

# The Committee of 100

on the Federal City



## **Testimony of the Committee of 100 on the Federal City Before the Council Committee of the Whole, Performance Oversight Hearing on the Office of Planning, Thursday, March 18, 9am, virtual.**

Thank you, Chairman Mendelson. I am Kirby Vining, Chair of the Committee of 100 on the Federal City. We appreciate the opportunity to testify on the performance of the Office of Planning during this past year. We will focus our testimony on OP's advancement of density changes throughout the city through map amendments to the Comprehensive Plan.

OP reviewed hundreds of proposals for map amendments to the Future Land Use Map (FLUM) during Open Call and accepted 150 of the proposed amendments. Of these, 68 of the amendments were proposed by OP, 25 by the law firm Holland & Knight, and 15 by Goulston & Storrs on behalf of clients. The most successful submitter that was not a law firm was Ward 3 Vision with 16 accepted FLUM amendments. These four groups account for 75% of the accepted FLUM amendments.

Looking only at the FLUM amendments proposed by OP, 12 recommend High Density Residential uses – a category rarely applied outside of Central Washington. Half of these amendments add residential where it isn't currently designated. Are these amendments the result of community planning? We can't find any references to the map amendments in the Area Elements, which is where the face of the map states that information will be provided. Stating that a Small Area Plan exists is the most residents get from OP – there is no linking of amendments to actual Small Area Plan provisions where a plan exists. The OP staff report accompanying the transfer of the amendments to the Council in April 2020 states that the FLUM land use changes follow small area planning decisions but none of the amendments link to a specific Small Area Plan and the provision that anticipates the change in use or density. This must be corrected.

Twenty-seven map amendments proposed by OP to the FLUM create or increase residential density to medium and 10 of these are paired with increases in commercial density to medium. According to the amended Framework Element, these zones would permit 90 to 110 ft buildings before applying any Inclusionary Zoning bonuses. Did any community planning underpin these map amendments?

In addition, OP states that the amendments are focused on adding density at Metro stations and along corridors – but again there appears to be no planning to determine where this growth is appropriate as the Land Use Element policies recommend. In some cases, OP is recommending high density near low density residential areas and in other cases adjacent to industrial land. Are there standards being applied, were the neighborhoods consulted or asked to participate in determining if these map amendments are appropriate?

The Office of Planning's amending of the Generalized Policy Map doesn't appear to be a serious effort. It has created Future Planning Analysis Areas which are largely the same areas where it is proposing or has accepted significant map amendments to the FLUM. Since when do you authorize upFLUMing that sets in motion upzoning followed by a planning effort to determine if it was warranted and wise? By its

selection of these areas OP is announcing that these areas will see a change in density and intensity of use. No kidding! The FLUM amendments make that clear. There is no need for these Future Planning Analysis Areas because 1) OP can organize Small Area Plans now, and 2) there is nothing future about it since OP has already proposed density and use changes on the FLUM.

The Committee of 100 has been very critical of the Office of Planning's handling of this Comprehensive Plan amendment cycle. We think it is antagonistic to neighborhoods, historic preservation, low income residents, residents of color, and any resident who isn't ready to fall into line with its development vision. But we have focused on the maps today because they highlight how little OP has engaged with the citizens and how casual OP is about land use planning. OP demonstrates through these map amendments that it is a development-centric agency looking for quick ways to reward developers with land speculation or profitable development opportunities.

We urge the Council to reject OP's FLUM amendments that it cannot persuasively connect to a Small Area Plan provision and we further ask that the Council spend time this year examining how OP operates from its staffing of the Zoning Commission to its control of the small area planning process to its superficial assessment of development impacts. There is a reason that so many residents rail against the Office of Planning. It wouldn't take much delving below the surface to understand why.

Thank you.