends the following amendment proposals not be adopted:**

Trees

The City received two applications to amend policies related to trees, tree protection, and urban forest canopy in the Comprehensive Plan. While similar to amendment applications that were considered and either not approved or not docketed in previous years, these were docketed by the City Council for further consideration. The proposed amendments to protect tree canopy were analyzed by OPCD but not recommended for adoption. It is our understanding that OPCD is working with the Seattle Department of Construction and Inspections (SDCI), Office of Sustainability and Environment (OSE), and the Urban Forestry Commission to update the City's Urban Forestry Plan which takes a comprehensive look at programs and policies that will expand and sustain Seattle's urban forest. Following final adoption of the Urban Forestry Plan, OPCD will work with OSE and the Urban Forestry Commission to identify how the plan can be supported by amendments to the Comprehensive Plan as part of the 2024 major update. The Planning Commission looks forward to the opportunity to review future policies related to the protection of trees, tree canopy, and the urban forest. This natural infrastructure provides critical benefits to the resilience and livability of our city.

**Docketed Amendments Not Analyzed by OPCD**

Of the proposed Comprehensive Plan amendments that were docketed by the City Council in Resolution 31970 for further analysis, the following five were not analyzed or recommended by OPCD as part of the 2020-2021 annual amendment cycle:

- Amendments related to the West Seattle Bridge
- A new name for Single-Family areas
- Designation of the South Park Urban Village
- Amendments related to fossil fuels and public health
- Impact fee amendments

West Seattle Bridge

The applicant proposed to amend City policies to assist in mitigating the emergency closure of the West Seattle High Bridge. At the time the proposed amendments were docketed, the closure of the bridge was anticipated to be much longer than it ultimately will be. Shortly after docketing this amendment, it was announced that the bridge would only be closed for three years. OPCD did not see a need to conduct the review described in the docketing resolution because of the relatively short period between adoption of any potential amendments and return of the bridge to service. The need to amend the Comprehensive Plan to identify mitigation related to the closure was determined to be unnecessary.

### Alternative Name for Single-Family Zones

We fully support the City Council proposed amendment to replace the term “Single-Family Area” with “Neighborhood Residential Area” in the Comprehensive Plan Future Land Use Map, relevant elements in the plan, neighborhood plans and appendices.

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 2020 *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 forwarding this amendment and strongly supports its adoption. We encourage alignment and coordination between the Council and the Executive in moving forward with this amendment.

### South Park Urban Village Designation

The City Council proposed an amendment to assess how the South Park neighborhood meets the criteria for Urban Village designation. OPCD has stated that an effort to determine whether the South Park neighborhood should be designated as an Urban Village is more appropriately addressed as part of the Major Update to the Comprehensive Plan. OPCD expects to review the Urban Centers and Villages Growth Strategy during that effort. The Planning Commission is supportive of a comprehensive review of the City’s Urban Centers and Urban Villages. If an effort to review the South Park Urban Village moves forward, the Commission strongly recommends that community members and the relevant stakeholders are engaged throughout that process. We look forward to providing our input and feedback at the appropriate time.

### Fossil Fuels and Public Health

The City Council has requested that OPCD, in consultation with SDCI, OSE, and the Environmental Justice Committee, draft potential amendments to the Environment, Land Use, or Utilities Elements that would clarify the City’s intent to protect public health and meet its climate goals by limiting fossil fuel production and storage. OPCD has stated that the level of analysis to effectively identify and evaluate potential amendments is more appropriate for the Major Update to the Comprehensive Plan. The Planning Commission is generally supportive of goals and policies to reduce the impacts of climate change, including any strategies to reduce the use of fossil fuels. We will look forward to the opportunity to review such amendments in the future.

### Impact fee amendments

The City Council has requested 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. The Planning Commission received a briefing on a proposed Comprehensive Plan Amendment related to transportation impact fees in October 2018. We understand that the State Environmental Policy Act (SEPA) analysis of that proposed amendment was appealed to the Hearing Examiner and this amendment is now subject to ongoing City Council consideration. The Commission will look forward to the opportunity to review this amendment if/when it moves forward.

We appreciate the opportunity to provide our recommendations on the 2020-2021 Comprehensive Plan Amendments. If you have any questions, please do not hesitate to contact Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is a stylized, cursive 'RM' for Rick Mohler. The signature on the right is a more elaborate cursive signature for Jamie Stroble, with the name 'Jamie Stroble' written in a smaller, more legible font over the main signature.

Rick Mohler and Jamie Stroble, Co-Chairs  
Seattle Planning Commission

cc: Seattle City Councilmembers

Mayor Jenny Durkan

Lish Whitson, Eric McConaghy; Council Central Staff

Rico Quirindongo, Michael Hubner; Office of Planning and Community Development