



City of Seattle

Seattle Planning Commission

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Jessica Brand, Planning and
Development Specialist
Diana Canzoneri,
Demographer and
Senior Policy Analyst

December 5, 2013

Honorable Councilmember Richard Conlin, Chair
Planning, Land Use and Sustainability Committee
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

RE: Proposed Stadium District amendment

Dear Councilmember Conlin,

As stewards of the Comprehensive Plan, the Planning Commission reviews and provides comment on proposed annual Comprehensive Plan amendments. We are in the process of completing our review of the proposed 2013-2014 amendments and will submit our recommendations in the coming months. Given the heightened interest in Stadium District, the Planning Commission is conducting an in-depth review of the Comprehensive Plan amendments proposed by the Department of Planning and Development (DPD). We feel it is necessary to write specifically and in conjunction with transmission of the Director's Report regarding this proposal.

We recommend that this proposal be removed from this year's consideration and impress the need for more information.

The Commission is well-informed about the area: our report, [The Future of Seattle's Industrial Land](#), was released in 2007; Commissioner Brower participated on both the Stadium District study and Duwamish Manufacturing and Industrial Center (M/IC) study Advisory Committees; and we have been briefed by DPD staff throughout the Comprehensive Plan amendment process.

The reasons the Commission recommends that the City defer consideration of the proposed amendment are as follows.

- ***Changes proposed in amendment could exacerbate pressure on industrial lands***

The knowledge the Commission has gained while researching and advising city leaders on industrial lands policy has impressed upon us the importance of industrial lands as vital and unique assets to both the local and regional economy. As multiple analyses—including our own—have found, industrial lands in Seattle are under great pressure from permanent conversion to non-industrial uses. The Commission has also long been concerned regarding impacts on industrial activities from nearby non-compatible land uses. Removing land from Duwamish M/IC and making land use policy changes could exacerbate and accelerate pressures on industrial businesses and Port operations. An economic study, including the comparison of job creation, tax revenue, and indirect benefits should be conducted prior to any decision. The implications should be more fully understood before moving forward.

- ***Information to evaluate transportation and freight mobility impacts is currently insufficient***

The Stakeholder Advisory Committee for the Duwamish MIC Policy and Land Use Study noted that transportation within and through this area continues to be a major issue for local businesses, sports operations, freight carriers, and Port and industrial activities. The Seattle Department of Transportation (SDOT) is embarking on two major planning efforts—The Industrial Areas Access Study and the Freight Master Plan. The analysis for these planning efforts will help the City get a fuller understanding of the impacts on industrial uses that have already occurred with changes in land use, as well as strategies the City could use to mitigate future disruption of port operations and freight mobility.¹

SDOT recently began work on the Industrial Areas Access Study, and will start work on the Freight Master Plan during the first part of next year. The analysis from these planning efforts is vital to informed decision-making and we recommend completing these plans before moving any stadium district amendment forward.²

¹ Coordination with the Seattle Industrial Areas Freight Access Project is specified as one of several objectives of the analysis and planning work the City committed to do in the 2012 Memorandum of Understanding (MOU) with King County and ArenaCo.

² The MOU indicates that the City has *until December 31, 2014* to submit policy and land use recommendations to the City Council and Mayor regarding the Stadium Transition Area Overlay District. Thus, there appears to be time for DPD to consider the forthcoming analysis from the Industrial Areas Access Study and the Freight Master Plan, make any changes needed, and resubmit a Stadium District amendment during the next annual amendment cycle.

As stewards of the Comprehensive Plan, we feel it is necessary to communicate now that we recommend removing this proposal from this year's annual amendment process. We acknowledge the time and effort DPD has invested in this proposal and understand their interest in moving forward.

We will submit our recommendations on all the Comprehensive Plan amendments in the coming months. In the meantime, we are happy to discuss this and answer any questions. We look forward to continued conversations with the City Council, Mayor, and DPD on how to best navigate the sometimes competing, but mutually important goals involved. Feel free to contact us or Planning Commission staff analyst, Jesseca Brand at (206) 684-8694.

Sincerely,



David Cutler
Seattle Planning Commission Co-Chair



Amalia Leighton
Seattle Planning Commission Co-Chair

CC: Mayor Michael McGinn;
Seattle City Councilmembers;
Darryl Smith, Ethan Raup, Alison Van Gorp; Mayor's Office;
Rebecca Herzfeld, Eric McConaghy, Martha Lester, Council Central Staff;
Diane Sugimura, Marshall Foster, John Skelton, Tom Hauger, Kristian Kofoed, Gary Johnson, Geoff Wentlandt, DPD;
Peter Hahn, Tracy Krawczyk, Kevin O'Neill, SDOT;
Rick Hooper, Office of Housing;

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURES & RECUSALS:

- Commissioner Catherine Benotto disclosed that her employer, Weber Thompson, designs projects and advises developers throughout the City that may be affected by these proposed changes.
- Commissioner Josh Brower disclosed that his firm, Veris Law Group PLLC, represents single and multifamily developers throughout the city, land owners and industrial businesses in the Ballard-Interbay-Northend Manufacturing & Industrial Center and the Duwamish Manufacturing & Industrial Center. Commissioner Brower also indicated that he represented the Seattle Planning Commission on both the Duwamish Industrial Lands Stakeholder Advisory Group and the Stadium District Study Stakeholder Advisory Group.
- Commissioner David Cutler disclosed that his employer, GGLO, designs projects and advises clients that may be impacted by amendments to the Comprehensive Plan.
- Commissioner Colie Hough-Beck disclosed that the firm she works for, HBB, works on public and private projects throughout Seattle that may be affected by these amendments. Hough-Beck also disclosed the Port of Seattle is a client.

- Commissioner Bradley Khouri disclosed that his firm, b9 architects, does work throughout the city of Seattle that may be impacted by amendments to the Comprehensive Plan.
- Commissioner Grace Kim is owner of Schemata Workshop, an architectural firm that does work in various neighborhoods in the City of Seattle.
- Commissioner Jeanne Krikawa disclosed that the SODO Business Association is a past client.
- Commissioner Amalia Leighton disclosed that her employer, SVR Design, provides engineering and landscape architecture services to public and private clients throughout the city.
- Commissioner Morgan Shook disclosed that the firm with which he is employed, BERK, works on municipal planning and private development projects that may be impacted by amendments to the Comprehensive Plan.
- Commissioner Luis Borrero disclosed that his firm, DRiVE, works on projects throughout the City of Seattle that may be impacted by amendments to the Comprehensive Plan.