

City of Seattle

COMPREHENSIVE PLAN AMENDMENT APPLICATION

Use this application to propose an amendment to the goals, policies, Future Land Use Map, appendices, or other components of the adopted City of Seattle Comprehensive Plan.

Applications are due to the Seattle City Council (sent electronically to: compplan@seattle.gov) no later than 5:00 p.m. on May 15th for consideration in the next annual review cycle. Any proposals received after May 15th will be considered in the review process for the following year. *(Please Print or Type)*

Applicant: Chris Leman *Date:* 5/15/20

Email: cleman@oo.net

Street Address: 2370 Yale Avenue East

City: Seattle *State:* WA *Zip:* 98102-3310 *Phone:* 206-322-5463

Contact person (if not the applicant): none

Name of general area, location, or site that would be affected by this proposed amendment (attach additional sheets if necessary):

Seattle as a whole

If the application is approved for further consideration by the City Council, the applicant may be required to submit a State Environmental Policy Act (SEPA) checklist.

Acceptance of this application does not guarantee final approval.

Applicant Signature: 

Date: 5/15/20

REQUIRED QUESTIONNAIRE: Comprehensive Plan Amendment Application

1. *Provide a detailed description of the proposed amendment and a clear statement of what the proposed amendment is intended to accomplish. Include the name(s) of the Comprehensive Plan Element(s) (Land Use, Transportation, etc.) you propose to amend.*

In the Citywide Planning element, adopt the following Land Use Policy:

In order to maintain the character of Seattle's neighborhoods and retain existing affordable housing, discourage the demolition of residences and displacement of residents, while supporting redevelopment that enhances its community and furthers the goals of the Plan.

2. *For amendments to goals and policies only: Describe how the issue is currently addressed in the Comprehensive Plan. Why is a change needed?*

From its adoption in 1994 to the 2016 update when this provision was repealed, the Comp Plan included the above-proposed language as Land Use Policy LU-11. Without accompanying analysis, the 2016 amendments repealed it from the Comp Plan. What replaced it were the following two Housing policies that contain no language discouraging demolition, and only speak of mitigating its effects:

H 2.6 Seek to identify affordable housing at risk of demolition and work to mitigate the displacement of residents ahead of planned upzones

H 5.25 Work to mitigate the potential demolition of housing units that are affordable to low-income households without subsidies.

3. *Describe why the proposed change meets the criteria adopted in Resolution 31807 which sets criteria for Council to consider an amendment to the Comprehensive Plan.*

This amendment fully meets all of the criteria of Res. 31807. It is consistent with the Growth Management Act, with state and local law, and with countywide and multicounty policies; it cannot be addressed through regulations, budgets, programs, or neighborhood planning; it meets the four elements of practicality; and it is likely to make a material difference in a future City regulatory or funding decision.

4. *What other options are there for meeting the goal or objectives of the amendment? Why is a Comprehensive Plan amendment needed to meet the goals or objectives?*

From its first adoption in 1994 until its revision in 2016, the Comp Plan included this exact language as Land Use Policy LU-11. The language should be re-adopted in order to restore to the Comp Plan a balance in discouraging demolition and displacement while supporting compatible redevelopment.

Adopting this policy amendment into the Comp Plan provides unique and irreplaceable stability to the City and to the public because the Washington State Growth Management Act (RCW 36.70A) provides for a local Comprehensive Plan certain procedural protections that are present in no other City legislation. The Comp Plan by state law can be amended only once a year, and then only under legally enforceable process requirements.

5. *What do you anticipate will be the impacts of the proposed amendment, including impacts to the geographic area affected? Why will the proposed change result in a net benefit to the community? Please include any data, research, or analysis that supports the proposed amendments.*

It is well documented that many people with moderate or low incomes live in older or smaller buildings currently threatened with redevelopment that can drive them from their homes. The proposed policy amendment would restore to the Comp Plan its recognition that demolition can contribute to housing displacement. The amendment would also mandate that there be a balance in supporting development that is compatible with the building saved from demolition. Restoring Land Use Policy LU-11 would thus produce better land use decisions, and greater public trust in these decisions.

6. *How does the proposed amendment support the existing goals and policies of the Comprehensive Plan? If the proposal would change existing goals and policies or add new goals and policies to the Comprehensive Plan, describe how the proposed amendment is consistent with the Washington State Growth Management Act (<http://apps.leg.wa.gov/rcw/default.aspx?cite=36.70A>), the Puget Sound Regional Council's Vision 2040 (<http://www.psrc.org/growth/vision2040/>), and the King County Countywide Planning Policies (<http://www.kingcounty.gov/depts/executive/performance-strategy-budget/regional-planning/CPPs.aspx>).*

The proposed policy amendment gives meaning to the Comprehensive Plan as a document that balances the displacement that would result from demolition with the opportunity to provide additional housing from redevelopment of the property that is proposed for demolition. The amendment is also completely consistent with the Washington State Growth Management Act, the Puget Sound Regional Council's Vision 2040, the King County Countywide Planning Policies, and the Seattle Mandatory Housing Affordability legislation. In fact, this amendment will give reality to aspirations for affordable housing that are stated in these documents as well as in the Comp Plan itself.

7. *Is there public support for this proposed amendment? If the amendment would change the Future Land Use Map or a Neighborhood Plan, please list any meetings that you have held with the community about the amendment. If the amendment would have a citywide impact, please list any organizations that you have discussed the amendment with. Notes: You may attach letters of support for the amendment. The City will provide public notice and opportunity for public comment, and environmental review for all applications.*

Growth will not be sustained for long if those most affected by it (especially through loss of their homes) believe (as increasing numbers do) that public officials aren't serious about balancing growth with displacement. City officials must show that they are not more solicitous of the wishes of developers than of the welfare of their own constituents. It was a step

backward in this trust relationship that the 2016 amendments removed this Land Use Policy from the Comp Plan without serious analysis. Reinstating the previous balance and trust into today's Comprehensive Plan is not only widely supported by the public; it is the only way to avert a worsening backlash against growth and a loss of faith in officialdom.

8. *Has the proposed amendment been considered before by the Council? If so, when was it considered and what was the outcome? If the amendment has been previously rejected, please explain either:*

- *How the proposal has changes since it was last rejected, or*
- *Changed circumstances since the proposal was last considered that support reconsideration of the proposal*

The proposed amendment was submitted in the 2017 and 2019 amendment cycle. It was not docketed for study, and we can find no evidence of analysis or discussion by City Councilmembers or staff, by members of the Executive Branch, or the Planning Commission.

Since that time, the Mandatory Housing Affordability upzones were adopted, and during that process there was recognition and acknowledgment that without additional policies, demolition and displacement will measurably reduce the net total of affordable housing units during the implementation of MHA.

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