Seattle 2035

Draft Plan

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Date: 11/20/2015

Name: David Osaki

Draft Plan Element: Economic Development, Land Use, Neighborhood Planning

Comment:

November 20, 2015

City of Seattle

Department of Planning and Development
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124-4019

SUBJECT: City of Seattle - Draft 2035 Comprehensive Plan

City of Seattle:
The Aurora Licton Residential Urban Village ("ALUV") appreciates the opportunity to comment on the City of Seattle - Draft 2035 Comprehensive Plan. We appreciate the work that has gone into the draft Plan's preparation and associated public outreach.
As background, ALUV consists of interested neighbors, community groups and business owners who reside or work in and near the Aurora Licton Residential Urban Village. Our goal is to actively coordinate with community members, organizations and the City to successfully implement the vision of the City of Seattle's adopted 1999 Aurora Licton Neighborhood Plan (City of Seattle Comprehensive Plan Ordinance #119538).

We have, unfortunately, found that a considerable number of policies and recommended actions in the Aurora-Licton Neighborhood Plan have never been implemented. This includes, as examples, recommendations related to capital improvements, enhancing public safety, adopting design guidelines, developing a community center and creating vibrant commercial areas that provide neighborhood serving goods and services.

To further the goal of promoting the Aurora-Licton Neighborhood Plan vision, ALUV has adopted the following Mission Statement,

"Mission

Build a pedestrian-safe, visually vibrant, economically sound, livable and welcoming neighborhood using sustainable-growth principles."

ALUV's mission is therefore closely aligned with the four core values of Seattle's Comprehensive Plan which are:
- Community - developing strong connections between a diverse range of people and places
- Environmental Stewardship - protect and improve the quality of our global and local natural environment
- Economic Opportunity and Security - a strong economy and a pathway to employment is fundamental to maintaining our quality of life

•Social Equity - limited resources and opportunities must be shared; and the inclusion of underrepresented communities in decision-making processes is necessary.

ALUV looks forward to working with the City to further both our Mission and the Comprehensive Plan's core values.

In preparing these comments, ALUV took note of the draft Comprehensive Plan comments provided by other groups, including community councils. It is not our intent to repeat comments prepared by these other groups, other than to say that we too are concerned with any revisions to the existing Comprehensive Plan that could be taken to weaken policy and regulations that protect the sanctity of residential areas or revise processes that lessen the public's role in influencing the outcome of land use decisions.

The following comments on the Draft Comprehensive Plan are generally organized by topic.

Land Use

The City of Seattle's Development Capacity Report (Updated September 2014) indicates that the City of Seattle is projected to grow by 70,000 housing units through 2035. The same report indicates that development capacity under existing zoning is about 224,000 housing units, a sufficient amount to accommodate the 70,000 households King County Countywide Planning Policies (CPP's) assign to Seattle for the next 20 years.

With so much excess capacity we question the need to expand urban village boundaries. Focus should be on directing public investment on public facilities and services within existing urban village boundaries to make them livable and provide a safe and quality urban environment.

If there is a need to expand an urban village boundary for any reason, it should only be done in conjunction with a neighborhood plan update to ensure adequate notice and involvement by the neighborhood. This should be included as a policy in the land use and/or neighborhood planning element.

Economic Development Element

Proposed Policy ED1.3 states,

"ED.1.3 Prioritize commercial districts for assistance in areas of lower economic opportunity."

Areas characterized by lower economic opportunity should not be the only criteria to prioritize assistance to commercial areas. Economic opportunity should also be prioritized in urban villages that require targeted economic development to successfully implement the Urban Village strategy.

In the case of the Aurora-Licton Residential Urban Village, there is an absence of pedestrian oriented neighborhood serving goods and services to support residential development in the Residential Urban Village. Recent development along Aurora Avenue, such as mini-warehouses and contractor storage yards, do not support a pedestrian oriented neighborhood serving goods and services. Economic assistance in attracting appropriate uses to the Residential Urban Village is needed.

We would ask that proposed Policy ED1.3 be revised to state,

"Prioritize commercial districts for assistance in areas of lower economic opportunity and in urban villages lacking the appropriate mix of neighborhood oriented commercial goods and services."

Neighborhood Planning Element

We appreciate that Neighborhood Planning Element makes many positive statements about neighborhood planning, provided that they can be implemented. This includes providing neighborhoods with appropriate tools to refine their current vision.

In terms of policies, proposed Policy NP1.1 states,

"NP1.1 Prioritize neighborhood planning in areas expecting or experiencing significant change, primarily in urban centers and urban villages."

While change is an appropriate criteria for prioritizing neighborhood planning, so too should be the length of time since the last neighborhood plan update. The Aurora Licton Neighborhood Plan was adopted in 1999.

We would ask that this policy be revised to state,

"NP1.1 Prioritize neighborhood planning in areas expecting or experiencing significant change, primarily in urban centers and urban villages, and in those neighborhoods where neighborhood plans are the most outdated."

We would also request that an update to the Aurora-Licton Neighborhood Plan be initiated promptly.

Conclusion

ALUV appreciates the opportunity to comment on the draft 2035 Comprehensive Plan. We look forward to the Mayor's recommended Comprehensive Plan and future opportunities to comment before the City Council on 2016.

Sincerely,

David Osaki

Date: 11/20/2015

Name: Laura Cooper

Draft Plan Element: Land Use

Comment:

I urge the exclusion of Land Use Guideline 16: GOAL LUG16 Maintain the city's cultural identity and heritage by rehabilitating, restoring, and reusing structures in designated historic districts and landmarked sites, objects and structures.
A city that honors its history is richer than one that does not.
Thank you.
Laura Cooper
Ballard Historical Society Trustee
206-781-0336

November 15, 2015

City of Seattle
Department of Planning & Development
Attn: Seattle 2035
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124

Re: Draft Seattle Comprehensive Plan, Transportation Element Comments

We greatly appreciate the opportunity to comment on the Draft Seattle Comprehensive Plan, Transportation Element. The Cascade Bicycle Club (Cascade) is a regional nonprofit with nearly 16,000 members. Our mission is to improve lives through bicycling. We support growth distribution that makes it easier to experience Seattle by foot, bike, or transit. Making bicycling safe, comfortable, and convenient will advance Seattle toward its goal of creating an interconnected, vibrant, and affordable city.

INTEGRATING LAND USE AND TRANSPORTATION

Cascade supports TG1, as land use is the most powerful influence on the City's transportation system. We have recently seen a great deal of excellent projects and now we must focus on better bike and transit connections to urban centers and urban villages. We cannot reduce auto dependency until we provide safe, reliable, and affordable alternatives.

Recommendation:

- T1.2 Design transportation infrastructure in urban center and villages to support compact, accessible, and walkable neighborhoods for all ages and abilities.
    - Add *bikeable.*
- T1.3 Invest in transportation projects and programs to further progress towards meeting Seattle's mode share goals and reduce dependence on personal automobiles, particularly in urban centers.
    - Include a table outlining specific and individual mode share goals, such as those for transit, drive alone, rideshare, walk, and bike.

MAKE THE BEST USE OF THE STREETS WE HAVE

We support TG2 to allocate space on Seattle's streets to safely and efficiently connect people and goods while creating inviting streetscapes. We specifically support T2.1 in designating space in the public right-of-way to accommodate multiple travel modes, including bicycling.

Cascade would like the City to ensure that The Plan is consistent with other recent Seattle planning efforts. The Bicycle Master Plan, Pedestrian Master Plan, and Climate Action Plan have engaged residents on issues of growth, development, and transportation. Much good work has been completed. But The Plan must be bold and make space for the actualization of the goals adopted in these earlier plans. For example, the Climate Action Plan establishes a 25% drive alone rate by 2035. This does not match, and is 10% more aggressive than, the 65% non-drive alone (or the 35% drive alone) work trips mode share target as indicated in Transportation Figure 1.

Recommendation:

- Include a policy stipulating that modal and other related plans have consistent quantitative goals.

TRANSPORTATION OPTIONS

Cascade advocates for increasing safe, affordable, and healthy travel choices that are accessible for people of all ages and abilities. Correspondingly, the City must expand access to safe infrastructure for bicycling as promised in the Bicycle Master Plan. We are especially supportive of the following policies:

- T3.1 Develop and maintain high-quality, affordable and connected bicycle, pedestrian, and transit facilities.
- T3.8 Provide high-quality pedestrian, bicycle, and bus transit access to high-capacity transit stations, in order to support transit ridership and reduce single-occupant vehicle trips.
- T3.9 Develop and maintain pedestrian and bicycle facilities that enhance the predictability and safety of all users of the street and that connect to a wide range of destinations.
- T3.10 Prioritize bicycle and pedestrian investments on the basis of increasing use, safety, connectivity, equity, health, livability, and opportunities to leverage funding.
- T3.11 Develop programs and facilities, such as bike share, that encourage short trips to be made by walking or biking.
- T3.15 Create vibrant public spaces in and near the right-of-way that foster social interaction, promote access to walking, bicycling and transit options, and enhance the public realm.

Recommendation:

- Create a map that integrates modal plans for better analysis of how modal plans interact.

ENVIRONMENT

As in TG4, we support promoting healthy communities by providing a transportation system that protects and improves Seattle's environmental quality. But in order to meet the following policies, the City should identify mode split targets in The Plan:

- T4.1 Design and operate streets to promote green infrastructure, new technologies, and active transportation modes while addressing safety, accessibility and aesthetics.
- T4.2 Reduce single-occupant vehicle trips, vehicle dependence, and vehicle miles traveled in order to help meet the City's greenhouse gas emission reduction targets.

Recommendation:

- Identify mode split targets in these policy statements.

SUPPORTS A VIBRANT ECONOMY

Cascade has recently collaborated with the freight community with regard to safely sharing the road with bikes. We support T5.4 to improve safety for all modes of transportation on streets heavily used by trucks.

Recommendation:

- T5.10 Build great streetscapes and activate public spaces in the right-of-way to promote economic vitality.
    - Bike infrastructure has been proven to increase sales for proximate businesses. Add *promote bicycle access.*

SAFETY

We support TG6 to invest in safety for our most vulnerable road users, such as pedestrians and bicyclists. Because collisions involving pedestrians and bicyclists are a relatively small percentage of overall collisions in the city, but represent a much higher percentage of the serious injuries and fatalities, we would like to see Vision Zero more clearly called out in this section. Seattle has proposed to eliminate serious injuries and fatalities by 2035. Cascade would like confirmation that the growth strategy will accomplish Vision Zero.

Recommendation:

- T6.1 Reduce collisions for all modes of transportation and work toward a transportation system that produces zero fatalities and serious injuries.
    - Add *Vision Zero.*
- T6.6 Consider lowering speed limits on residential streets and arterials as a way to reduce collision rates.
    - Strike *consider.*

CONNECTING THE REGION

The City's investment in transportation is especially worthwhile once disparate projects are seamlessly connected. The City should also ensure that it is safe and comfortable to bike within a 3-mile bikeshed in and around the urban centers and urban villages.

Recommendation:

- T7.6 Support expansion of regional light rail and bus service to encourage more trips to and through Seattle on transit.
    - Add *improve bicycle and pedestrian access*
- Add T7.9: *Support expansion of regional multi-use trail system to encourage more bicycle and pedestrian trips to and through Seattle*.

MEASURING LEVEL OF SERVICE

This section states that the City is currently considering alternative methods of level of service (LOS) standards that consider all travel modes. Cascade suggests employing multimodal LOS to ensure that urban villages can

enjoy multiple mobility options. Seattle must be resolute and look beyond auto-centric LOS standards. We applaud the City for exploring growth scenarios around present and future Link light rail stations. But access to transit alone does not make a community successful. Station links to the first and last mile of trips are critical.

Recommendation:

- T9.3 Consider establishing level-of-service standards that include non-motorized modes in order to advance this Plan's goals of encouraging use of travel options, reduce dependence on drive-alone automobile use and accommodate growth in urban centers and urban villages.
    - Strike *consider* and specify *multimodal LOS.*

FUNDING

Cascade strongly supported the City in passing the Move Seattle Levy. Even so, many projects listed in the measure are also dependent on grant matches and other outside funds. But we cannot solely rely on property tax and automobile-related taxes, such as the commercial parking tax and vehicle license fee to fund transportation. Concerning the latter two, this practice is particularly risky if we continue to discourage car-dependency as stated throughout The Plan. Similarly risky, especially in the event of recession or even a milder economic downturn, is reliance on sales tax. Accordingly, diverse funding sources will lead to better planning, design, and construction of transportation capital projects. We applaud the City for the following policies:

- T10.2 Work with regional and state partners to encourage a shift to more reliance on user-based taxes and fees, and to revenues related to impacts on the transportation system, the environment.
- T10.7 Consider the use of transportation impact fees to help fund transportation system improvements needed to serve growth as envisioned in this Plan.

Overall, we support the great goals and policies outlined in the Transportation Element.
Thank you for the opportunity to comment on how active transportation can safely, reliably, and affordably move Seattle residents and visitors over the next twenty years.

Sincerely,

Andrea Clinkscales, AICP, PMP
Principal Planner
Cascade Bicycle Club

cc: 2035@seattle.gov

CENTRAL AREA
LAND USE
REVIEW
COMMITTEE

November 20, 2015

City of Seattle
Department of Planning and Development ***Transmitted via email***

Re: Seattle 2035 Comprehensive Plan Update – Comments on Draft Plan

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The Central Area Land Use Review Committee (LURC) is pleased to be given an opportunity to participate in the public process for the Seattle 2035 Draft Plan.

The LURC is a volunteer committee composed of residents, business owners and property owners in the Central Area, many of whom work in the planning and design industry. The mission of the LURC is to advocate for and support development that contributes to the vitality of our neighborhoods. Our group facilitates community conversations around land use issues to constructively shape land use and development in the Central Area.

The LURC has reviewed the draft plan for "Seattle 2035," particularly the proposal to expand the boundaries of the 23rd & Union-Jackson Residential Urban Village to include the residential areas to the south towards I-90. Given the proximity to the proposed Rainier Ave light rail station and the overall trend in the environs towards low-intensity multi-family zoning, the expansion of the Urban Village boundary seems to be an appropriate direction that we generally support.

The LURC recognizes that the inclusion of this area in the Urban Village boundary is an important first step to directing residential development into areas that are, or in this case, will soon be, served by high-capacity transit. Increasing the density of residential development within walking distance of the planned light rail station will provide more Central Area residents with meaningful access to public transportation, increasing the mobility of those residents and helping further the city's environmental sustainability goals. Additionally, improvements to the pedestrian environment in the areas north of the station, as a result from further planning and investment into the area, will strengthen the connection of the station area with the Jackson core.

There are of course, further details to be determined, especially the exact alignment of the boundary. We look forward to working with DPD as the plan is finalized over the next several months, and as the city engages with the neighborhood to conduct more localized planning within that area.

Sincerely,

Jeffrey Floor & Christina Ghan, Co-Chairs
Central Area Land Use Review Committee
www.centralarealurc.org

LURC Members:

Jeffrey Floor (Co-Chair)	Tova Cubert	Bill Zosel
Christina Ghan (Co-Chair)	Dennis Comer	Paul Crane
Jonathan Konkol (Vice-Chair)	Mike Moedritzer	
Amanda Bryan	Bill Bradburd	

City Neighborhood Council

700 Fifth Ave, Suite 1700, PO Box 94649, Seattle WA 98124-4649

November 19, 2015

Seattle City Council
600 4th Avenue – 2nd Floor
Seattle WA 98104
VIA EMAIL

Seattle Mayor Ed Murray
600 4th Avenue – 7TH Floor
Seattle, WA 98104

Seattle Dpt Planning/Development
Patrice Carroll, Tom Hauger
P.O. Box 34019, Seattle 98124

Re: Seattle 2035 – Draft Comprehensive Plan | City Neighborhood Council (CNC) – Neighborhood Planning & Land Use Committee (NPLUC) Draft Comments

Dear Seattle City Councilmembers, Mayor Ed Murray, Patrice Carroll, Tom Hauger, Seattle 2035 Team:

The CNC's Neighborhood Planning & Land Use (NPLU) Committee has been aware of the Department of Planning and Development's (DPD) outreach to obtain community input regarding the Seattle 2035 Draft Plan which is a complex and far reaching effort.

The City Neighborhood Council (CNC) recognizes the comprehensive planning process as a way to accept and manage population and jobs growth coming to Seattle, while managing transportation, livability and environmental considerations the community wants and the Growth Management Act requires.

We acknowledge the Seattle 2035 team for extending the comment period through November 20th to allow the community to provide measured input and note that more time may have been beneficial for many volunteer groups across the city to review and respond. The CNC Neighborhood Planning & Land Use Committee (NPLUC) met no fewer than 6 times over the past two months, attended public meetings and exchanged countless emails and documents in this exhaustive evaluation process. The draft results of the CNC NPLU Committee efforts are attached. The draft five page summary consists of major goal and policy issues and an elaboration with specific editorial suggestions for most of the Comp Plan elements.

Thank you for your consideration of the CNC NPLUC draft comments regarding the Seattle 2035 Draft Plan updates.

Sincerely,

Irene Wall | Cindi Barker
CNC NPLUC Co-Chairs

Laine Ross | Catherine Weatbrook
CNC Co-Chairs

CNC NPLUC Draft Comments Attached
C: Kathy Nyland, Director - Department of Neighborhoods

The City Neighborhood Council, Neighborhood Planning & Land Use Committee's Draft Comments Submitted November 19, 2015

The New Seattle Comprehensive Plan

The City Neighborhood Council's (CNC) Neighborhood Planning and Land Use Committee (NPLUC) met multiple times over the course of the last four months to review the Draft Comprehensive Plan (Seattle 2035) and compare the proposed new policy language with the original policy language using a document prepared by DPD called the "crosswalk." This crosswalk document was a side by side comparison of existing and proposed goals and policy language. This was helpful to understand the sometimes subtle shifts in meaning when policy language was modified. The comparison also made it more obvious when existing policy and goals language was entirely eliminated.

The CNC NPLUC offers the following draft summary of the Committee's consensus on major topics in the draft Seattle2035 plan. More detailed comments, suggested to particular policies and policies to retain from the current plan are included in appendices to this summary document.

Major Goal and Policy Issues

The "value" of accommodating growth should not overshadow other community expectations of livability in the city.

Taken together, the policy deletions and changes leave us feeling that the overall "livability" of Seattle will be compromised or ignored in order to accommodate an ever increasing demand for housing and jobs within Seattle city limits. The concept of sustainability is removed. The metrics suggested by the Seattle Sustainable Neighborhoods Assessment Project are missing from the proposed new Comprehensive Plan. The past recognition of the importance of citizen-based ownership of planning is gone and with it the acknowledgement that Seattle residents feel strong connections to their neighborhoods – for a variety of social, cultural, historic and aesthetic reasons. The concept of urban villages has been changed from preserving character while accommodating reasonable growth and providing adequate services, to merely achieving greater densities everywhere.

Neighborhood individual character is being eroded with the loss of distinctive older buildings, landscapes and viewscapes and the increasing uniformity and ubiquity of certain building forms and features (or lack thereof). Crowding, traffic congestion, the competition for parking in many residential areas and the significant increase in the cost of living in Seattle (for the both long term and new immigrant residents) is reducing the overall civility and livability of many areas of the city. We could like to see **stronger policies** that support livability for the people who currently live and work in Seattle; inventory and preservation of unique aspects of Seattle's neighborhoods; and firm assurances that new development will truly enhance the city, not merely occupy it.

We support continuation of the urban village strategy with the following caveats:

- Restore growth estimates for all urban village, not just the 6 urban centers.
- Designating a new urban village at 130th should only be accomplished with a concurrent neighborhood planning process.
- Changing the boundaries of the 11 urban village to capture transit walksheds should involve specific outreach efforts to those neighborhood residents and property owners.

We do not support any increases in density / development capacity along transit corridors until the following conditions are met.

- New transit service should be in place and stable for two years before increasing development capacity.
- Consistent definitions of a “transit corridor” “transit stop” “frequent transit” “superior transit” are included in the policies and definitions.
- When a level of service standard for transit is defined that addresses the experience of transit users, not merely headways and spans of service; and that identifies the additional transit service that will be needed to accommodate the estimated housing and job growth targets in the plan.

We do not support the FLUM change at this time.

- Not a mature concept – the proposed change blur the distinctions between zones in the urban villages and create uncertainty for property owners.
- Regulations must be adopted prior to the map change to specify how zone transitions will be created by new development.

We want to see policies to enforce metrics.

- There are targets provided in some chapters but no concurrent policy concerning monitoring and acting to address deviations from those metric. For example on Page 124 there is policy to increase the tree canopy to 40% but not policies to enforce the goals.
- The Mayor’s housing goals are not called out in the Comp Plan. Shouldn’t they be so they are measured and monitored?

Create a new Community Involvement Element.

- Community engagement was pulled out of many sections and was relegated to the discussion section of the Growth Strategy chapter.
- We agree that repeating community engagement policies in each element is duplicative therefore to ensure that community engagement is a required element of this Comp Plan, we recommend creating a new element for Community Involvement.

Neighborhood Planning.

- Seattle 2035 as proposed eliminates the vast majority of references to “neighborhoods” and “neighborhood plans” from its goals and policies. It appears the City considers neighborhoods adversaries and neighborhood plans obstructions. The consequences are significant, far-reaching and damaging to Seattle values and planning objectives.
- Neighborhood plans are not a substitute for city-wide planning, but the alternative is to allow development divorced from local characteristics, concerns and standards. Neighborhood plans should not be eliminated as a consideration in decision making. Neighborhood plans may need to be updated, along with individual design guidelines but planning offers neighbors the ability to direct, protect and improve their homes, environment and quality of life.

Draft

- In the draft 2035 Plan, neighborhood plan implementation is reduced to one sentence in the Neighborhood Planning Element. This is not adequate recognition of the importance of neighborhood/subarea planning.
- Non adopted, city-created plans, like action plans and UDFs, are not addressed by policies. That makes it ambiguous as to their enforcement.

We need policies to better manage development capacity citywide including:

- Policies that first direct growth into areas in areas with underutilized capacity and not meeting their growth targets that are served by existing and future planned light rail stations.
- Where development capacity approaches the 80% utilization or 80% of the growth target is achieved, deny development permits in those areas and direct development into underperforming areas.

We need clearer policies on Seattle's role in regional growth management.

- Policies should articulate rationale for determining Seattle's acceptable share of growth among the five metros (Seattle, Everett, Bellevue, Tacoma, Bremerton).
- Policies about growth distribution should acknowledge Puget Sound Regional Council initiatives promoting subregional centers, including downtowns in suburban cities.
- When development at the regional level gets unbalanced, and other metros or subareas are underperforming, Seattle needs to work with PSRC members to re-balance the growth on a regional basis using incentives and disincentives
- Policies should require regional performance measures for preservation of forest, rural, agricultural lands consistent with the rationale for the urban village strategy.

Strengthen the discussion of and policies to achieve concurrency.

- The GMA requirements for concurrent investment in infrastructure to support growth is not discussed in the document and should be. It is important for citizens and policy makers to understand how capital planning, in particular for transportation investments, meets concurrency requirements. In our comments on the Transportation and Land Use Elements, we recommend development of new transit concurrency standard. The screenline LOS method of determining peak hour arterial capacity appears at odds with people's actual experience of using our limited arterials most hours of the day.

Use of surplus property (within the City limits).

- We suggest that land not be divested from the city at all, and that leasing arrangements should be prioritized as the first use of a surplus property.
- If land must be sold, land of comparable value within Seattle must be purchased in its stead.
- In the circumstance that such land cannot be obtained policies need to better reconcile competition between use of surplus property for housing or open space needs.

Preservation of housing stock.

- There is insufficient policy support for housing preservation, particularly for preserving affordable rental housing stock suited for families

Sweeping zone-wide changes should no longer be allowed.

- Need policies that tailor conditions of development permits to specific site and surrounding areas to address cumulative impacts and ensure that policies concerning preservation of unique neighborhood character are met.
- Eliminating neighborhood character and plans as criteria in decision making is particularly disturbing regarding such issues as rezones, land use departures and conditional uses. Neighborhood planning provides flexibility and diversity in applying citywide regulations not otherwise possible. Land use criteria disconnected from individual neighborhood characteristics can lead to unintended consequences. Once enacted into law, the city may not have the authority to deny permits because proposed uses are incompatible or detrimental to existing or planned community development if they otherwise meet the code.

Seattle should have a 50 -100 outlook for the city's growth and development.

- Need a goal or policy to establish a longer-term growth capacity analysis that sets the groundwork for the subsequent 20 year planning cycles.
- Rigorous community involvement should guide recommendations for managing growth in the future.

Priority use of street.

- There is no sense of priority in the policies. Do policies with smaller numbers reflect a priority? If so TG2 implies that creating inviting spaces within the ROW is as important as other uses of streets in the allocation of uses. The policy language should make it clear that the primary role of streets is to move cars, buses, and commercial vehicles, bikes and to provide parking.

Setbacks and Green Space.

- In areas not meeting targets for community open space, increase the required setbacks and landscaping requirements for new multifamily residential development like Vancouver and Portland.

Parking for Private Vehicles.

- The city needs to acknowledge that a significant percentage of citizens, including the elderly, disabled and mobility-challenged, cargo-carrying parents, people transporting gear will at times require the use of private cars and will need a place to park them at both ends of their trips. Therefore new residential and development should provide a rational number of parking spaces on site for both commercial and residential projects.

Draft

Single-family zones are significant part of Seattle's character and should be respected.

- The great diversity of single family zoned areas in Seattle is one of the city's more beloved and distinguishing characteristics providing privacy, individuality, and breathing room despite the relative density of most inner-city SF neighborhoods. Our SF neighborhoods have contributed to the "quality of life" that Seattle is envied for. Previous comprehensive plan policies have rightfully acknowledged this feature of Seattle life. Revisions seek to deny the value of the single family zone if not to eventually eliminate it altogether by converting SF to a multi-family zone. There is no solid reason for this given that DPD's Development Capacity Report identifies residential capacity of 147,187 units across neighborhood commercial, lowrise, highrise, midrise and downtown zones.
- The Seattle2035 Plan should **retain the current policy language in LUG8; LUG9 and LUG10** about preserving, protecting these areas to provide opportunities for home ownership as well as a supply of rental housing suitable for families and shared-households for unrelated persons.
- Policies should encourage the retention and rehabilitation of single family homes in all neighborhoods as the most desirable rental housing for families.

No policy guidance for "The Grand Bargain"

- There are no specific policies to address the implications and impacts of the additional height that would be applied citywide across zoned both inside and outside urban village boundaries. The final Comprehensive Plan should address conditions where the additional height could have a detrimental effect on areas lacking transitions between low intensity and higher intensive zones, given that the heights and development capacity will increase significantly impacting privacy, solar access, views, and the use of shared public resources such as street parking, parks, transit and commercial services. **Need stronger policy language requiring greater setbacks to create transitions between zones where SF zones immediately abut a more intense zone.**

Keep current goals and metrics for providing open space.

- Changing to a "quality versus quantity" approach is not sufficiently justified. Keep the current metrics as goals for open space until there is further public debate on the issues motivating this dramatic change (impact fees, overall investment cost, other?)
- Consider new approach to weighting factor to achieve open space goals by subarea. Example greenway count at 25% - a ravine count at 80%, a park count at 100%; some large multi-use parks could count for more than 100%
- Need strong open space and parks policies to support regulation of open space requirements and tree preservation on developing sites.

Only count open space that the city can control.

- Counting space owned by other public agencies or private institutions has a lot of downside including lack of long term reliability; conflicts over use; and inconsistency with public expectations for what parks and open space should be. Parking lots and school playgrounds are not typically viewed as open space.
- If policy remains, amend to specifically eliminate cemeteries, school yards, and campuses for educational or institutional facilities.

Organization of Comprehensive Plan sections should reflect meaningful hierarchy of goals and policies.

- We recommend a two tier organization that recognized the following elements as establishing umbrella policies which take precedence when resolving conflicts with the more functional elements of the plan

- **GUIDING POLICIES**
    1. Growth Strategy
    2. Community Well-being
    3. Neighborhood Planning
    4. Environment
    5. Community Involvement (new)
- **FUNCTIONAL ELEMENTS**
    - Land Use
    - Transportation
    - Housing
    - Capital Facilities
    - Utilities
    - Economic Development
    - Parks and Open Space
    - Arts and Culture
    - Container Port
    - Shoreline Management

Appendices for

Growth Strategies
Housing
Capital Facilities
Environment
Land Use
Transportation
Parks and Open Space
Community Well-being

These Elements were not reviewed by our committee:

Economic Development
Utilities
Arts and Culture

Draft

Growth Strategy

Major Goal and Policy Issues

We support continuation of the urban village with the following caveats:

- Restore growth estimates for all urban villages, not just the 6 urban centers.
- Designating a new urban village at 130th should only be accomplished with a concurrent neighborhood planning process.
- Changing the boundaries of the 11 urban villages to capture transit walksheds should involve specific outreach efforts to those neighborhood residents and property owners.

We do not support any increases in density / development capacity along transit corridors until the following conditions are met.

- New transit service should be in place and stable for two years before increasing development capacity.
- Consistent definitions of a "transit corridor" "transit stop" "frequent transit" "superior transit" are included in the policies and definitions.
- When a level of service standard for transit is defined that addresses the experience of transit users, not merely headways and spans of service; and that identifies the additional transit service that will be needed to accommodate the estimated housing and job growth targets in the plan.

Seattle should have a 50 -100 outlook for the city's growth and development

- Need a goal or policy to establish a longer-term growth capacity analysis that sets the groundwork for the subsequent 20 year planning cycles.
- Rigorous community engagement should guide recommendations for managing growth in the future.

We need policies to better manage development capacity citywide including:

- Policies that first direct growth into areas in areas with underutilized capacity and not meeting their growth targets that are served by existing and future planned light rail stations.
- Where development capacity approaches the 80% utilization or 80% of the growth target is achieved, deny development permits in those areas and direct development into underperforming areas.

We need clearer policies on Seattle's role in regional growth management.

- Policies should articulate rationale for determining Seattle's acceptable share of growth among the five metros (Seattle, Everett, Bellevue, Tacoma, Bremerton).
- Policies about growth distribution should acknowledge Puget Sound Regional Council initiatives promoting subregional centers, including downtowns in suburban cities.

Draft

- When development at the regional level gets unbalanced, and other metros or subareas are underperforming, Seattle needs to work with PSRC members to re-balance the growth on a regional basis using incentives and disincentives
- Policies should require regional performance measures for preservation of forest, rural, agricultural lands consistent with the rationale for the urban village strategy.

Strengthen the discussion of and policies to achieve concurrency.

- The GMA requirements for concurrent investment in infrastructure to support growth is not discussed in the document and should be. It is important for citizens and policy makers to understand how capital planning, in particular for transportation investments, meets concurrency requirements. In our comments on the Transportation and Land Use Elements, we recommend development of new transit concurrency standard. The screenline LOS method of determining peak hour arterial capacity appears at odds with people's actual experience of using our limited arterials most hours of the day.

Use of surplus property (within the City limits).

- We suggest that land not be divested from the city at all, and that leasing arrangements should be prioritized as the first use of a surplus property.
- If land must be sold, land of comparable value within Seattle must be purchased in its stead.
- In the circumstance that such land cannot be obtained policies need to better reconcile competition between use of surplus property for housing or open space needs.

We want to see policies to enforce metrics.

- There are targets provided in some chapters but no concurrent policy concerning monitoring and acting to address deviations from those metric. In this element in particular there is a lack of policy direction on measuring and metrics.

Create a new Community Involvement Element.

- Community engagement was pulled out of many sections and was relegated to the discussion section of the Growth Strategy chapter.
- We agree that repeating community engagement policies in each element is duplicative therefore to ensure that community engagement is a required element of this Comp Plan, we recommend creating a new element for Community Involvement.

Neighborhood Planning.

- Seattle 2035 as proposed eliminates the vast majority of references to "neighborhoods" and "neighborhood plans" from its goals and policies. It appears the City considers neighborhoods adversaries and neighborhood plans obstructions. The consequences are significant, far-reaching and damaging to Seattle values and planning objectives.
- Neighborhood plans are not a substitute for city-wide planning, but the alternative is to allow development divorced from local characteristics, concerns and standards.

Draft

Neighborhood plans should not be eliminated as a consideration in decision making. Neighborhood plans may need to be updated, along with individual design guidelines but planning offers neighbors the ability to direct, protect and improve their homes, environment and quality of life.

- In the draft 2035 Plan, neighborhood plan implementation is reduced to one sentence in the Neighborhood Planning Element. This is not adequate recognition of the importance of neighborhood/subarea planning.
- Non adopted, city-created plans, like action plans and UDFs, are not addressed by policies. That makes it ambiguous as to their enforcement.

Comments

Urban Village Strategy, Discussion p 23
In the very last sentence of the discussion, it describes how new development is directed away from single family focused communities because most of those areas do not have needed services within easy walking distance. We understand that the Planning Commission will be recommending striking this sentence. We support leaving the sentence intact; it states the truth and the underlying premise to the creation of Urban Village Strategy.

It is not clear how to read this Growth Strategies Element and know which goals/policies apply to inside UV's, outside or both. The Urban Village Strategy section (goal 2) has a sub section with 3 policies specifically for areas outside UV's. Does that mean none of the other items in that section apply outside? Why only that one section? It is not done that way for the other sections.

GSG1 – "Have strategies that prepare the City for the challenges and opportunities of growth and that represent the needs and desires of a broad cross-section of city residents and business owners."

- Add back in the policy statement that these strategies should be developed with the collaboration of all residents and business owners, not just a broad cross section. Otherwise this is a short sighted goal (a broader view was expressed in old UVG10). Or just get rid of the cross section clause.
- Add "…of <u>current and future</u> city residents and business owners".

GS1.1 – "Work with other governments in the region to develop coordinated approaches to growth management that will advance the City's values."

- Add "<u>and which result in equitable regional growth</u>"

GS1.4 – "Develop and use practices to reach historically under-represented communities and to aid their participation in decision-making processes."

- How is this balanced with goal to reach and engage all citizens? Lacking a specific Community Engagement Element (see our proposal to add one), this should be revised to say "Develop and use practices to reach <u>all residents and businesses, including</u> historically under-represented communities and to aid their participation in decision-making processes."

Draft

GSG2 – "Accommodate most of the city's housing and employment growth in designated urban centers and urban villages in ways that will lead to equitable outcomes for all of the city's residents."

- See old UVG4, this new goal says to "accommodate", the old goal said to "direct". Accommodate is a much more passive word and implies that no matter what policies we set, we will just have to accommodate. This goal should be much more action oriented; that's what a Plan does.
- Add "…for all of the city's residents <u>and is consistent with neighborhood plans</u>"

GS2.1 – "Designate places as urban centers, urban villages, or manufacturing/industrial centers based on the functions they can perform and the densities they can support."

- Recommend that old UVG17 be restored in place of this policy. It spoke to the concept of having more complete communities and addresses the livability features of those Urban Villages. The Urban Village strategy goes beyond density and function. UVG17 - "Designate as urban centers unique areas of concentrated employment and housing, with direct access to high-capacity transit, and a wide range of supportive land uses such as retail, recreation, public facilities, parks, and open space."

GS2.2 – "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, provide services and employment close to housing, and promote efficient use of public services, including transit, with housing options for a variety of households and a range of incomes."

- Encourage is not strong enough, change to focus, mandate or require.
- Add at the end "<u>consistent with their village designation and neighborhood plans</u>". We're not sure why this was changed so significantly from the old UVG16, because now Figure 1 addresses most of the characteristics listed. The reference to the neighborhood plans is important to point towards the investments and activities that the individual neighborhoods feels important, particularly in the newer plans (see also our concern about not referring to the new non-adopted Action Plans and Urban Design Frameworks)

GS2.4 – "Coordinate planning for transportation, utilities, open space and other public services to meet the anticipated growth and increased density."

- This should really say "<u>with all other elements of this Plan</u>" instead of listing only some of the Elements. This ignores Community Well-Being, Environment, etc. It also has the potential of establishing precedent – if the others aren't listed, then do the ones listed trump other aspects?

GS2.7 – "Promote levels of density, mixes of uses, and transit improvements that will support the use of walking, biking, and public transportation."

- This really doesn't make sense, please make English.
- The old wording UVG3 also referenced Transportation Demand Management (TDM), and that should be added back as a strategic concept. "…walking, biking, public transportation <u>and other TDM strategies"</u>

GS2.8 – "Direct the majority of future development to centers and urban villages, and limit the possibility of scattered growth along <u>those</u> arterials and other areas <u>that are</u> not conducive to walking, transit use, and cohesive community development."

- Suggested minor edits shown above.

GS2.10 – "Establish Urban Centers and Urban Villages using the criteria described in Growth Strategy Figure 1."
In replacing UV3 with this new policy and Figure 1, several important concepts have been left out which need to be restored:

- "Clearly defined geographic boundaries that reflect existing development patterns, functional characteristics of the area, and recognized neighborhood boundaries." This concept will be important when discussion the future boundary expansions of existing Urban Centers and Villages, and also for establishment of new Centers or Villages during the next 20 years.
- A policy about boundaries should also address transition zones.
- "Zoning sufficient to accommodate the residential and employment growth targets established for that village." This was only captured for the Hub Urban Villages in the Growth Accommodations table of Figure 1, it was not captured for the Urban Centers nor for the Residential Urban Villages. As currently worded, it leaves those two types wide open to the interpretation of the word "potential" Need to add "current zoning permits" in both types.
- We do like the table approach to capturing the characteristics of the 3 types and their general characteristics.

GS2.12 – "Reflect the area that is generally within a ten-minute walk of frequent light rail stations in urban village boundaries."

- What's a "frequent light rail station". We agree with this policy if you mean light rail stations.
- If you mean frequent transit, please see our comment about the conflict in interpretation of "frequent transit" between the glossary and Figure 2 below.
- Suggest "stations within urban village boundaries".

GS2.14 – "Allow commercial activity in residential urban villages that supports the overall residential function and character of the village."

- Add back in the old UV31 reference to allow a different mix as allowed by the neighborhood plan to allow for exceptional uses that would benefit the neighborhood/urban village. UV31 "Allow employment activity in residential urban villages to the extent that it does not conflict with the overall residential function and character of the village, provided that a different mix of uses may be established through an adopted neighborhood plan." The flipping of the context of this policy, "from do not allow unless..: to "allow as it supports" should be carefully considered.

GS2.15 – "Promote meaningful choice for marginalized populations to live and work in urban centers and urban villages throughout the city."

- A policy for "meaningful choices" is not helpful. Please clarify what you mean.

GS2.16 – "Designate areas as manufacturing/industrial centers consistent with the following criteria and with the Countywide Planning Policies:"

- In addition to the other items listed in this policy, add back in the first bullet of old UV4 "Clearly defined geographic boundaries that reflect existing development patterns, functional characteristics of the area, and recognized neighborhood boundaries."

GS2.21 – "Support healthy neighborhoods throughout the city so that all residents have access to a range of housing choices, as well as access to parks, open space and services that make it easy for them to walk, bike or take transit to meet many of their daily needs."

- Revise to "Support healthy neighborhoods throughout the city, balanced with overall growth policies, so that all residents have access to a range of housing choices, as well as access to parks, open space and commercial services that make it easy for them to walk, bike or take transit to meet many of their daily needs"

GS2.22 – "Allow limited multifamily, commercial, and industrial uses outside of urban villages to support the surrounding area or to maintain the existing character."

- Limited is a difficult word in a policy statement. Cumulatively limited? Locally limited? What is the intent of the policy, to allow or to restrict?
- Use of the word limited actually worked better in the old UVG36, suggest it be restored to resolve the confusion. UVG36 "Allow limited amounts of development in areas of the city outside urban centers and villages to maintain the general intensity of development that already characterizes these areas and to promote the targeted level of growth in village and center locations."

GS2.23 – "Plan for uses and densities on hospital and college campuses that are located outside an urban center or village in ways that recognize the important contributions of these institutions and the generally low-scale development of their surroundings."

- This policy removes the concept of engagement of nearby residents and businesses and the master planning process. There was a version in the crosswalk that was much better and we suggest it be used instead: "Determine the appropriate uses and densities on hospital and college campuses that are located outside an urban center or village through a master planning process that engages nearby residents and businesses".
- In the Land Use Element, new goal LUG14 and its subsequent policies all address Major Institutions. Is this single Growth Strategy policy the only one that applies to outside UV's and the LU items apply only to inside UV's? What applies when and where is very confusing on this topic.

GSG3 – "Accommodate approximately 80% of the city's expected household growth in urban centers and urban villages and 80% of employment growth in those areas plus manufacturing/industrial centers. Figure 2 shows the amount of growth planned for each Draft center, and Figure 3 shows the growth rate planned for different categories of urban villages."

- Modify to say "Encourage growth in Seattle between 2015 – 2035 to be generally distributed as follows: approximately 80%..." This reflects the more active role of the plan, eliminating the weak concept of merely accommodating, and also restates the period of growth.
- Figures 2 & 3 (picture below)–
    - For Figure 3, label this chart consistent with Fig 2, Estimated Urban Village Growth Rates 2015 – 2035
    - In Figure 2, expand to add estimates for all Hub and Residential Urban Villages. In Figure 3, add Urban Centers to show percentage. Then a full picture of expected growth will be visible, both in estimated numbers and in percentages. See Overarching Comments above for discussion of importance in knowing the

estimated amount of growth for each urban village and the value of using metrics to measure and react if needed.

- Figure 3 – when expressing a number such as 50% of expected job rate, it doesn't make sense. 50% of what number? There are 115,000 jobs expected, is the 50% number half of that number? Half of that number minus the cumulative number in Figure 2? The Figure is not useful.
- In Figure 3 (and Figure 2 if above suggestion is accepted), policies in this draft imply that Residential Urban Villages may be the location for some job growth, so as to reduce commutes and to provide more compete services within UV's (GS2.6, GS2.14, GS2.15, GS3.2, etc.). Expected Jobs growth rate for Residential Urban Villages should be shown.
- Figure 3 footnote ** says "Frequent transit means a light rail station or two or more bus lines serving multiple destinations". That is consistent with our understanding of the definition used in discussion of Transit Communities by the Planning Commission and one we agree with. But in the Glossary, Frequent Transit is defined as "Generally, bus or train service that arrives every 15 minutes or less". This is not consistent with the concept that 15 minute urban boundary walksheds should be set based on *nodal connections*, not simply on headways. The definition in the Glossary should be changed to meet the footnote.

Growth Strategy Figure 2
Estimated Urban Center Growth 2015-2035

	Housing Units	Jobs
Urban Centers		
Downtown	10,000	30,000
First Hill/Capitol Hill	7,000	3,000
University District	2,700	8,000
Northgate	1,600	6,000
South Lake Union	4,700	20,000
Uptown	3,500	3,500
Manufacturing/Industrial Centers		
Duwamish	-	3,000
Ballard - Interbay	-	1,500

Growth Strategy Figure 3
Estimated Urban Village Growth Rates

	Expected Housing Growth Rate*	Expected Job Growth Rate*
Hub Urban Villages		
With frequent transit **	70%	50%
Without frequent transit	40%	50%
Residential Urban Villages		
With frequent transit	80%	
Without frequent transit	20%	

** Growth above 2014 actual housing units or jobs*
*** Frequent transit means a light rail station or two or more bus lines serving multiple destinations*

GS3.2 – "Increase employment growth in areas that are convenient to the city's residential population as a way to promote walking and transit use and to reduce work commutes."

- Unless people are working from home or virtually, you can't reduce commutes. Clarify by saying "…to reduce <u>the length</u> of work commutes."

- This appears to conflict with the general discussion that some job growth in Residential Urban Villages would be allowed, in that this policy seems to target actively increasing it. May need to be reworded to clarify.

GS3.4 – "Base 20-year growth estimates for each urban center and manufacturing/industrial center on:

- Citywide targets for housing and job growth adopted in the Countywide Planning Policies
- The role of the center in regional growth management planning
- Access to transit
- Existing zoning, including capacity for additional commercial and residential development
- Existing densities
- Current development conditions, recent development trends and plans for private or public development, such as by major institutions
- Plans for infrastructure, public amenities and services that could attract or support additional growth
- Potential benefits and burdens for the city's marginalized populations"

- Add new bullet point "Local circumstances and community preferences as expressed in Urban Center and MIC neighborhood plans"
- If growth estimates are restored for the Hub Urban and Residential Villages, this policy should be expanded accordingly.

GSG4 – "Maintain and enhance Seattle's unique character and sense of place, including its natural setting, history, human-scaled development, and community identity as the city grows and changes."

- Add aesthetics, livability and natural environment to this goal.

GS4.1 – "Encourage the preservation, protection, and restoration of Seattle's distinctive natural features and land forms such as bluffs, beaches, streams, and remaining evergreen forests."

- Change evergreen to urban.

GS4.9 – "Design public infrastructure and private building developments to help visitors understand the existing block and street patterns and to reinforce the walkability of neighborhoods."

- Why is this only about visitors? Add "residents and visitors".
- Does this mean street and alley vacations are now prohibited? Needs to be stated more clearly.

GS4.10 - "Use zoning tools and natural features to ease the transitions between urban villages' moderate building intensities to lower-density developments of surrounding areas."

- Revise to "Strengthen and use zoning tools and natural features to ease the transitions between urban villages' moderate building intensities to lower-density and single family developments of surrounding areas …".

GS4.11 Design streets with distinctive identities that are compatible with a citywide system that defines differences between types of streets.
GS4.12 Preserve, strengthen, and, as opportunities permit, reconnect Seattle's street grid as a means to knit together neighborhoods and to connect areas of the city..

Draft

GS4.13 Develop street designs that reflect each street's function, right-of-way width, adjoining uses and opportunities to provide open space and green infrastructure.
GS4.14 Design urban villages to be walkable, using approaches such as clear street grids, pedestrian connections between major activity centers, incorporation of public open spaces, and commercial buildings with retail and active uses that flank the sidewalk.

- There seems like a lot of overlap between these four policies, can they be condensed?
- GS4.12 – isn't the street grid already complete?
- GS4.13 – haven't those street designs have already been developed?

GS4.14 – "Design urban villages to be walkable, using approaches such as clear street grids, pedestrian connections between major activity centers, incorporation of public open spaces, and commercial buildings with retail and active uses that flank the sidewalk."

- Add "…active uses that flank <u>but do not obstruct</u> the sidewalk".

GS4.17 – "Encourage the use of land, rooftops, and other spaces to contribute to urban food production."

- Is this referring to private or public space? If public, now there is competition between that space being used for affordable housing, open space (see our comments in Overarching Comments about surplus property) and food production. What is the prioritization and balancing mechanism?

GS4.20 – "Consider taller building heights in key locations to provide visual focus and define activity centers, such as near light rail transit stations in urban centers and urban villages."

- Taller than what? Existing zoning? This would be a place where "<u>as noted in neighborhood plans</u>" would be a good addition!

GS4.23 - -"Encourage street widths and building heights that are in proportion with each other by reducing setbacks from the street and keeping reasonable sidewalk widths for lower buildings."

- Really, this policy makes no sense. What is it trying to accomplish?
- What is a reasonable sidewalk width for a lower (shorter?) building? Wider or narrower? Why is proportionality a policy, isn't the use of the sidewalk more important than the proportion of the sidewalk to building?
- We disagree with any reduction to setbacks.
-

GS5.2 - "Consider annexing land in cases where:

- The area has access, or can easily be connected, to areas already served by the City
- The City can readily provide services to the area
- The boundary changes or interjurisdictional agreements will result in an equitable distribution of revenues and costs related to asset transfer and to the development, maintenance and operation of facilities "

- It won't help the City in the long run to accept annexation areas if they are not evaluated within these Growth Strategy goals and policies. Consider adding a 4th bullet that says <u>areas must have some capacity to become an Urban Center, Hub or Residential Village.</u>

Draft

New and Retained Goals and Policies for Growth Strategies Element

Create a policy that says new and expanded urban centers and villages must include transition zones and define transition zones in the glossary (see also suggested change to GS2.10)

Create a policy directing that transition zones must be consider in all rezones inside urban centers and villages.

Create a policy to require that all rezones inside urban centers and villages must be consistent with neighborhood plans.

There are no policies that address what growth should look like should it be encourage along transit corridors (see our overarching comment above that it should not be encouraged until certain conditions are met). Those concepts and policy direction needs to be set.

Retain UVG8 – "Use limited land resources more efficiently and pursue a development pattern that is more economically sound, by encouraging infill development on vacant and underutilized sites, particularly within urban villages."

Retain UVG9 – "Maximize the benefit of public investment in infrastructure and services, and deliver those services more equitably by focusing new infrastructure and services, as well as maintenance and improvements to existing infrastructure and services, in areas expecting to see additional growth, and by focusing growth in areas with sufficient infrastructure and services to support that growth."

Retain UVG23 – "Encourage economic activity and development in Seattle's industrial areas by supporting the retention and expansion of existing industrial businesses and by providing opportunities for the creation of new businesses consistent with the character of industrial areas."

Retain UVG35 – "Achieve development within urban villages at a pace appropriate to current conditions in the area."

Retain UV30 – "Balance objectives for accommodating growth, supporting transit use and walking, maintaining compatibility with existing development conditions, maintaining affordable housing, and responding to market preferences for certain types of housing, through the density and scale of development permitted."

Retain UV37 – "Recognize neighborhood anchors designated in adopted neighborhood plans as important community resources that provide a transit and service focus for those areas outside of urban villages."

Retain Metrics for Growth Performance:
Not addressed in this Draft are the four Comp Plan amendments submitted in 2014, which staff was directed by Council to review for inclusion. They are:

1. In order to monitor the effects of the urban village strategy: collect data, review, and report on growth and change in urban centers, urban villages, and manufacturing/

industrial centers at least every 3 years. Include in these reports factors such as: progress on implementing neighborhood plan approval and adoption matrices; changes in the numbers of jobs and housing units; housing costs, including net loss or gain of low-income and very low-income housing units; housing types; crime rates; transportation systems and their use; business types; public facilities; services; and open space, to the extent information is practically available. Collect and report on similar data for typical areas outside villages for comparison. Broadly communicate the results of monitoring efforts. Provide a Briefing to City Council by July of the year following the review in order to be used for consideration in the annual Budget cycle. Provide the results directly to the Neighborhood Plan Stewards on record with the Department of Neighborhoods. Work with community members to identify appropriate responses to significant growth, lack of growth or changes, including: community-led activities; additional planning for, or re-prioritization of, City Programs or infrastructure improvements; partially or entirely updating a neighborhood plan; or working with other public agencies to address community goals.

2. Review situations where the rate of growth is significantly faster or slower than anticipated in the growth targets contained in Appendix UV-A or where other measures indicate significant changes in the center or village over an extended period of time. Evaluate the significance of the changes or the significance of lack of change with center or village residents, business owners, and other community stakeholders in light of the expectations underlying the neighborhood plan for the area, the actual level of growth, progress toward neighborhood plan implementation, and the relative maturity (level of mixed-use development, the pedestrian environment, infrastructure, and public facilities) of the area as an urban center or village

3. To ensure compliance with [the two new polices suggested above], the Council shall receive and consider a report, compiled by DPD and DON, that documents the impacts of growth in each Urban Village when approving capital and operating budget for all departments. These growth impact reports shall be available for public review prior to the start of the annual Council budget cycle.

4. When housing or job growth exceeds 100% of targets in any urban village or center, the city shall make all affirmative efforts to re-direct job and housing growth to designated growth areas that have not yet reached their targets.

Draft

Community Well-being

Major Goal and Policy Issues

None noted

Comments

CW1.4 – "Partner with other governments, schools, institutions, and community-based organizations to involve people of all backgrounds meaningfully in planning and decision-making that impact their community and their personal well-being."

- This policy rolls together multiple old policies, but dropped the aspect of "assist in finding community solutions". We suggest that be restored; it speaks volumes more than "meaningfully".

CW3 Supportive and Healthy Communities - All polices related to Family Planning were removed as being "too specific". (HD27.1, HD28.1, HD31.1)

- The old policies to not appear to be too specific, Family Planning is a general topic. We do not believe that this topic should be eliminated. Reword or do what is needed, but policies related to Family Planning need to be restored.

CW3.9 – "Consider using City land, including parks and surplus property, to expand the capacity to grow, process, distribute, and access local foods."

- As previously noted in other sections, this policy introduces another use for surplus properties, needs to be balanced with other policies in Housing and (our suggestion) Open Space suggesting those uses for surplus properties.

CW3.11 – "Support efforts to reduce exposure to second-hand tobacco smoke in indoor and outdoor areas, particularly where vulnerable populations, such as children and seniors are likely to be present."

CW3.12 – "Require healthy building methods and materials in City-funded projects, and encourage private development to use construction methods and materials that result in healthy indoor environments for all Seattleites."

- CW3.11 and 3.12 reflect a narrowing of the old policy HD23. That policy more broadly addressed "work to reduce environmental threats and hazards to health in the workplace, at home and at play" with several sub-bullets. These two policies now limit the city's concerns to only second hand smoke and building materials. Restore the broader policy language of HD23.
- Note: in the policy crosswalk, it was often noted that old policies were eliminated because they were "too specific". This is an example of the new draft going the wrong way; general to specific.

In the Lifelong Learning Discussion, suggest the below addition (underlined) to make clear that partnerships are needed for facilities as well as programming "Well-educated people will have the skills to pursue opportunities and careers of their choice. Achieving this requires coordination with

Seattle Public Schools, as with other public agencies, nonprofit agencies, community groups and business organizations ensure that safe and sufficient public facilities exist to make quality education and opportunities for learning and training available to children, youth and adults."

Suggest that CW4.1, 4.3 and 4.4 be rewritten for better grouping of topics and adding reference to both facilities and programming, as follows:
CW4.1 Coordinate with other agencies to plan that facilities and programs exist in order to create equitable access to high quality early learning and K-12 services.

CW4.3 Encourage parent, volunteer, business, and community support for education and their involvement in schools, and support families so that their children are prepared for school.

CW4.4 Support the Seattle Public Schools efforts to create safe learning environments in and after school that promote academic and personal achievement for all children and youth, including safe school walk zone, safe play grounds and parks and transportation choices."

CW4.9 – "Work with colleges, universities, other institutions of higher learning, and community based organizations to promote life-long learning opportunities and encourage the broadest possible access to libraries, community centers, schools, and other existing facilities throughout the city."

- Why was the specific reference to Urban Villages removed? We can understand in relation to schools, but Capital Facilities such as libraries and community centers are supposed to be located into the growth areas, per the Growth Strategy of providing amenities into dense areas.
- Restore "focusing on development of these resources in urban village areas" for libraries and community centers.

CW6.3 – "Provide opportunities for, and actively recruit, diverse representation on City of Seattle boards, commissions, and advisory committees that contribute to City decision-making."

- Unclear why the reference to neighborhood planning implementation was removed. In the Neighborhood Planning element, policy NP1.2 merely says "engage a wide range of people". We think the city should have an active role in actively recruiting diverse representation to the neighborhood planning process which continues today. Add back in from HD43 "and in the neighborhood planning process"

CW6.5 - "Promote race and social justice, human and civil rights, and mutual respect to reduce intolerance."

- Add a specific policy for the city that was in HD39, either as separate policy or as addition to this one "Reach out and bring people together in ways that build bridges between individuals and between groups."

Retain the following policies:
HD34 – "Work with the state and King County to focus criminal justice efforts on preventing the most seriously threatening and predatory crimes and violent drug-related crimes."

- Provides specific guidance on major issues.

HD48 – "Encourage connections between services that coordinate, link and integrate public, private and community-based services. Facilitate collaboration of programs through the use of City funding."

- A policy of encouraging connections is a great policy. If the concern is about the use of city funding, that can be deleted.

Other Detailed Concerns noted

CW1.2 - Use new, innovative, relevant and respectful ways to encourage broad participation in neighborhood and community activities and events."

- Add words as shown from the old policy HD1 to always look for improvement.

CW5.5 – "Emphasize education, prevention, and early intervention to reduce the risk of exposure to negative health impacts, violence and injury."

- This needs clarification. What is the subject?

CW5.8 – "Encourage a policing strategy that works in partnership with the community to reduce crime through education and enforcement, and encourage communities to build block-by block networks to prevent crime, develop social networks, and solve common problems."

- Add back in prevention, crime prevention is a specific concept that applies to many other programs. You justify removal of HD30, which referenced CEPTD; without a policy for prevention, then that type of program would not be supported.

CW5.14 – "Report crime statistics periodically to guide future decisions about programs and resource allocation that can help control crime and make Seattle residents feel safer in the city."

- Old policy HDG8.2 listed additional topics of concern, and specifically called for "…a decrease in the per capita incidents of crime…" Restore the intent to use data to achieve a decrease in crime.

CW7.3 – "Strive to disseminate more comprehensive and coordinated information about the availability of services in the community."

- Modify as suggested above

CW7.4 - "Use feedback from participants to develop customer-focused services, using feedback from participants, and involve consumers in identifying needs and planning for service delivery."

- Retain the old policy, which makes more sense. HD47 "Encourage customer-focused services with feedback from those who use them and involvement of consumers in identifying needs and planning for service delivery."

CW7.5 Consider related issues, such as transportation and the need for dependent care, when planning for schools, health, human services, employment, and recreation programs.

- Add schools to the listed topics, as show above.

Draft

Neighborhood Planning

Major Goal and Policy Issues

Neighborhood Planning.

- Seattle 2035 as proposed eliminates the vast majority of references to “neighborhoods” and “neighborhood plans” from its goals and policies. It appears the City considers neighborhoods adversaries and neighborhood plans obstructions. The consequences are significant, far-reaching and damaging to Seattle values and planning objectives.
- Neighborhood plans are not a substitute for city-wide planning, but the alternative is to allow development divorced from local characteristics, concerns and standards. Neighborhood plans should not be eliminated as a consideration in decision making. Neighborhood plans may need to be updated, along with individual design guidelines but planning offers neighbors the ability to direct, protect and improve their homes, environment and quality of life.
- In the draft 2035 Plan, neighborhood plan implementation is reduced to one sentence in the Neighborhood Planning Element. This is not adequate recognition of the importance of neighborhood/subarea planning.
- Non adopted, city-created plans, like action plans and UDFs, are not addressed by policies. That makes it ambiguous as to their enforcement. The role and applicability of sub area planning activities must be clearly incorporated within Neighborhood Planning Processes.

Comments

There is no other way to describe the revision of the Neighborhood Planning Element than to say it has been eviscerated. Not just in this section, but Seattle 2035 as proposed eliminates the vast majority of references to “neighborhoods” and “neighborhood plans” from its goals and policies. It appears the City considers neighborhoods adversaries and neighborhood plans obstructions to be eradicated. The consequences are significant, far-reaching and damaging to Seattle values and planning objectives.

Eliminating neighborhood character and plans as criteria in decision making is particularly disturbing regarding such issues as rezones, land use departures and conditional uses. Neighborhood planning provides flexibility and diversity in applying citywide regulations not otherwise possible. Land use criteria disconnected from individual neighborhood characteristics can lead to unintended consequences. Once enacted into law, the city may not have the authority to deny permits because proposed uses are incompatible or detrimental to existing or planned community development if they otherwise meet the code.

If neighborhood plans are eliminated from consideration and the city is denied the authority to temper development through the values they represent, who will be the decision makers? Decisions

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affecting the character of neighborhoods and surrounding properties will be made by absentee and transient developers.

Neighborhood plans may not be perfect and may need to be updated, but they were usually developed through thousands of hours of effort by Seattle citizens, with support, oversight and approval of the City. Newer planning efforts have been lead by the City, so it is baffling to see the City step away from keeping policies to use those plans. Neighborhood planning offered neighbors the ability to direct, protect and improve their homes, environment and quality of life. Each plan reflects the unique characteristics of its environment. They were usually the result of compromise and consensus.

Neighborhood plans are not a substitute for city-wide planning, but the alternative is to allow development by outside parties divorced from local characteristics, concerns and standards. Neighborhood plans should not be eliminated as a consideration in decision making.

The intro to this section, 2nd paragraph says "The plans in this element are the most recent versions of the adopted neighborhood plans." Our understanding is that all planning work done by the city recently which has not been adopted into the existing neighborhood plans is OUTSIDE the purview of this Comprehensive Plan. That means that all current Action Plans, Urban Design Frameworks and other city/community created plans do not carry the weight of the adopted plans and can be ignored in consideration of any adherence to Comprehensive Plan policy. This is covered as a discussion topic in the 5th paragraph, but the discussion does not carry the weight of policy.
This is not acceptable; those plans represent the most current thinking and planning for sub areas and should be included in this Comprehensive Plan. We realize that it is a problem that is not the making of the Comprehensive Plan team, but rather a lack of policy direction by the Executive and Council branches on how to regard the non-adopted sub plans. This needs to be resolved and addressed in this update, even if there has to be a policy stating what to do with the non-adopted plans and future plans.
As a possible solution, we suggest a new policy that DPD maintain a matrix of all planning work considered relevant for a neighborhood during the life of this Comprehensive Plan and that matrix is the reference point for all departmental work which is, by policy, directed to review neighborhood plans for input.

NP1.4 – "Consider neighborhood plan recommendations when prioritizing City capital investments ~~and~~ service allocations <u>and land use decision making"</u>. Add the important topic of land use as well as investments and service, as shown.

Retain NG4, with modification. This policy is an important one and was not fully accomplished in the past 20 years. NG4 – "Define clearly the role that adopted neighborhood plan goals and policies, neighborhood plan work-plan matrices, and recognized neighborhood plans play in the City's decision-making and resource allocation<u>, and define how to assure compliance with the adopted neighborhood plans</u>."

NP1.5 – "Support neighborhood plan implementation to enhance the quality of these urban environments and to promote continued collaboration between the City and neighborhood groups." This is all that remains of the 10 extensive policies that used to make up the Neighborhood Plan Implementation section of this element. (N10 – N19). This is not adequate recognition of the

importance of neighborhood/subarea planning, which should be an ongoing governed, integral part of city planning.

Restore old goal NG6. **"**Build strong, effective strategies for developing and implementing neighborhood plans." This is an important policy and the city needs to commit to planning WITH implementation.

Restore old goal N7 "Establish basic guidelines for creating and updating neighborhood plans that ensure an inclusive, collaborative and effective approach. Provide guidelines for things such as how to develop public participation processes, make plans with realistic expectations, and monitor implementation of the plans over time." Establishing how and when to update plans is fundamental step of planning, and it would help set direction for budget allocation in advance. This is something that can be improved in this Comp Plan cycle.

Other Detailed Concerns noted

NPG1 – "Help fulfill this Plan's values, vision, and goals by maintaining plans for neighborhoods where the City wants or expects growth to occur and by including growth strategies in those plans that are appropriate to each neighborhood."
The use of the phrase "growth strategies" is new and is not a term that will be found in neighborhood plans until the concept gets put into newer plans now being written. Suggest that this goal be modified to reflect what those strategies would be in context of the older plans. For example, would those be just the land use or housing items in a neighborhood plan? Or is it really every policy in a neighborhood plan. Help provide continuity to the users.

NP1.2 – "Engage a wide range of people from the neighborhood in each neighborhood planning process, including homeowners, renters, business owners, <u>business and community organizations, parents of students, faith communities</u> and employees, with special emphasis on groups who have historically been under-represented." Add as shown.

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Environment

Major Goal and Policy Issues

We want to see policies to enforce metrics.

- There are targets provided in some chapters but no concurrent policy concerning monitoring and acting to address deviations from those metric. In this chapter, E1.2 says to increase the tree canopy to 40% but has no policy to enforce the goal.

Major Comments

Landslides are a common, complex and growing problem in Seattle. There is substantial evidence that landslide losses are growing as more property is developed in landslide prone areas. (Source: Seattle Office of Emergency Management, Seattle Hazard Identification and Vulnerability Analysis)
We suggest stronger policies addressing the loosing of restrictions in Environmentally Critical Areas and in risk areas such as mapped liquefaction zones and steep slopes. This was cited as a concern in the DEIS in the Earth and Water Quality Chapter. While the DEIS says that many areas with those conditions are already "built up", if additional density and additional land uses in Single Family zones are created, then the problem will continue to expand. This has to be addressed in the context of determining environmental significance and land use changes. Reference DEIS p 3.1-7, 3.1-8. If the policies are more appropriately reflected in the Land Use Element, make it so.

There are no policies addressing access to the natural environment (land and water sections)

E1.7 – "Promote the care and retention of trees and groups of trees that enhance Seattle's historical, cultural, recreational, environmental, and aesthetic character." This seems really weak for an important policy. There are many current examples of how this is routinely ignored. How will this policy guide code to achieve the overall goal of EG1? Original words in E4 of "protect and retain" should be reinstated to give more direct and enforceable direction.

E3.3 – "Implement innovative policies, such as road pricing and parking management, that better reflect the true cost of driving and therefore lead to less automobile use, while employing strategies which mitigate impacts on low income residents." We should not implement this policy at this time. There have not been studies that support implementation, at a minimum this should be changed to "explore". In addition, the true cost of biking should be added, as the cost of bike lanes is not yet reflected in right of way demand costs.

Other Detailed Concerns noted

EG1 – "Foster healthy trees, vegetation, and soils to improve human health, provide wildlife habitats, reduce drainage costs, give residents across the city access to nature, and increase the quality of life for all Seattleites." It seems that this goal should be split out and the part about drainage moved to the Water section.

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E1.2 – “Strive to increase citywide tree canopy coverage to 40% over time.” This is a goal, not a policy. It also sort of doesn’t make sense. 40% of what? Or increase it by 40% over a period of time? You also have no policies about measuring and reacting if “off plan” over the life of this plan. Until you determine the start and add point, add back in the words from E23 of “no net loss of tree canopy coverage”

E1.3 – “Use trees, vegetation, green stormwater infrastructure, amended soil, green roofs, and other low-impact development features to meet drainage needs and reduce the impacts of development.” Should be changed to “require”

E1.4 – “Increase the amount of permeable surface by reducing hardscape surfaces where possible and maximizing the use of permeable paving elsewhere.”
This could be written better, maybe replace elsewhere with “where paving is required in both commercial and residential construction”.
Also, vegetative cover should not have been removed (see old policy E10). If E1.4 policy wants to deal with just paving, an additional policy should be added to encourage the increase of green cover.

E1.6 – “Strive to manage 700 million gallons of stormwater runoff each year with green stormwater infrastructure by 2025.” This is a goal, not a policy. It also needs to be moved out of the Land section and put into the Water section (see E2.2 which also covers storm overflows).

E2.1 – “Protect and improve water and sediment quality by controlling pollution sources and treating stormwater through best management practices.” Could something be added here to say that our policy is to require compliance to the highest EPA standards? The old policy E14 was not restricted to just addressing pollution and treating stormwater, why was it limited down?

E2.6 – “Promote quality wildlife habitats in Seattle's waterways by protecting and improving migratory fish passageways, spawning grounds, wetlands, estuaries, and river mouths.” Restore the old policy because these new list would fall under old definitions. At a minimum include both lists..

Climate Discussion - in the 3rd paragraph, add seniors in with marginalized populations. That is a specific policy in E4.2 and should be reflected in discussion. And in general, this paragraph should be expanded to explain <u>how</u> they are at greater risk (could you give an example, it would help in understanding)

E3.1 – “Expand transit, walking, bicycling, and shared transportation infrastructure, and services to provide safe and effective options for getting around that also produce low or zero emissions.” Should this be a two part policy? Or do you mean that the options must also produce low or zero emissions? Very confusing.

We question why EG8 was removed for being too vague. The city should be a role model for others in environmental performance. This policy should be restored “Continuously improve the City’s environmental performance in its roles as a large employer, builder and maintainer of capital facilities, land owner and regulator to not only improve the natural environment but also to set an example for others’ behavior.”

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We question why old E2 was removed for being too vague. This sounds like an excellent policy "Incorporate the improvement of the natural environment into the City's planning efforts and capital development projects. For instance, plan for transportation systems that control impacts on air quality and climate-change, as well as on water pollution and the consumption of fossil fuels."

Restore old policy E6, it is a good policy "Create partnerships with organizations in the private sector and engage the community to protect and enhance Seattle's urban ecosystems and habitat." (see also removal of E15 which has the same concept but for reducing greenhouse gas emissions, it is a policy that would support the new goal EG3)

Restore old policy E11, this gets to the need to establish actual plans and metrics to measure the success of this Comp Plan "Identify long-term goals and develop plans or strategies for improving the environmental quality of each of the city's aquatic areas, including a long-term plan to restore and sustain Seattle's creeks. Consider in these plans or strategies the use of incentives, regulations and other opportunities for action to restore and sustain the long-term health of Seattle's creeks and shorelines."

E18 should be restored "Collect data and regularly report on the sustainability measures and numeric goals in this plan to inform and enable citizens and decision-makers to consider alternative policies or programs, where outcomes differ from what was intended. Conduct an inventory of greenhouse gas emissions in Seattle at least every three years. Use data, public input, and approaches developed by other public agencies and private organizations that address sustainability. Consider combining this monitoring activity with the one described in the Urban Village Element of this Plan." This is in line with one of our overarching comments that there is a lack of measureable action in this Plan.

E24 should be restored as an excellent measurable goal "Update the tree canopy inventory in the Urban Forest Management Plan at least every 10 years to measure progress toward the goal of increased canopy coverage."

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Proposed New Element for Comp Plan 2035
Community Involvement

Major Goal and Policy Issues

Create a new Public Engagement Element.

- Public engagement was pulled out of many sections and was relegated to the discussion section of the Growth Strategy chapter.
- We agree that repeating community engagement policies in each element is duplicative therefore to ensure that community engagement is a required element of this Comp Plan, we recommend creating a new element for Public Engagement.

Comments

The existing draft of the 2035 Comprehensive Plan touches in multiple places the topic of engagement with Seattle residents, businesses, marginalized populations – in other words, all citizens.

Yet the language used varies across the elements. Sometimes it's just a broad cross section, sometimes it's all people. And the policies suggested also focus on the element topic, not so much the quality or results of the engagement.

We suggest that a new Element be added which spans the entire Comp Plan and describes how people should be involved in the decisions and what the expectation of quality engagement looks like.

Suggested goal topics:

- Community involvement as a partnership
- Accessible, meaningful and effective participation
- Involvement of people of all ages, abilities and economic conditions
- Capacity building for civic engagement.

Policies should be created to address:

- Transparency
- Ease of access to information to facilitate participation
- Ample, early, timely and adequate notice of opportunities to participate
- Accountability and responsiveness
- Social equity, including environmental justice
- Implement lessons from the 2004- 2014 Comprehensive Plan
- Implement quality of life and concurrency metrics for use in involvement
- Promote and reward civic responsibility
- Build Departmental capacity to facilitate community involvement

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Land Use

Major Goal and Policy Issues

We do not support the FLUM change at this time.

- Not a mature concept – the proposed change blur the distinctions between zones in urban villages and create uncertainty for property owners.
- Regulations must be adopted prior to the map change to specify how zone transitions will be created by new development.
- We would support a "one step" process for rezones with the assurance that community wishes are taken into consideration before granting the rezone.
- Rezones should be consistent with a existing Neighborhood Plans, Urban Framework Plans, or Action Plans.

Sweeping zone-wide changes should no longer be allowed.

- Need policies that tailor conditions of development permits to specific site and surrounding areas to address cumulative impacts and ensure the preservation of unique neighborhood
- Eliminating neighborhood character and plans as criteria in decision making is particularly disturbing regarding such issues as rezones, land use departures and conditional uses. Neighborhood planning provides flexibility and diversity in applying citywide regulations not otherwise possible. Land use criteria disconnected from individual neighborhood characteristics can lead to unintended consequences. Once enacted into law, the city may not have the authority to deny permits because proposed uses are incompatible or detrimental to existing or planned community development if they otherwise meet the code.

Setbacks and Green Space.

- In areas not meeting targets for community open space, increase the required setbacks and landscaping requirements for new multifamily residential development like Vancouver and Portland.

Parking for private vehicles.

- The city needs to acknowledge that a significant percentage of citizens, including the elderly, disabled and mobility-challenged, cargo-carrying parents, people transporting gear, etc., will at times require the use of private cars and will need a place to park them. Therefore new development should provide a rational number of parking spaces on site for both commercial and residential projects.

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Single-family zones are significant part of Seattle's character and should be respected.

- The great diversity of single family zoned areas in Seattle is one of the city's more beloved and distinguishing characteristics providing privacy, individuality, and breathing room despite the relative density of most inner-city SF neighborhoods. Our SF neighborhoods have contributed to the "quality of life" that Seattle is envied for. Previous comprehensive plan policies have rightfully acknowledged this feature of Seattle life. Revisions seek to deny the value of the single family zone if not to eventually eliminate it altogether by converting SF to a multi-family zone. There is no solid reason for this given that DPD's Development Capacity Report identifies residential capacity of 147,187 units across neighborhood commercial, lowrise, highrise, midrise and downtown zones.
- The Seattle2035 Plan should **retain the current policy language in LUG8; LUG9 and LUG10** about preserving, protecting these areas to provide opportunities for home ownership as well as a supply of rental housing suitable for families and shared-households for unrelated persons.
- Policies should encourage the retention and rehabilitation of single family homes in all neighborhoods as the most desirable rental housing for families.

No policy guidance for "The Grand Bargain"

- There are no specific policies to address the implications and impacts of the additional height that would be applied citywide across zoned both inside and outside urban village boundaries. The final Comprehensive Plan should address conditions where the additional height could have a detrimental effect on areas lacking transitions between low intensity and higher intensive zones, given that the heights and development capacity will increase significantly impacting privacy, solar access, views, and the use of shared public resources such as street parking, parks, transit and commercial services. **Need stronger policy language requiring greater setbacks to create transitions between zones where SF zones immediately abut a more intense zone.**

Comments

New LUG1 seems to open all kinds of development to all areas, not just within Urban Villages. Allowing "infill development compatible with the established context in areas outside centers and villages" risks allowing undesirable types and scale of development where there is no clear established context to guide it.

FLUM trumps rezone criteria LU1.1; LU 1.2 and LU1.3 . These policies substitutes the "urban village strategy" and the proposed new FLUM for rezone criteria which could, when coupled with a lack of growth estimates for each village, prioritize growth over a more balanced view of what the urban villages were meant to be. These policies suggest that preferences expressed in neighborhood plans would have no influence over rezone criteria. All rezones should be established through a neighborhood planning process, a new or updated one if the existing neighborhood plans do not call for rezones.

Modify LU1.1	Use the Future Land Use Map to identify where different types of development are planned to achieve a development pattern that supports the urban village strategy <u>and that is consistent with adopted neighborhood plans for that area.</u>
Modify LU1.2	Use the Future Land Use Map, the land-use policies in this land use element, <u>policies in neighborhood plans</u>, and criteria in the Land Use Code to determine the appropriate zoning designation for property in the city.
Modify LU1.3	Promote this plan's overall desired land-use pattern through appropriate zoning that regulates the mix of uses and size and densities of development to: focus new residential and commercial development in urban centers and urban villages. Integrate new projects outside of centers and villages with the established development context <u>and any relevant conservation district overlays.</u>

Retain LU11 keep this policy which references the "character of Seattle's neighborhoods and retaining existing affordable housing, discourage demolition and displacement…"

Retain LU11	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 this Plan.

New LUG2 eliminates reference to neighborhoods and current residents. Retain current policy instead.

Retain LUG2	Foster *neighborhoods* in which *current* and future residents and business owners will want to live, shop, work, and locate their businesses. Provide for a range of housing types and commercial and industrial spaces in order to accommodate a broad range of families and individuals, income groups, and businesses.
Do not substitute "new" LUG2	Provide zoning and accompanying land use regulations that: Allow for a variety of housing types to accommodate housing choices for households of all types and income levels; support a wide diversity of employment-generating activities providing jobs for a diverse residential population, as well as a variety of services for residents and businesses; Accommodate the full range of public services, institutions, and amenities needed to support a fully developed, diverse, and economically sustainable urban community

Restore Deleted Goals and Policies Encouraging Affordable Housing: Lack of affordable housing is recognized as a serious problem in Seattle. Proposed amendments to the comprehensive plan eliminate goals and policies to preserve and incentivize affordable housing. They should be restored.

Retain LUG4 – Reject LUG6	LUG4 provides that off-street parking can be set to "reduce housing costs." That goal is proposed to be replaced by LUG6 which substitutes "lower construction costs" for reducing housing costs. Reduction in parking requirements will likely always lower construction costs with no required reduction in housing costs.
Retain LU11	LU11 references a policy of "retaining existing affordable housing, discourage demolition and displacement…" The proposed comprehensive plan eliminates this policy.

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Retain LU102 – Reject LUG7	LU102 includes a policy of using zoning incentives and other development related tools to provide for or preserve public benefits including "housing affordable to low- and moderate-income households…" That objective is proposed to be replaced by LUG7 which just increases density with no reference to affordability.

Modify LU6.3	LU6.3 Within Urban Centers r~~R~~ely on market forces to determine the amount of parking provided in new development. ~~in areas of the city that are well-served by transit, such as urban centers and those~~ In urban villages ~~that contain frequent transit service without~~ require~~ing~~ ~~a minimum~~ parking ~~require ment in these areas~~ to be provided by new public commercial and multi-family residential development that may cause parking spill-over to residential areas outside the village. Outside urban villages require parking for new development consistent with the size of the development and existing availability of parking in the area. Require the provision of sufficient electric vehicle recharging stations in new multi-family residential development.

New LU5.1 – remove reference to "new development"

Modify LU5.1	Allow for flexibility in development standards so existing structures can be maintained and improved and ~~new development~~ can better respond to site specific conditions.

Keep reference to regional transit stations. New LUG9 eliminates the direct linkage to access to "regional transit stations."

Retain LUG16	Accommodate the greatest concentration of housing in desirable, pedestrian-oriented urban neighborhoods having convenient access to *regional transit stations***,** where the mix of activity provides convenient access to a full range of residential services and amenities, and opportunities for people to live within walking distance of employment.
Do not substitute LUG9	Achieve a residential development pattern in line with the urban village strategy that includes increased availability of a variety of housing types and densities, including opportunities for both home ownership and renting, that promote walking and transit use near employment concentrations, residential services and amenities.

LU1.7 is ambiguous – what is the definition of "Large"? This needs clarification.

Clarify LU1.7	Require Future Land Use Map amendments only when needed to achieve a significant change to the intended function of a *large area.*

E1.5 New policy no longer focuses on tree preservation and is vague. Restore existing LU 40 and 41 which encourages the preservation or planting of street trees.

Restore This LU41	Because of the many benefits that street trees provide to both property owners and the general public, encourage the preservation or planting of street trees as development occurs, except in locations where it is not possible to meet City standards intended to preserve public safety and utility networks.

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Restore Tree Protection Focus LU40	Use the following tools to protect trees, appropriate to the size, importance and location of a tree: • Providing flexibility in development standards • Promoting tree retention through the design review process • Promoting site planning and horticultural practices that are consistent with the reasonable use of property • Educating the public and development community concerning the value of retaining trees • Restricting the removal of trees on undeveloped land prior to review of a specific development proposal

LU5.11 Signage policy is too vague. Policy allows too much flexibility for size and height of signs under vague concept of "creating visual harmony." Need clearer guidelines.

Clarify LU5.11	Allow for flexibility in signs' height or overall area on existing or new buildings when there is a comprehensive design that creates visual harmony between the sign, the building and the site where it is located.

LU5.16 on views. Revised language refers to "zoning" which is too crude a tool for view protection. Consider private views when rezoning. See addition below.

Modify LU5.16	Address view protection through: • ~~Zoning~~ Land use regulations that takes into accounts views, with special emphasis on protection of shoreline views • Development standards that help to reduce impacts on views, including height, bulk, scale, and view corridor provisions, as well as design review guidelines • Environmental policies that protect specified public views, including views of mountains, major bodies of water, designated landmarks and the downtown skyline, during reviews of development projects Protection of private view should be considered when permitting or denying a conditional use, rezone, or other departure from the land use regulations."

Parking Minimums. Restore language in LU50 that reads "Parking requirements should account for local conditions and include language that parking requirements for new development should consider the impacts on street parking supply needed by local small businesses.

Modify LUG6	Regulate off-street parking requirements to ~~address~~ meet parking demand that may vary across the city in ways that reduce reliance on automobiles, ~~lower construction costs~~, and create attractive walkable environments, and promote economic development throughout the city.
Retain LU50	In urban centers and urban villages, consider removing minimum parking requirements and setting parking maximums in recognition of the increased pedestrian, bicycle and transit accessibility these areas already provide or have planned. Parking requirements for urban centers and villages should account for local conditions and planning objectives.

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Modify LU6.2	Establish parking regulations that recognize differences in the likely auto use and ownership of intended occupants of new developments, such as low-income, elderly, or disabled residents. Consider visitor parking demand when establishing parking requirements.

Modify LU6.8	Allow shared and off-site parking facilities to create more efficient use of parking and to provide the flexibility to develop parking on a separate site. Ensure that such parking is compatible with the existing or desired character of the area and also ensure that such parking is available for the development relying on the shared parking.

Retain reference to single-family structures. Retain LU 57 because the substitute LU8.1 changes the concepts away from SF homes to a less reliable standard of "consistent residential character of low height, bulk and scale over several blocks." This suggests possibility of allowing non SF structures in the SF zone under vague criteria. Policy needs to clarify how many blocks are "several."

Retain LU57	Designate as single-family residential areas, those areas that are predominantly developed with single-family structures and are large enough to maintain a low-density development pattern.

Do not Include LU8.1	Designate as single-family residential areas those portions of the city that are predominantly developed with single-family houses and that are large enough to maintain a consistent residential character of low height, bulk and scale over several blocks.
Modify LU8.2	Use a range of single-family zones to: • Maintain the current density and character of existing single-family areas • Maintain the current low height and bulk character of designated single-family areas • Protect designated single-family areas intensity that are predominantly in single-family residential use, or that have environmental or infrastructure constraints; Respond to neighborhood plans calling for rdevelopment or infill development that maintains the single-family character of the area but also allows for a greater range of housing types.

Retain deleted policies (LU59 & LU 60) for neighborhood planning in upzones.

LU59	Permit upzones of land designated single-family and meeting single-family rezone criteria, only when all of the following conditions are met: • The land is within an urban center or urban village boundary. • The rezone is provided for in an adopted neighborhood plan. • The rezone is to a low-scale single-family, multifamily or mixed-use zone, compatible with single-family areas. • The rezone procedures are followed.

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LU60	Apply small lot single-family zones to single-family property meeting single-family rezone criteria only when all of the following conditions are met: • The land is within an urban center or urban village boundary. • The rezone is provided for in an adopted neighborhood plan. • The rezone procedures are followed.

Retain policy with clear intent about ADUs. New LU8.4 and LU 8.5 creates uncertainty and appears to be aimed at removing the requirement for owner occupancy of either the principal or accessory dwelling unit. Current policies requiring homeowner residency should be retained because loosening this standard essentially upzones SF areas to multi-family zones without broad-based agreement.

Retain LU64	In order to create attractive and affordable rental opportunities and provide greater flexibility for homeowners, permit accessory dwelling units in single-family zones, subject to regulations designed to limit impacts and protect neighborhood character.
Do not include LU8.5	Allow the development of residential structures compatible with the existing pattern of low height, bulk and scale of development in those neighborhoods where and encourage accessory dwelling units and other housing types that are attractive and affordable to a broad range of households and incomes. *LU8.5 has incomplete sentence… in those neighborhoods where (words are missing)*

LU 8.9 provides a looser standard for minimum lot sizes. New language substitutes concept of use of historic platting patterns to **create lots that are "compatible"** with surrounding lots to "**integrate well"** which suggests a less objective standard. The policy should be to discourage the creation of very small lots that are not compatible with or don't meet the 75/80 rule for being similar in size to adjacent lots. Does this policy allow the "tall side yard" houses? It should not.

Clarify LU8.9	Allow exceptions to minimum lot size requirements to recognize building sites created under earlier regulations and historic platting patterns, to allow the consolidation of very small lots into larger lots, to adjust lot lines to permit more orderly development patterns, and to provide more housing opportunities by creating additional buildable sites that integrate well with surrounding lots and do not result in the demolition of existing housing.

Retain current criteria references in LU 69. New LU8.8 shifts the metrics of character in SF areas including reference to setbacks toward more generic "use of min. lot sizes" which open up potential of creating new zones with even smaller lot sizes that current 5,000 SF. Creating small lot sizes is an increase in density outside urban villages which is not consistent with the Growth Strategy to focus development into urban villages.

Clarify LU8.8	Use minimum lot size requirements to maintain the character of single-family residential areas, while reflecting differences in development conditions and densities in various single-family areas throughout the city.

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Retain LU69	Reflect the character of existing low-density development through the regulation of **scale, siting, structure orientation, and setbacks**.

Unlimited Height allowance. Retain original policy. LU 5.4 provides for "unlimited height" in some zones. Bad idea and contrary to other policy about view protection.

Retain LU70	Establish height limitations in single-family residential areas that establish predictable maximum heights, maintain a consistent height limit throughout the building envelope, maintain the scale relationship between a structure and its site, address varying topographic conditions, control view blockage and encourage pitched roofs.
Modify LU5.4	Establish maximum height limits to maintain the desired scale relationship between new structures, existing development and the street environment; address varying topographic conditions; minimize view blockage; and, especially in lower-scale residential areas. ~~In certain Downtown zones and in industrial zones, heights could be unlimited to allow for special types of development uniquely suited to these zones.~~

Criteria for MF zone. New language (LU9.10) is more permissive and invites conversion of SF zones areas to MF zones to create "transitions" to more intensively zones areas like NC zones. A 15-foot minimum setback from the property line at ground and upper levels should be used to create such transition. No rezones without neighborhood plan updates.

Retain LU75	Limit the multifamily zones to areas that do not meet the single-family zone criteria, except in circumstances where an adopted neighborhood plan indicates that a different zone is more appropriate.
Do not include LU9.10	Designate low-rise multifamily zones in places where low-scale buildings can provide a harmonious transition between single-family zones and more intensive multifamily or commercial areas.

Defining amenity space. Retain original policy. New language shifts toward providing less open space and more enclosed indoor space as meeting amenity area requirements.

Retain LU86	Provide for the recreational needs of residents with standards for amenity areas that may include private or shared **open space**, whether in the form of rooftop decks, balconies or ground-level spaces.
Do not include LU5.5	Provide for residents' recreational needs on the development site with standards that may include requirements for private or shared amenity areas such as rooftop decks, balconies, or ground-level open spaces, and that may include an option to provide a portion of the **required amenity area as enclosed spaces** shared by all residents.

Midrise not always appropriate. LU 9.11 new language would allow midrise buildings in all urban villages and urban centers. Midrise may not be appropriate for all urban villages, esp residential urban villages. Policy needs clarification regarding where midrise is appropriate zone.

Clarify LU9.11	Use midrise multifamily zones to provide additional housing opportunities in urban villages and urban centers.

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Density or Affordablity? New LU67 is clumsy policy that does not include specific reference to using developer incentives to produce low income housing only to provide increased in density!

Retain LU102	Use zoning incentives and other development-related tools to provide for, or preserve, public benefits. Public benefits or other features may include **housing affordable to low- and moderate-income households,** preservation of historic resources or provision of new public open space. (Emphasis added)
Do not include LUG7	Use development incentive programs to provide opportunities **for increasing density** in areas targeted for growth while addressing the impacts of the added density on the livability of urban neighborhoods, with particular emphasis on addressing the needs of those residents who are least likely to be served by higher density development provided by the private market. (Emphasis added)

Other Detailed Concerns noted

Create a new policy (LU 4.9) to expressly prohibit minor communication utilities in shoreline zones where they will interfere with protected water and mountain views from any public place including parks, viewpoints, and public rights of way.

Create policy to address AirB&B and other non-regulated transient housing uses. The growth of this form of short term rental is likely affecting the availability of long term rentals. Develop a policy that defines limits of this use.

No view blocking residential towers in stadium district. Stadium District LU15.1 and LU15.4 would allow residential uses in the Stadium District up to 200 feet south of Charles St. including "tower structures." This area would include the WOSCA site. This policy should be rejected or modified to prohibit towers on the WOSCA site which would significantly interfere with public views of Puget Sound and the Olympic mountains from the stadiums. These are SEPA protected views.

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Transportation

Major Goal and Policy Issues

Priority use of street.

- There is no sense of priority in the policies. Do policies with smaller numbers reflect a priority? If so TG2 implies that creating inviting spaces within the ROW is as important as other uses of streets in the allocation of uses. The policy language should make it clear that the primary role of streets is to move cars, buses, and commercial vehicles, bikes and to provide parking.

Comments

The sections/policies in this element should be re-ordered.

- The topical order suggests a hierarchy of importance which diminishes the city's most important transportation functions and responsibilities. **Operating and Maintaining the Transportation System** should be the first section and the top priority.

Transit service must proceed or be concurrent with the growth and density that will generates more ridership demands.

- Policies about integrating land use with transportation are not adequate to address the current deficit of peak hour transit service let alone the anticipated new demands from the 115,000 job and 70,000 housing unit projections. This demand should be projected for the initial 10 year plan to add 50,000 housing units, and those projections updated regularly.
- Recommend a new policy that requires a transit capacity and demand projection analysis when a permittee seeks to use code provisions depending on access to transit rather than provide on-site parking. Having transit within 1,320 feet is not sufficient if there is no room on the bus or train.

Priority uses of streets and alleys is for mobility, not parklets and play.

- Given acknowledged limitations of the streets we have and the increasing demands for all modes of travel, we should have policies that clearly indicate streets are not a substitute for parks and playgrounds. If we need a policy about occasional street closures for special events, that should be treated separately.

Parking is still a valuable use of curb space in commercial and residential areas.

- Access to convenient close street parking is needed by many businesses in neighborhood business districts and should be a priority to maintain the economic health of urban villages.

Reduction in vehicle miles traveled should be in absolute terms, not on a per capita basis which blunts the environmental benefits of the policies.

- Policy T1.3 and T4.2 states a goal of reducing dependence on personal automobiles and vehicle miles traveled. This goal should be reflected in an absolute reduction in vehicle miles

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traveled in the city even as the population grows. This would be more consistent with goals in the Environment section of the document.

What parts of the city will be prioritized for transportation investments?

- The discussion section describes " a transportation investment strategy that provides service where it is needed, including those parts of Seattle which have historically had less investment in transportation." Obviously we would expect the city to provide service ***where needed*** so that part of the sentence seems rather silly. However the reader would like to know which underserved areas are intended for increased investment and of what nature. More clarity is needed especially given the passage of the Move Seattle levy.

Consider transportation impacts of proposed development and impose conditions to mitigate the impacts.

- Relying on the majority of new residents and job holders to use transit, bike, or walk to work is not likely to be sufficient to untangle Seattle's traffic congestion. Policies on the use of development impact fees to remedy congestion are needed.
- Consider incentives or requirements for large employers to make better use of telecommuting, flexible hours and other ways to spread out commute demand or provide privately financed paratransit.

Need to better define "sufficient" when used in policy below.

T 1.1 Provide sufficient transportation facilities and services to promote and accommodate the growth this Plan anticipates in urban centers, urban villages, and manufacturing/industrial centers, while reducing dependence on personal automobile trips.

TG2 and T2.1. No sense of priority in these policies. TG2 implies that creating "inviting spaces" within the ROW is as important as other uses of streets. While bicycling is growing as a mode, do we really intend that accommodating bikes is a ***higher priority*** use of streets than "general purpose traffic"? Acting on this policy will be highly controversial. Also "shared transportation options" need to be defined or a more commonly understood term used instead.

TG2	Allocate space on Seattle's streets to safely and efficiently connect people and goods to their destinations while creating inviting spaces within the right-of-ways.
T2.1	Designate space in the public right-of-way to accommodate multiple travel modes, including transit, freight movement, pedestrians, bicycles, general purpose traffic, and shared transportation options.

T3.1 The word "affordable" is vague. Use cost-effective instead.

T3.1	Develop and maintain high-quality, affordable and connected bicycle, pedestrian, and transit facilities.

T2.3 On street parking is actually beneficial providing a buffer between moving cars and pedestrians on the sidewalk. The meaning of "non-mobility" is unclear. Bullet 5 - Implementation of parking demand management could promote PRZs everywhere. Policy should preserve street parking

wherever possible given the needs and benefits for local businesses in most urban villages.
Conclusion is to eliminate bullet 4 and 5.
Bullet #4 highlights another paradox within the policies. Here we are encouraging "off-street parking" while most other policies discourage the provision of parking. The city should encourage off-street parking in new development where there is not a demonstrated capacity to absorb additional parking demand created by new residential and commercial development.

T.2.3	Employ the following tactics to resolve potential conflicts for space in the right-of-way: 1. Allocate needed functions across a corridor comprised of several streets or alleys, if all functions cannot fit in a single street 2. Share space between modes and uses 3. Prioritize assignment of space to shared and shorter duration uses ~~4. Encourage off-street accommodation for non-mobility uses, including parking and transit layover~~ 5. ~~Implement transportation and parking demand management strategies to encourage more efficient use of the existing right-of-way.~~

T2.4, T2.5, T2.6, and T2.7 all suffer from too much jargon. This section needs a definition of "Transition Zone." What is "network connectivity" and "activation?" If the intent is to say don't take away pedestrian space in order to make lanes wider, we generally agree however there is no sense of cost effectiveness.

T2.6 and Figure 3. New policy does not include bus stops in list of priorities. In residential area, appears to imply that planting strips can become parking. Loss of trees in planting strips. Use of the term **Storage is a judgmental term. Parking should be acknowledged as a legitimate use of the ROW.**
Recommend retaining current policy T40 and T41.

T2.6	Assign functions in the transition zone to support nearby land uses provide support for modal plan priorities and to accommodate multiple functions.

Do not use this: Transportation Figure 3
Priorities for Right-of-Way "Transition Zone by Predominant Use of Area

Commercial/mixed-use areas	Industrial areas	Residential areas
Access for commerce Access for people Activation Greening Storage	Access for commerce Access for people Storage Activation Greening	Access for people Access for commerce Greening Storage Activation

Retain T40	In commercial districts prioritize curb space in following order: transit stops and layover, passenger and commercial vehicle loading, short-term parking (time limit signs and paid parking); parking for shared vehicles; and vehicular capacity.
Retain T41	In residential districts, prioritize curb space in the following order: transit stops and layover; passenger and commercial vehicle loading; parking for local residents and for shared vehicles; and vehicular capacity.

Other Detailed Concerns noted

T2.9 - Street classification. If this is a placeholder until SDOT goes through process of getting agreement on new street classifications, leave definitions in place until then (T7).
(continued next page)

T2.9	Identify different types of streets with standards that are consistent with street classifications and that reflect the objectives of adopted modal and land use plans. T2.10 Designate the following classifications of arterials: • Principal Arterials: roadways that are intended to serve as the primary routes for moving traffic through the city connecting urban centers and urban villages to one another, or to the regional transportation network. • Minor Arterials: roadways that distribute traffic from principal arterials to collector arterials and access streets. • Collector Arterials: roadways that collect and distribute traffic from principal and minor arterials to local access streets or provide direct access to destinations.

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Retain this policy T7	Designate, in the Transportation Strategic Plan, a traffic network that defines Interstate Freeways, Regional, Principal, Minor and Collector Arterial streets, Commercial and Residential Access streets and Alleys as follows: **Interstate Freeways:** roadways that provide the highest capacity and least impeded traffic flow for longer vehicle trips. **Regional Arterials**: roadways that provide for intra-regional travel and carry traffic through the city or serve important traffic generators, such as regional shopping centers, a major university, or sports stadia. **Principal Arterials:** roadways that are intended to serve as the primary routes for moving traffic through the city connecting urban centers and urban villages to one another, or to the regional transportation network. **Minor Arterials**: roadways that distribute traffic from principal arterials to collector arterials and access streets. **Collector Arterials:** roadways that collect and distribute traffic from principal and minor arterials to local access streets or provide direct access to destinations. **Commercial Access Streets**: roadways that directly serve commercial and industrial land uses and provide localized traffic circulation. **Residential Access Streets**: roadways that provide access to neighborhood land uses and access to higher level traffic streets. **Alleys:** travelways that provide access to the rear of residences and businesses that are not intended for the movement of through trips. Where a continuous alley network exists, it is the preferred corridor for utility facilities.

T2.11 Alleys – support this policy but it needs companion language discouraging current practice of vacating alleys for large developments.

T2.11	Maintain, preserve and enhance the City's alleys as a valuable network for public spaces and access, loading and unloading for freight, and utility operations.

T1.2 – Safety Policies all tend to talk about investing in urban villages which appears to ignore areas outside of urban village even though many accidents and needs occur. Also children's safety does not appear directly in any of these policies.

T1.2	Design transportation infrastructure in urban centers and villages to support compact, accessible, and walkable neighborhoods for all ages and abilities.

T1.5 See addition underlined. This policy suffers when KC Metro moves bus stops.

Modify T1.5	Improve transportation connections to urban centers and villages from all Seattle neighborhoods, particularly by providing a variety of affordable travel options (pedestrian, transit, and bicycle facilities) and by being attentive to the needs of vulnerable and

	historically marginalized populations including children, seniors and the mobility impaired.

T5.9 Access to business districts. Support this but removal of street parking conflicts with this policy.

T5.9	Improve access to urban villages and other neighborhood business districts for customers and delivery of goods.

T7.5. Should support job growth outside Seattle as a means of reducing VMT. Why not have a policy that supports job development in Kitsap County where housing is more affordable rather than support additional communing to Seattle?

T7.5	Support a strong regional ferry system that maximizes the movement of people, freight and goods.

TG 9 - Level of Service Standards. Seattle should develop transit LOS standards that do not rely on crush capacity boarding and leaving people behind at stops. Arterial level of service standards needs to acknowledge the lack of E-W corridors in Seattle and should also include intersection delay "traditional" LOS measures at key locations in the city.

TG9	Use level of service standards, as required by the Growth Management Act, as a gauge to assess the performance of the arterial and transit system.

Restore T32	Recognize that stairways located within Seattle's public rights-of-way serve as a unique and valuable pedestrian resource in some areas of the City. Discourage the vacation of public rights-of-way occupied by stairways, and protect publicly-owned stairways from private encroachment.

Action Items versus Policies. Modify or remove statements like T2.8, T3.6 and T 3.11 which are action items, not policy statements. T5.2 develop a freight network in the Freight Mobility Master Plan. Is there not already a Freight Mobility Plan? Remove?

Question on mode share. Transportation Figure 1 shows mode share for percentage of work trips made by travel modes other than driving alone. Question arose - Why is the 2035 target for South Lake Union (55%) so much lower than for Downtown (85%) and the University District (85%), Uptown/Queen Anne (75%) or even Seattle overall at (65%)? Is this because of the quantity of parking being provided by new development there? That does not seem consistent with the majority of policies in the Plan.

Glossary

Add a definition to the glossary for "Green Infrastructure."

Draft

Housing

Major Goal and Policy Issues

Preservation of housing stock.

- There is insufficient policy support for housing preservation, particularly for preserving affordable rental housing stock

Use of surplus property (within the City limits).

- We suggest that land not be divested from the city at all, and that leasing arrangements should be prioritized as the first use of a surplus property.
- If land must be sold, land of comparable value within Seattle must be purchased in its stead.
- In the circumstance that such land cannot be obtained, policies need to better reconcile competition between use of surplus property for housing or open space needs.

We want to see policies to enforce metrics.

- The Mayor's housing goals are not called out in the Comp Plan. Shouldn't they be so they are measured and monitored?
-

Restore community engagement to this Element

Major Comments

The introduction does not sufficiently address seniors and disabled, and all sub sections should be reviewed for inclusion.

Paragraph 4 in introduction reads as though all statements are true. Believe these are still aspirations for the city, possibly change to reflect desire.

HG2 needs to be bounded to the context of this plan. As currently worded, it sounds like the future is open ended. (eg "to support the need projected by this Comprehensive Plan")

Policies addressing preservation are sorely lacking, particularly in Supply (HG2) and Affordable Housing (HG5)

Additional support for strong preservation policies comes from the statement in the Draft EIS, section 3.6.3 Mitigation Strategies (for Housing)
Under all alternatives, including the No Action Alternative, housing affordability and risk of displacement will continue to be a significant concern. As described previously, housing affordability and displacement are driven by demand generated as a result of Seattle's strong job market, land value, construction costs and other factors outside of the proposal and alternatives. Nevertheless,

the City recognizes the critical importance of these issues and recommends consideration of the following mitigation strategies.

Housing affordability strategies should be tailored to meet specific objectives, for example:

> *Creating an environment where the community retains the conditions that afford it good opportunities while providing for stability and economic mobility for people vulnerable to displacement;*
>
> *Expanding choices in areas that are currently unaffordable for lower income people who may want to live or operate a business there; and*
>
> *Stabilizing areas that are transitioning to higher levels of desirability due to amenities such as light rail service.*

H3.5 and H4.7 express a similar idea within their respective topics of Diversity of Housing and Housing Construction and Design. Recommend that the wording be adjusted so that it is clear the policies are linked and to have a common direction. One says to be flexible to unique neighborhood context and the other says respect existing neighborhood character.

> H3.5 Consider allowing additional housing types that respect existing neighborhood character in single-family areas, particularly within or near urban centers and urban villages.
> H4.7 Adopt development standards and design guidelines that help achieve a variety of quality housing types and respond flexibly to unique neighborhood contexts.

H2.6 – "Engage local communities, particularly in neighborhoods with marginalized populations, to identify and jointly address unique housing and community amenity or service needs." This should also contain reference to neighborhood plans or area sub plans, which are now beginning to address housing issues.

Other Detailed Concerns noted

HG2.8 is worded poorly to reflect a balance between demolition and preservation of good housing stock.

H3.2 - please rewrite in English, why is it so long?

H4.3 - "Implement green home-building and renovation requirements" Do you mean implement code? Develop more code?

H5.6 – "Consider access to high frequency transit and estimated housing and transportation costs when funding extremely low-, very low-, and low-income housing." Not clear why the costs part is included connected to access to high frequency transit.

H5.9 - "Address the needs of communities most vulnerable to displacement due to redevelopment pressure through policies and funding decisions related to extremely low-, very low-, and low-

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income housing" Why is this limited to low income, we should also be considering displacement of median income (at a minimum) and down for this policy.

H5.11 and H5.12 – NOT SURE but didn't these just pass legislation? In that case, should the policies be revised somewhat? In the crosswalk, H5.12 is said to be the replacement for using good neighbor guidelines but H5.12 are very specific about application for city funding, while the old H37 was more general about problem solving. H37 should be restored to require use of good neighbor guidelines.

H5.18 – "Require planning for affordable housing needs for extremely low-, very low-, and low income households as part of major institution master plans and development agreements approved by the City when such plans would lead to housing demolition or employment growth" Do you mean "Require inclusion of affordable housing…"?

It may have ended up in the general discussion, but the concept that affordable housing should be spread throughout the city seems to be gone. Restore old H42 "Allow use of public funds to provide subsidized low-income housing units in otherwise market-rate housing developments in order to better integrate low-income households into the community."

H45 and H46 (old) were deleted with the comment "Level of specificity more appropriate for implementation plan". It is not clear what implementation plan covers the broadness of those two policies. Those were good policies and not so specific to justify such a comment. H45 and H46 should be restored.

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Capital Facilities

Major Goal and Policy Issues

Use of surplus property (within the City limits).

- We suggest that land not be divested from the city at all, and that leasing arrangements should be prioritized as the first use of a surplus property.
- If land must be sold, land of comparable value within Seattle must be purchased in its stead.
- In the circumstance that such land cannot be obtained, policies need to better reconcile competition between use of surplus property for housing or open space needs

Setbacks and Green Space

- In areas not meeting targets for community open space, increase the required setbacks and landscaping requirements for new multifamily residential development like Vancouver and Portland.

Restore community engagement to this Element

Comments

Parks is not specifically excluded from this chapter in the Introduction (p 104). But in the Parks and Open Space element, there is no discussion of Parks capital facilities except for "Major Open Space Attractions" and in the context of maintenance. There appears to be a lack of goals or policies around Parks Capital Facilities. In the DEIS, section 3.8 Public Facilities, there is much discussion on the lack of, and demand for, open space and facilities. Goals and Policies are needed to capture and implement the proposed mitigation strategies in the DEIS.

The DEIS speaks to the existing capacity levels of the police precincts in section 3.8-6. "The East, West and South Precincts' station facilities are currently at capacity…." There are no goals or policies to address the at capacity situation in those precincts. Cumulatively, with the new hiring plan by SPD, all precincts will probably be stressed and this should be addressed citywide.

Introduction Paragraph 1 does not reflect the important coordination work needed between the City and the Seattle School District. Suggest revising to read: ""While non-
City organizations and agencies are not required to meet the goals and policies of the Comprehensive plan, the City is directed by the Growth Management Planning Council to <u>cooperatively plan that public school facilities are available to meet the needs of existing and projected residential development</u>. As such, the City works with groups such as the Seattle Public Schools and the Public Health of Seattle and King County to strive for similar goals<u>.</u>"

The second paragraph of the introduction makes the claim that
"the City's network of capital facilities is generally sufficient to accommodate forecasted housing an d job growth through 2035."

This is not true for schools. We don't have enough buildings to accommodate existing student population, and the existing plan is not sufficient. We need an additional 15-26 buildings to accommodate K-12 facilities needs for the existing enrollment growth of the past 7 years (7000 new students in 7 years) and to accommodate reasonable class sizes as determined by state law. This should be acknowledged by the City. We request this

1. be acknowledged in the introduction and
2. a new policy added to specifically address the projected shortfall.

Introductory Section, bulleted list of things that the City will aim to ensure related to capital facilities, we suggest a new bullet be added "will plan for sufficient facilities for public services such schools and public health centers"

Removed neighborhood plan input from all relevant sections of this Element. This needs to be restored (old CF11)

CFG2 – "Operate and maintain existing capital facilities to reduce ongoing resource consumption and day-to-day costs and to ensure their long-term viability, while serving the needs of the people that use them." We note the change from "capital assets" in old policy CFG2 to "capital facilities" in this draft. We are concerned that this policy is now limited to buildings, not land. Please confirm that this policy is intended to encompass all that is owned by the city, both buildings and property. The land itself is not included in the glossary definition of Capital Facilities.

CF5-3 – "Partner with Seattle Public Schools to plan for expected growth and to encourage the siting, renovation, and expansion of school facilities in or near urban centers and villages."
This policy does not account for the possibility that family growth may happen in other areas. In particular, if the growth is going to be directed into the transit corridors, planning for schools should encompass more areas. Suggest the policy be revised to say "Partner with Seattle Public Schools to plan for expected growth and to encourage the siting, renovation, and expansion of school facilities where student enrollment is expected to occur."

Other Detailed Concerns noted

CF3 – "Locate capital facilities to achieve efficient citywide delivery of services, support an equitable distribution of services, minimize environmental impacts and maximize facilities' value to the communities in which they are located." Add that community impacts should also be minimized.

CF3.3 - "Locate capital facilities so that the majority of expected users can reach them by walking, bicycling and/or taking public transit." Add "and are accessible to seniors and disabled persons." (or " and are accessible to people of all ages and abilities")

CF4.6 – "Encourage a wide range of transportation options by promoting car sharing and by providing bicycle, transit and electric-car-charging facilities." This being direction for the capital facilities, there are often activities here that require equipment or supplies for the instructors and participants. Provisions must be provided for those who play sports, create projects and bring people and materials to these facilities to be able to bring their supplies and equipment.

Restore old CF7 "The City will consider capital improvements identified in neighborhood plans, in light of other facility commitments and the availability of funding and will consider voter approved funding sources." Specifically the part about considering capital improvements identified in neighborhood plans.

The intent of CF8 should be restored. "Explore tools that encourage sufficient capital facilities and amenities to meet baseline goals for neighborhoods and to address needs resulting from growth." The exploration of tools that measure if we are meeting the capital facilities needs is an important policy.

CF23 should be restored. "Consider life-cycle cost analysis as a method to better understand the relative costs and benefits of City buildings and capital facilities." Life cycle cost analysis is a best practice, not clear why this was removed.

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Parks and Open Space

Major Goal and Policy Issues

Keep current goals and metrics for providing open space.

- Changing to a "quality versus quantity" approach is not sufficiently justified. Keep the current metrics as goals for open space until there is further public debate on the issues motivating this dramatic change (impact fees, overall investment cost, other?)
- Consider new approach to weighting factor to achieve open space goals by subarea. Example greenway count at 25% - a ravine count at 80%, a park count at 100%; some large multi-use parks could count for more than 100%
- Need strong open space and parks policies to support regulation of open space requirements and tree preservation on developing sites.

Only count open space that the city can control.

- Counting space owned by other public agencies or private institutions has a lot of downside including lack of long term reliability; conflicts over use; and inconsistency with public expectations for what parks and open space should be. Parking lots and school playgrounds are not typically viewed as open space.
- If policy remains, amend to specifically eliminate cemeteries, school yards, and campuses for educational or institutional facilities.

Use of surplus property (within the City limits).

- We suggest that land not be divested from the city at all, and that leasing arrangements should be prioritized as the first use of a surplus property.
- If land must be sold, land of comparable value within Seattle must be purchased in its stead.
- In the circumstance that such land cannot be obtained policies need to better reconcile competition between use of surplus property for housing or open space needs.

Comments

Add clear definitions of parks uses for "Passive" "Low Intensity" and "High Intensity" uses.

- This would help clarify expectations of what uses are expected in what areas (recreation and community centers and their associated grounds, parks, open space, greenbelts.)

Eliminate P1.2	Identify goals for the City future open space system that are realistic about the quantity of land that could be acquired, consider land management by other agencies, and that drive improvements in the quality and usability of those spaces.

New policy needed that sets priority for use of Parks District funding to meet growth-inducted needs for parks and open space.

Retain this policy instead of P1.3 which implies that streets could be counted against goals for open space.

Retain UV50	Establish, through the combined systems of urban trails, green streets and designated boulevards, a network among the city's varied open space features and urban villages and urban centers as well as connections with recreational and natural areas within the Puget Sound region.

Do not use P1.3 Provide urban trails, green streets, and boulevards in public rights-of-way as recreation and transportation options and as ways to connect open spaces and parks to each other, to urban centers and villages, and to the regional open space system.

P1.4 Make rights-of-way available on a temporary basis to provide space for community events, such as street fairs, farmers' markets, or neighborhood celebrations without undue obstacles and at reasonable cost.

P1.5 Provide natural areas to preserve important natural or ecological features in public ownership and allow people access to these spaces for passive uses.

P1.7 ~~Encourage or~~ Require private developers to incorporate on-site publicly accessible open space or to provide appropriate recreation opportunities for building tenants within new developments.

P1.12 Consider accessibility by individuals and families ~~by transit, bicycle, and on foot~~ when acquiring new park facilities or improving existing ones.

P2.9 Provide programs that are accessible and welcoming to ~~communities of color and to immigrant and refugee~~ communities and residents.

P3.1 Maintain the long-term viability of parks facilities by regularly addressing major operational and maintenance needs.

P3.3 Enhance wildlife habitat by removal of invasive plants, restoring forests and expanding the tree canopy on City-owned land.

PG4 Plan and maintain regional parks and facilities to accommodate the people who will want to visit them, while respecting the facilities' neighbors. Balance investment in regional parks with park and open space needs throughout the city.

P4.3 Integrate ~~the proposed~~ future ~~Central~~ downtown ~~W~~waterfront ~~P~~park facilities with existing nearby parks, trails and open spaces.

November 20, 2015

Hon. Edward Murray
Seattle City Hall
600 4th Ave. 7th floor
Seattle, WA 98104

Dear Mayor Murray:

As industrial property owners, owner/operators, business owners, real estate brokers, business leaders and concerned neighbors, we have deep concerns about the proposed removal of all future Industrial Commercial (IC) zoning as part of the City of Seattle's 2035 Comprehensive Plan.

We strongly oppose the unwarranted removal of the IC zone and are equally concerned about the lack of dialogue, outreach and engagement with industrial owners, owner/operators and other affected stakeholders prior to this recommendation.

Land zoned Industrial Commercial (IC) represents less than 1% of the city's total land base and less than 10% of the city's roughly 4,670 acres of industrial land.[1] Roughly 87% of the city's industrial land – or 4,133 acres – is zoned Industrial General-1 or Industrial General-2[2]. As such, this land is expressly protected from non-industrial uses (specifically office and retail uses) via the city's 2007 industrial lands downzone.

Industrial Commercial land exists as a natural buffer between IG-zoned land and other less restrictive zones – such as Commercial (C) or Neighborhood Commercial (NC). Both of these less-restrictive zones encourage residential uses and other neighborhood-focuses amenities, pedestrian elements and are often in or near Urban Villages or Urban Centers.

As supporters of Seattle's maritime, manufacturing and industrial heritage, we recognize that the working waterfront in South Seattle and Ballard, or the Duwamish waterways, are clear examples of industrial/maritime use and should remain that way. But along the edges, which is where Industrial Commercial land exists, there should be flexibility and a mix of non-residential uses.

The complete removal of the IC zone from the city's land use code is extreme and unwarranted. IG-zoned land is robustly protected from encroachment by non-industrial uses and uses advanced in IC-zoned land is consistent with the current code. Eliminating this zoning designation would remove that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property

[1] City of Seattle land use zoning and GIS layers; King County GIS parcel layer
[2] DPD Duwamish M/IC Policy and Land Use Study, 2013

owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

We have been equally concerned about the remarkably vague language previously advanced in the 2035 Comprehensive Plan that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future. We are pleased this language is no longer in the current Draft EIS and strongly support its removal.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

As neighborhood property owners, owner/operators, developers and industry leaders, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and landholders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, we urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

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Constructive Element

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Kate Joncas, Deputy Mayor, City of Seattle
Robert Feldstein, Director, Office of Policy and Innovation, Mayor's Office
Chris Gregorich, Special Advisor for Strategic Initiatives, Mayor's Office
Sara Belz, Office of Policy and Innovation, Mayor's Office
Diane Sugimura, Director, Seattle Department of Planning & Development
Kathy Nyland, Director, Department of Neighborhoods

November 20, 2015

Dear Councilmembers, Patrice Carrol, Tom Hauger, Seattle 2035 Team, Seattle Planning Commission:

The Seattle 2035 Planning Process is a complex and far reaching effort, with long term implications for business, community, livability, transportation, housing, and the environment.

We, the Crown Hill Business Association, have long talked with our surrounding communities about the challenges of our location and how we would guide future changes. We've repeatedly work with SDOT, DPD, EOD, and DON on projects in our community and have always been assured that we would have a seat at the table in future planning in our community. In fact, on the campaign trail, our now elected Councilman Mike O'Brien said that absolutely communities would have a seat at the table to guide the process and allow different communities to have a different feel and approach. But nowhere does the 2035 document reflect those assurances. It must.

Portland's Comprehensive Plan, has a chapter entitled "**Community Involvement**" (http://www.portlandoregon.gov/bps/article/532776), while Seattle's plan has removed virtually all reference to neighborhood planning and community guided development, simply listing "community" as a "theme" with no outline, no metrics, and no mention of developing standards.

It lacks a definition of how the plan will be administered, and provides **no role for the public** in its administration.

For proper risk management, it is a necessity that the Comprehensive Plan include a comprehensive **accountability** process, with safeguards to assure that diverse opinions will have a place in the city's most widely impacting policy during its application.

We offer the following specific comments:

- There must be specific minimum standards in the 2035 plan for community involvement.
- There must be specific mention that, and how, different communities will be able to have different approaches as well as look, feel and solutions. The Crown Hill Residential Urban Village (RUV) has almost no sidewalks now, and any expansion will increase the number of areas with no sidewalks to the village. It's time for a new look at sidewalks as we build out our area.
- With an approximately 400% increase in Crown Hill RUV area, and even more density on deck with planned up-zones, Crown Hill is becoming close to the size of Ballard. As the Ballard Growth boom is daily moving to Crown Hill, the plan for light rail needs to address the needs north of Market Street. The potential stop at 65th needs to be moved 25 blocks north.

- Removing metrics from parks, transportation, and other quality of life measures, removes any objective way to rate the progress and quality of the density. Metrics must be added into the plan for parks, libraries, community centers, transportation services, and business vitality.

Changing any boundaries without understanding the challenges and success in what was done previously is a mistake. Why repeat the mistakes of the past? And why not capitalize on successes?

We've learned that vastly adding density without meaningful follow-through for transportation is a nightmare. We must not do to any other community what was done to and is still being done to Ballard regarding transportation. Since most Crown Hill residents have to pass through Ballard to get to their jobs, we need to be careful about timing.

Thank you to the team for their efforts to date in this substantial project. We appreciate your thoughtful consideration of these issues that are very important to our community. We are ready to provide any additional information you may need, and we look forward to your response regarding how these issues may be addressed.

Sincerely,

Loy Suderman
President, Crown Hill Business Association

CC: CHBA Board Members

Downtown Residents
c/o Albert C.S. Chang
1920 4th Ave Unit 407
Seattle, WA 98101
11/20/2015

Diane M. Sugimura, Director
Seattle Department of Planning & Development
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124

Re: Public Comment on Seattle 2035: Comprehensive Plan for Managing Growth 2015-2035

Dear Director Sugimura:

We are downtown residents writing to comment on "Seattle 2035: Comprehensive Plan for Managing Growth 2015-2035" published on July 8, 2015.

The plan makes clear that "the largest amount of residential growth is expected to occur in [the] urban center," with downtown expected to adsorb 10,000 new residential units.

As downtown residents, we appreciate the appeal of downtown living and look forward to welcoming new neighbors. We understand that additional residential development in the downtown core can bring a multitude of public benefits. We know that mixing residential use into an area dominated by office spaces will increase night time street safety and vibrancy.

However, we are concerned that the City's current design guidelines and development regulations have not kept up with the change of land use. Many areas of downtown currently being contemplated for mixed residential developments are zoned as Downtown Office Core and therefore lack "development standards that promote privacy and livability, such as appropriately scaled landscaping [and] street amenities." (GS4.15) In fact, of the 33,512 future residential units possible in downtown (Development Capacity Report, pg. 11), nearly 2/3rds of that growth can occur in areas which lack meaningful residential design standards, such as DOC 1 & DOC 2.

The residents of the Cosmopolitan Condominium and the Olive 8 Condominium can attest to the lack of tower separation requirements in most areas of downtown Seattle. The communities at the Cristalla Condominium and Escala Condominium are facing the same fate. Other sites in the immediate area and beyond could produce similar results under current zoning regulations.

In order to "promote Downtown Seattle as… a vital and attractive environment that supports employment and residential activities and is inviting to visitors," (LUG12) the City must take this opportunity to reconsider the development standards that apply in the downtown core. While the lack of height restrictions and tower separation requirements in the downtown commercial core may have been adequate for office towers; it is clearly insufficient for a residential community.

As downtown residents, we chose to live here because we value living in the city center. The livability of downtown and the health of our community are at risk so long as the planned land use and development standards for our neighborhood remain at odds. As Brent Toderian, former Chief Planner in Vancouver would put it; we want "density done well." To achieve that, the City must embrace urban design standards that match the planned land use.

Sincerely,

Vicki Hewlett

Mary E Watson

Rebecca Mullen

Kate Carroll

Paul Guglielmotti

EASTLAKE COMMUNITY COUNCIL

117 E. Louisa St. #1
Seattle, WA 98102-3278

November 20, 2015

Mayor Ed Murray
601 Fifth Ave., Floor 7, P.O. 94749
Seattle, WA 98124-4749

Members of the City Council
601 Fifth Ave., Floor 2, P.O. 34025
Seattle, WA 98124-4025

Seattle 2035 Comprehensive Plan Update
c/o Director, Dept. of Planning and Development
701 Fifth Avenue, #2000, P.O. Box 34019
Seattle, WA 98124-4019

Seattle Planning Commission
701 Fifth Avenue
P.O. Box 34019
Seattle, WA 98124-4019

URGENT NEED TO REBALANCE THE DRAFT COMPREHENSIVE PLAN UPDATE

To the Mayor, City Council, DPD, and Planning Commission:

The current draft "update" of Seattle's Comprehensive Plan is in effect a new plan that would unleash unprecedented and unbalanced growth pressures upon those neighborhoods that the Comprehensive Plan since 1994 has designated as urban centers, hub urban villages, or (like Eastlake) residential urban villages. The current draft would impose on these urban centers and villages major new growth expectations while removing hundreds of protections in the current Comprehensive Plan that now ensure them some semblance of village-like livability.

The information that the City has so far given out at public events and on its web site discloses few of the hundreds of provisions of the current Comprehensive Plan that would be deleted or weakened. The City must revise this draft to make it more balanced; and it must tell the public about the actual changes from the current Comprehensive Plan that the proposed "update" would actually make.

This "update" would repeal current protections for livability and public involvement. Officially terming these neighborhoods as "urban villages," as the Comprehensive Plan has done since 1994, was a promise that while growth would come, it would be no more than is consistent with the intimacy and charm of a village. The commitment was that urban problems like crime, noise, traffic danger, etc. would not be worsened by growth; that public investments would bring amenities like parks, sidewalks, etc.; that the growth expectations for urban villages would be scaled back if livability would otherwise be sacrificed by growth; and that the residents, businesses, and community organizations in each village would (especially through neighborhood planning) play a central role in decisions about how much it should grow and in what ways.

Contrary to those commitments, the current "update" would transform the Comprehensive Plan into an engine of growth at any cost. Goals and policies that currently protect sustainability, livability, and public participation would be either weakened or entirely deleted. The "urban village strategy" would be redefined to deny the urban centers and urban villages the balancing protections that they now enjoy in the current Comp Plan.

P**olicies and goals in the Comp Plan have protections in state law; removing them would eliminate that protection.** Washington state law **(**the Growth Management Act) requires cities and counties each to have a Comprehensive Plan, to obey it, to amend it only once a year, and to do so in accordance with City laws and resolutions. Enforcement action can be imposed by the Washington state Growth Management Hearings Board and the state courts. Because so many policies and goals in the current Comprehensive Plan would be either deleted or moved to a plan other than the Comprehensive Plan, the public would lose major protections under state law; this must not be allowed to happen.

Following are specific responses and comments on different parts of the proposed Comprehensive Plan update. Most of the comments are about parts of the current Comprehensive Plan that are slated for elimination but should be kept. Some comments are about additions that should not be made. And a smaller number of comments are about City proposals that should be accepted, or proposals that we hope that the City will consider. Goals are those with a G and policies are those without a G. In most cases a proposed deletion is complete; but here a policy or goal is also deemed deleted if whatever language proposed in its place is not a meaningful replacement.

BALANCE GROWTH WITH LIVABILITY AND SUSTAINABILITY

1. Do not delete *Toward a Sustainable Seattle* from the Comp Plan's title. The proposed update would eliminate these words from the Comprehensive Plan's title; since the Plan was first adopted in 1994, its title has been *Seattle's Comprehensive Plan: Toward a Sustainable Seattle.* (The proposed new title is *A Comprehensive Plan for Managing Growth*.) *Effect of the proposed change: The Comp Plan's title would all too accurately reflect what this proposed update seems intended to make it--a growth machine, no longer a means to ensure that growth is balanced with sustainability and livability*

2. Do not delete the current priority for sustainability from the Comp Plan's text. Throughout, the current Comp Plan's references to sustainability would be deleted. For example, the proposed update would eliminate the following from page vii of the current introductory Vision section: "Sustainability is the common-sense notion that the health of our environment, our economy, our bodies, and our community as a whole, are not only closely linked, but dependent on one another. The four core values described above -- economic opportunity and security, environmental stewardship, social equity and community -- are the pillars of sustainability. The overarching goal of this Comprehensive Plan is to promote sustainable development -- that is, development that reflects, protects, and advances these core values, through a smart and well-integrated approach to where and how we grow." *Effect of the proposed deletion: the Comprehensive Plan would favor growth at any cost rather than seek a balance with sustainability and livability.*

3. Do not delete goal UVG35, "Achieve development within urban villages at a pace appropriate to current conditions in the area." Growth is not sustainable if it is pressed at a pace faster than is physically or socially bearable. *Effect of the proposed deletion: would break a promise to urban villages that has been in the Comprehensive Plan since its adoption in 1994: Growth must be kept to a pace that does not damage or disadvantage the community.*

4. Do not delete policy UV30, for balanced growth. The proposed update would delete UV30, **"**Balance objectives for accommodating growth, supporting transit use and walking, maintaining compatibility with existing development conditions, maintaining affordable housing, and responding to market preferences for certain types of housing, through the density and scale of development permitted." *Effect of the proposed deletion: would break a promise to urban villages that has been in the Comprehensive Plan since its adoption in 1994, namely that growth will be of a magnitude and kind that is compatible with local conditions and with affordability.*

5. Do not delete policy UV69 for coordinating investment and growth. The proposed update would delete UV69: "Maximize the benefit of public investment in infrastructure and services, and deliver those services more equitably by focusing new infrastructure and services, as well as maintenance and improvements to existing infrastructure and services, in areas expecting to see additional growth, and by focusing growth in areas with sufficient infrastructure and services to support that growth. *Effect of the proposed deletion: would eliminate guidance and incentives for equity in sharing the impacts of growth and of investment in and maintenance of infrastructure and the private investment that follows it.*

NEIGHBORHOOD CHARACTER AN D AFFORDABILITY

6. Do not delete policy LU11: "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." *Effect of the proposed deletion: would reduce current protections for affordable housing and neighborhood character.*

7. Do not delete goal LUG2: "Foster neighborhoods in which current and future residents and business owners will want to live, shop, work, and locate their businesses. Provide for a range of housing types and commercial and industrial spaces in order to accommodate a broad range of families and individuals, income groups, and businesses." *Effect of the proposed deletion: would reduce the Comp Plan's neighborhood focus.*

8. Affordability criteria must moderate efforts to promote density. Much in the proposed update favors increased density, with the apparent assumption that affordability will benefit when it may not and in fact may suffer from related displacement. The environmental impact statement done as a part of the proposed update [section 3.6.3 Mitigation Strategies (for Housing)] stated:

> Under all alternatives, including the No Action Alternative, housing affordability and risk of displacement will continue to be a significant concern. As described previously, housing affordability and displacement are driven by demand generated as a result of Seattle's strong job market, land value, construction costs and other factors outside of the proposal and alternatives.

Nevertheless, the City recognizes the critical importance of these issues and recommends consideration of the following mitigation strategies. Housing affordability strategies should be tailored to meet specific objectives, for example: Creating an environment where the community retains the conditions that afford it good opportunities while providing for stability and economic mobility for people vulnerable to displacement; expanding choices in areas that are currently unaffordable for lower income people who may want to live or operate a business there; and stabilizing areas that are transitioning to higher levels of desirability due to amenities such as light rail service.

9. Retain the current policy LU102 and reject the proposed LUG7 so that density will not be prioritized over affordability. LU102 offers zoning incentives and other tools to provide for or preserve public benefits including "housing affordable to low- and moderate-income households. The proposed new LUG7 would use those same tools to push density without any reference to affordability.

10. The proposed housing element contains some good provisions for neighborhoods. H3.5 says to "Consider allowing additional housing types that respect existing neighborhood character in single-family areas, particularly within or near urban centers and urban villages" H4.7 says to adopt development standards and design guidelines that help achieve a variety of quality housing types and respond flexibly to unique neighborhood contexts.

11. The proposed housing element seems be concerned mainly about the low end of displacement. Its proposed policy H5.9 recommends addressing "the needs of communities most vulnerable to displacement due to redevelopment pressure through policies and funding decisions related to extremely low-, very low-, and low-income housing." This seems too narrow a view. People who are above the low-income level may significantly at risk for displacement, and with few options.

12. Do not add policy LU9.11 on midrise zones: "Use midrise multifamily zones to provide additional housing opportunities in urban villages and centers." *Effect of the proposed addition: Encourages midrise zoning with its taller buildings in parts of urban villages and centers whose neighborhood plan does not call for it. Disempowers neighborhood planning.*

13. The proposed new goal LUG2 on zoning fails to give priority to neighborhood impacts or even mention them. As proposed, LUG2 states that zoning will "Allow for a variety of housing types to accommodate housing choices for households of all types and income levels; support a wide diversity of employment-generating activities providing jobs for a diverse residential population, as well as a variety of services for residents and businesses; and accommodate the full range of public services, institutions, and amenities needed to support a fully developed, diverse, and economically sustainable urban community." The goal needs to be revised to give priority to the local conditions that make for a successful neighborhood. *Effect of the proposed revision: zoning would increasingly be based on citywide priorities rather than on neighborhood conditions and needs.*

14. Do not delete policy LU3 on rezones: "Establish rezone criteria and procedures to guide decisions about which zone will provide the best match for the characteristics of an area and will most clearly further City goals." This proposed deletion is one of many in which the proposed update would throw out policies in the current Comprehensive Plan which direct that land use decisions be respectful

of the local context. We are concerned that relying mainly on the Future Land Use Map could encourage a cascade of rezones that would ignore local conditions and neighborhood plans. It would be better to adopt a policy requiring that all rezones be consistent with neighborhood plans. *Effect of the proposed deletion: Encourages wholesale upzones without regard for local condition, plans, or preferences.*

15. In new policy LU5.16 on view protection, the proposal should allow private view impacts to be considered when permitting or denying a conditional use, rezone, or other departure from the land use regulations. As the proposed update encourages rezones, conditional uses, and other departures, it is important for potential view blockage by a new project to be a valid objection.

16. Do not delete policy LU81 limiting building heights: "Limit building heights to establish maximum heights, maintain scale relationships with adjacent buildings, and limit view blockage." *Effect of the proposed deletion: lowers current obstacles to unlimited increases in building heights.*

17. Do not adopt proposed policy GS4.20, "Consider taller building eights in key locations to provide visual focus and define activity centers." *Effect of the proposed addition: unusually tall buildings are more likely to shadow activity centers and to block vies rather than provide visual focus.*

18. Do not adopt proposed policy GS4.23, "Encourage street widths and building heights that are in proportion with each other by reducing setbacks from the street and keeping reasonable sidewalk widths for lower buildings." *Effect of the proposed addition: reduced setbacks aren't a good thing in an urban village where yards and especially trees are lacking and much needed to green up the area. Plus: the proposal doesn't make sense.*

19. Do not delete policies LU1, LU5, LU76, LU164 that currently direct that zoning, rezoning, and conditional use changes reflect community preferences, and be consistent with neighborhood plans. *Effect of the proposed deletion: ignores community preferences and marginalizes the neighborhood planning process.*

20. Do not delete policies LU59 and LU60, which define and protect single family zoning. *Effect of the proposed deletion: lowers the Comp Plan's barriers to eliminating single family zoning.*

21. Do not replace policy LU67 with policy LU8.9. *Effect of the proposed replacement: could bring back the previously prohibited ultra small lot development in single family and multifamily zones.*

PUBLIC AND NEIGHBORHOOD INVOLVEMENT

22. Do not eliminate the commitment to public involvement in the current Comp Plan's Vision section. That section (proposed to be entirely deleted in the update) now reads (p. ix) as follows: "Citizen participation in City processes will build upon the dialogue between government and citizens that began with the development and adoption of the Plan. The City will strive to find improved means to communicate with and involve citizens in planning and decision-making. The City will strive to provide information that can be easily understood and to provide access for public involvement. This will include processes for amending and implementing the Plan." *Effect of the proposed deletion:*

would undermine City efforts to reach out truthfully to the public and involve it meaningfully—a new neglect already reflected in how the current update process is failing to inform and involve the public.

23. Do not remove the commitment to widespread public involvement in the current Comp Plan's Urban Village element (proposed to be renamed and refashioned as the Planning for Growth element). But do add (and practice) transparency. Both of the following provisions would be eliminated in the proposed update: UVG10, "Collaborate with the community in planning for the future."; and UV8, "Involve the public in identifying needs for planning, and designing public facilities, programs, and services. Encourage and provide opportunities for extensive public involvement in City decisions, and encourage other agencies to provide similar opportunities."

24. The proposed Comp Plan update should not delete UVG10 and UV8 or replace them with a rather weak goal and policy. The new goal would be GSG1, "Have strategies that prepare the City for the challenges and opportunities of growth and that represent the needs and desires of a broad cross-section of city residents and business owners." ; and the new policy would be GS1.2, "Engage Seattle residents and businesses in discussions leading to the adoption of plans that guide growth, City government activities, and City services so that the outcomes reflect the public's values and concerns." These proposals are not worthy of replacing UVG10 and UV8, which should be kept. *Effect of the proposed change: The proposed new GSG1 and G1.2 fail to give any priority to widespread public involvement. The original language from UVG10 and UV8 (quoted above) should be retained.*

25. The proposed new GS1.2 is good and should be added: "Maintain an updating process for this Plan that is predictable and transparent to the public." Unfortunately, this standard of transparency is not being met in the current update process.

26. The proposed update would unjustifiably remove from most of the Comp Plan's sections the policies and goals for community involvement. The update would systematically remove all of the references to community involvement throughout the Comprehensive Plan. *Effect of the proposed deletion: eliminates the Comp Plan's current openness and encouragement for public involvement.*

27. Do not adopt the huge number of deletions in the element on neighborhood planning, and do not remove from most Comp Plan elements most other references to neighborhood plans and neighborhood planning. The proposed Comp Plan update would virtually eliminate any recognition or priority for neighborhood planning. Among the policies proposed for elimination are those numbered N10 to N19 regarding its implementation:

> N10: Establish a firm and clear relationship between the City's budgeting processes and adopted neighborhood plans and, using the biennial budget, demonstrate how the urban village strategy is being carried out.
> N11: Assess as part of the City's budget process, neighborhood plan implementation needs and resources, taking into consideration the results of implementation activities for each area and public input into the budget process.
> N12: Use adopted neighborhood plan goals and policies and the City's neighborhood plan work plan matrices to help balance between competing goals in City decision making and the allocation of budget
> resources.

N13: Consider recommendations from neighborhood plans in the context of Seattle as a whole. Incorporate such requests into City prioritization processes, as appropriate, for capital expenditures and other decision making recognizing the City's legal, administrative and fiscal constraints.
N14: When allocating resources to implement neighborhood plans, at a minimum consider the following factors: Where the greatest degree of change is occurring; Where growth has exceeded current infrastructure capacities; Where there is a deficit in meeting service levels called for by the Comprehensive Plan or the expectation of other City policies or agency plans; Where there is an urban center or urban village designation; Where the neighborhood plan goals and policies or work plan matrix have specific prioritized plan recommendations endorsed by the City; Where resources would help spur growth in urban centers or urban villages; Where there are opportunities to leverage other resources, or partnerships; Where the resource would address priorities of more than one neighborhood; and Where the impact of a single, large activity generator will have detrimental effects on the infrastructure capacities of the neighborhood.
N15: In implementing neighborhood plans, work with neighborhood groups to refine and prioritize recommendations in light of changing circumstances and consistent with the adopted goals and policies of each neighborhood plan.
N16: Permit the addition of new strategies, including regulatory changes, through the neighborhood plan implementation process when existing tools are inadequate to meet implementation needs.
N17: Support and encourage the incorporation of cultural elements, such as public art and historic resources, in the implementation of neighborhood plans. In future planning efforts, include a broad range of creative skills to improve the value of the neighborhood projects.
N18: Monitor progress toward implementing Council adopted neighborhood plans and communicate results to City officials, neighborhood planning participants and interested citizens.
N19: Support neighborhood plan stewardship with the goal of promoting continued cooperation between the City and local neighborhoods in implementing adopted neighborhood plan goals and policies, carrying out neighborhood plan work plan activities and implementing this Comprehensive Plan. These efforts should be directed toward not only accomplishing specific projects, but also toward fostering the ability of neighborhoods to inspire people with the energy, interest and ability to work collaboratively with the City in implementing neighborhood plans.

The Neighborhood Planning element should NOT suffer deletion of the above ten policies numbered N10 to N19 that are in the current version. *Effect of the proposed deletion: eliminates the centrality of neighborhood plans and neighborhood planning to the current Comp Plan. In fact, it consigns neighborhood plans and planning to a negligible role.*

28. As one example among many, the addition of policy LU9.1 (discussed in the above section on neighborhood character and affordability) would undermine neighborhood plans by promoting midrise zoning whether or not called for by the neighborhood plan. The proposed new policy LU9.1 should NOT be adopted.

29. Do not weaken goal GSG1 by stating that in amending the Comprehensive Plan, only a "broad cross-section of city residents and business owners" will be consulted. *Keep the original language that makes clear that the Comprehensive Plan is not a top-down or centralized process, but a process of dialogue between the government and its publics.*

OPEN SPACE, TREES, SHORELINES, AND COMMUNITY CENTERS

30. Public land (including submerged parcels) that is surplus to its original agency should be kept in public ownership as open space, and sold for possible benefit to housing only if there is no open space use needed.

31. Do not delete policy LU34 which encourages yards: "Limit the maximum amount of lot area covered by a structure to maintain compatibility with the scale and character of an area, to provide an adequate proportion of open area on a site relative to the area occupied by structures, and to provide occupants with sufficient access to light and air, as appropriate to the intended character and use of an area." *Effect of the proposed deletion: Removes current expectations for yards, landscaping, and trees.*

32. Do not delete policy LU39: to "preserve and enhance the City's physical and aesthetic character and environment by preventing untimely and indiscriminate removal or destruction of trees" and to provide incentives to property owners for tree retention.

33. Do not delete policy LU41 for street trees.

34. Do not delete policy UV39 to enhance the tree canopy and understory in urban villages. *Effect of the proposed deletions: Trees would no longer specifically be identified as important.*

35. Do not weaken policy E10 favoring vegetative cover. E10 in the current Comprehensive Plan is as follows: "Strive to increase the amount of permeable surface and vegetative cover in the city in order to mitigate the heat island effect of developed areas, control storm water flows and reduce pollution." The proposed update is not preferable, as it would eliminate the reference to vegetative cover. New E1.4 would read: "Increase the amount of permeable surface by reducing hardscape surfaces where possible and maximizing the use of permeable paving elsewhere."

36. Do not delete policy E11 on aquatic areas. The proposed update would eliminate E11: "Identify long-term goals and develop plan or strategies for improving the environmental quality of each of the city's aquatic areas, including a long-term plan to restore and sustain Seattle's creeks. Consider in these plans or strategies the use of incentives, regulations and other opportunities for action to restore and sustain the long term health of Seattle's creeks and shorelines."

37. Proposed policy LU4.8 on minor communication utilities should be amended to not allow them in shoreline areas.

38. Do not delete policy CF9, which gives urban centers and villages a priority for public facilities. The proposed update would delete CF9: "Encourage the location of new community based capital facilities, such as schools, libraries, neighborhood service centers, parks and playgrounds, community centers, clinics and human services facilities, in urban village areas. The City will consider providing capital facilities or amenities in urban villages as an incentive to attract both public and private investments to an area." Eastlake is probably the only urban village that lacks either a public library, a community center, or a neighborhood service center. The only public meeting space is in the

local school, which is closed all summer. *Effect of the proposed deletion: The current priority for public facilities granted to urban centers and villages would be eliminated, just at the time they are being asked to take on still more growth.*

39. Do not delete the current policy CF7 (proposed for elimination in the update): "The City will consider capital improvements identified in neighborhood plans, in light of other facility commitments and the availability of funding and will consider voter approved funding sources."

40. Do not delete the current policy CF8 (proposed for elimination in the update): "Explore tools that encourage sufficient capital facilities and amenities to meet baseline goals for neighborhoods and to address needs resulting from growth."

TRANSPORTATION AND PARKING

41. Do not delete goals LUG6, LUG6.1, and TG17 and policies LU20, LU49, LU, LU50, T-39, T-40, and T-46 that currently direct that parking policies "account for local objectives," recognize parking as a part of "moving people and goods," consider "access to local businesses," "parking spillover into residential areas," and "truck access and loading," and not "introduce serious safety problems or blighting influences" but rather "achieve vitality of urban centers and urban villages" and "preserve Seattle's competitive position in the region." While deleting those goals and policies, the Comp Plan "update" would introduce two new policies: LU63 to "rely on market forces" for onsite parking and T40 to give higher priority in the allocation of street space to "greening" (e.g. on-street parks) over "storage" (the City's new negative term for parking). *Effect of the proposed deletions and additions: reduces balance and sanity in parking policies.*

42. Proposed policy TG9 should be amended to include improvements in the measure of transit level of service to reflect actual loads and the lack of space or sitting room on some bus routes.

43. The transit mode shares shown in proposed Transportation figure 1 need improvement. The 2035 target for South Lake Union is only 55 percent, much lower than for Downtown (85 percent), the University District (85 percent), Uptown/Queen Anne (75 percent) and even Seattle overall (65 percent). Eastlake is deeply affected by increasing levels of traffic from the South Lake Union area.

44. Do not delete two policies that support the maintenance and expansion of public stairways. The proposed update would delete T32, " Recognize that stairways located within Seattle's public rights-of-way serve as a unique and valuable pedestrian resource in some areas of the City. Discourage the vacation of public rights-of-way occupied by stairways, and protect publicly-owned stairways from private encroachment. And T33, "Accelerate the maintenance, development, and improvement of pedestrian facilities, including public stairways." *Effect of the proposed deletions: public stairways would be neglected if their priority in the current Comprehensive Plan were to be erased.*

45. Do not delete policies T8 and T70 to discourage damage from heavy vehicles and to finance the needed repairs. The proposed update would delete T8, " Pursue strategies to reduce and help prevent road damage from heavy vehicles." and T70, "Pursue strategies to finance repair of road damage from heavy vehicles in a way that is equitable for Seattle's taxpayers." Road and bridge use

by vehicles that are heavier than normal weight limits (causing exponentially greater damage than vehicles within normal weight limits) has caused hundreds of millions of dollars in unnecessary damage. The Comprehensive Plan is where these important policies need to be so that the City will take timely action to prevent such damage and will recoup some of the repair cost from those causing it rather than from Seattle taxpayers. *Effect of the proposed deletions: would weaken City efforts to address damage from heavy vehicles.*

NEW PROPOSALS

46. Add a new section on community involvement. A serious omission throughout the history of the Comprehensive Plan has been the lack of a community involvement element. Such elements are in the comprehensive plans for Portland, San Francisco, Bellevue, Spokane, and Tacoma; Seattle should catch up. Public involvement is not something to be feared or avoided; it is a valuable resources for planners, and is a fundamental value in a democracy. Yet the proposed update does not reflect this value in what is proposing or in the way it is dealing with the public about the proposals. *Effect of the proposed addition: Policy decisions would be higher in quality because of public input, and would also be better understood and supported by the public.*

47. Adopt a new policy to limit the "Airbnb" type of short term rental that is displacing affordable housing. Other cities are grappling with this issue, and Seattle needs to.

48. Require public facilities and infrastructure to keep pace with growth and growth targets. *Effect of the proposed addition: concurrency of growth with the facilities it requires. See the City Neighborhood Council letter for details.*

49. Direct growth to where it is needed and can be accommodated. Discourage building in urban centers and urban villages that have met their growth targets or whose infrastructure is under capacity. Encourage building in urban centers and urban villages that have fallen short of their growth targets or whose infrastructure has unused capacity. *Effect of the proposed addition: greater equity in sharing the impacts of growth and of investment. Greater incentive for investment in and maintenance of infrastructure.*

50. Reinstate Policy L61 from the 1994 Comprehensive Plan. The 1994 Comp Plan ordinance section L61 (pages 29-30 of the original document, but pages 35-36 of the PDF scan of Ordinance No. 117221) required the City to "monitor development activity annually to identify situations where the rate of growth is different from that anticipated by growth targets, either because: 1) it is occurring too rapidly and may be disruptive; or 2) there is insufficient growth to achieve planned conditions in designated villages." This section L61 also required the City to "initiate … a special review procedure" which "should include a review process with the affected community" that shall "consider the following, or other appropriate actions, if a determination is made that action is needed to address the rate of growth:

a. Provide resources to ensure rapid completion or revision of a neighborhood plan to better address how growth is to be attracted or discouraged;
b. Propose rezone actions or changes to development standards to reduce development activity, or, depending on the circumstances, increase development opportunities;

c. Make commitments for specific public improvements to mitigate the impacts of added growth or as incentives to attract desired growth; and/or stablish annual development targets to more closely monitor the rate of growth in the affected area."

Effect of the proposed reinstatement of policy L-61 from the 1994 Comprehensive Plan: would honor a promise made when the urban centers and urban villages were first established—namely that growth will occur where it can best be accommodated and is most wanted.

Conclusion. We hope that City officials will take the above suggestions to heart and will adopt them in the update of Seattle's Comprehensive Plan.

Sincerely,

Christopher K. Leman, President
Eastlake Community Council
info@eastlakeseattle.org
http://eastlakeseattle.org
(206) 322-5463

cc: Lake Union District Council and City Neighborhood Council

20 noviembre de 2015

City of Seattle
Department of Planning and Development
700 5th Avenue, Suite 1900
PO Box 34019
Seattle, WA 98124
Sent via email to 2035@seattle.gov

RE: Comentario sobre el Borrador del Plan Comprensivo Seattle 2035

Para Seattle 2035,

De parte de Futurewise y la comunidad de El Centro de la Raza le damos las gracias por la oportunidad de dar comentario acerca el Plan Comprensivo Seattle 2035.

En 2014, Futurewise y El Centro trabajaron juntos para incluir la comunidad en el proceso del Plan Comprensivo de Seattle, particularmente enfocado en los residentes hispanohablantes de Seattle y el sur del Condado de King. Diseñamos e implementamos una variedad de actividades participativas para la comunidad incluyendo, encuestas SpeakOuts, una cumbre de jóvenes. De estas actividades, varias prioridades claras aparecieron de la comunidad:

- Mejor tránsito, cual es más accesible y seguro para usadores, asequible y confortable para todos, incluyendo familias con niños.
- Viviendas económicas en vecindades seguras que tienen escuelas buenas, tiendas, parques, librerías, cafés y restaurantes accesibles, iglesias y centros comunitarios.
- Más seguridad para personas que caminan o están en bicicleta.
- Mejores trabajos y sueldos para todos, incluyendo inmigrantes
- Una ciudad donde todos son bienvenidos y personas no se sienten discriminados.

Más recientemente, traducimos las diez propuestas claves de los materiales del Plan Comprensivo y los llevamos a El Centro para hablar de ellos con residentes en el centro localizado en Beacon Hill. Debajo están los comentarios que recibimos. Esperamos que incorporen estos comentarios a los que han colectado del foro seattle2035.consider.it y las juntas abiertas para la comunidad cuales no fueron accesibles a las personas que no hablan inglés.

Propuesta 1: Guiar más crecimiento a áreas dentro de una caminada de 10 minutos de tránsito frecuente.

- Sí, el tráfico es terrible.
- Tránsito que va afuera de la ciudad y a otras partes del estado. Deben conectar el tránsito a otras ciudades.
- Sí, pero mejor transportación para conectar el 'east side' con Seattle.
- Mejor tránsito y mejor servicio.
- No vivimos cerca a las estaciones de tránsito. Vivimos en Everett y Federal Way debido al aumento de renta dentro de la ciudad, más 'Park & Rides'.

Propuesta 2: Crear un Mapa del Futuro Uso de Territorio que comunica el futuro desarrollo en aldeas urbanas.

- Planear para mejor uso del espacio dentro de aldeas urbanas.

Propuesta 3: Movimiento hacia estándares de servicios de transportación que consideran todas las maneras de viajar, incluyendo caminantes, bicicletas, carros, camionetas y tránsito.

- Sí, bicicletas son importante.
- Sí, pero extender el 'Link light rail' más lejos.
- Sí.

Propuesta 4: Planear para escuelas y localizar escuelas que sirven y servirán el crecimiento de la población de Seattle.

- Los maestros necesitan más respeto.
- Tránsito a escuelas.
- Más servicios de intervención para las comunidades en el norte de Seattle.
- Crear programas que beneficien escuelas que no tienen muchos recursos.

Propuesta 5: Minimizar el desplazamiento de poblaciones marginadas y pequeños negocios mientras sigue creciendo Seattle.

- Más comunicación en otros idiomas, especialmente en los servicios públicos y de salud.
- Menos discriminación en viviendas accesibles.
- Teniendo buena comunicación con la comunidad y si se reubican darles la cantidad justa.
- Estándares de viviendas accesibles.
- Proponer un plan para tomar en cuenta negocios pequeños. Crear una atmosfera que beneficie a los negocios pequeños.

Propuesta 6: Aumentar la diversidad de tipos de viviendas en zonas residenciales de baja densidad, incluyendo zonas unifamiliares.

- Considerar impactos al medioambiente por nuevo desarrollo. Contabilidad por los impactos al medioambiente.
- Sí, está más difícil para vivir en la ciudad por esta razón.
- Sí, todos tienen necesidad. Se pueden ayudar uno al otro.
- Incentivo para los dueños de casa para proveer soluciones para la vivienda accesible.

Propuesta 7: Designar un Distrito de los Estadios en el Mapa del Futuro Uso de Territorio alrededor de los estadios deportivos profesionales.

- Sí, muchas veces el espacio es poco usado.
- Más seguridad.
- Ese espacio se puede usar para otras cosas.

Propuesta 8: Actualizar las reglas de planeamiento de las vecindades a través de la cuidad para que reflejen las prácticas de hoy.

- Sí, está bien.

Propuesta 9: Estimar, monitorizar y reportar acerca el crecimiento y cambio a través de la ciudad e en aldeas urbanas.

- Medir niveles de servicio y tratamiento en viviendas accesibles, hospicios para desamparados y por los proveedores de servicios.
- Medir niveles de éxito escolar. También incluyendo entrada al y salida del colegio en las medidas (por grupo étnico).
- Sí, medir por vecindad. Más vigilancia.
- Medir delincuencia y tranquilidad de la comunidad.

Propuesta 10: Crear metas para parques e espacios abiertos que se enfocan en calidad, equidad, y proximidad a trabajos y residencias.

- Sí, cuidar y mantener los parques.
- Más programas gratis.
- Sí, los parques son súper importantes en sostener un espacio comunitario y un sentido de pertenencia.
- Rentan a la gente con más dinero de fuera de la ciudad mientras la gente que ya paga impuestos ya no pueden usar los parques. ¡No es justo!
- Los espacios públicos no son para ganar dinero.
- Enfocarse en acceso a pie, impacto, accesibilidad también.

De nuevo, nos gustaría darles las gracias por la oportunidad de participar en el desarrollo del Plan Comprensivo y esperamos que considerarán los comentarios de la comunidad de El Centro de la Raza. Durante nuestro trabajo la comunidad de El Centro ha sido entusiasmado por participar en estas discusiones y contribuir al futuro de Seattle. Esperamos que en el futuro los materiales de Seattle 2035 serán traducidos para incluir los residentes que no hablan inglés en este proceso de planeamiento importante.

Sinceramente,

Jeanette Ordonez

Futurewise
Community Outreach and Education Coordinator

Denise Pérez Lally

El Centro de la Raza
Human Services Director

November 20, 2015

City of Seattle
Department of Planning and Development
700 5th Avenue, Suite 1900
PO Box 34019
Seattle, WA 98124
Sent via email to 2035@seattle.gov

RE: Comments on Seattle 2035 Comprehensive Plan Draft

Dear Seattle 2035,

On behalf on Futurewise and the community at El Centro de la Raza we thank you for the opportunity to comment on the Seattle 2035 Comprehensive Plan.

In 2014, Futurewise and El Centro worked together to engage the community in the Seattle Comprehensive Plan process, particularly focused on the Spanish-speaking residents of Seattle and South King County. We designed and deployed a variety of engagement activities including surveys, SpeakOuts, a Youth Summit. From this outreach, several clear priorities emerged from the community:

- Better, more user friendly transit that is safe, affordable and comfortable for all, including families with children.
- Affordable housing in safe neighborhoods that have quality schools, accessible stores parks, libraries, cafes and restaurants, churches and community centers.
- More safety for people who are walking or biking.
- Better jobs and wages for all, including immigrants
- A city where all are welcome and people do not feel discriminated against.

More recently, we translated the ten key proposals from the Comp Plan engagement materials and took them to El Centro to discuss with residents in their Beacon Hill center. Below are the comments we received. We hope that you will add these to the comments which you have gathered from the seattle2035.consider.it forum and the community open houses which were not accessible to persons who do not speak English.

Proposal 1: Guide more growth to areas within a 10-minute walk of frequent transit.

- Yes, traffic is terrible.
- Transit that goes out of the city and to other parts of the state. They should connect local transit to other cities.
- Yes, but better transportation to connect the east side to Seattle.
- Better transit and better service.
- We don't live close to transit stations. We live in Everett and Federal Way due to increasing rents. More Park & Rides.

Proposal 2: Create a Future Land Use Map that communicates future development in urban villages.

- Plan for better use of space within urban villages.

Proposal 3: Move towards transportation service standards that consider all travel modes, including pedestrians, bicycles, cars, trucks and transit.

- Yes, bicycles are important.
- Yes, but extend the Link light rail further.
- Yes.

Proposal 4: Plan for and locate schools to serve Seattle's growing population.

- Teachers need more respect.
- Transit to schools.
- More intervention services for communities in north Seattle.
- Create programs that benefit schools that do not have many resources.

Proposal 5: Minimize displacement of marginalized populations and small businesses as Seattle grows.

- More communication in other languages, especially in public and health services.
- Less discrimination in affordable housing.
- Have good communication with the community and if they are relocated give them just compensation.
- Standards for affordable housing units.
- Propose a plan that takes into account small businesses. Create an atmosphere that benefits small businesses.

Proposal 6: Increase the diversity of housing types in lower density residential zones, including single-family zones.

- Consider environmental impacts from new development. Accountability for environmental impacts.

- Yes, it is more difficult to live in the city because of this reason.
- Yes, everyone has needs. People can help one another.
- Incentives for homeowners to provide solutions for affordable housing.

Proposal 7: Designate a Stadium District on the Future Land Use Map around the professional sports stadiums.

- Yes, the space is often underused.
- More security.
- This space can be used for other things.

Proposal 8: Update citywide neighborhood planning policies to reflect current practices.

- Yes, this is good.

Proposal 9: Estimate, monitor and report on growth and change citywide and in urban villages.

- Measure levels of service and treatment of residents at affordable housing units, homeless shelters and from service providers.
- Measure levels of educational attainment. Include college-entrance, exiting in measure as well (per ethnic group).
- Yes, measure by neighborhood. More monitoring.
- Measure delinquency and community tranquility.

Proposal 10: Set goals for parks and open space that focus on quality, equity, and proximity to jobs and residences.

- Yes, care for and maintain parks.
- More free programming at parks.
- Yes, parks are super important to sustaining a community space and sense of belonging.
- They rent to people outside of the city with more money while those who pay taxes can no longer use the parks. This is not fair!
- Public spaces are not for making profit.
- Focus on walkability, impact, accessibility as well.

Again, we would like to thank you for the opportunity to participate in the development of the Comprehensive Plan and hope you will take into consideration the comments provided by the community at El Centro de la Raza. Throughout our engagement the El Centro community has been enthusiastic about participating in these discussions and contributing to the future of Seattle. We hope that future Seattle 2035 materials will be translated to include non-English speaking residents in this important planning process.

Sincerely,

Jeanette Ordonez

Futurewise
Community Outreach and Education Coordinator

Denise Pérez Lally

El Centro de la Raza
Human Services Director

November 20, 2015

Re: Draft 2035 Comprehensive Plan Update

Dear Seattle Comprehensive Planners:

These comments reflect my experience involved in land use planning and action and project reviews, along with opinions of hundreds of Fremont (and Seattle) residents I have worked with and listened to for over 40 years.

1. Relationship to Other Actions

The 2035 Comprehensive Plan update process is separate from environmental impact review under SEPA. In my June comments on the Draft EIS for the Plan I suggested that the affected decision making processes should be more comprehensively described. For example, the Housing Affordability and Livability Agenda (HALA) committee finished its work in the Spring, but the impacts of its many recommendations were not assessed in the DEIS. Neither are the HALA's numerous specific proposals called out as included elements, or not, in the draft Plan.

The table at p. 16 of the draft Plan is a good template for listing decisions that will flow from or are closely related to the EIS for the updated plan. However, the Council has taken action already on the affordable housing element, a key component of the comprehensive plan. Council Resolution 31622 (October 5) adopted a Council work plan to implement many of the recommendations of the HALA advisory committee, including reference to adoption of fiscal measures on a short time frame.

Many of the proposals in the HALA recommendations and work plan, now incorporated into the Council's future agenda by actions taken, are admirable. Nevertheless, many are controversial. The review and adoption process of these 2035 Plan elements should be as transparent as possible by describing the policy and decision process. Simply putting the Council's work plan (attached to Resolution 31622) into the Plan (or it's final EIS) would be a good start.[1]

[1] It would also be appropriate for the City to complete the work indicated as needed in the DEIS: "The City is currently evaluating the impacts to affordable housing through the development of a needs assessment that will inform HALA's work." 2035 DEIS (May 2015), p. 3.6-33. Cf.: http://www.commerce.wa.gov/commissions/AffordableHousingAdvisoryBoard/Affordable-Housing-Needs-Study/Pages/default.aspx

2. Changes in Proposed Plan of Interest to Fremont

• Neighborhood planning has been largely eviscerated in the draft Plan. The lack of policies requiring a robust democratic decision making process including impacted communities of interest is unacceptable. Members and organizations of the Fremont community have engaged on these issues with the City far longer than I have lived here. This draft Plan is moving in the wrong direction, away from a welcoming of our community's engagement to improve our great city.

• Concurrency has yet to be done very well. After the Fremont Plan was incorporated into the City's comprehensive plan 20 years ago, some resources were allocated to address specific problems identified in a community focused planning process. However, after a few years the benefits of the urban village bargain became scarce. Instead of utilizing neighborhood planning to inform needed City actions and resource allocations, the Council abandoned the process, even after spending resources and a year on the Neighborhood Planning Advisory Committee.

The Council adopted amendments to the zoning code in 2010 made things worse for Fremont and other neighborhoods. We got the development facilitated by those amendments and a booming economy, both more commercial buildings and more housing. We are experiencing many adverse impacts from these rapid changes. Many of the new housing units are small, 500 square feet or less. And transit service (bus) has not keep up; many people have been underserved for years, often watching buses go by, or standing on the bus daily.

• Fremont is about half or less single family zoned (SF). While many residents of Fremont—including me—would like it to be easier to develop ADUs as is proposed in the draft Plan, that change should not be done without any accompanying neighborhood based planning to determine where up zones and related actions are most appropriate and necessary.

Thus, this goal from the existing Comprehensive Plan should be retained:

> LUG 10: Provide for different intensities of single family areas to reflect differences in the existing and desired character of single family areas across the city. Allow development that is generally consistent with the levels of infrastructure development and environmental conditions in each area. Include opportunities for low-cost subsidized housing in single-family areas.

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• City owned property that is no longer needed to provided City services should be held in reserve until it can be used for public benefits. Fremont is short on open space for parks, for p-patches, and for affordable housing. We have repeatedly watched as surplus City property has been sold and turned into market rate housing. Fremont wants more affordable housing, and these actions by the City are not helpful. The Plan should call for maintaining City ownership of these properties and seeking and implementing financing mechanisms to construct more such housing.

Thank you for the opportunity to comment. I hope you will take these and the many other comments you are sure to receive and craft a revised Plan for the Council that better reflects a consideration of all interested people who live in, work in, and visit Seattle.

Toby Thaler
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206 697-4043
fremont@louploup.net

25 YEARS futurewise
Building Communities & Protecting the Land

November 20, 2015

City of Seattle
Department of Planning & Development
700 5th Avenue, Suite 1900
PO Box 34019
Seattle, WA 98124
Sent via email to 2035@seattle.gov

RE: Comments on Seattle 2035 Comprehensive Plan Draft

To Whom It May Concern:

Thank you for the opportunity to comment on the Seattle 2035 Comprehensive Plan Draft. Working with City staff over the past several years, it is obvious that a tremendous amount of work and thoughtfulness has gone into the draft.

Futurewise is a non-profit organization that works throughout Washington State to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of life for present and future generations. We work with communities to implement effective land use planning and policies that prevent waste and stop sprawl, provide efficient transportation choices, create affordable housing and strong local businesses, and ensure healthy natural systems. We have supporters across Washington State, including the City of Seattle, and together we are creating a better quality of life in Washington State.

In 2014 and 2015, Futurewise and its partners conducted an extensive community engagement program throughout the city to ensure that the voices of Seattle residents are heard in the Comprehensive Planning process. The engagement included "SpeakOuts", surveys, workshops and focus groups for persons of color, residents with limited English proficiency, youth and other groups not normally reached through traditional outreach methods. The results of this engagement have been summarized and highlighted in the *City of Seattle Health and Equity Assessment* found at www.futurewise.org and were shared with City staff.

We would like to offer comments on the policies and goals related to eight priorities:

(1) Modify the growth strategy and associated land use to provide greater flexibility, more affordability and less displacement. How we plan to grow is one of the most important questions answered by the Comprehensive Plan. The Urban Village strategy set forth in 1994 has been largely successful in directing new residential units and jobs into villages and has allowed the City to target public investment efficiently. We support this strategy as a way to combine more intense land uses with transit and other amenities into compact, multimodal communities. However, the urban village strategy needs to be modified to provide an increased, more flexible supply of land for development which will produce a greater variety of housing types, increase affordability in the city and reduce the risk of displacement for low-income residents and businesses.

(2) Support housing affordability through aggressive, bold action. Housing affordability is a critical issue facing Seattle. We believe that a lack of affordable housing is increasingly becoming a threat to the economic vitality and environmental sustainability of our city and that all possible policies and resources should be used to address housing affordability. We support those goals and policies which are needed to implement the Housing Affordability and Livability Agenda (HALA) recommendations through increasing the number of

affordable and market-rate units, providing more resources for affordable housing, offering more support for communities and using innovation to meet our goals.

(3) Implement increased environmental protection, climate change adaptation and mitigation. The Pacific Northwest's extraordinary natural environment is one of its most important assets. We have an obligation to protect natural systems for ourselves and future generations. A key part of this is the reduction of greenhouse gas emissions as well as support for our communities to be resilient in the face of climate change impacts. To continue to reduce our impacts on air, water and natural habitats as we add 120,000 new residents and 115,000 new jobs, we will need to plan carefully, increase our public engagement (with the entire community), and implement innovative solutions in transportation, building codes and regulations, industry, utilities and community development.

(4) Employ land use, transportation and other city policies and investments to support health and well-being. Cities can improve health and well-being through access to opportunity, jobs, healthcare, social connections, healthy food access, positive attachment to place. However, cities can also negatively impact health due to air quality problems from transportation and industrial uses, threats to bodily safety from traffic collisions, and mental and emotional stress from noisier, more intrusive environments. Therefore, the City must use its policies and investments to mitigate these negative impacts by ensuring affordable, healthy food access, safe and efficient transportation, personal safety and protection from violence and crime, and by ensuring healthcare and healthy environments are affordable and accessible regardless of income, race, English proficiency, age, gender identity, sexual orientation or religion.

(5) Focus on equity and opportunity throughout the Plan. The City of Seattle has significant disparities by race, ethnicity, income and geography in many critical determinants of opportunity, including health, incomes, education, housing cost burden, homeownership and many other critical measures. The policies in the Plan can and should be focused on reducing these disparities in accordance with the City's Race and Social Justice Initiative (RSJI). Furthermore, the City should set specific, measurable goals for reducing disparities that can be tracked for progress on an annual basis.

(6) Articulate neighborhood livability and support. Neighborhoods, whether they are a dense urban village or single family areas, are the primary way that Seattle residents experience the city. Neighborhoods are extraordinarily important to people and they have a fierce sense of ownership and are protective of the characteristics which drew them there in the first place, whether it is affordability, cultural diversity, historic character, valued assets, natural amenities or connections to neighbors, businesses and institutions. We believe that the City can support neighborhood growth and change while protecting these elements of neighborhood livability by working with residents to identify their priorities, planning for change and using policies and investment to guide growth responsively and responsibly.

(7) Increase meaningful community engagement and partnership. The City has committed to broader participation by under-represented communities throughout this planning process. Holding open houses in multiple neighborhoods and at different times of day is an improvement on traditional engagement methods which can be exclusionary. We encourage the City to continue to expand their engagement activities which allow in-depth discussions about policies in accessible, relatable language in comfortable community spaces. Using community leaders and community-based organizations as trusted intermediaries should be utilized more fully and there should be more resources dedicated to translation and interpretation for non-English speakers. Clearly demonstrating how city decisions have been responsive to the engagement process is critical to building trust and demonstrating the value of engagement for stakeholders. These methods should not be limited to only the Comprehensive Plan, but broadly in all planning initiatives taken by the City.

(8) Emphasize quantifiable goals and commit resources to tracking progress towards these goals. The Plan sets forth a vision for a Seattle that is equitable, affordable and sustainable. However, without specific, actionable and quantifiable goals, we will be unable to determine if we are fulfilling this vision or not and we will be unable to change our programs and investments to better fulfill this vision. Where possible, the City should set specific goals and develop a process for tracking and reporting on progress in a timely and transparent manner.

These eight priorities are influenced by goals and policies found throughout the Plan. For simplicity and clarity, we have organized our comments by element to reflect the order of the Plan:

Growth Strategy Element

We support the continuation of the Urban Village strategy which has been successful in efficiently accommodating a significant portion of Seattle's growth in the past 20 years. We support the creation of urban villages which use dense land use in conjunction with complete multimodal transportation networks to create compact neighborhoods which support healthy active transportation choices, reduce the environmental impacts of growth and enhance community connectivity.

- Because the majority of our growth will go in urban villages, it is critical that villages accommodate our goals for affordable housing. Therefore, the number of affordable units created and demolished in each village should be tracked as part of policy **GS1.5** and **GS1.6**. This will enable the City to refine policies, programs and investments as needed to ensure that there are affordable units in each village.

- The Plan's policies should go further in explicitly stating the need for affordable housing in urban villages. This could occur in policies **GS2.6** (in addition to or rather than "broad cross-section") and **GS2.15** (which currently states "promote meaningful choice for marginalized populations to live and work in urban centers…") and **GS3.5**.

- We support policy **GS2.7** and encourage the City to specify "safe walking, biking, and public transportation" in accordance with the adopted Vision Zero policy.

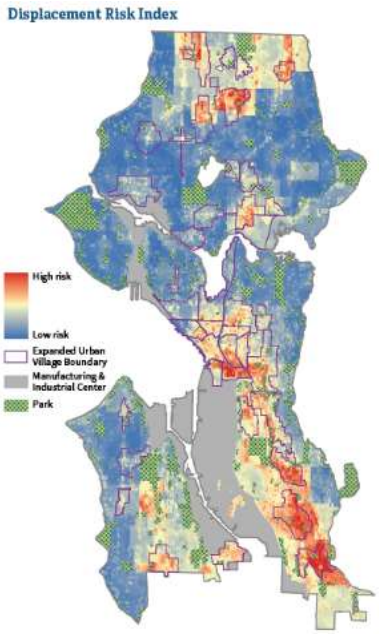
- We support policy **GS2.12** which will expand urban village boundaries and recommend that "a ten-minute walk of frequent light rail stations" be changed to "a ten-minute walk of frequent transit service" to be more flexible with regard to mode and more consistent with the HALA recommendations.

- We support policy **GS2.22**, which will allow limited multifamily commercial, and industrial uses outside of urban villages. Because increasing land supply for multifamily housing is a critical component of addressing our affordable housing crisis, we recommend that "promote housing supply, mix and affordability" be included as a condition for land use changes under this policy.

- We support goal **GSG5** and its associated policies identifying potential annexation areas and annexation policies. Annexing these areas would provide efficiencies in service delivery, improve level of service for residents and businesses, and lead to more cohesive land use and transportation integration with the adjacent city.

- While we support directing growth to urban villages, many of the existing urban villages are in areas with high displacement risk for marginalized populations, as noted in the City's *Growth and Equity Analysis*. This may result in a disproportionate burden of accommodating growth and redevelopment on those people are most vulnerable to displacement and who would most benefit from remaining in urban villages which have superior transit service, culturally appropriate institutions and other supportive amenities.

  For this reason, we support directing a larger proportion of growth into existing urban villages in "high opportunity/low displacement risk" areas as well as the creation of new urban villages in areas identified as "high opportunity/low displacement risk". Additionally, we support policies which protect both residents and businesses from displacement to mitigate this risk equitably and fairly, as noted in policy **GS2.9**.



Land Use Element

- We suggest that **LUG2** include "providing adequate supply to meet demand and growth targets" in the goals of the City's zoning and land use regulations.

- We support the policies which recognize disproportionate adverse impacts and aim to minimize and mitigate inequitable outcomes (**LU2.8**).

- We strongly support policy **LU5.17**, which recognizes that higher-density development will require additional conditions related to preservation, open space and affordable housing.

- We support policy **LU9.4**, which establish evaluation criteria for rezoning land to multifamily and recommend that "promote housing affordability" be included as a condition for land use changes under this policy.

- We support the policies which recognize the impact of land use on health and well-being, and that promote healthy residents and communities through noise control (**LU5.12** and **LU5.13**), air quality (**LU5.14**), food access (**LU5.18**), recreation space (**LU5.5**), as well as policies which encourage safe and convenient active transportation modes (**LU6.5**, **LU6.6** and **LU6.7**).

- We support policies which use land use regulations to protect the natural environment and support climate change mitigation and adaptation (**LU5.8**)

- While off-street parking can reduce the need for on-street parking which allows for mobility uses in the City's limited Right of Way (ROW), off-street parking reduces site capacity and increases the cost of construction, leading to more expensive housing and commercial costs. Currently, the Plan has goals and policies which both encourage off-street parking (**T2.3**) and ones which aim to minimize off-street parking (**LUG6** and related policies). The Plan should have better consistency related to parking, ideally focusing on the goal of reducing overall parking demand rather than accommodating parking demand at the expense of either mobility or affordability through policies such as **LU6.5**, **LU6.8**, **LU6.10** and **LU6.13**.

- We strongly support the use of development incentives to increase density and, in particular, provide housing options not met by the market (**LUG7**). We suggest that some examples of housing market deficiencies where

these incentives could be used be included in the Plan, particularly "affordable housing" and "family-sized housing".

- We strongly support policies which allow additional compatible housing types in single family neighborhoods (**LUG8**, **LU8.3**, **LU8.5**, **LU8.11** and **LU8.12**). We suggest that neighborhood character be promoted through consistent and compatible design standards like height, scale and bulk, but discourage the use of "single family" as a descriptor of character, such as in **LU8.2,** because it is inconsistent with other policies. We support the inclusion of housing choice as a consideration in changing the development standards in single-family areas (**LU8.12**).

- We support goal **LUG9**, and its policies, which sets forth a vision of multifamily zones which includes a variety of housing types and densities, mixed-incomes, and promotes walking and transit use.

- We suggest the inclusion of "minimizing or mitigating loss of tree canopy and vegetation" as a need to be considered in midrise and highrise areas in **LU9.14**.

- We support **LU10.1**, the prioritization of existing commercial/mixed use areas over the creation of new business districts, particularly in areas with established districts with locally-owned and neighborhood supporting businesses.

- We support the use of land use regulations that protect and encourage locally-owned, neighborhood serving businesses, such as **LU10.7** and **LU10.22**. These policies are particularly important in those areas identified as high displacement risk in the *Equity and Growth Analysis* where businesses that serve persons of color, immigrant and refugees, persons with limited English proficiency and other needs may be under significant displacement pressure due to rising rents or displacement of their customer base.

- We support the use of land use policies which improve the safety, accessibility and comfort of people walking, people on bikes and people taking transit (**LU10.7**. **LU10.9**, **LU10.11**, **LU10.16**, **LU10.18** and **LU10.20**).

- We support the protection and expansion of safe industrial land uses that support equitable employment opportunity in Seattle (**LU11.2, LU11.4, LU11.5, LU11.6, LU11.10**).

- While it is reasonable not to impede industrial land uses with unnecessary landscaping and streetscaping regulations for aesthetic purposes (**LU11.11**), there should be minimum utilitarian requirements which will support a healthy environment through stormwater management and vegetation to improve air quality and mitigate heat impacts of climate change.

- We support the use of overlay districts to achieve support transit communities and large master planned communities where appropriate (**LU13.2**, **LU13.3** and **LU13.4**).

- While recognizing the benefits of an expanded, mixed-use Stadium District, we have serious concerns about the impact this might have on the surrounding industrial lands and related businesses and jobs. Therefore, we recommend that **LU15.2** be modified from "minimize negative impacts on nearby activities" to "<u>avoid</u> negative impacts…" or "without impacting" and that the Plan include additional language about potential conflicts and a framework for prioritizing business-supporting industrial lands when conflicts arise.

- We support the use of historic and landmark designation to protect those sites, buildings and districts which contribute to the character of our city and provide a visible link to the shared history of our city, our neighborhoods and our people. (**LUG16**) We support the following comments from Historic Seattle:

- *Foster stewardship of neighborhood, place, and landscape as contributors to the city's viability and vitality*
- *Celebrate the diverse physical form and fabric of the city*
- *Promote the city's historic and cultural resources as an economic asset*
- *Promote the environmental benefits and opportunities of preserving and adaptively reusing historic buildings*
- *Encourage rehabilitation and adaptive use of buildings to conserve resources, reduce waste, and demonstrate stewardship of the built environment*
- *Promote seismic and energy efficiency retrofits of historic buildings to reduce carbon emissions, save money, and improve public safety*
- *Identify and establish alternative means to protect the historic character of neighborhoods selected as urban centers and villages*
- *Encourage adaptive use of historic community structures, such as meeting halls, schools, and religious buildings, for uses that continue their role as neighborhood anchors*

- While we appreciate that Goal **LUG17** includes the correct standard of protecting the functions and values of critical areas,[i] we encourage the expansion of the land use policies designed to protect the ecological functions and values of our environmentally critical areas. The development of wetlands and fish and wildlife habitat conservation areas will result in their destruction. We urge more specific language in **LU17.3** to reflect that "reasonable development" in environmentally critical areas may not only be destructive to the environment, but also may endanger human health and safety. So we recommend that **LU17.3** be modified to read as following, with our additions underlined and our deletions struck through: **LUG17** Protect the ~~ecological~~ functions and values of environmentally critical areas, including wetlands and fish and wildlife conservation areas; prevent erosion caused by development on steep slopes; and protect public health, safety and welfare in hazard-prone areas, including areas subject to landslides, liquefaction or floods, while allowing ~~permitting~~ development in areas subject to erosion, liquefaction, or floods where the safety of occupants can be assured~~that is reasonable in light of these constraints~~.

- Policy **LU17.1** does not address conservation of wetlands which are often, but not always, fish and wildlife habitats. So we recommend addition a new bullet "Conserve wetlands" to Policy LU17.

- Policy **LU17.3** should reflect the standard of no net loss of functions and values for critical areas.[ii] So we recommend that Policy LU17.3 reads as follows: "Allow adjustments of development standards in environmentally critical areas to ~~help~~ protect those places and their functions and values while enabling reasonable development."

- While we support Policy **LU17.5**, instability has many causes beyond development, including precipitation, ground water, geology, and slope.[iii] So we recommend that Policy LU17.5 should be modified to consider instability due to causes other than development. Natural slope failure can be as damaging, or even as deadly, as development induced slope failure. In addition, both relative and absolute risk should be considered. So we that Policy LU17.5 be modified to read as follows: "Identify landslide-prone areas by examining the geologic, hydrologic and topographic factors that contribute to landslides and regulate development to protect against future damage due to instability, including instability that might be created or exacerbated by development, including potential damage to public facilities. Consider the ~~relative~~ risk to life or property when reviewing development proposals for landslide-prone areas."

- We are concerned that Policy **LU17.6** maybe read as implying that construction on landslide-prone slopes is safe if properly engineered. The science shows this is not the case. For example, the USGS report *Shallow-Landslide Hazard Map of Seattle, Washington* states:

> Although most of the source areas for debris flows are located near the tops of slopes in the Seattle area, debris-flow sources are scattered among lower parts of the slopes as well. There are enough of these that a runout zone established below susceptible cells based on the mean or maximum runout length from this data set would cover most of the existing slopes. For this reason, we conclude that the runout data indicate that all areas of steep slopes forming bluffs of Puget Sound and along other bluffs in the Seattle area should be considered hazardous. Furthermore, where flat-lying areas exist in Seattle below steep slopes that are above water and can be occupied, a runout zone based on the mean (60.2 m) or maximum (235 m) runout length would provide a degree of protection for the runout areas of most of the existing slopes of concern.[iv]

So we recommend that Policy LU17.6 be modified to read as follows; "LU17.6 Avoid development on landslide-prone areas, landslide runout areas, and their buffers. Where scientific and engineering analysis shows construction may be safely allowed, r~~R~~equire engineering solutions for development on landslide-prone sites in order to prevent slides during high-stress periods and if there has been poor maintenance of the hillside.

- We strongly support policy **LU17.11** which seeks a "net gain in wetland function by enhancing and restoring wetland function across the city." Wetlands have many functions that benefit the community such as flood storage. This policy wisely encourages a net gain in these important functions.

Transportation Element

- We support **TG.1** and its policies, which recognize that transportation investments supporting land use policies are critical to the success of the Urban Village strategy and are needed to create compact, accessible and walkable neighborhoods while reducing dependence on personal automobiles. We support policy **T1.5** which recognizes that vulnerable and historically marginalized populations may have special transportation needs to be considered.

- We support accommodating multiple travel modes and placemaking functions in public right of way (**TG2**). This section should also acknowledge the need to use right-of-way to house landscaping and incorporate other design standards which support critical environmental and natural systems.

- We support the development of a decision-making framework (**T2.8**), which should include safety, mobility, access, greening and environmental uses, placemaking and activation as well as community and personal health.

- We support **TG3** and its policies which expand transportation options for those most in need (**T3.3**) and focuses on the expansion of interconnected, accessible bicycle, pedestrian and transit facilities.

- We support **TG4** and its policies which incorporate the recommendations from the Climate Action Plan and will help the City achieve its environmental and greenhouse gas reduction goals.

- Goal **TG6**, which addresses system safety, should acknowledge the need to improve personal safety around transit facilities (like light rail and bus stops) so that people are safe while waiting for or using transit, through methods like better design or through coordination with public safety departments.

- We support policy **T9.3**, which would establish an alternative, multimodal approach for Level of Service (LOS) standards which will be more useful in meeting the City's GHG emissions reduction targets.

Housing Element

- The City's housing element should include housing policies and goals which are consistent with and supportive of the Housing Affordability and Livability Agenda (HALA) strategies, particularly **H2.1**, **H2.3**, **H2.5**, **H2.7**, **H3.1**, **H3.5** and **HG5** and its policies.

- The policies under **HG1** should include testing, monitoring and enforcement of fair housing compliance for all protected classes in the City of Seattle to identify those groups which are still experiencing discrimination. It should also include coordinating with non-profit groups and quasi-governmental agencies to achieve fair housing goals through coordinated education and protection programs.

- We agree with policy **H2.6**, in which local communities should be part of the affordable housing conversation to ensure that programmatic and policy solutions are addressing their specific needs.

- We support the goal **HG3** and policies related to expanding the mix of housing found in Seattle through design standards, zoning, and land use policies to better meet the diverse needs of Seattle households.

- We suggest that goal **HG4** include a policy which considers providing assistance to low-income homeowners, landlords or building owners/managers for renovations and upgrades to improve energy efficiency of housing units. We suggest the City explore innovative financing techniques and improved incentives to encourage and support the use of innovative, sustainable building methods.

Capital Facilities Element

- We appreciate the commitment to using the development and management of capital facilities in an equitable way which incorporates the environmental, economic, social and health benefits of capital facilities (**CFG1**), in particular the structuring of user fees to mitigate cost burdens for low-income households (**CF1.7**), supporting job creation and training (**CF1.8**), locating new capital facilities to support equitable distribution of services for underrepresented communities (**CF3.2**) and encouraging accessibility of capital facilities for people of all abilities, socioeconomic backgrounds, ages and cultures. (**CF4.1**)

- We support the inclusion of capital facilities as a part of the City's strategies in restoring the natural environment and preparing for the impacts of climate change through a commitment to resilient capital facilities (**CF1.6**), improved resource conservation (**CF2.2**, **CF2.3**) and in the design and construction of new capital facilities (**CFG4**) .

- In addition to considering climate conditions (such as flooding) during facilities siting, we recommend that the City also take into consideration the need for capital facilities to provide a resource for communities during adverse impacts (**CF3.6**) as part of siting, design and construction of facilities.

- We recommend that the City include a policy which states that it will develop specific goals and metrics to monitor the progress towards the equitable distribution of capital facilities through the Race and Social Justice Initiative.

Utilities Element

- We support the commitment to using the utilities services to further environmental stewardship, race and social equity, economic opportunity and the protection of public health (**UG1**).

- We support embedding equitable access into decision making criteria (**U1.1**). We support the policy to discourage siting and design alternatives that may increase negative impacts, particularly on communities which already bear a disproportionate amount of these impacts (**U3.2**).

- We support the incorporation of climate change considerations in the development of a resilient utility system (**U1.3**). We encourage the inclusion of a policy which recognizes that the City's utility system will not only be responding to climate change, but can play an important role in the achievement of the City's climate change mitigation through policies, particularly related to conservation as included under goal **UG2**.

Economic Development Element

- We support the policy to strengthen neighborhood districts (**ED1.2**), particularly those neighborhood business districts identified as areas with high displacement risk in the *Equity and Growth Analysis*.

- We support the prioritization of assistance to commercial districts in areas of lower economic opportunity (**ED1.3**) and encourage that assistance to be community-driven and culturally-competent.

- We support the policy to increase job training, internship and placement to overcome high barriers to employment and achieve greater racial and social inclusion in the workforce (**ED4.2**). This policy should also include programs to educate and work with businesses to understand how they can improve their hiring and retention of more diverse employees, women, and other groups which face higher barriers to employment.

- We support the goal of strengthening the entrepreneurial environment for start-ups and small businesses (**EDG5**) and encourage the inclusion of a policy which recognizes the particular need for entrepreneurial support for businesses owned by persons of color, immigrants and non-native English speakers.

Environment Element

- The Plan's Environment Element should include policies and goals which are consistent with and supportive of the strategies and outcomes outlined in the Seattle Climate Action Plan, particularly **EG3, and policies E3.1 through E3.7**. Climate change, as well as the city's adaptation and mitigation measures, will have disparate impacts on certain populations, particularly low-income households, persons of color, transit-dependent households, recent immigrants or non-English speaking residents, the elderly and persons living in more vulnerable neighborhoods. The City should study and address these disparate impact with responsive, equitable mitigation actions.

- We support the goal of fostering healthy trees, vegetation and soils to promote both environmental and human health (**EG1**) and suggest including a policy recognizing that there will need to be diverse strategies to achieve these goals which are responsive to different land use patterns and that our high density areas can and should support this goal.

- The need to protect waterways and healthy fish and wildlife should include a policy of respecting the needs of subsistence and cultural fishing within the City.

- Pedestrian-friendly neighborhoods as outlined in **E3.2** to reduce emissions are critical to Seattle's emissions reduction strategy, and therefore the Comprehensive Plan should change the language from "aspire" to "will."

- We strongly support the goal in **E3.3** to implement these policies "while employing strategies which mitigate impacts on low income residents," though we would advise broadening to "low income residents and other impacted communities."

- Sea level is rising and floods and erosion are increasing. In 2012 the National Research Council concluded that global sea level had risen by about seven inches in the 20th Century and would likely rise by 24.3 inches in Seattle by 2100.[v] The general extent of the two feet of sea level rise currently projected for coast can be seen on the NOAA Coastal Services Center Sea Level Rise and Coastal Flooding Impacts Viewer available at: http://coast.noaa.gov/digitalcoast/tools/slr/

  The Washington State Department of Ecology (Ecology) writes that "[s]ea level rise and storm surge[s] will increase the frequency and severity of flooding, erosion, and seawater intrusion—thus increasing risks to vulnerable communities, infrastructure, and coastal ecosystems."[vi] Not only our marine shorelines will be impacted, as Ecology writes "[m]ore frequent extreme storms are likely to cause river and coastal flooding, leading to increased injuries and loss of life."[vii]

  A recent peer reviewed scientific study ranked Washington State 14th in terms of the number of people living on land less than one meter above local Mean High Water compared to the 23 contiguous coastal states and the District of Columbia.[viii] This amounted to an estimated 18,269 people in 2010.[ix] One meter, 3.28 feet, is well within the projected sea level rise estimates of three to four feet or more for the end of this century.[x]

  Sea level rise will have an impact beyond rising seas, floods, and storm surges. The National Research Council wrote that:

  > Rising sea levels and increasing wave heights will exacerbate coastal erosion and shoreline retreat in all geomorphic environments along the west coast. Projections of future cliff and bluff retreat are limited by sparse data in Oregon and Washington and by a high degree of geomorphic variability along the coast. Projections using only historic rates of cliff erosion predict 10–30 meters [33 to 98 feet] or more of retreat along the west coast by 2100. An increase in the rate of sea-level rise combined with larger waves could significantly increase these rates. Future retreat of beaches will depend on the rate of sea-level rise and, to a lesser extent, the amount of sediment input and loss.[xi]

  A recent paper estimated that "[a]nalysis with a simple bluff erosion model suggests that predicted rates of sea-level rise have the potential to increase bluff erosion rates by up to 0.1 m/yr [meter a year] by the year 2050."[xii] This translates to four additional inches of bluff erosion a year.

  Homes built today are likely to be in use 2100. And new lots created today will be in use in 2100. This is why the Washington State Department of Ecology recommends "[l]imiting new development in highly vulnerable areas."[xiii] So we recommend that new lots and new buildings be located outside the area of likely sea level rise. So we recommend that the following new policies be added to page 127:

  E4.3 New lots shall be designated and located so that the buildable area is outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands will likely migrate during that time.

E4.4 Where lots are large enough, new structures and buildings shall be located so that they are outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands will likely migrate during that time.

Parks and Open Space Element

- We support innovative strategies to better expand public and green space in right of way, private development, shorelines, smaller acquisitions and uses, and schools or other public agencies (**PG1**). However, we believe that keeping a quantifiable goal for parks and open space, defined as total open space, open space per person, or resident proximity, is necessary to ensure that we prioritize expanding greenspace and openspace, which is a critical component of health and livability in the city.

- We suggest adding more ways to increase access to parks and greenspace beyond acquisition. In addition to considering multimodal access (**P1.12**), access can be improved through better maintenance of existing facilities, improved safety and neighborhood connectivity, and facilities or programs which are culturally or age-appropriate to reflect the surrounding community.

- We support and appreciate the thoughtful consideration of the needs of many users reflected in the policies under goal **PG2**, in particular the emphasis on parks and recreation to support healthy living for diverse populations, various age groups, persons with disabilities and families.

- Policy **P2.9** should include a specific reference to non-English speaking populations because language isolation is a significant contributor to mental and emotional stress and is a significant barrier to accessibility of parks and recreational facilities for many residents. We suggest the inclusion of a policy similar to **CF1.7** regarding the structuring of user fees to mitigate cost burdens for low-income households.

Community Well-Being Element

- We support the Plan's emphasis on encouraging broad participation in neighborhood and community activities and events(**CW.1**).

- We strongly support partnering with community organizations and institutions to involve people of all backgrounds in planning and decision making (**CW1.4**).

- Many populations have specific barriers to heath care, including limited physical access, fear of government institutions, language isolation and cultural taboos surrounding mental health and addiction. Policy **CW3.3** should include language that articulates these barriers and recognizes that targeted, culturally competent strategies will need to be employed to achieve equitable health outcomes.

- We support policy **CW3.5** and **CW3.6**, which recognizes that healthy food needs to be accessible, affordable and culturally appropriate.

- We support Goal **CWG4** and its policies. Policy **CW4.8** should include language which indicates special support for families of English language learners that empower parental involvement.

- We support CWG5 and the public safety policies. We suggest an additional policy which reads:

  CW5.15 Coordinate with SDOT, Metro and other transit agencies to address crime and personal safety for transit riders.

- We support Goal **CWG6** and its policies to provide equitable opportunity and access to services for all Seattle residents. The City should include a policy which indicates a commitment to measuring and tracking equitable opportunity and access through a variety of metrics that can be used to guide programs and investments to create more equitable outcomes.

Neighborhood Planning

- As the city grows and changes, neighborhood planning will be critical. Neighborhood planning can be resource intensive and we support the approach to prioritization in **NP1.1** and through broader, more meaningful engagement with under-represented groups, as discussed in **NP1.2**.

Again, we appreciate the opportunity to provide comment on the Plan. We look forward to the release of the Mayor's Recommended Plan in 2016.

Sincerely,

Amy Gore
Sustainable Communities Director

[i] *Whidbey Envtl. Action Network v. Island Cty.*, 122 Wn. App. 156, 174 – 75, 93 P.3d 885, 894 (2004) "the GMA requires that the regulations for critical areas must protect the 'functions and values' of those designated areas. This means all functions and values." Footnotes omitted.
[ii] *Whidbey Envtl. Action Network v. Island Cty.*, 122 Wn. App. 156, 174 – 75, 93 P.3d 885, 894 (2004).
[iii] Dianne L. Brien and Mark E. Reid, *Modeling 3-D Slope Stability of Coastal Bluffs, Using 3-D Ground-Water Flow, Southwestern Seattle, Washington* p. 6, pp. 39 – 46 (U.S. Geological Survey Scientific Investigations Report 2007-5092: 2007) accessed on Nov. 19, 2015 at: http://pubs.usgs.gov/sir/2007/5092/
[iv] Edwin L. Harp, John A. Michael, and William T. Laprade, *Shallow-Landslide Hazard Map of Seattle, Washington* p. 17 (U.S. Geological Survey Open-File Report 2006–1139: 2006) accessed on Nov. 19, 2015 at: http://pubs.usgs.gov/of/2006/1139/
[v] National Research Council, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* p. 23, p. 96, p. 102, p. 156 (2012) accessed on Nov. 11, 2015 at: http://www.nap.edu/catalog.php?record_id=13389
[vi] State of Washington Department of Ecology, *Preparing for a Changing Climate Washington State's Integrated Climate Response Strategy* p. 90 (Publication No. 12-01-004: April 2012) accessed on Feb. 17, 2015 at: http://www.ecy.wa.gov/climatechange/ipa_responsestrategy.htm
[vii] Washington State Department of Ecology, *Preparing for a Changing Climate: Washington State's Integrated Climate Response Strategy* p. 17 (Publication No. 12-01-004: April 2012).
[viii] Benjamin H Strauss, Remik Ziemlinski, Jeremy L Weiss, and Jonathan T Overpeck, *Tidally adjusted estimates of topographic vulnerability to sea level rise and flooding for the contiguous United States* 7 ENVIRON. RES. LETT. 014033, 4 (2012). Accessed on Nov. 19, 2015 at: http://iopscience.iop.org/1748-9326/7/1/014033/article This journal is peer reviewed. Environmental Research Letters "Submission requirements" webpage accessed on Nov. 19, 2015 at: http://iopscience.iop.org/1748-9326/page/Submission%20requirements
[ix] *Id.*
[x] Washington State Department of Ecology, *Preparing for a Changing Climate: Washington State's Integrated Climate Response Strategy* p. 82 (Publication No. 12-01-004: April 2012). The National Science Foundation projected the high of the range for Seattle at 4.69 feet. National Research Council, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* p. 96 (2012).
[xi] National Research Council, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* p. 135 (2012).
[xii] George M. Kaminsky, Heather M. Baron, Amanda Hacking, Diana McCandless, David S. Parks, *Mapping and Monitoring Bluff Erosion with Boat-based LIDAR and the Development of a Sediment Budget and Erosion Model for the Elwha and Dungeness Littoral Cells, Clallam County, Washington* p. 3 accessed on Nov. 19, 2015 at: http://www.coastalwatershedinstitute.org/Final%20Report_Clallam%20County%20Bluffs%202014_Final%20revised.pdf.
[xiii] State of Washington Department of Ecology, *Preparing for a Changing Climate Washington State's Integrated Climate Response Strategy* p. 90 (Publication No. 12-01-004: April 2012).

GEORGETOWN
• COMMUNITY COUNCIL •
PO Box 80021, Seattle, WA 98108

November 20, 2015

Hon. Edward Murray
Seattle City Hall
600 4th Ave. 7th floor
Seattle, WA 98104

Dear Mayor Murray:

We're writing to once again express our great concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's industrial land.

As residents who live in a sea of industry, any change in industrial zoning affects our quality of life. In addition to the concerns we shared with you in our June 18, 2015 letter, we'd like to address the core values of the Comprehensive Plan and how they relate to our neighborhood.

Community - *developing strong connections between a diverse range of people and places*. Georgetown is a neighborhood that is home to a diverse community of people and businesses. The broad stroke, one-size-fits-all approach to industrial lands fails to take into account the aspects that make our neighborhood unique. The residential community was shut-out of the stakeholder process for the industrial land study that helped shape the staff recommendations for the Comp Plan. As a result, this perspective is not represented in the current comp plan amendments.

Environmental Stewardship - p*rotect and improve the quality of our global and local natural environment.* Improving our environmental surroundings has been a priority for years. We combat air, water and noise pollution every day. The Comp Plan provides us an opportunity to have different conversation about environments, to re-examine our green policies and the ban of open space in our industrial areas. Let's revisit urban canopy goals. Georgetown has the smallest canopy and the most need, yet current city policies prevent us from making noticeable increases. Include 1:1 tree replacement and require landscaping requirements for all businesses, even industry.

Economic Opportunity and Security - *a strong economy and a pathway to employment is fundamental to maintaining our quality of life.* We support a strong economy, and living wage jobs. However, profits to industry should not come at the expense of quality of life for residents and workers. Georgetown is an excellent example of a mixed-use community. We have an opportunity to be a national model. However, the success of the relationship between industry and residents depends on a stakeholder process that involves a broad range of voices.

Social Equity - *limited resources and opportunities must be shared; and the inclusion of under-represented communities in decision-making processes is necessary.* Clean air and water should be a right no matter where you can afford to make your home. Residents of Georgetown have a life expectancy that is 10 years shorter than our neighbors just two miles away. Industrial Commercial (IC)

zoning provides opportunity to create meaningful buffers between industry and residents. Eliminating this designation, as proposed in the current draft Comp Plan, would preclude future land uses in Seattle's industrial border areas and thus eliminate flexibility in providing means to address health disparity and social equity issues.

We ask that you consider the long term affect the Comp Plan will have on the health and vitality of our community. We ask that you not trade the character of our neighborhood in exchange for an arena in SODO. And finally, we ask that you consider excluding all of Georgetown from the proposed industrial comp plan amendments.

Sincerely,

The Georgetown Community Council Board of Directors

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Bruce Harrell, Seattle City Councilmember
Mike O'Brien, Seattle City Councilmember
Sally Bagshaw, Seattle City Councilmember
Tim Burgess, Seattle City Councilmember
Kshama Sawant, Seattle City Councilmember
Sara Belz, Senior Policy Advisor, Office of the Mayor
Steve Lee, Senior Policy Advisor, Office of the Mayor

GROUNDSWELL NW
Creating Community Parks & Habitat

11.20.2015

addressees: Seattle DPD, Seattle Planning Commission, Seattle Parks and Recreation

Re: Comments for 2035 Seattle Draft Comprehensive Plan

Dear: Seattle 2035 Planning Team

I am writing to you on behalf of Groundswell NW in reference to and in support of the Parks and Open Space Element of the Seattle 2035 Draft Comprehensive Plan. We are encouraged to see the introduction of a standalone Parks and Open Space element in this draft plan which demonstrates that Seattle values the importance parks, open space and habitat plays in the health and well being of a thriving city.

Upon review of the Parks and Open Space Element, we believe that overall goals and policies presented meet the goals and mission of the NW Seattle community which Groundswell NW represents, and we request that you take into consideration the following recommendations and revisions in order to make this document stronger.

1. P1.1 – *"Continue to expand the City's park holdings, with special emphasis on serving urban centers and urban villages and areas that have been traditionally under-served."* We recommend including language that reduces the 10,000 sq. ft. threshold for purchasing park property in order to better serve the limited space available for parks and open space within the Urban Villages and in other fully developed neighborhoods.

2. P1.2 – *"Identify goals for the City's future open space system that are realistic about the quantity of land that could be acquired, consider land managed by other agencies, and that drive improvements in the quality and usability**, as well as quantity,** of those spaces."* While it is important to be realistic about open space acquisition, the Comprehensive Plan should also be an aspirational document, and in many areas there is still a need to acquire new open space.

3. P1.5 *"Provide natural areas to preserve important natural or ecological features in public ownership and allow people access to these spaces **to the degree consistent with habitat objectives**."*

4. P1.6 *"Provide public access **and, where possible, habitat enhancement**, to shorelines by using street ends, regulation, or acquisition."* We would like to see some language about working with neighborhoods and owners to add public access to currently private waterfront/shoreline where appropriate.

5. P1.7 – *"Encourage or require private developers to incorporate on-site publicly accessible open space or* ***contribute financially to new or enhanced local parks, and*** *to provide appropriate recreation opportunities for building tenants within new developments."* It is important for new development to contribute to public open space as well as provide private recreation space. This policy should also include language that open space should be beautiful and sustainable. We encourage you to not provide developers the opportunity to provide private-only open space. This approach is not welcoming to the surrounding community and encourages the continuation of zero lot line development with minimal landscaping along the edges of the property that is incompatible with the neighborhood character.

6. P1.8 – *"Use cooperative agreements with the Seattle School District and other public agencies to provide access* ***during non-school hours*** *to open spaces they control."*

7. We would like to see some language about expanding partnerships among open space agencies, transit agencies, private sector and nonprofit institutions to acquire, develop and/or manage existing open spaces.

8. We would like to see language that addresses the consideration of equity in the location, development and acquisition of open space to help in the reduction of health disparities and in the promotion of social and environmental justice.

9. We encourage the city to be more specific in setting goals for public open space accessibility, e.g., *"In order to meet increased population needs, all users should be able to access public open space within a 10 minute walk without obstacles (e.g. geography, arterial crossings, etc.)."*

10. Consider adding a new policy under Goal 3 – *"Engage the community in volunteer maintenance and stewardship of parks and natural areas to stretch maintenance resources and expand neighborhood "ownership" of parks properties and facilities."*

11. Consider adding a new goal or new policy under Goal 1 to, *"Facilitate the development of community-initiated or supported open space.s"* This is something Parks does today and should be made more visible.

In closing, we appreciate the opportunity to provide comments on the draft comprehensive plan. Please contact me if you would like any further clarifications. In addition, we understand that a more detailed Parks Development Plan will be written in 2016 in order to implement the polices from this draft plan. We ask that Groundswell NW have the opportunity to participate in the development of this plan.

Sincerely,

Dawn Hemminger
Board President, Groundswell NW
groundswellnw@gmail.com | 206-953-3940

On behalf of fellow Groundswell NW Board Members
Dave Boyd, Renee Dagseth, David Folweiler, Dennis Galvin, Frana Milan, Jan Satterthwaite

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Educate Advocate Preserve

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October 30, 2015

Diane Sugimura
Director
City of Seattle Department of Planning and Development
700 Fifth Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019
Via e-mail

Re: Recommendations on Proposed Comprehensive Plan Amendments

Dear Ms Sugimura,

Thank you for the opportunity to comment on the **Seattle 2035** Comprehensive Plan Draft, specifically the proposed Arts & Culture Element where the Historic Preservation component now resides. Historic Seattle is the only citywide nonprofit dedicated to protecting Seattle's unique character through our efforts to *educate*, *advocate*, and *preserve*.

The intent of the Comprehensive Plan is to meet the requirements of Washington Growth Management Act and set forth a 20-year vision for the city's growth. It should provide a bold vision that aligns with the plan's four core values – race and social equity, environmental stewardship, economic opportunity, and community – and guides the development of goals and policies. Historic Seattle has strong concerns that historic preservation is not prominently featured throughout the Draft Plan. The re-use and rehabilitation of historic buildings is a key component of each of the Plan's four core values.

In our current economic boom, we are witnessing the demolition of our historic buildings at an alarming rate. Each time a historic building is demolished, Seattle loses an irreplaceable piece of its unique character. The Draft Plan highlights critical core values vital to our City yet does not acknowledge the role historic buildings play in these values. These core values cannot be achieved without the preservation of Seattle's historic buildings.

Why does historic preservation matter?

- **Our older buildings play a vital role in defining Seattle's sense of place and the character of its neighborhoods.** Since the city adopted its landmark preservation ordinance in 1973, it has established 8 historic districts and designated more than 450 individual sites, buildings, structures, and objects. The city's Historic Resources Survey, last updated in 2000, includes over 5,000 properties. These places contribute to Seattle's identity and quality of life, create a distinctive sense of place, and serve as tangible reminders of where we came from. If we continue to tear down old buildings, the city will lose its authenticity and what makes it a great city. It will become anonymous, without its historic compass.

- **Reinvesting in historic properties sparks economic revitalization.** Preservation and adaptive use projects provide important economic benefits to the community by stimulating neighborhood revitalization, creating local jobs, and attracting local businesses.

- **Historic preservation is sustainable development.** Reusing and rehabilitating a historic building is more socially, economically, and environmentally sustainable than demolition and new construction. Building reuse almost always offers environmental savings over demolition and new construction. The city should demonstrate its leadership role and embrace the adage, "The greenest building is one that is already built." Historic buildings enhance community character and preserve affordable housing. The Preservation Green Lab's *Older, Smaller, Better* report demonstrates that neighborhoods with a "fine-grained mix of old and new buildings" were more economically, socially, and culturally vital than areas with mostly newer, larger buildings. Additionally, these neighborhoods already have density between 30 and 100 residential units per acre.

Historic preservation goals and policies do not exist in a vacuum. Preservation encompasses all of the plan's core values and should be balanced with other goals and policies. The 159-page draft plan references the term "historic preservation" in various sections (LU5.17, LU7.2, LU14.15, LU15.5, H4.9, and ED1.4) and "Historic District and Landmarks" are referenced on page 67 under the Land Use Element (LUG16, LU16.1-LU16.4). However, historic preservation is not treated as an important and broad priority shaping a sustainable and livable city.

One of the biggest challenges will be finding strategies to accommodate anticipated growth, while also preserving historic buildings and respecting neighborhood character. Areas slated for high-density development must strike a balance between historic preservation goals and other policy objectives. Tools must be developed to manage this change.

What is proposed is a weak Historic Preservation component (ACG5) within the new Arts & Culture Element having little relevance to the rest of the plan's goals and policies. The proposed policies do not convey a robust historic preservation program.

What are the specifics of Historic Seattle's position?

The attached memo provides our comments and recommendations to better integrate historic preservation into the new Comp Plan by:

- ***Expanding the Historic Preservation goals***
- ***Strengthening the Historic Preservation policies***
- ***Strengthening and expanding the proposed survey/inventory policy***
- ***Connecting the Historic Preservation component with other Comp Plan elements***

The city's most vibrant urban neighborhoods are those with a high concentration of historic buildings and mixed-scale development. The city needs to invest in its future by balancing new growth with the existing building fabric. The Comp Plan should value stewardship of historic properties as an important priority along with clean water, natural resources, open space, environmental stewardship, and social equity.

As we continue to grow, the city will face design and development challenges, as well as opportunities. Seattle 2035 should lay out a path that leverages our historic and cultural resources in achieving healthy, complete communities. If historic preservation continues to be marginalized within the Draft Plan, Historic Seattle fears that our city will lose all the qualities that make it a desirable place to live, work and play.

Thank you for your consideration.

Sincerely,

Kji Kelly
Executive Director

Recommendations for the Historic Preservation Component

Seattle 2035 Comprehensive Plan

Historic Seattle offers the following recommendations to promote preservation and enhance planning, regulations, and incentive tools:

EXPAND THE HISTORIC PRESERVATION GOALS

The Draft Comp Plan distills the Historic Preservation component down to one goal (page 140): *ACG5 – Preserve assets of historic, architectural, archeological or social significance*. Seattle Municipal Code (Chapter 25.12 – Landmark Preservation) states "the economic, cultural and aesthetic standing of this city cannot be maintained or enhanced by disregarding the heritage of the City and by allowing the unnecessary destruction or defacement of such cultural assets."

The Historic Preservation component should establish a long-range vision for how historic and cultural resources will be used in the future. Other goals to consider include:

- Foster stewardship of neighborhood, place, and landscape as contributors to the city's viability and vitality
- Promote a broad, comprehensive definition and awareness of historic preservation
- Celebrate the diverse physical form and fabric of the city
- Promote the city's historic and cultural resources as an economic asset
- Promote the environmental benefits and opportunities of preserving and adaptively reusing historic buildings
- Prioritize preservation and rehabilitation opportunities as a strategy and planning tool in Seattle's land use regulations

STRENGTHEN THE HISTORIC PRESERVATION POLICIES

The draft plan outlines six policies related to historic preservation and cultural resources. The language found within the Draft Comp Plan is weaker than the existing plan and three of the policies (CR12, CR14 and CR15) have been removed. Other policies to consider include:

- Identify and establish alternative means to protect the historic character of neighborhoods selected as urban centers and villages
- Protect the scale and character of the established urban fabric, while encouraging compatible and context-sensitive infill development

- Encourage rehabilitation and adaptive use of buildings to conserve resources, reduce waste, and demonstrate stewardship of the built environment

- Promote seismic and energy efficiency retrofits of historic buildings to reduce carbon emissions, save money, and improve public safety

- Identify historic resources that can be successfully used to meet the city's housing goals

- Encourage the creation of ecodistricts to achieve sustainability and resource efficiency at a district scale

- Develop planning tools to conserve and protect older neighborhoods that have a unique scale and identity, but are not currently protected

- Encourage adaptive use of historic community structures, such as meeting halls, schools, and religious buildings, for uses that continue their role as neighborhood anchors

- Mitigate impacts of new development on historic properties

- Identify, preserve, and protect archeological resources

STRENGTHEN AND EXPAND THE PROPOSED SURVEY/INVENTORY POLICY

The survey and inventory policy (AC5.3) should prioritize and expand future inventory efforts that:

- Focus on areas of anticipated growth as part of future planning projects

- Encourage preservation in areas that are currently under-represented

- Maintain and conduct periodic updates to the city's Historic Resources Survey identifying potentially significant resources

Additionally, these efforts should go beyond the baseline inventory and take a more proactive approach to nominate and designate individual properties and historic districts.

CONNECT HISTORIC PRESERVATION WITH OTHER COMP PLAN ELEMENTS

Historic preservation is integral to all four of the plan's core values and should be referenced throughout the Plan's goals and policies:

- **Land Use** – encourage building and site designs that respect the unique built natural, historic, and cultural characteristics of Seattle's neighborhoods. A study by the Preservation Green Lab, *Older, Smaller, Better*, documents how the character of buildings and blocks – their human scale, structural rhythm, massing and aesthetic balance – contribute to the urban vitality of a neighborhood. The Comp Plan should use this to inform land use policies and encourage context-sensitive development that fills in gaps within the established urban fabric.

- **Housing and Economic Development** – include adaptive use projects as part of the solution for providing quality, affordable housing options. Rehabilitation of existing housing units and other building types (i.e., former schools, warehouses, etc) provides residents with choices and contributes to a variety of housing options.

  Rehabilitation of historic buildings is pivotal to responsible neighborhood development. Projects benefit both small entrepreneurs and larger developers taking advantage of tax incentives. The PGL's

Older, Smaller, Better report provides clear and powerful data that these older buildings draw a higher percentage of local businesses than new construction.

- **Environmental Stewardship** – the city should demonstrate its leadership by developing a strong policy that encourages stewardship of existing buildings as part of its sustainability goals. The policy for establishing energy-efficient standards (Policy E15.6) places emphasis on high-performance new buildings as a means of reducing the greenhouse gas emissions.

  As the adage goes, "The greenest building is one that is already built." Building reuse offers environmental savings over demolition and new construction. It saves on landfill space and energy expended in recycling materials from demolition, not to mention the building's embodied energy. Life spans for new buildings are often 30-40 years vs. more than 100 years for most historic structures.

- **Neighborhood Planning**– older buildings play a vital role in defining Seattle's sense of place and the character of its neighborhoods. Updates to the citywide neighborhood planning policies should take into consideration a neighborhood's distinctive physical characteristics including building scale, massing, materials, etc.

HOUSING
DEVELOPMENT
consortium

November 3, 2015

City of Seattle
Department of Planning & Development
700 5th Avenue, Suite 1900
PO Box 34019
Seattle, WA 98124

RE: Housing Development Consortium (HDC) Comments on the Seattle Comprehensive Plan Housing Element Update

To Whom It May Concern:

Thank you for the opportunity to comment on the City's Comprehensive Plan Housing Element update. HDC greatly appreciates the impressive work that has gone into updating the Housing Element and strongly supports the City's efforts to plan for affordable housing.

HDC is a coalition of more than 100 nonprofit organizations, private companies, and public partners committed to the vision that all people should have the opportunity to live in safe, healthy, affordable homes in communities of opportunity. In setting forward the pattern of residential and commercial growth over the next 20 years, the Comprehensive Plan plays a tremendous role in determining whether Seattle residents of all incomes can find affordable homes near work, school, transit, and other important services. Therefore, it is vital that the Housing Element includes strong, specific policy statements outlining the City's commitment to creating, preserving, and monitoring affordable housing opportunities.

Specifically, HDC encourages you to consider the following comments as you work to finalize the Housing Element.

Equal Access To Housing

HDC strongly supports efforts to ensure all people have fair and equal access to housing. The City should promote strategies that increase access and remove barriers to stable housing, including policies that ban discrimination based on

HDC's Affordable Housing Members:

- Low-income Housing Organizations
- Community Development Corporations
- Special Needs Housing Organizations
- Public Housing Authorities
- Community Action Agencies
- Workforce Housing Organizations
- Public Development Authorities
- Government Agencies and Commissions
- Architects and Designers
- Development Specialists
- Certified Public Accountants
- Regional Funders and Lenders
- National Funders and Lenders
- Community Investment Specialists
- Property Managers
- Law Firms
- Contractors

Affording Opportunity

1402 Third Avenue, Suite 1230 Seattle, Washington 98101
206.682.9541 Fax 206.623.4669 www.housingconsortium.org

source of income or criminal history. The City should also continue its leadership in promoting a "Housing First" approach to homelessness. We recommend adding more detail to **H1.5** to outline the City's commitment to specific policies and models that will increase equal access to housing.

Supply of Housing

Increasing Seattle's overall housing supply will help meet growing demand and can help slow the increase in housing prices. In some cases, however, new development replaces housing that was more affordable to low and moderate wage Seattle residents. In working to increase the supply of housing overall, the City should promote policies that limit displacement and encourage a net increase in affordable homes over time. Housing intended to replace units demolished or converted to different or higher-end uses should be affordable and available to low-income families.

Diversity of Housing; Housing Construction & Design

Planning for a diversity of housing types is important for meeting the needs and preferences of different household sizes, income levels, and populations. We strongly support efforts to facilitate the construction of affordable housing through increased efficiencies in design review, which we urge the City to reflect in **H3.2**. Additionally, as more moderate income families struggle to find housing that is both affordable and of an appropriate size, we support the City's continuing efforts to encourage the development of affordable, family-sized homes in close proximity to parks, schools, transit, and educational opportunities, consistent with **H3.4**. HDC supports efforts to allow flexibility and innovation in construction and design, particularly as it pertains to increasing attractive and affordable housing options for extremely low-to middle-income households. It is critical that the City continues efforts to promote the health and safety of housing, as reflected in **H4.1**.

Housing Affordability

Like all cities in King County, Seattle is required to plan for the housing needs of households across the income spectrum, including those with incomes below 80% of Area Median Income (AMI). The Countywide Planning Policies (CPPs) set guidelines for the percentage of housing that should be affordable to those with moderate, low, and very-low incomes, including those with special needs. The CPPs also recognize that the greatest need exists for households with incomes below 30% AMI and that addressing this need will require funding, policies, and collaborative actions by all jurisdictions working individually and collectively. Seattle's Housing Element should make mention of the CPPs and Seattle's responsibility to plan for its share of affordable housing.

❖ Monitoring

Recently, Mayor Ed Murray, in consultation with the Seattle City Council, set a goal to create 20,000 income-restricted units over the next decade. Meeting this goal will require the implementation of a number of new strategies and an increased commitment to existing tools that we know are working, such as the Seattle Housing Levy. With this new commitment—and with a monitoring requirement coming from the CPPs—we suggest adding a policy to the Housing Element which will require the monitoring of Seattle's progress toward meeting affordable housing needs. We suggest the following language: *"Monitor and evaluate over time Seattle's progress toward meeting affordable housing goals and needs. Report regularly on numbers of*

income and rent restricted units. Review and revise housing policies and strategies, especially where monitoring indicates that adopted strategies are not resulting in adequate affordable housing to meet the need."

❖ Intergovernmental Advocacy

Meeting Seattle's affordable housing goals will require increased resources from the state and federal government. We suggest editing **H5.15** to reflect the role Seattle's legislative and intergovernmental relations efforts will play in supporting state and federal funding: *"Encourage and advocate for new federal, state, and county laws, regulations, programs, and incentives that would increase the production and preservation of extremely low-, very low, and low-income housing."*

❖ Addressing the Spectrum of Need & Expanding the Toolbox

Seattle should plan for affordable housing across the needs spectrum—from those experiencing homelessness to first time homebuyers. The Housing Element includes a number of strong strategies to promote affordability, and we appreciate the work that DPD has done to draft these policies. Specifically, we support the Housing Element policies which promote:

- The preservation and development of affordable housing
- Inclusivity in neighborhoods with the services residents need to thrive (education, employment, transit, etc.)
- Efforts to stem the tide of displacement
- Investment in underserved areas consistent with community priorities
- Increased access to stable, safe and healthy housing, including relocation assistance

The rapid increase in rents and home prices in recent years has created unique challenges around housing Seattle's moderate income households, those earning between 60 and 80% AMI. Because it is difficult to access public subsidy to create housing for these households, tools that leverage the power of the private market to create affordable homes are critical. Development incentives tied to affordability, like the Multifamily Tax Exemption (MFTE) program, help meet this need. **H5.17** should fully reflect the City's commitment to providing incentives of this type and should list examples of other effective incentive tools, such as impact fee exemptions, permit fee waivers and reduced parking requirements, that incentivize the construction of affordable housing and promote long-term affordability.

❖ New Development & Contributions to Affordable Housing

HDC believes there is a shared responsibility between the private and public sectors for addressing affordable housing needs, particularly as the market is unable to meet the growing demand for housing our workforce. In line with the Mayor and City Council's efforts to require affordable housing alongside new development, we urge you to add a policy to the Housing Element to *"Require the provision of affordable housing by new development."* Hundreds of jurisdictions across the country have successfully used inclusionary housing to address affordable housing needs and create inclusive, mixed-income communities. Seattle's Comprehensive Plan should reflect the City's recent commitment to this national best practice.

Commercial development, and particularly research, laboratory, and medical facilities, has a strong nexus with increased demand for affordable housing.[1] As written, **H5.18** does not reflect a strong commitment to require major institutions and those entities building under development agreements to provide affordable housing. The current policy has not resulted in the affordable housing necessary to meet the housing needs of moderate and low-wage employees. We strongly urge the City to amend this policy to state: *"Require ~~planning for~~ contribution toward affordable housing ~~needs~~ for extremely low-, very low-, and low- income households as part of major institution master plans and development agreements approved by the City when such plans would lead to housing demolition or employment growth."* This policy statement reflects an equitable expectation that all new development will contribute to affordable housing.

We appreciate how the Housing Element balances the creation of housing overall with policies specific to creating housing affordable to very-low, low-, and moderate-income households. Seattle's existing affordable housing need is immense, and as the City continues to grow, it will become increasingly difficult for lower income individuals and families to find homes they can afford near their jobs in the city. Implementing the affordable housing policies contained in the Housing Element—swiftly and fully—is critical for ensuring Seattle can remain a place for people of all incomes to call home.

Thank you for this opportunity to comment and for your time and attention to these critical housing issues. HDC is following this update very closely and will continue to engage our members throughout the process. We are happy to answer any questions or provide additional details on our comments.

Sincerely,

Kayla Schott-Bresler
Policy Manager

[1] David Paul Rosen & Associates, "Administrative Review Draft: Seattle Affordable Housing Nexus Study and Economic Impact Analysis," May 13, 2015.

Lake City Neighborhood Alliance

http://lcna-seattle.org/

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Seattle Mennonite Church
South Cedar Park Good Neighbors Association
Techno-Formation Vocational Services
Thornton Creek Alliance
Victory Heights Community Council

November 19, 2015

Tom Hauger
Kristian Kofoed
Department of Planning and Development

Dear Members of the Seattle 2035 Planning Team,

I am writing on behalf of Lake City Neighborhood Alliance (LCNA), an alliance of organizations with the mission to protect and enhance the quality of life in the greater Lake City area. LCNA is comprised of 28 member groups representing neighborhood, business, faith, school, special-issue, and service-provider groups throughout Lake City. At our November 12th meeting, LCNA members expressed concerns about some proposed Parks and Open Space Goals and Policies in the Draft 2035 Comprehensive Plan, and strongly advocated for the following revisions:

1. P1.2-Replace the draft text with the following revised policy: "**That the expansion of the City's needed park and open space sites to support proposed growth be funded through the Park District's expanded taxing authority and reevaluation of the current commercial and multifamily lot-line to lot-line development in Hub Urban Villages to allow for greater setbacks to create needed open space that could be achieved with taller building heights and/or additional density**".
2. P1.7-Revise the proposed policy to **delete the words "Encourage or"** at the beginning of the policy "Require private developers to incorporate……"
3. P2.1-Revise this draft text to incorporate the following additional wordage after "community centers" to read as ….."**and provide new, full-service community centers in underserved Hub Urban Villages".**
4. PG4-LCNA takes issue with this goal based upon the potential for these types of Park facilities competing unfairly with limited funding opportunities for new parks in urban and residential villages. Revise this goal to add the following conditional statement: **"providing that these regional park facilities can be funded without reducing necessary funding of park needs in Hub Urban Villages due to projected growth".**

Thank you for considering LCNA's recommendations.

Very sincerely,

Sandra Adams Motzer

Sandra Adams Motzer
Chair
sandymotzer@aol.com
206.819.8056

Laurelhurst Community Club

Serving Seattle's Laurelhurst Community since 1920

November 20, 2015

Seattle Department of Planning and Development
Attention: Seattle 2035
700 5th Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019

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Re: Comments on Seattle 2035

The Laurelhurst Community Club (LCC) commends the efforts of the City of Seattle to plan for the accelerated growth in population anticipated over the next 20 years. Preparing for good solutions for housing, schools, commercial services, open and park greenspace, and the supporting transportation infrastructure will require active collaboration of citizens from all affected types of residents and governmental agencies to make it successful.

LCC has attended the Seattle 2035 Open House, and reviewed the proposals. The future land use map (FLUM) has many proposed goals and also underlying changes that support the goals, yet many the actually undermine the stated goals.

In order to balance city growth, and retain what makes Seattle such a desirable place to live and work, some of the proposed changes are too damaging to the liveability and quality of life of the city and should be struck from the 2035 Comprehensive Plan.

Laurelhurst Community Club agrees with many of the stated goals in the 2035 growth plan, yet many of the codes are then followed by loopholes which will undermine such goals.

LCC recommends the following changes and comments:

1. In section on "**Uses**", page 39, it states, "regulating land uses provides predictability about how an area will evolve over time, which is necessary to support neighborhood stability." LCC agrees, and yet the "policies" state: LU2.1 "Generally allow for a broad mix of compatible uses in those zones that allow the greatest densities of development." This can leave a loophole, or catch all for exceptions. This sentence should be stricken.

2. Under "**Special Uses: Public Facilities and Small Institutions**" (pages 40-41): The "goal" is to allow public facilities and small institutions to locate where they are generally compatible with the function, character and scale of the area, even if some deviation from certain regulations is necessary"

- Under "policies", LCC applauds LU3.1, LU3.3, LU3.4, LU3.5, and LU3.6 in requiring these types of buildings to be well integrated into local communities.
- LCC objects to LU3.2 which gives wide latitude and a "free pass" that development can use to waive away compatibility requirements. We request that LU3.2 be stricken, or changed.

- In regard to LU3.7, the repurposing of surplus schools, LCC recommends the formation of a citizen's advisory committee be required as a formal process to allow any use change.

3. LCC agrees with the goals and policies on the **Telecommunication Facilities**, and applauds the firm stance to keep them out of residential areas. (LU4.5).

4. **Land Use "General Development Standards"** (Page 43): LCC supports the Seattle 2035's statement "The City uses development standards to ensure that new development is in keeping with the existing and planned character of a neighborhood, and that it accounts for physical and environmental constraints."

LCC also supports the stated goal: "Maintain development standards that guide building design to serve each zone's function and produce the scale and character desired." However, LU5.1 "Allow for flexibility in developmental standards"....provides for development that undermines the above worthy goals, and should be stricken from the Seattle 2035 comp plan.

The other codes **do support** the overarching goal, such as LU5. 2, through LU 5.16, and are excellent inclusions in the land use code which maintain and enhance the quality of life in the city.

Proposed code LU5.17 (page 45) is not clear in its implementation, and leaves open loopholes too large for developers. The policy is too vague as written, and can allow a wide variation of underlying code or zoning to be wiped away for a non-specific incentive.

LCC supports landmark preservation, and mitigating increased density, but this policy should be separate for both issues, and written with specific allowances.

Policy LU5.19 is definitely on target to help prevent some poor quality of development that Seattle has experienced in the past 15 years. The policy does not state the mechanics of how a design review process will be part of the land use process. LCC is very supportive of this policy, and would like to see it imbedded as a process more clearly in this policy.

5. **Off Street Parking**: The Laurelhurst Community Club supports the use of transit and other transportation modes, but also recognizes that transport for some businesses, outlying job locations, job mobility requirements, parents' trips for children to/from daycare or schools, runs for heavy groceries, access to non-transit served (or if you are actively ill) healthcare appointments, etc., also require that the City plan to accommodate the use of and some parking and use of personal vehicles.

The goals of LUG6 to reduce the reliance on automobiles are lofty, and LCC generally supports it.

- With respect to Seattle 2035, and the concurrent social justice goal of having Seattle grow to accommodate a wide range diversity of income levels, family types, etc., some of the policies to squeeze out parking actually will create an unfair burden on lower income families.

- Many small business owners and employees, the backbone of our City, rely on use of their personal vehicle to deliver services. For example, tools for builders,

housecleaners, dog walkers, etc. need to be transported by vehicles and to various daily locations.

- Seattle 2035 need to provide for more growth in all transportation modes policies to be consistent with it's strive to provide housing and jobs for a diverse economy. More residents will bring in more vehicles, and we are short sighted not to plan for that as well as transit and bikes.

- Specifically, LU6.1 is not balanced for a very large and diverse city. Promoting economic development and also reducing parking may not work. In policy sections LU6.2, LU6.3, LU6.4, LU6.5, LU6.6, LU6.7, LU6.8, LU6.9., LCC requests that the policy be re-written to include both citizen and business community involvement for imposing changes on existing parking requirements. The impacts on the elderly, lower income families, and the local small businesses must be considered, such as in LU6.10, but with more specifics.

- The other policies LU6.10, LU6.11 coop spaces do not work well, and one business will benefit while the other loses customers who drive past seeing no parking.

- For businesses, especially restaurants, they operate when transit stops running. It is important that they have some parking available for potential customers of other Seattle neighborhoods. (e.g. it is nearly impossible to dine now on Capital Hill-no bus, and no parking)

- The policy LU6.13 the concept of retaining open space maximum is a good one. However, transit does not serve parks well, and has limited operating hours, especially on weekends, holidays and evening hours. Thus, this policy must be mindful that some sports fields for our youth are located in the parks, and parking for families is very important. We want to encourage citizens to use parks, not penalize people by not allocating adequate parking for all ages of walkers, families using the playgrounds, youth and adults using fields, dog walkers, and nature wanderers. Seniors will not use the parks if some parking is not available, and that is discriminatory, so Seattle2035 must maintain access to parklands for all.

- Policy LU6.15 Stand alone park n ride should be explored to multi use with other entities. Having some parking will encourage transit use, and the city should encourage businesses, or institutions nearby transit hubs to allocate some parking for this purpose. The city might grant a tax reduction (like developers of low income housimng) for providing this for transit users, parking is a bonus **underground** for the city as well.

- LCC opposes the deletion of goals LUG6, LUG6.1, and TG17 and policies LU20, LU49, LU, LU50, T-39, T-40, and T-46 that currently direct that parking policies "account for local objectives," recognize parking as a part of "moving people and goods," consider "access to local businesses," "parking spillover into residential areas," and "truck access and loading," and not "introduce serious safety problems or blighting influences" but rather "achieve vitality of urban centers and urban villages" and "preserve Seattle's competitive position in the region." While deleting those goals and policies, the Comp Plan "update" would introduce two new policies: LU63

to "rely on market forces" for onsite parking and T40 to give higher priority to "greening" over "storage" (the City's new negative term for parking) in the allocation of street space. LCC asks that you restore the deletions.

6. **Incentives:** The goal of LUG7 reflects the emphasis on providing new housing at the expense of impacts on existing urban neighborhoods. Many urban villages and centers have already achieved targeted growth. In adding to that density unless the measures such as providing open space or "other community resources" is spelled out, it will not happen.

For proposed LU7.2., LCC would ask that the comp plan add specific language to ensure that open space component is actually built out with each project, and that cumulative effects be allocated to each development, so they all do not go "under the radar" to provide such amenity.

7. **Land Use Areas:** The definitions include "single family areas in different parts of the city developed at different times with distinct character that may be defined by a particular architectural style or a unique relationship to their surroundings"

In the goals (page50) for detached single family, it adds "Provide single family and other compatible housing options"... This language should be struck as this wording automatically undermines the "single family" character. Single family residential is just that, not any given "mix" of types of housing. Seattle is well known across the country for those neighborhoods where residents of any economic or social background can actually live in a single family home, and not share walls, with the savings that have accumulated.

Restore land use codes LU59 and LU60 which define and protect single family zoning. At the Open House in the Rainier Valley on November 7, 2015, several local residents expressed opposition to the changes of their single family zones. Their homes were something that they aspired to with financial and sweat equity. Further, the point was made that sf homes often house adults, young adults in transition (broke from being students), seniors who cannot live alone, and/or perhaps another family friend or student renter. Thus, in fact within the single family structure, one single family structure provides housing for three households. Retaining the set backs, yards and character of such sf zones make it workable with extra breathing room for those residents, and perhaps an attic room, and kitchen garden, and a place for their children to exercise in their yard.

8. The same reasoning follows that the City must restore LU 1, LU5, LU 76 and LU 164 that direct any conditional use changes, reflecting community preference, and require any change to be consistent with neighborhood plans. Use changes to properties adjacent sf zones will only be in character and successful with a collaborative neighborhood public process, and not "back door" deals with developers who have no stake in its outcome, except profitability, and such changes cannot be reversed.

LU.8.1 Designate as single family residential areas those portions of the city that are predominantly developed with single family houses that are large enough to maintain a consistent residential character of low height, bulk and scale over several blocks." However, LU8.2 includes the working "respond to neighborhood plans for redevelopment or infill. but allows for a greater range of housing types".

Laurelhurst Community Club requests that this be deleted, as it essentially is a free pass key for developers to add non- single family residents or undersized lot development which is opposite of LU8.1 designed to establish the single family residential zone.

LU8.4 Recognizes the single family zone as the principal use, and LCC agrees with that statement, but opposes policies such as LU8.5, LU8.9 and LU8. 11 which undermine that type of land use zone.

Policy LU8.9 is especially disturbing as it allows below standard lot sizes to be inserted into existing single family neighborhoods based on outdated historic lots that are no longer used. Developers troll these records to find a way to wedge in a "tall skinny house", opposed by all Seattle neighborhoods, which actually destroy the intent of LU8.1. Thus, LU8.9 cannot be included in the comprehensive plan as it does not support the stated land use goal.

LU8.11 Permitting of non conforming developments by City Council or "conditional use" approval gives another loophole that can destroy the intent of the land use code stated in LU8.4. This policy should be eliminated from the proposed plan.

LU8.5 Allowing developments of any residential structure should be struck as well. It can destroy well planned set back requirements and protections for open and green spaces that necessarily make the single family zones livable.

9. In order to retain some liveability with relationship of the built environment to the relief of open space, view corridors and fresh air, LCC requests that LU81 be retained to maintain that balance, and enforces the respectful adjacencies of building heights. Without this regulation, a domino effect occurs, and creates an unfair burden on the code compliant height dwellings to continue to "top off", when most cannot afford to do so.

10. Seattle's tree canopy preservation and enhancement seems to be abandoned in the 2035 goals for the City. The Urban Forest Management Plan's 5 year Implemention Strategy parallels Seattle 2035 growth plan, and targets a comprehensive strategy for increasing the urban canopy to 30% coverage in 30 years. Seattle's trees provide environmental and social benefits and enhance the liveability of the city. Trees and plants absorb global warming pollution, provide habitat for wildlife, clean the air and waters, lessen impacts of storms by absorbing rainwater, calm traffic and improve the walkability of our neighborhoods.

The priorities stated include the following in regard to the critical tree canopy on private property, which now holds the majority of the City's trees. Page 12 of the report states:

"The urban forest occurs primarily on private property and therefore is sutainable when the community values trees and is engaged in planning, preserving planting and caring for them"

Priorities include:
"Improve regulations to encourage tree preservation and protection on private property, and on the right of way.

"Provide additional incentives for tree planting focusing on single family residential zones especially in neighborhoods with lower tree canopy cover."

The Laurelhurst Community Club asks that the 2035 Comprehensive Plan look to add back the zoning and tree policies which will strengthen the Urban Canopy as the city grows into 2035 with concurrent health and liveablity.

11. Urban boundaries: LCC opposes expanding the existing boundaries of the Roosevelt Residential Urban Village. We believe that the current boundaries are most appropriate as the neighborhoods in the area grow and continue to absorb increased density.

12. **Multi family Residential:** The policies and goals appear to be compatible and LCC agrees with those provisions.

13. **Commercial/Mixed Use:** LCC generally agrees with most of these goals and policies.

14. **Industrial Areas:** LCC supports the goal, and especially LU11.11 which proposes landscaping and installing street trees for screening to offset visual impacts. LCC also supports height restrictions of LU11.20 for a reasonable transition to neighboring zones.

15. **Downtown areas:** LCC supports the goals and plan to establish a Master Plan Community. Retaining open space and view corridors should be considered in the Master Plan.

16. **Major Institutions:** The stated goal "Encourage the benefits that major institutions offer the city..., while minimizing the adverse impacts associated with development and geographic expansion". -The policy LU14.3 which establishes using only the institution's master plan instead of underlying zoning is a one-sided policy, and LCC requests that this be stricken, and zoning should be also shown. Using both overlays demonstrates the impacts on neighboring areas to be shown accurately.

- LU14.14 LCC suggests that community involvement to be "required" and not "encouraged" as it currently states. If "encouraged" only, the major institution will not do it.
- LU14.6 undermines the goal of compatibility with surrounding neighborhoods and should be stricken. "Allow the MIO to modify underlying zoning provisions and development standards are a gift to any major institution, and allow them to basically do whatever they want.
- LCC strongly requests that LU14.6 be eliminated from the Comprehensive 2035 Plan.
- LU14.15 This policy should be stronger, perhaps stating that demolition of existing housing will not be allowed. The affordable housing stock is so limited, and major institutions have no right to demolish it. Major Institutions can always find another way to expand.
- LU14.16 This is the real requirement for community involvement so LU15.14 should be stricken (see above note).

17. **Stadium District:** LCC generally concurs with the goal and policies.

18. Unwarranted deletions that protect sustainability and livability are either weakened or entirely deleted. Please restore the proposed deletions below:

- Deletes policy LU11: "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."

- Deletes policy LU34: "Limit the maximum amount of lot area covered by a structure to maintain compatibility with the scale and character of an area, to provide an adequate proportion of open area on a site relative to the area occupied by structures, and to provide occupants with sufficient access to light and air, as appropriate to the intended character and use of an area."

- Deletes policy LU39 to "preserve and enhance the City's physical and aesthetic character and environment by preventing untimely and indiscriminate removal or destruction of trees" and to provide incentives to property owners for tree retention; and deletes policy UV39 to enhance the tree canopy and understory in urban villages.

- Deletes policy LU81: "Limit building heights to establish maximum heights, maintain scale relationships with adjacent buildings, and limit view blockage."

- Deletes policies LU1, LU5, LU76, LU164 that currently direct that zoning, rezoning, and conditional use changes reflect community preferences, and be consistent with neighborhood plans.

18: **Environmentally Critical Areas:** LCC agrees with the goal to protect the environment, especially wetlands and public health. The policies are excellent, but LCC notes that LU17.3 to "Allow adjustments of development standards..." is not consistent with the goal, allows a "back door" for potentially harmful impacts on these environmentally fragile areas and should be stricken.

Thank you for your attention in integrating the comments of the Laurelhurst Community Club, and we offer to work with you in any of our proposed changes to the 2035 comprehensive plan.

Sincerely,

Colleen McAleer

Colleen McAleer
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Jeannie Hale

Jeannie Hale
President
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cc: City Councilmembers; Diane Sugimura

North Beacon Hill - local community group
Contact: Carey Dagliano Holmes
Design Professional Representative
DPD's South East Design Review Board
cholmes@weberthompson.com

November 12, 2015

Re: Community Feedback on North Beacon Hill Urban Village Expansion

Dear Seattle 2035 Planning Team;

The North Beacon Hill Proposed Urban Village Expansion map included in the 2035 Draft Plan (dated 8/10/15) illustrates a generalized expansion boundary based on an assumed 10 minute walk to the Beacon Hill light rail station and the small 2-bus line transit hub located in front of the Beacon Hill station. The proposed boundary shown in this exhibit does not accurately reflect the 10 minute walk criteria, so I have attached a marked-up copy of this map with a proposed expansion boundary line revision that accurately reflects the 10-minute walk criteria. Please see attached.

The proposed boundary line revision is based on actual pedestrian research conducted by local community members who have tested the 10 minute criteria. All community members involved in this study are residents of North Beacon Hill, and physically active and healthy individuals in the 30 – 55 year old age range. The research did not take into account walk times for disabled individuals, individuals over the age of 55, or individuals with children (which would likely decrease the 10 minute walkshed radius by at least 1 -2 blocks).

As you will see, there is a significant discrepancy between the generalized boundary included in the 2035 plan, and the specific local pedestrian research. Our assumption is that the generalized boundary did not take into account the significant topography drop that exists just a few blocks from the Light Rail station. The residents of North Beacon Hill would like for the 2035 Planning Team to strongly consider revising the North Beacon Hill Urban Village Expansion per the local pedestrian research and community feedback illustrated on the attached document. Our community appreciates the opportunity that DPD and the Seattle 2035 Planning Team has given us to submit feedback on this proposal. We hope to see this feedback implemented into the 2016 Recommendation a revised expansion proposal.

Our community is happy to provide further feedback or discussion on this issue. Please let me know if we can be of further assistance to DPD or the Seattle 2035 Planning Team on this issue. Please let me know what your next steps on this feedback will be.

Thanks much,

Carey Dagliano Holmes
Design Professional Representative,
DPD's South East Design Review Board

North Beacon Hill Residential Urban Village

Hub / Residential Urban Village

Potential Urban Village Expansion

Frequent Transit Station / Stop

Current Zoning

City-Owned Open Space

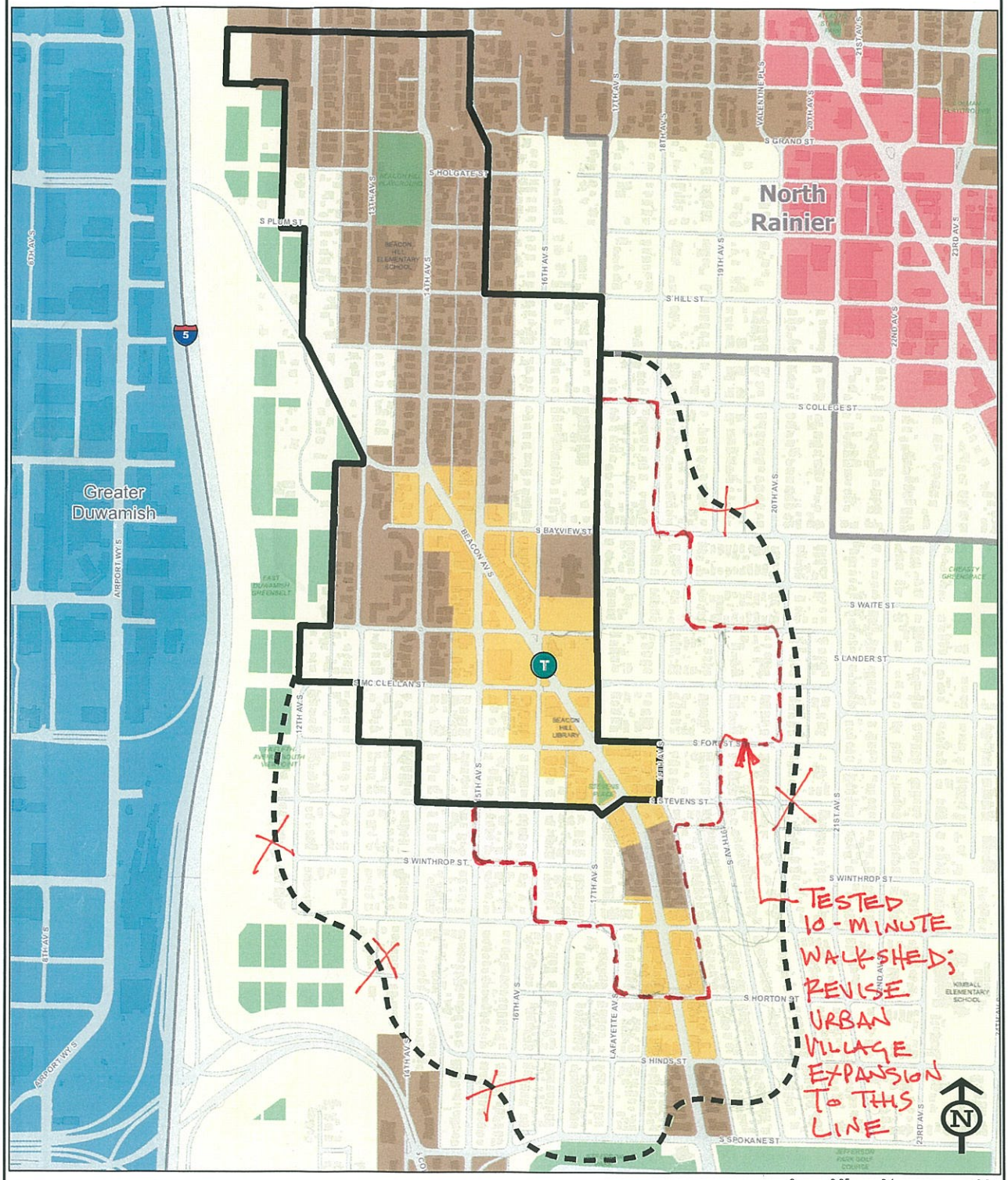
Neighborhood Commercial — NC1; NC2; NC3

Single Family — SF 5000 / 7200 / 9600

Commercial — C1; C2

Low-Rise Multi-Family — LR1; LR2; LR3

Industrial — IG1; IG2



For Public Review and Discussion

Miles 0 0.05 0.1 0.2

Single family areas located within the current urban village boundary. DPD is considering policy changes that would treat single-family areas within urban villages differently than single family areas outside urban villages. Changes would make it easier to build other types of housing in these areas.

Potential village expansion area. This area, shown with a dashed line, is a generalized boundary based on a 10-minute walk to frequent transit (a light rail station or two or more bus lines serving multiple destinations). DPD is studying this area to develop a proposed urban village boundary. DPD is currently seeking community feedback on this concept. There will be additional opportunities for community feedback as work progresses. Submitted comments and community feedback will be used to develop a proposed urban village boundary to be included with the Mayor's Recommended Plan scheduled for a December 2015 release.

Seattle 2035

YOUR CITY, YOUR FUTURE

City of Seattle
Edward B. Murray, Mayor

August 20, 2015

11/12/15: cholmes@weberthompson.com

Northeast District Council
4534 University Way NE, Seattle, WA 98105
(206)-233-3732
http://northeastdistrictcouncil.wordpress.com/

November 19, 2015

Diane Sugimura, Director
Department of Planning & Development, City of Seattle
700 5th Ave #2000
Seattle, WA 98104

RE: Comments on the 2035 Comprehensive Plan Draft

Dear Ms. Sugimura –

The Northeast District Council (NEDC), a group of 15 neighborhood organizations in Northeast Seattle wanted to give a joint comment on the Seattle 2035 Comprehensive Plan draft, in addition to comments to be submitted by individual neighborhoods.

The NEDC representatives are opposed to expanding the existing boundaries of the Roosevelt Residential Urban Village. We believe that the current boundaries are most appropriate as the neighborhoods in the area grow and continue to absorb increased density.

Thank you for your consideration of our position.

Sincerely,

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Belvedere Terrace Community Council
Hawthorne Hills Community Council
Inverness Community Club
Laurelhurst Community Club
Matthews Beach Community Council
Portage Bay/Roanoke Park Community Council
Ravenna Bryant Community Association
Residents of Magnuson Park
Roosevelt Neighborhood Association
Roosevelt Neighbors' Alliance
University District Community Council
University Park Community Club
View Ridge Community Council
Wedgwood Community Council
Windermere North Community Association

Port of Seattle

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November 20, 2015

Ms. Diane Sugimura, Director
City of Seattle
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Seattle, WA 98124-4019

Re: ***Comments on the draft major update of the Seattle Comprehensive Plan***

Dear Ms. Sugimura,

The Port of Seattle appreciates the opportunity to comment on the draft Seattle 2035 document. We applaud the City for taking the approach of overhauling the document to reduce redundancy and inconsistency. At the same time, the City must be careful to not lose important policy nuances while executing this strategy.

Overarching comments

The draft plan does not do enough to provide certainty about the future of the City's two manufacturing / industrial centers (MICs). We have previously cited the conditions that make industrial stakeholders worry about the long-term integrity of the Duwamish and Ballard-Interbay Northend MICs. These conditions include perennial Comprehensive Plan amendment requests to take land out of MICs, initiatives to blur the definition of industrial uses, and a track record of the Industrial Commercial zone of failing to attract industrial developments.

A city that wishes to have the tax base diversity and living wage jobs that come from an industrial center must instill certainty in the future of that center.

Accordingly, we are disheartened to see that the draft plan omits two policy statements[1] that industrial leaders crafted with DPD staff through the Duwamish M/IC Policy and Land Use Study Advisory Committee. The policy known in that process as Recommendation #1 would have enacted strict criteria to be applied to any proposal to remove land from a MIC. In its place the draft plan contains GS2.20 which merely states that such criteria "should be developed." This is a big disappointment since such criteria already were developed and enumerated in Recommendation #1.

A similar loss of integrity occurred for the policy statement known as Recommendation #4 in that study. Recommendation #4 had been crafted during the study to prohibit new application of the IC zone within

[1] The exact language for the two policies is established as Recommendations #1 and #4 of DPD'S Duwamish M/IC Policy and Land Use Study, November 2013. They are found on pages 34 and 37, respectively, of that report.

a MIC. Instead, the draft plan contains a policy that states "Limit the future application of the IC zone..." What those limitations might be is unstated.

The key transportation proposal for the draft plan, in the summary of the draft, reads: "Move towards transportation service standards that consider all travel modes, including pedestrians, bicycles, cars, trucks, and transit." (*Seattle 2035, A Comprehensive Plan for Managing Growth, Draft Plan Summary, page 2*)

The Port of Seattle endorses this vision for the future of Seattle's transportation system, because it is focused on providing transportation services for all modes, including freight. The proposal also supports Mayor Murray's vision for transportation in Seattle: a unified transportation strategy that integrates, balances and makes provisions for all travel modes.

Our comments below follow the sections of the Seattle 2035 review document.

Detailed comments

Stadium District (p. 65)

As we noted throughout the 2013 Stadium District Study, these allowances for residential and lodging uses will lead to conflicts with established industrial uses within the Duwamish MIC. The most salient example of this is Policy LUG15.1's allowance for residential uses on the WOSCA property. This site is across the street from Terminal 46, one of the state's biggest marine cargo terminals. One of the most fundamental purposes of a zoning code is to buffer residential and industrial uses. This is because marine cargo terminals are dynamic operations that generate traffic, noise, and light. Our experience indicates that adding new residential uses near a large marine cargo terminal will lead to complaints and lawsuits from the new residents once they discover what it is like to live next to a thriving marine cargo terminal.

Urban Village Strategy Terms

It is difficult for the reader to follow the area designations under the urban village strategy to the extent that a manufacturing / industrial center is one such designation. We recognize that this nomenclature was established a long time ago and a great number of planning documents are built upon it. The City may wish to be more explicit in the introductions to the Seattle's Growth Strategy, Land Use, and Transportation elements that there are exactly four types of area designations under the urban village strategy and that they are urban centers, manufacturing / industrial centers, hub urban villages and residential urban villages. Please also note that the page 37 description of the Future Land Use Map (FLUM) states that MICs are depicted in the FLUM but, in fact, only the other three area designations of the urban village strategy are depicted there.

To the lay reader, by context alone, "Urban Village Strategy" does not imply that MICs are a subset, (although the document does clarify this at close reading). Then, certain policies are crafted with the residential uses in mind, which conflict with industrial uses. As long as MICs remain a subset in this policy, distinctions must be included that incompatible uses do not apply to industrial zones. Such comments are included below.

Policy LU11.25 regarding the Industrial Commercial zone

A dominant theme in the industrial zone policies is that existing industrial waterfront areas must keep their industrial zoning because waterfront industrial land is a scarce resource. Policy LU11.25 contradicts this doctrine by suggesting that the water views and shoreline access must be used to "attract new technology businesses to the area" in the IC zone. The city has sufficient commercial zoning capacity for offices to have water views and shoreline access. This policy unnecessarily interferes with industrial zoning. Further, it appears to be inconsistent with the policies of the Shoreline Management Act and the City's new shoreline master program, which states a use preference for water dependent uses.

Other comments on Seattle's Growth Strategy and Land Use elements

- Growth Strategy Introduction (p. 20): Please add "Robust and health manufacturing / industrial centers" to the bullet list.

- Introduction, second paragraph (p. 20): At the end of the paragraph please add "Meanwhile this allows the important industrial economic sector to flourish in buffered centers."

- Planning For Growth policies (p. 21): Please add new policy "Survey the health of the MICs to ensure the industrial sector continues to thrive and provide additional investments or incentives to enhance these activities."

- Urban Village Strategy Discussion (p. 22): At the end of the second paragraph please add "MICs are an urban village strategy designation and they benefit from separation of incompatible land uses, specifically residential." This is intended to highlight that land uses in residential zones may be incompatible with industrial zones.

- Urban Village Strategy Goals (p. 24): Please add a new policy after GS2.3: "Strengthen and protect MICs from uses such as residential and pedestrian-oriented commercial uses."

- Growth Strategy Figure 1 (p. 25): Please add a note that MICs are an urban village strategy designation not addressed in this Figure. Please add a parallel table with the corresponding attributes of MICs.

- Urban Design (p. 30): Please note at the end of the first Discussion paragraph that "MICs will have their own unique and different design characteristics."

- GS4.14 (p. 32): Please add "residential" so it reads, "Design residential urban villages to be walkable, using ..."

Summary--Transportation

Key Proposals (p. 2): Support the proposal to: "Move towards transportation service standards that consider all travel modes, including pedestrians, bicycles, cars, trucks, and transit."

Plan Elements (p. 6): Please add "goods" to the second sentence: "... Seattle will continue to work with regional transportation agencies to move people and goods within the city and the region."

Next Steps (p. 8)

- The transportation performance measure is currently focused on the movement of people and does not address freight mobility. (Inconsistent with the transportation key proposal on page 2...) Maybe use "Reliance on the personal car" as a performance measure? That would allow introducing freight mobility measures like load zone availability or a reliability measure like buffer index.

Transportation Element

Introduction (p. 72)

In order to recognize from the outset that freight mobility, in addition to moving people, is a necessary element of the future of transportation, we recommend:

- Include "businesses" in the very first sentence: "... to equitably serve current residents, <u>businesses</u> and future growth in Seattle."
- Add a freight bullet to the list—something like: "Promote efficient, reliable and safe freight movement to support a vibrant economy and bring goods to residents." This is retained from the current Transportation Element (Goal TG6), and combined with the draft vision statement from the Freight Master Plan effort.
- Third paragraph reflects transportation in 2035, with a focus on moving people. Suggest adding reference to freight mobility of the future: need examples: ITS, increasing # of trucks, drivers reliance on traffic apps &c
- Fourth paragraph speaks to Seattle's lack of room for new streets from increased streets. We suggest adding in reference to potential for new capacity gains through transit lines in new right of way, or grade separations of existing bottlenecks/chokepoints (rail crossings).

Integrating Land Use and Transportation (p. 73)

We recommend a policy related to the City's two Manufacturing Industrial Centers—maybe one of the following:

"T1.6 Reliably connect manufacturing/industrial centers and business districts with each other and with the local, state, and international freight networks." (This is the Draft mobility goal from the Freight Master Plan effort); or

"T1.7 Enhance freight routes to ensure safe and efficient goods movement to, within and between Seattle's MICs and urban villages."

Make the Best Use of the Streets We Have <u>to Move People and Goods</u> (p. 74)

This purpose of this section's Zone treatment of Pedestrian, Transition and Travel Zones was not immediately apparent, we hope you could formalize that structure through formatting (e.g. capitalize

Transition Zone, or add headers?) and a clear description of the three zones in the ROW early on in the introductory paragraphs.

- Edit the header to include "to move people and goods" to indicate the primary function of streets.
- Think about re-organizing the policies to be clear which apply to all three zones.
- Regarding the Travel Zones, we suggest you emphasize the need for appropriate separation between incompatible modes (such as bicycles and trucks), especially in Policies 2.3 and 2.11 by adding language such as "where appropriate and safe."
- We underscore the Council's guidance with regard to the Complete Streets Ordinance, of which Section 3 reads: "Because freight is important to the basic economy of the City and has unique right-of-way needs to support that role, freight will be the major priority on streets classified as Major Truck Streets. Complete Street improvements that are consistent with freight mobility but also support other modes may be considered on these streets." (City of Seattle, Council Ordinance #122386) Please ensure that the Complete Streets Ordinance is supported in the implementation of policy T2.3. Add a bullet that reads:
    - "Prioritize the movement of freight on Major Truck Streets."
- We suggest replacing the word "tactic" with "strategy", as tactics generally address short-term action items and needs, while the Comprehensive Plan would seem to call for a more strategic approach.
- In the header, we highly recommend retaining the language from the last version of the Comprehensive Plan to set the stage for a goal and set of policies focused on moving people and goods—see above.

Transportation Options (p. 77)

- This section of the Draft Element is exclusively focused on providing people with mobility choices, the section header could be sharpened to reflect that.
- We suggest adding a policy that freight mobility is necessary for people to live a less car-dependent lifestyle:

  T3.19 Maintain, preserve and improve a system of truck streets and commercial loading zones to ensure that goods can be delivered efficiently and reliably to businesses and people, supporting a less car-dependent lifestyle.
- Paralleling Policy 3.2, we recommend adding "Ensure safe transportation options to MICs for employees, clients or customers."

Support a Vibrant Economy (move up from T5 to T4) (was p. 85)

The Transportation Options section provides maps of the modal plans for the movement of people. We recommend moving T5 (Vibrant Economy) to directly follow it, so that freight mobility policies immediately follow the people mobility policies.

- For goal T5 (new T4), we recommend clarifying what this goal is trying to achieve by replacing "strengthen" with "improve".
- Since the ability of the City to fund the projects that will implement the Transportation Element is dependent on income from a growing economy, we would encourage you to add this concept to the goal:

TG4 Improve mobility and access for the movement of goods and services to enhance and promote economic growth and opportunity throughout the City for all businesses and residents.

- T5.1, change 'Maintain' to 'Enhance' recognizing the support of the Mayor for the industrial sector as evidenced at the Maritime and Manufacturing Summit.
- T5.2 implies that the Freight Master Plan will not be complete before the new Transportation Element will be adopted, yet text in other sections of the draft implies that the FMP is complete. Please clarify the timing of these related efforts. Since it is likely that the FMP will be complete, or close by the time this Element is adopted, we recommend that you include the new freight network map, rather than the soon to be outdated Major Truck Street map here. As need be, you could note that the draft is in lieu of the final map.
- We suggest addition other incidents train crossings and bridge openings such as special events and construction or maintenance detours.
- Under T5.7, please delete or move ", and to minimize the impact of trucks idling and parking overnight on residential streets". While the Port agrees that these are worthy goals in themselves, there is no connection to the goal of this section, or its title.
- For T5.7, we suggest reordering to read: "Work with freight stakeholders and the Port of Seattle to improve intermodal freight connections involving industrial areas, Port terminals, rail yards, airports and highways."
- Please add a policy reflecting the recently completed Seattle Industrial Areas Freight Access Project in this section. The following combines two goals/objectives of that Project:

  "T... Maintain and improve truck-freight mobility and access to accommodate expected general traffic, freight and cargo growth, and ensure connectivity for major freight intermodal and trans-load facilities in the City's two Manufacturing Industrial Centers."

Environment (move down from T4 to T5) (was p. 84)

Diesel emissions from trucks and delivery vehicles are a major source of particulate matter and other air pollution. Recent data provided to SDOT by Charlie's Produce show that increases in the number of deliveries, combined with increased congestion and roadway configuration changes, have forced them to more than double the number of vehicles making deliveries in Seattle. This has led to increased fuel use and emissions, an outcome that is replicated by many other firms making deliveries in the city. There is direct benefit to making provisions to counteract the need to increase delivery vehicle fleets due to roadway conditions and loading zone availability.

Please note further, the Port of Seattle has made significant efforts to reduce Diesel Particulate Matter, reducing DMP from trucks serving our terminals by more than 50% between 2005 and 2011. Congestion reduces the benefits of those reductions.

We suggest either of the following policies:

T4.6 Support efficient movement of freight to decrease truck emissions.

Or Design and operate streets in a way that minimizes the need to increase the number of delivery vehicles due to roadway congestion.

Safety (p. 88)

- The Port supports efforts to minimize accidents and injuries. We also support the Complete Corridor approach, which acknowledges that it is not feasible to make provisions for all users on all city streets. It provides safer routes for more vulnerable users adjacent, but not necessarily on Principal Arterials. Please include this concept under this heading. To achieve this goal, policy T6.2 may be revised to read:

  T6.2 Minimize right-of-way conflicts to accommodate all travelers, using a Complete Corridor approach where necessary to maintain the functionality of the transportation system.
- In T6.3, we suggest including **truckers** along with motorists, pedestrians and bicyclists.
- Suggest moving current policy T5.4 to the Safety section (T6) for consistency with how safety issues on other network components are treated.

Connecting to the Region (p. 89)

The discussion and policies under this section of the Draft element are almost exclusively focused on the movement of people; freight is mentioned in only two of the eight proposed policies. Yet, the economy of the City is dependent on an efficient freight transportation system that seamlessly connects regional freeways with local port, rail and air intermodal facilities, the City's two Manufacturing-Industrial Centers and major truck freight traffic generators. Exports from Eastern Washington must be able to access Port of Seattle container terminals. Costco, Boeing, Amazon, like all manufacturers, retail businesses, and delivery services dependent on the cost-effective movement of freight, cannot function without reliable connections to the regional system.

- Please include a policy focused on freight mobility. A new, freight-focused policy may read something like:

  T7.3 Coordinate with regional, state and federal agencies, other local governments, as well as major private sector freight traffic generators, to ensure an efficient freight intermodal transportation system across jurisdictional boundaries.

- We would also like to recommend inclusion of WSDOT's map of Freight Economic Corridors within the City of Seattle, it provides a good overview of the most critical city streets connecting major freight truck trip generators to the regional system.
- We are surprised by policy T7.4, which gives staff guidance to "limit freeway capacity expansions," despite the fact that the City of Seattle does not have control over these facilities. We believe this is an UNWISE strategic policy because it limits freight mobility which uses the same facilities as SOVs.
- The Discussion paragraph should not overlook other fixed guideway systems in calling out "a regional light rail system" given Sounder heavy rail and street cars. Additionally, private sector transportation providers are important for waterways and railroad movements and could be added: "... including two interstate highways, several state highways, the transit network in the form of regional light and heavy rail, streetcars, buses, and the ferry network, as well as private sector providers on waterways and railroads."

Operating and Maintaining the Transportation System (p. 90)

The Port appreciates the renewed emphasis on least-cost planning and using ITS technology to maximize system efficiency for all modes.

- The priorities for this section of the Draft are well laid-out in the first sentence of the discussion. We recommend the same language be used in policy T8.2, which introduces concepts like social equity and place-making, that do not directly relate to the subject at hand.
- We would also like to include a performance measure specific to the movement of freight, which are currently under development as part of the Freight Master Plan. They are also consistent with the recommendations from the Seattle Industrial Areas Freight Access Project:

  T8.6 Work to reduce or eliminate freight system constraints such as weight and height restrictions, geometric deficiencies and pavement conditions preventing trucks from using the most efficient and safe freight routes.
- *We suggest policy acknowledging important designation within the system such as the over-dimensional route and the Heavy Haul Network.*

  "T... Maintain, preserve and enhance the City's network of over-dimensional routes and the Heavy Haul Network to ensure the safe and efficient movement of specialized freight."

Measuring Level of Service (p. 91)

The discussion of Level of Service measures outlined in the discussion and policies under this section is missing freight-related components. Please include measures for both the movement of freight in major freight corridors (truck travel time and buffer index) and the availability of load zones (both the number spaces and the number of tickets written, as an indicator of a shortage of load zone capacity), based on the performance measures currently under development as part of the Freight Master Plan process, and those defined through the Seattle Industrial Areas Freight Access Project:

"T9.4 Implement freight level of service standards for truck mobility and commercial loading zone capacity to ensure that the city maintains an effective and efficient freight system that meets the needs of business and industry, supports a growing economy and enables residents to life a less car-dependent lifestyle."

Funding (p. 92)

Funding for transportation infrastructure and operations within the City is dependent on a vibrant and growing economy: Businesses pay taxes to the City, which in turn can be used to fund transportation infrastructure and operations. Yet, the discussion and policies outlined in this section of the Draft element do not mention this vital linkage. Please add the word "economic" to the list of priorities under TG10.

It is also surprising to us that the list of draft policies under this heading provides of a list of investment priorities (see T10.6) that does not include mobility, economic growth, or efficient freight mobility–on which a less car-dependent lifestyle is dependent. Please add "freight mobility supporting a growing economy and a less car-dependent lifestyle" to the list of priorities under this policy.

We look forward to working together with you and your staff on these issues. Please do not hesitate to call Joseph Gellings at (206) 787 3368 if you have any questions.

Sincerely,

Stephanie Jones Stebbins
Director, Seaport Division Environmental and Planning

November 20, 2015

City of Seattle Department of Planning and Development
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Seattle WA 98124-4019

Dear Mr. Hauger,

We respectfully submit our comments on the Draft Comprehensive Plan Update (the Plan). Puget Sound Sage values the tremendous work done by DPD and City of Seattle staff to write the Plan. In particular, we deeply appreciate the extension of the City's race and social justice framework throughout.

Puget Sound Sage improves the lives of all families by creating shared prosperity in our regional economy. We bring together community, labor, faith, and environmental leaders to advance a common agenda for racial and social equity, a stronger democracy, better jobs, a clean environment, and thriving communities.

The Plan is the single most important policy document for the future of Seattle. To achieve the City's 20-year vision to accommodate growth the Plan must include a) a strong race and social justice framework with clear implementation and evaluation strategies b) goals and policies that improve outcomes and narrow disparities for all Seattle residents and c) concrete mitigation strategies to prevent displacement of residents and businesses that also help communities of color, low-income households, immigrant and refugee communities, and youth realize the benefits of growth. We believe that these elements are consistent with the City's equity values as stated in the Plan.

However, the Plan as proposed falls short of embodying both a vision and set of strategies for growth that benefits all Seattle residents. The comments and suggestions below are intended to make the Plan more clear on equity outcomes, accountability, and concrete strategies.

In addition to stronger equity goals and policies, the draft Plan should indicate *how* the City will implement it and make decisions moving forward. We suggest that the City state as a clear goal that future planning and decision-making around the Plan be rooted in a community participation and prioritize community leadership. While the City will play a critical role in creating resources for affordable housing, community leadership will the key to helping communities of color and low-income households prosper in place as the City grows. The Plan needs to live not just on paper and in government action but through ongoing community determination of their future.

<u>Overarching Comments</u>

- The racial and social equity framework, which is key pillar of the Plan, is incorporated inconsistently throughout the document. As the City moves into an implementation phase of its Race and Social Justice Initiative, we urge DPD to develop statements for all plan elements that assert the desired outcomes with regards to racial and social equity. The Growth Strategy, Land Use, and Transportation Elements need a stronger overarching equity lens and additional goals and policies to work towards increasing opportunities and reducing disparities for low income communities and people of color. Additionally, City staff should ensure that Plan goals and

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policies reflect the mitigation strategies identified in the DEIS and Equity Assessment that are critical to preventing displacement. As written, the Plan seems to be disconnected from those analyses.

- Policies in the Plan should indicate a clear path for implementation, monitoring, and evaluation. Throughout the plan, lack of specificity in goal and policy language will likely result in the plan being unenforceable, unmonitorable, and undermine the effectiveness of the City's vision to accommodate growth. Specific, quantifiable equity measures should be identified and monitored throughout the life of the plan.
- The City of Seattle has recently established a broad plan to address housing affordability and displacement through the Housing Affordability and Livability Agenda (HALA) process. From HALA has emerged the most clear and comprehensive strategy to date that will address our affordability crisis. With wide support from elected officials, private sector partners, and community, the HALA recommendations should be included in the Plan. Specifically, the Plan should reflect the clear numeric goals for affordable and market rate housing production, strategies to achieve these goals, and timelines for implementation included in the HALA report. There are several instances where the Plan goals and policies directly contradict the strategies agreed upon through HALA. These conflicts should be resolved.

Growth Strategy

Historically, marginalized communities have been left out of the planning process and most often are disproportionately burdened by strategies to accommodate housing and employment growth. The best way for the City to undo these historic outcomes is to put marginalized communities at the center of the planning process. Policies under GS1 must be amended to prioritize participation and leadership from marginalized communities. The City should also amend policies GS1.5 and GS1.6, which propose monitoring strategies to assess how the City is growing, to include collection and publication of baseline affordability data and the number of housing and commercial units in urban centers and villages. Without baselines data, the City will be ill-equipped to show whether the growth strategy displaces existing households or deepens inclusiveness and equity.

Growth Strategy Goal 2, which aims to accommodate most of the City's housing and employment growth in designated centers and urban villages, does not adequately address housing affordability and choice or residential and commercial displacement. In this section, the City must explicitly state its goals to 1) increase affordable, family sized housing choice in areas with high opportunity, and 2) invest in low-opportunity neighborhoods to guarantee that existing residents benefit from those investments. **Additional policies must be added to ensure that anti-displacement strategies are put in place before major growth or redevelopment occurs.**

Urban centers and urban villages play an important role in growth management, but unless these central places accommodate, and preserve cultural institutions like culturally relevant businesses and religious centers, social cohesion for our communities will be lost and displacement exacerbated. Policy GS2.2 should include language for the creation and preservation of cultural institutions and businesses.

The List of Hub Urban Villages should include a list of *potential* new locations to accommodate recently dedicated funding for additional transit stations along the LINK light rail, namely Graham Street Station and 130th St Station. The list of potential new Villages should also reference locations included in GS2.12 – the area that is generally within a ten-minute walk of frequent light rail stations in urban village boundaries—and other areas served by high-capacity transit. Both of these locations have a financial commitment from the City through the passage of the Move Seattle Funding Levy.

Land Use

All of the alternatives explored in the DEIS and accompanying equity assessment plainly state that any growth strategy will place disproportionate displacement risk on lower and middle-income communities and people of color in Central and South Seattle. As the City has well documented, displacement of marginalized people from their communities threatens the existing social fabric, disintegrates community support systems, and weakens political inclusion. The City must reference these expected outcomes in the policies and goals, as well as include new policies to prevent and effectively mitigate displacement.

Incentives for increasing density that require community benefits are an important strategy to accommodate growth in Seattle. However, new density with or without affordability should not come at the expense of existing affordable housing and commercial space. For example, if a new 100 unit building with 5 affordable units replaces an older building with 25 affordable units of naturally occurring affordability, it will be a loss for that neighborhood. A new policy under LUG7, should encourage plans to replace affordable units demolished through redevelopment and consider alternatives such as preservation of the original building by a non-profit or public agency.

The City of Seattle has a goal to increase housing choices in high opportunity areas for low-income households. As noted in the DEIS Equity Assessment, many of the City's high opportunity areas overlap with areas zoned for single-family homes. While the City is mandated to make policy accommodations for single-family uses through GMA, Land Use Goal 8 and accompanying polices should include strategies that increase affordable family sized housing choices in single-family neighborhoods to ensure access to services, high-quality jobs, quality education, etc.

The displacement risk documented in the equity assessment of the DEIS includes risk for residents of affordable housing, renters of affordable commercial space, and community spaces that house cultural institutions. LU 10.16 should be amended to include language regarding the preservation of affordable commercial space. While LU 10.22 should be amended to include cultural institutions and businesses. We also recommend referencing successful tools and programs like Community Cornerstones, which worked to help cultural businesses adapt to new TOD conditions and benefit from major community investments.

Transportation

Affordable and accessible transit is crucial to ensure the City of Seattle grows equitably. An affordably connected city opens up opportunities for housing choice, access to high-paying jobs, broader education choices, and other essential supports like healthcare, childcare, and community gathering spaces. Transportation-related policies and goals in the Plan should account for and address historic disinvestment and disparities in service for low-income communities and people of color.

Transportation Goal 3, which aims to meet the mobility needs of Seattle residents, does not include adequate provisions for affordability and accessibility of transportation service.

Investing in transportation in our City is also a significant investment in the local and regional economy. It is vitally important that the Plan ensures that any major investments in the transportation system benefit all sectors and participants of our economy. The City of Seattle has implemented successful tools and strategies (such as Community Cornerstones) to ensure that businesses in South Seattle adapt to changes created by light rail investment and remain stable in the face of rising land costs and rents. These best practices should be reflected in Transportation Goal 5 and subsequent policies.

Major public investments in our City should undergo rigorous tests to evaluate their impact on marginalized communities. In T10.6, please clarify how race and social equity factors will be considered in selecting transportation investments.

Housing

To encourage mixed-income and racially diverse communities, the City of Seattle has made a public commitment to 1) housing choices in high-opportunity areas and 2) preserving affordability and enhancing low-opportunity areas with strategies to ensure the benefits of growth flow to existing marginalized populations. The City should articulate these goals more clearly throughout the Housing Element.

The Plan makes no reference to the agreed upon housing strategies from HALA. Puget Sound Sage urges the City to reference:

- Affordability goals outlines by Mayor Murray and show how these goals meet or exceed the King County Countywide Planning Policies requirement to plan for affordability for 0-30%, 30-50%, and 50-80% AMI.
- Specific strategies to achieve housing affordability, such as recently adopted Mandatory Housing Affordability policies, among a list of other potential tools under Housing Goal 5 and subsequent policies.
- Provisions and timelines for implementing affordable housing preservation and displacement prevention strategies.

Housing Goal 2 and subsequent policies do not reference any DEIS or Equity Assessment findings that show increased growth near urban centers and hub urban villages will disproportionately impact low-income communities and people of color in Central and South Seattle. A new policy should be added under Housing Goal 2 that develops provisions and timelines for implementing displacement mitigation measures ahead of planned upzones. A similar policy should be included under Housing Goal 5.

While the development and enforcement of healthy housing programs will ensure safe housing for many Seattle residents, related housing policies and programs should include provisions to ensure that enforcement does not result in the loss of affordable housing.

There are currently no provisions in the housing element to monitor the success, failure, or impacts of the proposed policies. We strongly encourage the City to adopt goals and policies to monitor and evaluate outcomes of the Plan, especially those that may disproportionately impact communities of color, low-income households, immigrant and refugee communities, youth, etc.

Economic Development

In reality most of the topics covered in the Plan are strongly tied to economic development outcomes. As Seattle grows as a hub for high-paying jobs in technology, aerospace, manufacturing, and healthcare, the City must ensure that the benefits from growth are distributed equitably. Policies in the Land Use, Transportation, and Housing Elements that relate to economic development outcomes should all clearly articulate strategies that provide pathways to high quality employment for communities that have been historically excluded from opportunity. This includes both strategies to access high-paying jobs and make low-wage, dead end career jobs better. One clear example of encouraging better jobs are grocery stores in Seattle. Over 80% of all grocery chain jobs in the City are under collective bargaining agreements that provide good wages, high-quality health care and long-term career opportunity. Without collective bargaining, those jobs would reflect much poorer quality working conditions found in many suburban stores.

Goal EDG2 and subsequent policies should include strategies to encourage that high paying, high skill jobs in the industry clusters listed are accessible to and representative of all residents, specifically marginalized communities, throughout Seattle.

Strategies to improve workforce development for marginalized communities in EDG4 should be aligned with strategies to invest in places with low-access to opportunity and high-displacement risk, especially near high-capacity transit in Central and South Seattle. Examples include culturally-relevant early learning training, community college centers and food industry programs.

Goal EDG5 aspires to strengthen the entrepreneurial environment for small businesses, but does not acknowledge or plan to eliminate barriers for immigrant and refugee business owners. The City should add a policy under EDG5 that specifically addresses the needs of these vital community institutions.

Environment

Many of the goals and policies do not work directly to address historic environmental degradation and disinvestment in communities of color and low-income households. Policies should more explicitly address historic inequities and gaps in environmental quality between neighborhoods in Seattle. The City should develop a new policy to ensure that those most impacted by environmental injustice and climate change lead the policy conversation and develop the solutions moving forward.

Conclusion

We view the Plan as a significant tool for economic prosperity for all current and future Seattle residents. We believe that growth is possible without displacement and that increasing density can go hand in hand with race and social justice. But the Plan must prioritize specificity and scale of strategies, evaluation, community leadership in developing and implementing solutions, and consistency with existing policy direction to promote an equitable future for the City. We hope that you accept these comments in this spirit and look forward to working with you to finalize the Comprehensive Plan.

Sincerely,

Ubax Gardheere, MPA
Program Director, Puget Sound Sage

Cosigners:
One America
InterIm Community Development Association
Vietnamese Friendship Association
Homesight
Rainier Beach Action Coalition
Eritrean Association in Greater Seattle
Filipino Community of Seattle
East African Community Services

November 20, 2015

Diane Sugimura, Director **Sent via email**
City of Seattle Department of Planning and Development
Attn: Seattle 2035
700 5th Avenue, Suite 2000
PO Box 34019
Seattle WA 98124-4019

Re: Future Land Use Plans

Dear Ms. Sugimura,

Thank you for the opportunity to provide feedback on the Draft 2035 Comprehensive Plan. The Ravenna-Bryant neighborhood has unique geographical characteristics that need to be taken into consideration when making future land use plans.

1. **Well-served by transportation infrastructure**: When it comes to transit, the Ravenna-Bryant neighborhood is uniquely located between two future light rail stations. The southern end of the neighborhood is 1.5 to 2 miles from the UW Husky Stadium station. Easy access to the Burke-Gilman Trail will make biking to the station very attractive and frequent bus service to the station will create a quicker way to get downtown. The rest of Ravenna-Bryant will likely look to picking up light rail at the Roosevelt Station which will be from 0.2 to about 1.5 miles from the station. With easy access to transit and, eventually, a bike lane along NE 65th and along NE 68th east of 20th Avenue NE this second light rail station will be well-used by our community members.

2. **Located between a Residential Urban Village and an Urban Center**: On the west side of our community, 15th Avenue NE divides Ravenna from the Roosevelt Urban Village. The south side of our community abuts University Village which is part of the University Urban Center. Both of these areas provide easy access to a variety of businesses that are easily accessed by multiple modes of transportation.

3. **Located near large employers**: The University of Washington, University Village, and Seattle Children's Hospital are all within easy walking and biking distance from most people who live in Ravenna-Bryant and are served by transit that runs through our neighborhood. These three places of employment provide a variety of jobs with a variety of salary ranges.

- **Enable access to planning resources.** The RBCA supports the City's goals to increase housing capacity in transit-oriented areas and to increase housing for people of all income levels, but we are experiencing the growth without the commensurate planning resource and priority of infrastructure dollars afforded Urban Villages. In the context of the 2035 process, we invite a dialogue with appropriate people at DPD about how the City can best implement land use policies and investments that support growth along key corridors in Ravenna-Bryant, including whether portions of Ravenna-Bryant would be appropriate for a new Urban Village. If not, how can we best secure the funding for resources needed to support growth?

- **Inclusionary housing is essential.** RBCA wants to increase affordable housing and the diversity of our neighborhood. We therefore support the HALA recommendation for mandatory inclusionary housing. All of our other comments are predicated on the understanding that an increase in housing will include options that are affordable.

- **Address density in other areas of Ravenna-Bryant.** Almost none of the commercially-zoned areas in our neighborhood are within designated Urban Villages. These areas include NE 65th Street between 20th and 25th Avenues; NE 55th Street between 25thand 35th Avenues; and the west half of the Union Bay place from University Village to Five Corners in the "Ravenna" Urban Center. In addition to being commercially zoned, the area around University Village and along NE 55th Street are already well-served by bus routes and very close to the Burke-Gilman Trail, making for easy access to the UW light rail station. Three large employers are within biking and walking distance from these areas.

- **Include plans for community amenities.** It is essential that all plans for increasing the population of neighborhoods include plans for meeting community needs. Specifically, plans should address an increased need for schools, libraries, public safety services, and community center activities. Ravenna-Bryant area schools are already at or above capacity and the NE branch of the Seattle Public Library is the most-used outside of the downtown central library.

- **Maintain current Roosevelt urban village boundaries.** Based on concerns heard from community members, the Roosevelt Urban Village boundary should remain west of the centerline of 15th Ave NE between NE 62nd Street and NE 70th Street and the Roosevelt Urban Village should exclude Ravenna Park and Cowen Park. Attached is a petition circulated among residents in the area within the

proposed Roosevelt Urban Village expansion articulating concerns. We feel that keeping Roosevelt's Urban Village within Roosevelt's neighborhood boundaries also makes sense.

Sincerely,

Inga Manskopf, President
Ravenna-Bryant Community Association

Cc:
Councilmember Elect Rob Johnson
Councilmember Tim Burgess
Councilmember Elect Lorena Gonzales

No Expansion of Urban Village into Ravenna or Existing Parks

Seattle's draft Comprehensive Plan calls for increasing the density of housing within urban villages. Existing rules governing urban villages also allow for relaxed parking requirements during new development and include more exceptions before triggering environmental review during development. The Comprehensive Plan proposes to expand the boundary of the Roosevelt Urban Village to include single-family properties east of the center of 15th Ave NE as well as Cowen Park and portions of Ravenna Park. This petition expresses that residents are against the proposed eastward expansion of the Roosevelt Urban Village. We ask the Ravenna/Bryant Community Association and Roosevelt Neighborhood Association to issue a joint statement against this expansion, and we ask the city to maintain the current Roosevelt Urban Village boundary along the centerline of 15th Ave NE between NE 62nd St and NE 70th St as well as to exclude both Cowen Park and Ravenna Park from the Urban Village.

The Roosevelt Urban Village boundary should remain west of the centerline of 15th Ave NE between NE 62nd St and NE 70th St and the Roosevelt Urban Village should exclude Ravenna Park and Cowen Parks.

	Signature	Printed Name	Legal Voting Address
1.	E Skewes	Elizabeth Skewgar	6293 20TH Ave NE
2.	Meredith Regal	MEREDITH REGAL	6118 21st Ave NE 98115
3.	David Regal	DAVID REGAL	6118 21st Ave NE 98115
4.	Marika VanderSnoth	Marika VanderSnoth	6559 16th Ave NE 98115
5.	Jennifer Hall	Jennifer Hall	6528 16th Ave NE 98115
6.	[illegible]	John Sherrod	1518 NE 68th St 98115
7.	W Mercumes	W George Mercumber	6520 16 AVE NE 98115
8.	Mel Cyr	Michael Cyr	6316 16th Ave NE 98115

Persons signing this petition may not do so with any other than her or his true name, may not knowingly sign more than one of these petitions, and may not make any false statement on this petition.

I, Amy Eastwood, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: Amy Eastwood

Petitioner's printed name: Amy Eastwood

Street address, city, and county where petitioner is registered to vote: 6319 16th Ave NE Seattle, WA 98115

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The Roosevelt Urban Village boundary should remain west of the centerline of 15th Ave NE between NE 62nd St and NE 70th St and the Roosevelt Urban Village should exclude Ravenna Park and Cowen Parks.

	Signature	Printed Name	Legal Voting Address
1.	[illegible]	Alex Gagnon	6319 16th Ave NE Seattle, WA 98115
2.	[illegible]	Erin Dimopoulos	6326 16th Ave NE Seattle, WA 98115
3.	[illegible]	Patricia McKenney	6320 16th Ave NE
4.	[illegible]	Douglas S. Honig	6320 16th Ave NE
5.	[illegible]	Larry Moritt	6310 16th Ave NE 98115
6.	[illegible]	Melissa Gray-Moritt	6310 16th Ave NE 98115
7.	[illegible]	Anne Sullivan	6310 15th Ave NE 98115
8.	[illegible]	CHRYSTELL FLOTA	6315 17th AVE NE SEATTLE, WA 98115

Persons signing this petition may not do so with any other than her or his true name, may not knowingly sign more than one of these petitions, and may not make any false statement on this petition.

I, Alex Gagnon, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: _____

Petitioner's printed name: Alexander C. Gagnon

Street address, city, and county where petitioner is registered to vote: 6319 16th Ave NE
Seattle, WA 98115

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	Signature	Printed Name	Legal Voting Address
1.	Renata Tatman	Renata Tatman	1901 NE Naomi Pl.
2.	Matt Nordstrum	MATT NORDSTRUM	1915 NE NAOMI PL.
3.	Julie Nordstrum	JULIE NORDSTRUM	1915 NE Naomi Pl
4.	[illegible]	EVE KHAN	1914 NE Naomi Place
5.	Jeanne Martin	Jeanne Martin	6265 20th Ave NE
6.	Robert F Roeschach	Robert F Roeschach	6265 20th Ave NE
7.	S K Abrams	Shannon Abrams	1908 NE Naomi Pl.
8.	Susan Reynolds	SUSAN REYNOLDS	1900 NE Naomi Place

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Petitioner's signature: [signature]

Petitioner's printed name: Susan Woodmansee

Street address, city, and county where petitioner is registered to vote:
1711 NE 62nd
Seattle WA
98115 King Co.

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	Signature	Printed Name	Legal Voting Address
1.		Marisha Kemna	1711 NE Naomi Pl. 98115
2.	Joanne Simpson	Joanne Simpson	1737 NE Naomi PL 98115
3.	Diane Hoff	Diane Hoff	1747 NE Naomi Place 98115
4.		David Hoff	1797 NE Naomi Place, 98115
5.		Travis Pike	1751 NE Naomi Pl, 98115
6.		Christina Pike	1751 NE Naomi Pl 98115
7.		Dina Winkel	1755 NE Naomi Pl. 98115
8.		Steve Dubinsky	" " " " "

Persons signing this petition may not do so with any other than her or his true name, may not knowingly sign more than one of these petitions, and may not make any false statement on this petition.

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Petitioner's signature: Susan C. Woodrum

Petitioner's printed name: Susan C. Woodrum

Street address, city, and county where petitioner is registered to vote: 1711 NE 63rd
Seattle WA
98115 King Co.

No Expansion of Urban Village into Ravenna or Existing Parks

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	Signature	Printed Name	Legal Voting Address
1.		Monica J Haddock	6323 16th Ave NE, Seattle, WA 98115
2.		Cory J. Stewart	6323 16th Ave NE Seattle WA 98115
3.		TOLIS DIMOPOULOS	6326 16TH AVE NE, SEATTLE 98115
4.		Anna McGowan	6318 15th Ave NE.
5.		Lauren Rainwater	6302 15th Ave NE
6.		Austin Rainwater	6302 15th Ave NE
7.		CAROL TANIGUCHI	6315 16th AVE NE
8.		Paulina Lindstedt	11923 5th St. Kirkland, WA 98033 (@ 6329)

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I, Alex Gagnon, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: _____

Petitioner's printed name: Alexander C. Gagnon

Street address, city, and county where petitioner is registered to vote: 6319 16th Ave NE
Seattle, WA 98115

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	Signature	Printed Name	Legal Voting Address
1.		ELIZABETH HUGHES	1523 NE 63RD ST. 98115
2.		RICK GORM	1525 NE 63rd ST 98115
3.		Amber Calo	1525 NE 63rd St 98115
4.		William R. Sch	1531 NE 63rd St 98115
5.		Jennifer M. Leahy	1615 NE 63rd St 98115
6.		Michael Shim	6221 17th Ave NE 98115
7.		CAITLYN SHIM	6221 17th Ave NE 98115
8.		Jennifer Vellora	6209 17th Ave NE 98115

Persons signing this petition may not do so with any other than her or his true name, may not knowingly sign more than one of these petitions, and may not make any false statement on this petition.

I, JoElla Weybright, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: JoElla M. Weybright

Petitioner's printed name: JoElla M. Weybright

Street address, city, and county where petitioner is registered to vote:
1517 NE 63rd St.
Seattle WA 98115
King Co.

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	Signature	Printed Name	Legal Voting Address
1.	[illegible]	HENRY HERRMANN	6205-17th Av NE
2.	[illegible]	NICOLE RENAUD	1538 NE 62ND ST
3.	[illegible]	Jennifer Mims	1520 NE 62nd st
4.	[illegible]	Jack Rousso	1512 NE 62nd
5.	[illegible]	GAIL MARSHALL	1508 NE 62nd ST.
6.	Leslie Malkin	LESLIE MALKINEE	1508 NE 62nd ST.
7.	Tyler Radkey	1503 NE 63rd ST	Tyler Radkey
8.	Christine Valerio	1503 NE 63rd St	Christine Valerio

Persons signing this petition may not do so with any other than her or his true name, may not knowingly sign more than one of these petitions, and may not make any false statement on this petition.

I, Jo Ella Weybright, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: Jo Ella Weybright

Petitioner's printed name: Jo Ella Weybright

Street address, city, and county where petitioner is registered to vote:
1517 NE 63rd St
Seattle WA 98115
King Co.

No Expansion of Urban Village into Ravenna or Existing Parks

Seattle's draft Comprehensive Plan calls for increasing the density of housing within urban villages. Existing rules governing urban villages also allow for relaxed parking requirements during new development and include more exceptions before triggering environmental review during development. The Comprehensive Plan proposes to expand the boundary of the Roosevelt Urban Village to include single-family properties east of the center of 15th Ave NE as well as Cowen Park and portions of Ravenna Park. This petition expresses that residents are against the proposed eastward expansion of the Roosevelt Urban Village. We ask the Ravenna/Bryant Community Association and Roosevelt Neighborhood Association to issue a joint statement against this expansion, and we ask the city to maintain the current Roosevelt Urban Village boundary along the centerline of 15th Ave NE between NE 62nd St and NE 70th St as well as to exclude both Cowen Park and Ravenna Park from the Urban Village.

The Roosevelt Urban Village boundary should remain west of the centerline of 15th Ave NE between NE 62nd St and NE 70th St and the Roosevelt Urban Village should exclude Ravenna Park and Cowen Parks.

	Signature	Printed Name	Legal Voting Address
1.		Shelley Rosise	1511 NE 63rd St. Seattle WA 98115
2.		Lincoln Smith	1511 NE 63rd St Seattle WA 98115
3.		JoElla M. Weybright	1517 NE 63rd St. 98115
4.		Myron D. Weybright	1517 NE 63rd St 98115
5.		ELISSA KAMING	1923 NE. NAOMI pl. 98115
6.		Kevin R. Orr	1605 NE 63rd Seattle 98115
7.		Sandra Aculuni	1605 NE 63rd, Seattle 98115
8.		N. Eli Hastings	1504 NE 62nd Seattle, WA

Persons signing this petition may not do so with any other than her or his true name, may not knowingly sign more than one of these petitions, and may not make any false statement on this petition.

I, JoElla Weybright, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: JoElla Weybright

Petitioner's printed name: JoElla Weybright

Street address, city, and county where petitioner is registered to vote:
1517 NE 63rd St.
Seattle WA 98115
King Co.

No Expansion of Urban Village into Ravenna or Existing Parks

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	Signature	Printed Name	Legal Voting Address
1.	[illegible]	David Shellenbarger	1516 NE 62nd St
2.	Marsha Ose	Marsha Ose	1516 NE 62nd St.
3.	[illegible]	Lawrence Mans	1520 NE 62nd St
4.	Elena Allnutt	Elena Allnutt	1714 NE 60nd St
5.	[illegible]	Julie McNeill	1718 NE 62nd St.
6.	Karen M Hardy	Karen M Hardy	1734 NE 62
7.	Charles Hardy	CHARLES HARDY	1734 NE 62nd
8.	Kate Forster	KATE FORSTER	1744 NE 62nd 98115

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I, Jw, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: JoElla M. Weybright

Petitioner's printed name: JoElla M. Weybright

Street address, city, and county where petitioner is registered to vote: 1517 NE 63rd St.
Seattle 98115
King Co.

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	Signature	Printed Name	Legal Voting Address
1.	Amy Eastwood	Amy Eastwood	6319 16th Ave NE, 98115
2.	[illegible]	Luke Poverick	6321 17th Ave NE 98115
3.	[illegible]	UFUK INCE	6327 17th Ave NE 98115
4.	[illegible]	Julia Rapp	6326 17th Ave NE 98115
5.	[illegible]	Alex Lamb	6320 17th Ave NE 98115
6.	Maxine House	Maxine House	6305 17th AVE 98115
7.	[illegible]	Justin Struckmann	6306 17th Ave 98115
8.	[illegible]	Elizabeth Falvey	6302 17th Ave NE 98115

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I, Alex Gagnon, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: _____

Petitioner's printed name: Alexander C. Gagnon

Street address, city, and county where petitioner is registered to vote: 6319 11th Ave NE
Seattle, WA 98115

No Expansion of Urban Village into Ravenna or Existing Parks

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	Signature	Printed Name	Legal Voting Address
1.	B Becker	Brittany Becker	6329 17th Ave NE
2.	[illegible]	MARK H MCCOY	6318 17 AVE NE
3.	Susan Samuelson	Susan Samuelson	6318 17th NE
4.	[illegible]	CHRISTINE HAMBY	6314 17th AVE NE
5.	[illegible]	John Hamby	6314 17th Ave NE
6.	[illegible]	Miranda Rosebrook	6307 16th AVE NE
7.	Kathryn Lindell	Kathryn Lindell	6307 16th AVE NE
8.	[illegible]	JESS MARTIN	6307 16th AVE NE

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I, Alex Gagnon, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: _____

Petitioner's printed name: ALEXANDER GAGNON

Street address, city, and county where petitioner is registered to vote: 6319 16th Ave NE
Seattle, WA 98115

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	Signature	Printed Name	Legal Voting Address
1.	Patricia H Finlayson	PATRICIA H. Finlayson	6315 22nd Ave N.E.
2.	Bruce A. Finlayson	Bruce A. Finlayson	6315 22nd Ave NE
3.	Lori Cohen	[illegible]	1725 NE Naomi Pl, Seattle, WA
4.	Woody Wheeler	[illegible]	1725 NE Naomi Pl
5.	[illegible]	MICHAEL SKAHEN	6530 16th Ave NE
6.	Kimberly A. Larsen	Kimberly A. Larsen	6536 16th Ave NE
7.	Donald A. Larsen	Donald A. Larsen	6536 16th Ave NE
8.	Carrie Pratt	Carrie Pratt	6542 16 Ave NE

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I, Alex Gagnon, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: _____

Petitioner's printed name: Alex Gagnon

Street address, city, and county where petitioner is registered to vote: 6319 16th AVE NE
Seattle, WA 98115

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	Signature	Printed Name	Legal Voting Address
1.	[illegible]	Edward Boyer	1905 NE Naomi Pl
2.	[illegible]	Susan Woodruff	1711 NE 63 St
3.	[illegible]	David Woodruff	1711 NE 63 St
4.	[illegible]	Kim Quon	1711 NE Naomi Pl
5.			
6.			
7.			
8.			

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Petitioner's signature: Susan C Woodrum

Petitioner's printed name: Susan C Woodrum

Street address, city, and county where petitioner is registered to vote: 1711 NE 63rd
Seattle WA
98115 King Co.

No Expansion of Urban Village into Ravenna or Existing Parks

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	Signature	Printed Name	Legal Voting Address
1.	Maylin H. Fisher	MAYLIN H. FISHER	6274 19th Ave NE
2.	Diana Brandt	Diana Strandt	6317 21st Ave NE
3.	Noah Seixas	Noah Seixas	6311 21st Ave NE
4.	Marilyn Spotswood	Marilyn Spotswood	1721 NE 63rd
5.			
6.			
7.			
8.			

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I, Alex Gagnon, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: Alex

Petitioner's printed name: Alex Gagnon

Street address, city, and county where petitioner is registered to vote: 1639 11th Ave NE
Seattle, WA 98115

No Expansion of Urban Village into Ravenna or Existing Parks

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	Signature	Printed Name	Legal Voting Address
1.	Jerald Forster	Jerald Forster	1744 NE 62nd St.
2.	[illegible]	Stephen C. Forman	1758 NE 62nd St.
3.	[illegible]	Alfred Russell	1770 NE 62nd St
4.	[illegible]	Thomas A. Leahy	1615 NE 63rd Street
5.			
6.			
7.			
8.			

Persons signing this petition may not do so with any other than her or his true name, may not knowingly sign more than one of these petitions, and may not make any false statement on this petition.

I, JMW, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: JoElla M. Weybright

Petitioner's printed name: JoElla M. Weybright

Street address, city, and county where petitioner is registered to vote: 1517 NE 63rd St
Seattle 98115
King Co.

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	Signature	Printed Name	Legal Voting Address
1.	Darnell Samuelson	DARNELL SAMUELSON	6310 22nd Ave NE
2.	Christie Blauvelt	Christie Blauvelt	6315 21st Ave NE
3.	Laura Cyran	LAURA CYRAN	6316 16th Ave NE
4.	Susan Beaulieu	Susan Beaulieu	6365 16th Ave NE
5.	Elizabeth A. Sims	Elizabeth A. Sims	6302 19th Ave NE
6.			
7.			
8.			

Persons signing this petition may not do so with any other than her or his true name, may not knowingly sign more than one of these petitions, and may not make any false statement on this petition.

I, Amy Eastwood, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: Amy Eastwood

Petitioner's printed name: Amy Eastwood

Street address, city, and county where petitioner is registered to vote: 6319 16th Ave NE
Seattle, WA 98115

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	Signature	Printed Name	Legal Voting Address
1.		Katrina Shereko	6307 16th Ave NE
2.		Judith Bendich	1954 NE 62nd St.
3.		Hilary Stamback	6311 16th Ave NE
4.		Maria Lambright	6303 17th Ave NE
5.		John Manetti	6306 15th Ave NE
6.		Emily Manetti	6306 15th Ave NE
7.			
8.			

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I, Alex Gagnon, swear or affirm under penalty of law that I circulated this sheet of the foregoing petition, and that, to the best of my knowledge, every person who signed this sheet of the foregoing petition knowingly and without any compensation or promise of compensation willingly signed his or her true name and that the information provided therewith is true and correct. I further acknowledge that under chapter 29A.84 RCW, forgery of signatures on this petition may constitute a class C felony, and that offering any consideration or gratuity to any person to induce them to sign a petition is a gross misdemeanor, such violations being punishable by fine or imprisonment or both.

Petitioner's signature: _____

Petitioner's printed name: Alexander C. Gagnon

Street address, city, and county where petitioner is registered to vote: 6319 16th Ave NE
Seattle WA 98115

Date: 11/20/2015

Name: Roosevelt Neighbors' Alliance

Draft Plan Element: Growth Strategy, Neighborhood Planning

Comment:

The Roosevelt Neighbors' Alliance community group represents the northwest quadrant of the University District. We oppose the mayor's HALA initiatives because they eviscerate the protections in today's comprehensive plan. We cite may examples in Chris Leman's document found at http://www.eastlakeseattle.org/?page=CompPlan. The University District spent the past two years thoughtfully planning density across city and neighborhood stakeholders. The University District is already well ahead of its future growth target. The University District already more development capacity in its current zoning to satisfy twice the 2035 growth targets.

A thriving neighborhood needs thoughtful, planned, constrained redevelopment in concert with adaptive reuse of existing buildings, all in concert with neighborhood influence and a market economy balanced by laws that promote making a place that people want to be by choice.

Removing the comprehensive plan's many protections on livability and unleashing unfettered development fueled by greed to maximize profit is not the way to go about reimagining the city to accommodate future growth.

City leaders need to move into our urban centers and villages and live their lives in full exposure to their own policies. City leaders need to reconvene HALA with thoughtful progressive community leaders who understand how to mix growth and livability. City leaders need to come out into the light of day and debate comprehensive plan proposed amendments in a public forum that allows a free flow of thought and scrutiny by all.

The haste I see in this process reminds me of an adage. If you want to go fast, go alone. If you want to go far, go together.

The city is going alone today in haste. It needn't. Neighborhoods invite the city to go together with them to envision the denser and more livable future that is ours. Together we can go far. Alone we act in haste and are ultimately misguided and wasteful.

Our built environment survives bad decisions. That's precisely the problem with haste. Haste risks building something that generates a profit but doesn't give back to the community. Developers aren't bad or evil, they simply aim to maximize profits. Government and the people who elect government officials need to influence the trend toward greed into a trend toward creating long terms assets that collectively benefit the neighborhood. Profits will still be made. And so will real working thriving neighborhoods where people choose to be in a free market of neighborhood choice.

Be responsible, Mr Mayor. Come clean and have an open debate about your comp plan proposals and what the city needs to be responsible and livable 20, 50 and 100 years from now. It will take real leadership to course correct. I'm confident you can do just that. And I'm confident that neighborhood leaders are an ally for an even broader interests than today's Seattle 2035 or HALA ever were.

Roosevelt Neighbors' Alliance

RNA is the neighborhood organization serving the northwest U District

City of Seattle

Seattle Bicycle Advisory Board

November 20, 2015

To: Kevin O'Neill, SDOT

Copies: Nicole Freedman, SDOT

Subject: Comments on Seattle 2035 Comprehensive Plan Update

The Seattle Bicycle Advisory Board has collaboratively and thoughtfully reviewed the Seattle 2015 Comprehensive Plan Update and is following advisory comments.

The Comprehensive Plan obligates the City to provide infrastructure to accommodate growth targets. The Seattle Bicycle Advisory Board supports Comprehensive Plan elements that encourage the use of bicycle transportation. Improving our transportation network for safe use of bicycles for daily transportation is a cost effective way to accommodate growth, and has many other benefits for public health, community wellbeing, and environmental quality. If developed with care and with true involvement of the affected communities, bicycle transportation infrastructure improvements may also help fulfill Seattle's goals of equity and racial and social justice.

The Comprehensive Plan is important because it provides the foundation and overall framework for a variety of City plans and policies including the Bicycle Master Plan and the Climate Action Plan.

STRATEGIES
We have these specific comments on the overall Strategies:

1. Growth Strategy
The growth strategy is to "Guide more growth to areas within a 10-minute walk of frequent transit." We suggest that this be expanded to include a ***10 minute bicycle ride to frequent transit with bike parking and roll-on coaches.***

2. Land Use
The land use provisions would "Designate a Stadium District on the Future Land Use Map, an area around the professional stadiums, where housing and hotels would be permitted while protecting freight mobility."
We suggest expanding this to include planning for transit, bike and walking access to and through the stadium district to protect freight mobility and to provide alternatives to private vehicle access.

3. Transportation
We strongly support the strategy to "Move towards transportation service standards that consider all travel modes, including pedestrians, bicycles, cars, trucks, and transit."

4. Parks and Open Space
The plan would "Set goals for parks and open space that focus on quality, equity, and proximity to jobs and residences."

The Seattle Bicycle Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the city on matters related to bicycling, and the impact which actions by the city may have upon bicycling; and shall have the opportunity to contribute to all aspects of the city's planing processes insofar as they relate to bicylcing.

- City Council Resolution 25534

SMT, 700 5th Avenue, Suite 3800, Seattle, WA 98124-4996
Web Address: bikeboard@seattle.gov
An Equal Employment Opportunity, affirmative action employer. Accommodations for people with disabilities provided on request.

To achieve these goals, we encourage inclusion of policies that would promote park access by bicycle, and use of parks to provide safe walking and cycling connections as part of neighborhood routes accessible for all ages and abilities. This would particularly improve equity and quality of life for those too young to drive to parks.

CORE VALUES
We have these comments on the Four Core Values included in plan:

1. Race and Social Equity
The plan strives to address displacement and the unequal distribution of opportunities, to sustain a diverse Seattle. The Draft Plan promotes equitable access to housing, jobs, education, parks, community centers, and healthy food. Affordable housing and affordable transportation are interconnected and to be considered together.

For transportation planning including bicycle facilities we suggest inclusion of these strategies:

- Engage the whole community in outreach and planning.
- Use alternatives beyond standard public meetings and mainstream online social media to connect to all residents and ensure inclusion of non-English speaking communities.
- Take special care that transportation infrastructure improvements are not just avenues of gentrification, improving districts to the point that low-income people are pushed out by wealthier people attracted by the newly improved conditions.

2. Environmental Stewardship
Seattle protects rural areas, forests, and green spaces in the city by taking on a significant share of the region's growth and concentrating that growth in urban villages. The City is committed to become carbon neutral by 2050. The Draft Plan calls for development that significantly increase bike, walk and transit mode share percents. By making these modes more viable options, people can be less car-reliant.

We support this goal. More than 40% of Seattle's carbon emissions are from surface transportation. Seattle cannot meet its Climate Action Plan goal to be carbon neutral by 2050, and protect its air and water quality from pollution, without making biking, walking, and transit viable options that are actually used for the majority of all trips.

3. Economic Opportunity and Security
Jobs and livable wages create opportunity and stability in Seattle's communities. The Draft Plan includes policies that help the City accommodate and direct employment growth. It also addresses the education and skills residents need to fill the new jobs in Seattle.

Providing safe, efficient, connected transit, bicycle and walking routes, with bike share and car share options, will help alleviate the high cost of new housing, and rental rate increases for existing housing, by making it feasible to live without the expense of owning a car. The growth in Seattle population is primarily in young adults, the age group most like to walk, ride or use transit.

The Seattle Bicycle Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the city on matters related to bicycling, and the impact which actions by the city may have upon bicycling; and shall have the opportunity to contribute to all aspects of the city's planing processes insofar as they relate to bicylcing.

- City Council Resolution 25534

Bicycle infrastructure is cost effective, keeping the tax burden down. It has far lower cost per mile and cost per trip than light rail, streetcar, or new vehicle lane construction. This adds to financial security for people with fixed or low income.

4. Community
As Seattle grows and becomes more diverse, the Draft Plan encourages more public participation in decisions affecting all aspects of City policies.

We reiterate the comments we have made above for Race and Social Equity. Geographic equity is also applicable.

Investments that promote walking and bike riding as viable options to driving a car are investments in public health and community life. They improve public health by reducing air pollution and noise, and reducing injuries and deaths caused by vehicle crashes. They improve the quality of community life on the streets and in neighborhood and downtown commercial districts.

TRANSPORTATION ELEMENT

"Transportation systems will respond to travel demands, economic needs, development patterns, and changing lifestyles. Seattle will continue to work with regional transportation agencies to move people within the city and the region."

We support these Goals/Policies Relating to Bicycles:

- T1.6 Improve connections to urban centers and villages from all Seattle neighborhoods, particularly by providing a variety of affordable travel options (bicycle, transit, and pedestrian facilities)
- T2.1 Designate space in the public right-of-way to accommodate multiple travel modes.
- T3.1 Develop and maintain high-quality, affordable and connected bicycle, pedestrian, and transit facilities.
- T3.9 Develop and maintain pedestrian and bicycle facilities that enhance the predictability and safety of all users.
- T3.10 Prioritize bicycle and pedestrian investments on the basis of increasing use, safety, connectivity, equity, health, livability, and opportunities to leverage funding.
- TG6 Provide and maintain a safe transportation system that protects all travelers, particularly the most vulnerable users.

The Seattle Bicycle Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the city on matters related to bicycling, and the impact which actions by the city may have upon bicycling; and shall have the opportunity to contribute to all aspects of the city's planing processes insofar as they relate to bicylcing.

- City Council Resolution 25534

- T6.3 Invest in education measures that increase mutual awareness among motorists, pedestrians, and bicyclists.

We support the new draft consideration of right-of-way allocation and function, with the idea of multi-functional streets, making the best use of the streets we have.

Allocate space on Seattle's streets to safely and efficiently connect people and good to their destinations while creating inviting spaces within the ROW (Goal TG2)

We affirm the first three considerations listed for "integration of the top priorities":

1. Improve safety
2. Address sidewalk width before allocating space to other ROW zones
3. Preserve the transition zone for non-mobility purposes where possible

We have concerns regarding the last two considerations listed:

4. Prioritize shared and shorter duration uses.

   Concern:Often, bicycle routes are best as separated routes, not shared.

5. Relocate the most flexible uses to other streets or private property

   Concern: Some may consider bicycle use is to be the most flexible use. The easiest to shunt off to less direct or steeper routes instead of more desirable and useful routes. This consideration should be phrased in such a way that people on bikes, on foot, or using wheelchairs or mobility scooters are not considered the "most flexible" uses or users in most circumstances.

The Seattle Bicycle Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the city on matters related to bicycling, and the impact which actions by the city may have upon bicycling; and shall have the opportunity to contribute to all aspects of the city's planing processes insofar as they relate to bicylcing.

- City Council Resolution 25534

LEVEL OF SERVICE (LOS)

Level of Service is a quantitative or qualitative measure of the performance of transportation systems and facilities. Traditionally, LOS has focused on vehicle congestion (traffic volumes/ road capacity). The Growth Management Act requires LOS standards for all locally-owned arterials and transit routes. Puget Sound Regional Council is seeking LOS standards that focus on all modes of transportation.

We support a new approach to LOS that is multi-modal, not just car or vehicle-based as has been the case in the past. The emphasis should be on moving people, not simply moving cars or vehicles. This would align with MOVE Seattle and other citywide plan goals. Such an approach should encourage greater use of alternative modes including bikes, walking, and transit (bus and light rail).

SMT, 700 5th Avenue, Suite 3800, Seattle, WA 98124-4996
Web Address: bikeboard@seattle.gov

An Equal Employment Opportunity, affirmative action employer. Accommodations for people with disabilities provided on request.

We understand the City is currently considering mode share targets for sectors of the City. We would support forward-thinking, "aspirational" LOS mode share targets that reflect increased use of bikes and transit. This would be consistent with the planned build-out of light rail in Seattle and nearby cities, and an increasing mode share for bicycles as new infrastructure and facilities such as protected bike lanes and greenways are implemented, as defined in the new Seattle Bicycle Master Plan adopted in 2015.

Such a new and innovative approach to LOS should be designed so as to not restrict development but rather result in smart growth that is consistent with other City policies and strategies, including those in the Comprehensive Plan.

Sincerely,

SBAB Leadership Team:

Kristi Rennebohm-Franz
Chair

Adam Bartz
Vice Chair

Merlin Rainwater
Vice Chair

Don Brubeck
Secretary

SBAB Members:

Jeff Aken
Jed Bradley
Riley Kimball
Phyllis Porter
Leah Curtiss
Steve Kennedy
Lara Normand
Michael Wong

The Seattle Bicycle Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the city on matters related to bicycling, and the impact which actions by the city may have upon bicycling; and shall have the opportunity to contribute to all aspects of the city's planing processes insofar as they relate to bicylcing.

- City Council Resolution 25534

To: Department of Planning and Development (DPD)
From: Seattle for Everyone Governance Committee
Date: November 20, 2015
Re: Seattle 2035 draft comprehensive plan

We are writing on behalf of *Seattle for Everyone*—a broad coalition of affordable housing developers and advocates, for-profit developers and businesses, labor and social justice advocates, environmentalists and urbanists. We are united to build an equitable, prosperous, thriving, and inclusive Seattle that shares the benefits of the city's growth among all current and future residents—from those struggling with homelessness to wage-earners and families. *Seattle for Everyone* is working together to support the city's Housing and Livability Agenda (HALA) provisions to produce and preserve critically needed affordable and market-rate housing in the City of Seattle. We believe that the HALA recommendations represent the first ever comprehensive package of affordable housing policies that will provide for a growing, inclusive city over the coming decades.

The Seattle 2035 Comprehensive Plan provides the critical framework for growth in Seattle. Addressing our city's affordable housing crisis as we grow will take bold and innovative action to create and expand more affordable housing options throughout Seattle, most especially in areas with the greatest access to jobs, amenities, services and mobility choices. It is therefore essential that Seattle 2035 policies and HALA strategies are consistent, mutually supportive, clear and actionable.

Broadly *Seattle for Everyone* supports provisions in Seattle 2035 that seek to increase housing supply, diversity and affordability. In particular, we want to express our strong support for the following three key proposals put forward in the draft plan:

- Guide more growth to areas within a 10 minute walk of frequent transit
- Create a Future Land Use map that communicates future development in urban villages and provides more flexibility in changing between commercial, mixed use and residential development activities within urban villages.
- Increase the diversity of housing types in lower density residential zones, including single-family zones.

These proposals would increase land zoned for multi-family and expand urban village boundaries near transit, consistent with HALA recommendations MF.1, MF.2 and MF.3. We view these proposals as critical pieces to the successful implementation of HALA and the Grand Bargain.

We support the Grand Bargain agreement to require developers to provide for affordable housing in conjunction with increased capacity for multifamily housing and commercial development. We urge the City to add language to the land use and housing elements which reflects the City's commitment to enacting this policy as

well as developing strong provisions and measurable timelines for implementing proactive affordable housing preservation and displacement prevention strategies.

Seattle for Everyone urges your strong support for these key proposals to ensure that we leverage our city's unprecedented growth to create communities that are affordable, livable, accessible, inclusive and sustainable. We look forward to working together in the future and would welcome the opportunity to meet in person as you move forward with the Seattle 2035 Comprehensive Plan development process. If you have any questions about *Seattle for Everyone* please feel free to contact Kylie Rolf at (425) 327-1738.

Thank you for your time,

Adam Glickman, SEIU 775
David Moseley, Alliance for Pioneer Square
Faith Pettis, Pacifica Law Group
Hilary Franz, Futurewise
Kelly Rider, Housing Development Consortium of Seattle-King County
Maud Daudon, Seattle Metropolitan Chamber of Commerce
Rebecca Saldana, Puget Sound Sage
Sara Maxana, Ballard Resident

Seattle for Everyone Governance Committee

City of Seattle

Ed Murray, Mayor

Seattle Freight Advisory Board

Warren Aakervik, Chair

Bari Bookout

Katherine Casseday

Terry Finn

Timothy Hillis

Frank Rose

Pat Cohn

Hal Cooper Jr.

Dan McKisson

November 20, 2015

Ms. Diane Sugimura, Director
Department of Planning & Development

City of Seattle
700 Fifth Avenue, Suite 1900
P.O. Box 34019
City of Seattle 98124-4019

Subject: Seattle 2035: Draft Seattle Comprehensive Plan

Dear Ms. Sugimura:

The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.

City Council Resolution 31243

The purpose of the Freight Advisory Board is to "advise the City Council, Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment." (Resolution 31243)

The purpose of this letter is to provide comments from the Seattle Freight Advisory Board on the Seattle 2035 Draft Comprehensive Plan. As you may know, Seattle DOT is preparing the first Freight Master Plan (FMP) for the City and it is planned for completion in 2016. This is the fourth modal master plan for the City and must be reflected in this update to the Comprehensive Plan to fully reflect both the planned network as well as the expected changes in freight mobility and good deliveries – in concert with the planned growth and changes to person mobility in the City. Please do not finalize Seattle 2035 and the Seattle Comprehensive Plan until it can fully reflect an adopted Freight Master Plan, endorsed by both Mayor and Council. We strongly urge that the Seattle Comprehensive Plan not be finalized or adopted without incorporating and reflecting the adopted FMP. The current schedule for a Draft FMP for public comment is in February 2016. The Seattle 2035, Draft Seattle Comprehensive Plan is not a comprehensive plan for transportation and mobility in Seattle without reflecting the FMP which is still in development.

Seattle Municipal Tower, 700 5th Avenue, Suite 3800, PO Box 34996, Seattle, WA 98124-4996
Tel: (206) 684-4103 Tel: (206) 684-5000 Fax: (206) 684-5180
Web: www.seattle.gov/sfab/
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Below are Freight Advisory Board comments on the Draft Comprehensive Plan based on our review, for you to incorporate into the Final Plan.

- The Seattle 2035 Draft Comprehensive Plan must reflect the Freight Master Plan as a critical travel mode for Seattle. Do not adopt the Comprehensive Plan without incorporating the Freight Master Plan.

- Where is freight in the Plan? Freight must be included in the plan for property access and in the streets design standards for trucks, loading and site access. The current draft focuses on movement of people. Freight movement to the distribution centers with large trucks (WB67) for those same people should receive commensurate emphasis.

- Protect the manufacturing and industrial centers in Seattle – the MIC and the Ballard Interbay MIC

- Sustain the freight network – major truck streets, minor truck streets – as redefined in the Freight Master Plan in development

- Seattle growth envisions people mobility with emphasis on transit and non-motorized travel, however, reduced reliance on the private auto will increase reliance on freight and freight mobility to deliver goods throughout the City. This means that freight mobility is a key to a vibrant economy in Seattle. Level of service of transit and freight must be a benchmark of any further growth in the Seattle area.

The Freight Advisory Board looks forward to the Seattle 2035 – Comprehensive Plan that helps to set the stage for overall growth and livability in Seattle. Freight is a key element of Transportation for the City and we urge you to ensure that freight is fairly reflected in the updated Comprehensive Plan, including the Freight Master Plan in development.

Feel free to contact me if you have any questions or issues.

Sincerely,

Warren R. Aakervik, Jr.
Chairman, Seattle Freight Advisory Board

Seattle Green Spaces Coalition

Comments to Draft
Comprehensive Plan
November 20, 2015

Comments of Seattle Green Spaces Coalition to Draft Seattle 2035 Comprehensive Plan

Understanding The Value of Our Green Infrastructure to Our Ecosystem is Critical to Formulating a New Comprehensive Plan

Seattle Green Spaces Coalition strongly urges the City of Seattle to:

1. Incorporate more than a billion dollars a year worth of green infrastructure assets onto its balance sheet in the 2035 Comprehensive Plan -- enabling the city to preserve and steward its natural capital going forward, and to save tens to hundreds of millions of dollars in costs every year on financial borrowing, infrastructure development and maintenance, and public health,
2. Understand that publicly-held open and green spaces provide value in perpetuity to Seattle residents vs. selling that land for real estate development, which only provides short-term gains during each owner's amortization period,
3. Replace piecemeal evaluations of individual green and open space properties in the city surplus lands portfolio with an overall, holistic assessment of Seattle's green infrastructure.
4. Fulfill requirements in the Growth Management Act to concurrently develop infrastructure, including green and open spaces.

An Inter-Departmental Team (IDT) reviewed Statement of Legislative Intent 47-2-A-2 (Open Space Opportunity Fund), and reported that, "There may be real value to contemplating value of green infrastructure …in cost-benefit analysis."

A. **Comprehensive Plan 2035 must recognize that public open and green space assets provide monetary value.**

While standard economic practice assigns more value to present than future assets, we know the reverse is true. As the city builds out through residential and commercial development, open space becomes proportionately scarcer, and therefore more valuable.

Four years ago (2011), the Trust for Public Lands reported that Seattle parklands and natural areas deliver nearly $500 million a year in benefits and savings to the city – beyond the $20 million they generate in revenue. These included oxygen production and carbon sink, drainage, storm water and erosion control, habitat provision, heat island mitigation, aesthetics and property value enhancement, and recreation, public health and community engagement benefits. Two years ago (2013), the Urban Forest Stewardship Plan (UFSP) found that urban forests provide $23.4 million annually in air quality benefits and savings alone. Estimated today, the total benefits and savings provided by our public and private green infrastructure would exceed a billion dollars a year.

B. **Publicly held open and green spaces provide value in perpetuity**.

Our growing population requires more open space to make urban neighborhoods livable. Contrarily, privately owned land provides increasing value to its owner, and decreasing value to the city over its amortization period.

When the 1899 Seattle City Council acquired the Cedar River watershed area – for the benefit of Seattle citizens in perpetuity – council members acted with rare vision. A real estate appraisal of the watershed's 90,638 acres today, however, would go no further than valuing it as raw land, dotted with some valuable infrastructure. The real value of this area, which provides clean drinking water to 1.4 million people in the greater Seattle area, is almost incalculable. Little of that value would be realized if the City of Seattle sold this land at "fair market value." Further, the comparatively paltry sum would not come close to covering the cost of developing new city water sources. On the other hand, if Seattle wished to purchase a resource on this scale today, the cost would be astronomical, therefore prohibitive and fiscally irresponsible. Once these lands are lost, it requires great expense to repurchase them, or to replace them with human built capital.

Seattle Green Spaces Coalition urges the public sector to view its green infrastructure as an asset of continuously appreciating value. While the city currently tracks, tallies and depreciates built infrastructure over time, it does not tally or track green infrastructure, even though its value increases over time. This presents a fresh opportunity for the City of Seattle to explore. Precedents have been set, and new ones are being developed at federal, state, county and local levels, and in both the public and private sectors.

C. A Comprehensive Plan Must Take a Holistic Approach To The Built and Green Environment

Seattle Green Spaces Coalition urges the city to complete an aggregated, holistic assessment of Seattle's green infrastructure, a valuation of benefits and savings it provides the city, and then incorporate those values into the city's asset portfolio, for management, cost-benefit analyses and reporting. Briefly, we recommend creating an Integrated Master Plan for Open Space. We propose that the City identify its open space goals, not just "aspirations," and create a targeted work plan to implement these goals into realities.

Presently, piecemeal evaluations of individual open and green space properties in the city's surplus land portfolio set up a criteria competition between evaluating entities – e.g., the Parks & Recreation Gap Analysis vs. city department analyses vs. the Urban Forestry Commission vs. Seattle Parks Foundation vs. the Trust for Public Lands, etc. The surplus property process also sets up a rejection cycle starting with offering the land to other departments and agencies at "fair market value," which is often prohibitively expensive – and which they often reject, followed by asking for interest from citizens or citizen groups – who also in most cases cannot afford the price (see A. above).

This pricing system neglects the land's ecosystem services benefits, and the added value of neighborhood participation in activating and stewarding it. The city owns approximately 414 acres "excess" or "surplus" land, much of it wooded and/or planted open space that has provided benefits as part of Seattle's living ecosystem for generations. Without a comprehensive assessment of the city's open and green spaces, city leaders have no idea how these acres contribute to Seattle's green infrastructure, nor what value they provide. It makes no sense to dispose of these properties without knowing their value.

D. **The Growth Management Act (GMA) requires Seattle to develop concurrently its infrastructure, including green and open spaces, as it builds out its hardscape**.

The city has a responsibility to maintain and increase open and green space as it develops. This must be done in concert and compliance with city environmental goals, such as increasing forest canopy, reducing pollution and carbon footprint, and improving equity in city-wide distribution of and access to green assets. One of the key principles of environmental justice is that those most affected by environmental inequities are able to participate in the process and develop solutions. This would offer an ideal opportunity to satisfy GMA requirements, where the City examines how surplus properties can be re-purposed in ways that contribute to race and social justice and environmental equity.

Seattle Green Spaces Coalition urges the city to act on opportunities for repurposing city owned surplus land, by retaining it for interim or partial uses as temporary

encampments for the homeless, and for permanent uses as land conservancies, tree banks, P-Patches, parks, environmental, climate mitigation or educational sites, and other uses. While city departments have identified possible uses or pilot projects for surplus property, there is no integrated approach to re-purposing the land for public benefit.

Seattle Green Spaces Coalition encourages the city to find new, innovative funding, ownership and management strategies for retaining and expanding its open and green space assets. The city currently allows developments to trade technologies -- e.g. green roofs, green walls, bio swales, and permeable pavement — for reduced open space. None is proven sufficient to meet the serious environmental challenges facing Seattle. We urge the city to retain City owned green space to mitigate negative environmental effects.

Seattle has a laudable and extensive history of re-purposing sites of historical, cultural and environmental significance, such as Gas Works Park, the Burke-Gilman trail and MOHAI, to name just a few. These make our city unique, celebrate our heritage and add dimension to the fabric of our lives. People love to visit and spend time in places that have something to them. This experience can be brought to re-purposing our surplus land. Seattle's history also includes numerous, successful public/private partnerships, such as the Pike Place Market and Green Cities Partnership. City Fruit and Seattle Tilth have expressed interest in expanding their urban agriculture programs on City-owned surplus property – just two of many potential partners the city can with in the private and non-profit sectors

Since 2013, Seattle Green Spaces Coalition has been working with neighborhoods to identify their needs and desires, and how our surplus land can be re-purposed to meet them. We urge the city to encourage and grow these neighborhood efforts to capitalize on healthy green space.

It does not make sense to sell property, and to create a "draft" Comprehensive Plan without quantifying our green infrastructure needs and making a determination of how we will meet those needs. Green infrastructure is as critical to the future of the City as the build environment. Yet while the Draft Plan contains myriad details about future built environment without a framework of our green infrastructure balance sheet, and what our open space means for that balance sheet.

Key Metrics Have Been Omitted from the Draft Plan

The Draft Plan has deleted portions of the current Comprehensive plan that are very important for the livability of Seattle, and critically important for our ecosystem. We request that these be retained in the new plan:

- UVG15 (page30): Provide parks and open spaces that are accessible to urban villages to enhance the **livability** of urban villages, to help shape

the overall development pattern, and to **enrich** the character of each village.

- UV46 (page 40) Strive to accomplish goals in the Urban Village Appendix B for the amount, type and distribution of open space. This Appendix identifies the open space requirement to be one acre per 1,000 households and all areas in either urban center or village being within 1/8 if nuke from open space or ¼ of a mile for residential villages. The proposed plan has no statement.

- UV47 (page 40) Designate and preserve important natural or ecological features in public ownership as green space for low intensity uses.

Specific Comments

Seattle Green Spaces Coalition provides the following specific comments to the Draft Comprehensive Plan. Proposed changes and additions are underlined.

Growth Strategy/Planning for Growth

The Draft Plan states that it envisions a city where growth heightens our stewardship of the environment, yet the Growth Strategy Goals and Policies fail to include environmental stewardship.

Proposed Change:

Revise GSG1: Have strategies that prepare the City for the challenges and opportunities of growth and that represent the needs and desires of a broad cross-section of city residents and business owners and that enhance our environmental stewardship.

Add to Policies:

GS1.5: Monitor urban centers and villages to track changes over time in number of housing units and jobs, population and public investments, parks and open space, and use this information to make decisions about conducting further planning or providing additional investments to help meet the needs of residents in these locations.

GS1.7 [new]: Engage in on-going evaluation of how growth shall heighten our stewardship of the environment, enhance public health and further our climate action goals.

Growth Strategy/Urban Village Strategy

The Urban Village Strategy must take into account the character of neighborhoods with respect to green space. Also, to meet goals of concentrating various aspects of people's lives in urban centers (such as jobs and commerce), the Strategy should include parks, recreation, urban agriculture and open space within walking distance which also reduce car dependency and would benefit families and public health.

Proposed Changes:

Revise GS2.4: Coordinate planning for transportation, utilities, open space, public gathering places, parks and recreation opportunities, and other public services to meet the anticipated growth and increased density.

Revise GS2.6: Plan for development in urban centers and urban villages in ways that will provide a broad cross-section of Seattle households with better access to services, transit, recreation, and educational and employment opportunities.

Revise GS2.5: Encourage infill development, restoration of natural areas, and/or development of parks and recreation opportunities on vacant and under-used sites, particularly in urban centers and villages.

Revise GS2.10 to include Open Space as a Characteristic in Growth Strategy Figure 1.

Add the following to GS2.16 to reflect the benefits of open space and natural areas as buffers and contributors to cleaning industrial pollutants: Development of open space and natural areas to offset industrial pollutants and to provide clean air and clean water benefits.

Clarification Requested:

GS2.17 would designate the Ballard-Interbay and Duwamish areas as manufacturing/ industrial centers. However, these are areas where people currently live, where there are bike trails, parks, environmentally critical areas and significant natural areas. How will these current uses be supported and enhanced by a designation of "manufacturing/ industrial centers"?

Urban Design

While the Discussion section refers to the city's close relationship with nature, as well as the importance of parks and public spaces, these aspects of the physical environment are not reflected in the Policies section of the Natural Environment. The Comprehensive Plan needs to address the inadequacy of the current Tree Ordinance, and should incorporate greater tree protection in its policies.

Proposed Changes:

Add the following to GS4.1: Encourage the preservation, protection, and restoration of Seattle's distinctive natural features and land forms such as bluffs, beaches, streams, and remaining evergreen forests, and encourage urban design to foster a close relationship with nature through access to parks, community gardens, public spaces, and vistas.

Add the following additional policy under Built Environment: Preserve green infrastructure and neighborhood character and needs of natural environment by protecting natural features, trees and plant life.

Revise GS4.26: Design public spaces that consider the nearby physical context and the needs of the community, such as access to nature.

Annexation

Upon incorporation, areas abutting South Seattle will have additional need for green infrastructure as well as access to parks and natural areas. We recommend that a policy be added to plan for and support these needs.

Proposed Changes:

GS5.6 [new]: Retain publicly owned land in South Seattle to accommodate future needs for green infrastructure, parks and natural areas.

GS5.7 [new]: Develop plans for vacant and under-utilized land in South Seattle to accommodate future needs for green infrastructure, parks and natural areas.

Land Use

The land use goals fail to reflect an underlying mission of the Comprehensive Plan to enhance and preserve our natural environment. The goals also fail to reflect the need for parks and recreation for purposes of public health. (Parks and recreation are not merely "amenities" but vital parts of our living environment.) Also, the goals omit reference to our climate action goals. These should be included.

Proposed Changes:

We propose the following additions to LUG2: Provide zoning and accompanying land use regulations that:

- Allow for a variety of housing types to accommodate housing choices for households of all types and income levels

- Support a wide diversity of employment-generating activities providing jobs for a diverse residential population, as well as a variety of services for residents and businesses
- Accommodate the full range of public services, institutions, parks and recreation, open space, and amenities needed to support a fully developed, diverse, and economically sustainable urban community
- Support green infrastructure and enhance stewardship of the natural environment
- Support the City's Climate Action Plan, Urban Forestry Stewardship Plan and Food Action Plan

Add to LU2.1: Allow or prohibit uses in each zone based on the zone's intended function as described in Section 2 of this land use element and the expected impacts of a use on other properties in the zone and the surrounding area. Generally allow for a broad mix of compatible uses in those zones that allow the greatest densities of development while balancing stewardship of our natural environment.

We request that LU2.2 be deleted. It is unnecessary as standards for mitigation are addressed by the Environmentally Critical Areas Code. As written, LU2.2 is vague and could be interpreted to encourage "conditional" development without best scientific practices for mitigation.

Single-family Residential Areas and Multifamily Residential Areas

Throughout the City, we are not meeting our open space goals. While we are preparing for growing density, we must also make opportunities to grow our open space and natural areas.

We recommend the following additional policies:

LU8.13 [new]: Seek opportunities to grow our open space, green space and natural areas.

LU8.14 [new]: Retain public-owned surplus and excess properties for open space, green space and natural areas.

LU8.15 [new]: Aspire to engage community groups in opportunities to meet our open space goals.

LU9.16 [new] Seek opportunities to grow our open space, green space and natural areas.

LU9.17 [new] Retain public-owned surplus and excess properties for open space, green space and natural areas.

LU9.18 [new]: Aspire to engage community groups in opportunities to meet our open space goals.

Industrial Areas

To reduce industrial pollution and improve air and water quality, we recommend that natural areas be developed in the industrial areas. We propose the following additional policies:

LU11.27 [new]: Seek opportunities to develop natural areas to reduce industrial pollution and improve air and water quality, and retain public-owned surplus and excess properties for buffers and to reduce industrial pollution and improve air and water quality.

Environmentally Critical Areas

Growing density and development are putting pressures on our environmentally critical areas and placing more demands on our green infrastructure. To balance these pressures, we recommend the following additional policies:

LU17.19 [new]: Seek a net gain in tree canopy and biomass functions for carbon sequestration and to improve air quality across the city.

LU17.20 [new]: Retain publicly owned surplus or excess properties in environmentally critical areas as natural areas.

LU17.21 [new]: Seek to acquire vacant or under-utilized property in environmentally critical areas as parks or natural areas to enhance the natural environment.

Transportation

Other cities have begun to use alleys for flood control, water retention, green space, and community gardening. While some alleys in Seattle have been vacated for commercial use, the potential to vacate alleys for public use merits further exploration. We recommend revising policies T2.11 and T4.1 to reflect this opportunity as follows:

T2.11 [revised]: Maintain, preserve and enhance the City's alleys as a valuable network for green infrastructure and public spaces and where reasonable, finding alternative means for access, loading and unloading of freight and utility operations.

Revise T4.1: Design and operate streets and alleys to promote green infrastructure, new technologies, and active transportation modes while addressing safety, accessibility and aesthetics.

Environment

One of the top priorities of the Comprehensive Plan is protecting our ecosystem. While the Environment section describes certain aspects of the ecosystem, it does not address the basic need to acquire and preserve natural areas. This is fundamental to balancing the environmental impacts of past, current and future development which puts a great burden on residents and wildlife, and our ecosystem as a whole. We recommend revising the goal to include fostering healthy green spaces, parks and natural areas, not just trees, vegetation, and soils.

EG1 [revised]: Foster healthy green spaces, parks and natural areas, as well as trees, vegetation, and soils to improve human health, provide wildlife habitats, reduce drainage costs, give residents across the city access to nature, and increase the quality of life for all Seattleites.

We recommend adopting additional policies under the Environment Section to address protecting and enhancing our physical environment.

E1.8 [new]: Quantify the nature and quality of the City's green infrastructure needs and how those needs are and are not met by the ecosystem services provided by private and public lands

E1.9 [new]: Retain public-owned surplus and excess property to offset growing density and to restore our ecosystem.

E1.10 [new]: Develop protections for environmentally significant or distinctive land and features.

E1.11 [new]: Develop open space goals for the growing city population and plan for how to meet those goals.

E.1.12 [new]: Ensure that our natural areas and environmentally significant features are protected from degradation.

Water

We recommend an additional policy to preserve wetlands and streams.

E2.6 [new]: Retain publicly owned surplus and excess properties in watersheds and/or containing wetlands and streams.

E2.7 [new]: Seek to restore wetlands and streams on under-utilized or vacant land.

Parks and Open Space

Seattle is not meeting its current open space goals. While the current Comprehensive Plan contains metrics for the amount of open space per resident and the distances for nearby parks and open space, the Draft Comprehensive Plan has eliminated those goals. We request that the Comprehensive Plan adopt levels of service and metrics for open space needs for a growing population.

Further as the Parks Department owns and maintains a sizeable portion of the City's open space, the Parks Department is the steward of a significant part of Seattle's green infrastructure. To prepare for future growth, we require a plan to implement Seattle's open space goals, which would integrate parks and open space into Seattle's green infrastructure needs.

We recommend the following additions:

PG1 [revised]: Provide a variety of outdoor and indoor spaces throughout the city for all people to play, learn, experience nature, and build community.

PG2 [new]: Integrate DPR's stewardship of land into the green infrastructure needs of the City.

P1.13 [new]: Identify potential private-public partnership opportunities to fund acquisition of land.

P1.14 [new]: Provide incentives, impose impact fees, and utilize other mechanisms to require developers to provide funds for the city to acquire open space.

P1.15 [new]: Adopt levels of service and metrics for open space needs for a growing population.

P1.16 [new]: Retain public-owned surplus and excess property to meet the open space needs.

Thank you for considering these comments

Contact Information

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Seattle Human Rights Commission

1963 – 2015 · *52 years of championing human rights and fostering a just future*

November 20, 2015

Transmitted by email to: 2035@seattle.gov

Re: Seattle 2035 Comprehensive Plan

We, the Seattle Human Rights Commission (the "Commission"), write to share our support for the work accomplished by the Seattle 2035 Growth and Equity Analysis (the "Equity Analysis") and the efforts of the City of Seattle (the "City") to use an equitable development framework to achieve racial and social equity. As stated in the Commission's Input Letter (attached) regarding the Equity Analysis, the 2015-2035 Comprehensive Plan (the "Plan") presents a tremendous opportunity to embed human rights, including racial and social equity, within the City's growth strategies and policies.

The City of Seattle was declared to be a Human Rights City in 2012, and it made the commitment to protect, respect and fulfill the full range of inherent human rights for all, as set forth in the Universal Declaration of Human Rights ("UDHR"), the International Covenant on Economic, Social and Cultural Rights ("ICESCR"), and numerous other international human rights treaties.

The stated principal purpose of the Plan is to provide polices that guide the development of the City in the context of regional growth management (p. 18). Specifically, the Plan will be used by the City to help make decisions about proposed ordinances, capital budgets, policies and programs (p.18). However, the Plan recognizes that inequities exist for certain portions of the population (pgs. 5 & 10). It additionally acknowledges that projected growth in the City may affect marginalized populations negatively (p. 5 & 10). The Commission acknowledges that populations do not become marginalized naturally; the City's inequity is a result of a history of racial segregation and intentional disenfranchisement. To that end, the Commission urges the City to adopt a plan that seeks to eliminate inequities associated with the projected growth, rather than participate in the creation of greater disparity. Furthermore, when prevention is impossible and other options to prevent inequity have failed, the City is obligated to adopt strong **mitigation** and **remediation** policy strategies in order to equitably protect affected communities.

The Housing section of the Plan accurately recognizes that housing costs "unduly affect marginalized populations," thus resulting in growing inequities and racial disparities, and makes the protection of marginalized populations a central focus in its recommendations. These recommendations and others provide a strong vision and a path toward ensuring that all people in Seattle have the opportunity to benefit from the city's growth and have access to safe, healthy, and affordable housing options. In order to accomplish this vision, the Commission believes that this section of the Plan must invoke a greater sense of urgency and should include more specific requirements in its recommendations. For example, this section of the plan should include more details on tenant protections and other supportive measures to both affirm human rights and mitigate the loss of existing affordable housing stock. Given Seattle's unsheltered homelessness crisis, this section should also place a greater emphasis on housing as the solution to this problem, as well as express support for interim survival solutions for people who are experiencing homelessness, which for many is the direct result of rising rents and the lack of available affordable housing. The Plan should further describe how the listed policy recommendations will reduce racial disparities. Overall, this section of the Plan provides a strong vision for equity in housing because it advocates for the expansion of affordable housing and also recommends measures to prevent displacement; both approaches are essential in order to make this vision a reality.

As the Plan recognizes existing conditions of inequities in the Housing section, the Plan should also offer more strategies to address existing and potential adverse impacts on historically marginalized communities. For instance, the Environment section of the Plan "prioritizes investments, policies, and programs that address existing disparities in the distribution of environmental burdens and benefits" (p. 128). The section fails to cite specific policies, strategies, or resources that would address these disparities, and strategies such as emergency planning for extreme events and commitment to address contamination can be better embedded throughout the environment section. Additionally, the report does not examine existing conditions for historically marginalized communities' access to parks and open space. The report should thus make a clearer case for protecting these rights in more communities. In order to authentically support poverty reduction, the City should also make more explicit the types of investments in human services the City seeks to implement. The Plan should aim to prevent homelessness and encourage significant investments in human services. Additionally, the Plan should recognize the disproportionality in access to services delivery (p 143). The plan should emphasize policies for this in both access to open space and offering park activities. The Plan should prioritize mitigating and reducing impacts on communities that have already shared a disproportionate burden, and **include explicit strategies to leverage the City's growth to benefit historically marginalized communities**.

The City should also aim to increase marginalized populations' access to opportunities that influence social, economic, and physical well-being. As discussed in the Equity Analysis, many communities in Seattle historically lack **access to education, economic opportunity, transit, civic infrastructure, public health facilities, and healthy food**, all of which are enumerated as human rights in the UDHR, ICESCR, and numerous other international human rights treaties. The Plan should include clear and objective goals or benchmarks aimed at preventing and reducing displacement; increasing access to opportunity; and mitigating and remediating adverse impacts related to the growth anticipated between 2015 and 2035. Doing so will allow the City to have more meaningful guidance, and it will aid the City's efforts to embed the advance of human rights for all residents within its growth strategy.

The adoption of the 2015-2035 Seattle Comprehensive Plan is an opportunity for Seattle to affirm its commitment to human rights by explicitly incorporating international human rights principles. Seattle should be a place where everyone can have the opportunity to live happily, healthily, and freely, regardless of their race or ethnicity, income level, language or cultural background.

Respectfully,

_____

Danielle Wallace, Economic, Social, and Cultural Rights Task Force Chair

Jason Poydras

Jason Poydras, Commission Appeals Chair

Julianna Tesfu

Julianna Tesfu, Commission Secretary

Alex Becker, Commission Co-Chair

Ken Nsimbi
Ken Nsimbi, Commissioner

Sarah Bishop, Commission Co-Chair

Margaret Babayan, Commissioner

CC:
Mayor Edward B. Murray
Seattle City Council
Diane M. Sugimura, Director, Department of Planning and Development
Seattle Planning Commission
Patricia Lally, Department Director, Seattle Office of Civil Rights

November 18, 2015

Tom Hauger
Kristian Kofoed
Department of Planning & Development
tom.hauger@seattle.gov
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700 5th Avenue
Suite 2000
Seattle, WA
98124-4019

via electronic mail

RE: Seattle Comprehensive Plan Update

Dear Mr. Hauger and Mr. Kofoed,

Thank you for the opportunity to comment on the update to Seattle's Comprehensive Plan.

This year the Growth Management Act celebrates its 25th anniversary. There is much to celebrate. Seattle has led the way in helping to protect rural and resource lands. The public has been engaged in the planning process. We have seen tremendous investment in the city for commercial and residential uses. Many neighborhoods have been reenergized with progress being made in many more.

What's troubling, however, is while we have directed growth away from the rural area, we have not adequately accommodated growth in the urban area. Unmet housing demand in the urban area has spiked housing prices and condemned too many workers to long commutes. This impacts the very quality of life for families that the GMA pledges to preserve.

Job growth drives housing growth. A home is where each job goes at night. When we fail to zone for an adequate supply of housing relative to demand (as driven by jobs), housing prices rise and people travel farther from their job to find a place to live which they can afford.

Most home buyers in Seattle are struggling. Homes are selling for $500,000, prices are rising, and those that sell for median or less have multiple offers. According to the Northwest MLS, the October 2015 median sales price in Seattle for single family homes was $555,000 and $493,000 for single family homes and condominiums combined. A $500,000 mortgage demands an income well in excess of the area median income. Many buyers continue to rent in Seattle or *drive away from Seattle until they qualify*.

There are at least four problems with this:

1. Long commutes reduce an individual's quality of life.
2. Long commutes create sprawl.
3. Long commutes can cause dislocation of existing residents.
4. Regardless of transportation mode, long commutes are costly to the commuter, the government and the environment.

The mismatch between what the median income can afford and what the median priced home costs is a problem that spills into other cities --- and other counties. When Enumclaw or Marysville serve as affordable housing for Seattle --- it becomes a regional issue and the whole region suffers.

Seattle needs a housing strategy that recognizes the housing market is a continuum. It is interrelated. Greater housing options in one segment help the pricing equation in other segments. Fewer housing options hurt affordability everywhere. When the demand for housing outstrips supply, the market begins to behave like a game of musical chairs. Those with the financial wherewithal get a chair. Others do not. The way to change this dynamic is to first add more chairs --- or in this case more housing units.

12444 SE 32nd Street, Suite #100 | Bellevue, WA 98005 | **Main** 425.974.1011 | **Fax** 425.974.1032 | nwrealtor.com

Specific to the Seattle Comprehensive Plan Update, we need to commit to zoning for housing to meet actual demand for housing.

Realtors believe the HALA/Grand Bargain recommendations that address opportunities to add housing to all zones, including single family, will help resolve the severe shortage of housing supply relative to demand; an imbalance we see growing in the future if bold steps are not taken now. Proposals include the following:

Grow the urban villages
We have many low density areas in which a greater intensity of use could improve housing options and improve community character and quality. The following measures should be implemented:

More ADUs
Encourage more accessory dwelling units and backyard cottages. Existing regulations are relatively restrictive. Explore removing the owner-occupancy requirement.

Thoughtful urban village transition
At the edges of urban villages, encourage a transition in scale, height and bulk of buildings between higher-intensity and single-family areas. The transition area would allow low-rise housing types (duplexes, triplexes, cottage housing).

Simpler code
Remove duplicative single-family rezone criteria. Including rezone criteria in both the Land Use Code and in the Comprehensive Plan is unnecessary. It creates a longer, more expensive, two-step process to consider rezoning single-family parcels.

Encourage multifamily housing
To protect Seattle's legacy single family neighborhoods, it will be necessary to accommodate the vast majority of new growth in multifamily housing. To do so effectively demands a number of measures.

Increase the land available to multifamily housing.
HALA recommendation: *New multifamily zoned land should be prioritized near green belts, open space and parks; near schools and community centers; and within walking distance of the frequent transit network.*

Increase building heights in multifamily zones.
HALA recommendation: *Modify height limits and codes to maximize economical wood frame construction*

Change 65' zoning code height limits to 75' or 85'. This change would allow buildings to maximize cost efficiencies in "Five over Two" construction and would allow another story of housing on some sites without dramatically changing the scale of development. An 85' height limit could also be explored in conjunction with other adjustments to the building code to allow a sixth story of wood frame construction.

Consider increasing 30' and 40' zones: Upzones within this increment would significantly lower the per square foot cost of building new housing. The same or similar investments in construction of a base story and infrastructure could support five stories of housing instead of two or three with this change.

Consider building and fire code modifications to allow six stories of wood frame construction: Distinct from the proposals above, the City should review the possibility of stretching economical wood frame construction even further. This could take the form of building code changes to increase the height limit or allowed number of wood frame stories. This action needs careful vetting to ensure fire and life safety protection.

Increase flexibility on multifamily type
Remove code barriers to small flats or apartments in some multifamily zones. In some of the Lowrise multifamily zones, townhouse or rowhouse forms of development are favored by the code over stacked flats (apartments or condominiums located on different levels in a building). This can limit production of potentially greater numbers of housing units, or limit the housing product to ownership units instead of rental units. The City should change the code to allow more stacked flats in all Lowrise zones.

Remove recently created barriers to the creation of congregate micro-housing

Increase Zoned Capacity in Light Rail Station Areas
Seattle has underzoned its station areas. Greater intensity is needed to support ridership and leverage the major, long-term investment in light rail. Increase zoned capacity in these areas provides a golden opportunity for the city to promote more affordable housing units. As a matter of policy, station area density should be zoned for 50-year growth or more, rather than the 20-year GMA planning horizon.

Public property
HALA recommendation: *Where feasible, make City owned property available for housing.*

Simpler regulation, smoother process
For too many projects, design review adds costs and creates project delays with no added benefit for the project proponent or the public. In many instances, constraints placed on projects by design review make it difficult to meet the zoned density. The design review process should be revised to meet the aesthetic objectives of the program without adding undue costs or restrictions to the project.

Realtors place a high value on the goals of the Growth Management Act. The promise of a state made up of communities with a balanced set of attributes that make for a high quality of life and are growing in ways that are sustainable and equitable for all is as important now as it was 25 years ago. As a leader in the implementation of GMA, Seattle bears the responsibility of keeping the region livable. Housing is critical to the success of the act. We must take bold steps to plan for growth in a manner that is true and relevant to what's happening on the ground. If we do not, market-rate housing will remain less accessible to middle income earners and out of reach to lower-income earners.

Sincerely,

Tyler McKenzie, President
Seattle King County REALTORS®

Patti Hill, President-Elect
Seattle King County REALTORS®

BART WALDMAN
EXECUTIVE VICE PRESIDENT
LEGAL & GOVERNMENTAL AFFAIRS
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November 20, 2015

Via Email: 2035@seattle.gov; Tom.Hauger@seattle.gov; Kristian.Kofoed@seattle.gov

Tom Hauger and Kristian Kofoed
Department of Planning and Development

Re: Comments on Draft Seattle Comprehensive Plan

Dear Mr. Hauger and Mr. Kofoed:

The Seattle Mariners have actively participated in the City's planning process to establish a Stadium District, in recognition of the unique role of the existing sports and entertainment venues. Creation of a Stadium District is an outgrowth of the Stadium District Concept Plan with its shared vision for the area around Safeco Field and CenturyLink. We strongly support the creation of the Stadium District as described in Goal LUG15, and the Policies that implement it. However, we ask that you consider these additional comments about those Policies.

1. Policy LU15.8 refers to "minimizing the need for parking facilities" for major sports and entertainment uses. We do not believe that language is appropriate. Since the time Safeco Field and CenturyLink were opened, more than 4,000 parking spaces have been removed from around these facilities. Both venues counted on that parking supply to accommodate patrons. With its elimination, Safeco Field, for example, may in the future need to construct new parking. Policy LU15.8 should not discourage that or possibly be used to prevent such new parking when the implementing regulations are adopted. The key issue is limiting traffic impacts, and that can be accomplished in various ways. Thus, we ask that Policy LU15.8 be amended as follows:

> Encourage transportation management strategies by major sports and entertainment uses and other large uses in the district to ~~minimize the need for parking facilities and~~ limit the traffic impacts associated with events, by encouraging patrons to ride transit and choose non-motorized modes of travel.

P.O. BOX 4100 • SEATTLE, WA 98194 • 206.346.4000 • www.seattlemariners.com

Recognize that major sports and entertainment uses have unique needs for oversized signage or displays associated with venues, and accommodate such needs in sign code regulations.

You may recall that in 2012 and 2013, we discussed how the existing sign code regulations do not anticipate the large sports venues, and thus do not adequately address the signage needs of these unique buildings. Some changes were later made to the sign regulations to address a different topic, but there has not yet been a comprehensive look at the signage needs of the large sports venues. Instead of leaving this topic solely to the implementing regulations, we ask that the Plan include this policy direction in order to guide the later work on the regulations.

3. Policy LU15.4 states that building heights will be allowed that are compatible with the historic development pattern, "generally 65 to 85 feet" with some exceptions. We understand that this Policy is not itself establishing what heights apply within the Stadium District. Nonetheless, we wish to emphasize our previous comments that views to and from Safeco Field should be carefully considered in setting building heights on the southern portion of the WOSCA site and the property across the street, west of Safeco Field. Heights above 65 feet in those locations would cause adverse impacts on public views, whereas a height limit of 65 feet would preserve those public views. We appreciate your continued consideration of this point.

Finally, as noted in our prior comments on the Stadium District, we believe that a master planning process should be initiated for the WOSCA property before zoning regulations are established for that property. Public view protection and open space opportunities need careful consideration.

Thank you for extending the public comment period on the draft Plan, and we appreciate the City's efforts to implement a Stadium District.

Sincerely,

Bart Waldman

Cc: Melody McCutcheon
Susan Ranf

December 15, 2015

Director Diane Sugimura
Department of Planning and Development
700 5th Avenue Suite 2000 P.O. Box 34019
Seattle WA 98124-4019

Dear Director Sugimura:

On behalf of our 2,200 members, the Seattle Metropolitan Chamber of Commerce offers the following comments as you consider public input to the Seattle 2035 Draft Comprehensive Plan (Seattle 2035).

Seattle is one of the fastest growing cities in the nation. Based on King County's projections, over the next 20 years, Seattle will add 70,000 new residents and 115,000 new jobs. Rapid growth is already straining our current infrastructure as our city faces a shortage of affordable housing and an increasingly congested transportation system.

As our city and region grow at an unprecedented rate, we must have bold goals and specific targets for an equitable, prosperous and sustainable Seattle where everyone shares in the benefits of the city's growth. We have an opportunity to get it right with this update to our comprehensive plan and we must seize it.

Broadly, the Chamber supports goals and policies in the draft plan that will help:

- Increase housing supply, diversity, and affordability in ways that are consistent with the city's Housing Livability and Affordability Agenda (HALA) recommendations;
- Move people and goods faster and more efficiently through the city by improving mobility, accessibility, and reliability in our multimodal transportation system
- Retain and grow existing businesses, as well as spur entrepreneurship.

In particular, the Chamber supports the following key proposals:

- Guide more growth to areas within a 10-minute walk of frequent transit
- Estimate, monitor, and report on growth and change citywide and in urban villages
- Increase the diversity of housing types in lower density residential zones, including single family zones.
- Move toward transportation service standards that consider all travel modes, including pedestrians, bicycles, cars, freight, and transit.
- Plan for and locate schools to better serve Seattle's growing population.

As a footnote to the proposal to guide growth to areas within a 10-minute walk of transit, consider where the next wave of jobs will be located and make sure to prioritize adding density capacity near all light rail stops, including those south of downtown.

The Chamber strongly encourages your support for these key proposals. We also recommend including a progress indicator that examines the impacts of growth on neighborhood business districts.

We welcome any questions about our comments or any opportunity to engage further on Seattle 2035. Please direct your questions to Markham McIntyre (markhamm@seattlechamber.com or 206-389-7313).

Sincerely,

Maud Daudon
President & CEO

CC: Seattle City Councilmembers Bagshaw, Burgess, Godden, Harrell, Licata, O'Brien, Okamoto, Rasmussen, Sawant
Chris Gregorich, Director of Strategic Initiatives, Office of Mayor Ed Murray

Seattle Neighborhood Greenways
www.SeattleGreenways.org
Seattle Neighborhood Greenways *safe healthy streets for all*
200 2nd Ave South #100 Seattle WA 98104 (206)713-5869

November 20, 2015

City of Seattle
Department of Planning & Development
Attn: Tom Hauger
700 5th Avenue, Suite 2000
Seattle, WA 98124

How we measure success matters. Measuring the success of our transportation system based on how many vehicles can pass a certain line is outdated thinking, and does not align the with Seattle's values or vision of itself for the future.

We strongly support the moving away from the vehicular "level of service" to a level of service that focuses on moving people and goods in a way that promotes the health, safety, and wellbeing of Seattle's residents.

That is why we applaud the Seattle's development of a mode share based level of service. We urge the planning staff to continue down this path, to create a measurement system that pulls us towards safe and healthy future.

Specific recommendations:

T1.3 Invest in transportation projects and programs further progress towards meeting Seattle's mode share goals and reduce dependence on personal automobiles, particularly in urban centers.

> We appreciate the table of "non-work trips" in addition to the "trip to work" table. Another table is needed to define mode share goals for walk, bike, SOV, HOV, and transit.

T2.8 Develop a decision-making framework to direct the future planning, design and optimization of street right-of-way.

> Add "and prioritize the safety of people who walk and ride bicycles."

T4.1 Design and operate streets to promote green infrastructure, new technologies, and active transportation modes while addressing safety, accessibility and aesthetics.
T4.2 Reduce single-occupant vehicle trips, vehicle dependence, and vehicle miles traveled in order to help meet the City's greenhouse gas emission reduction targets.

> Rather than simply "promote.. active transportation" and "reduce" VMT, please use this opportunity to call out specific mode shares needed for walk, bike, SOV, HOV, and transit to meet our GHG Climate Action Plan targets.

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T6.1 Reduce collisions for all modes of transportation and work toward a transportation system that produces zero fatalities and serious injuries.

Safety is our primary objective in transportation planning with strong Mayoral support. Please specify a goal to "work toward a Vision Zero transportation system."

T6.5 Emphasize safety as a consideration in all transportation plans and projects, including in developing project prioritization criteria.

Add "that prioritizes the safety first of people who walk and ride bicycles."

T6.6 Consider lowering speed limits on residential streets and arterials as a way to reduce collision rates.

In the near future, we **will** lower speed limits on our streets. Restate as "Lower speed limits on residential streets and arterials as a way to reduce collision rates".

T9.3 Consider establishing level-of-service standards that include non-motorized modes in order to advance this Plan's goals of encouraging use of travel options, reduce dependence on drive-alone automobile use and accommodate growth in urban centers and urban villages.

Strike "consider". The Seattle Comprehensive Plan will be a success if it benchmarks counting and moving people, not vehicles, as the standard to follow for our transportation future.

Thank you for your public service and for creating and implementing an innovative way to measure our transportation system's success.

Cathy Tuttle, Ph.D., Executive Director
Seattle Neighborhood Greenways

cc: Tracy Krawczyk, Seattle Department of Transportation
Kevin O'Neill, Seattle Department of Transportation
Patrice Carroll, Department of Planning & Development
2035@seattle.gov

Date: 11/20/2015

Name: Seattle Parks Foundation,Thatcher Bailey

Draft Plan Element: Parks and Open Space

Comment:

Thank you so much for your thoughtful, inclusive, and important work. We submit a response to the section of the plan that focuses on Parks.

The following comments are more attitudinal than specific but we submit them because while we agree with and support all the public space goals the plan lays out we also feel we need to make a quantum shift in how we think about public space in Seattle, and how we integrate that thinking into a much broader and interrelated conversation about all facets of equity and quality of life.

Seattle Parks Foundation is currently working with, and learning from, 30+ community groups across the city that are reimagining their neighborhoods and organizing to enhance, expand, and create new green public spaces.
These are not casual participants in a bit of local improvement work; these are fiercely devoted volunteers, activists, and donors who are fundamentally transforming Seattle. Their efforts reflect an overwhelming consensus that our parks, trails, and recreation facilities are essential infrastructure in our growing city—a consensus that we can now back up with data.
Our partners at Forterra recently commissioned a values survey for the Puget Sound region. Respondents ranked two regional growth strategies higher than several others:

- Making it safe and convenient to walk or bike to neighborhood stores and schools (82%)
- Preserving and restoring remaining natural areas and creating more playfields, trails, and park facilities (75%)

Seattle's Draft Comprehensive Plan devotes a section to parks and open space and notes the importance of accessible, quality public spaces for our economy, health, safety, and environmental quality. This is good stuff, but it doesn't begin to convey the passion and purpose of the community leaders and volunteers that Seattle Parks Foundation works with every day—or the values corroborated by hard data from the Forterra survey.
Simply put, parks and open space are essential civic infrastructure, no less than housing and transportation. But while Seattleites are keenly aware that our growth poses serious housing and transportation challenges, there is far less awareness of how growth threatens residents' access to green space.
A recent parks-versus-housing debate in the Roosevelt neighborhood illustrates the need to broaden our frame of reference. In the Roosevelt Neighborhood Association's newsletter, the Roosie, Cory Crocker lamented the antagonism between these interests:
The more dense living situations are made livable only with access to sufficient public open space. Multifamily, affordable housing pushes density further to provide housing as efficiently as possible to the widest audience, thus making access to public open space even more essential.
The stresses of growth are real, but these stresses will only be exacerbated if we think about growth in terms of what we must give up. One of the key findings of the Forterra survey is that the majority of people in our region are realistic about the inevitability of growth but also optimistic that this growth will make all our lives better.
Growth forces us to think big—to understand that the challenges we face are not discrete but interconnected. Solutions for transportation, or housing, or parks must be solutions for the city as a whole. This means that our measure of successful public space extends far beyond particular

amenities or programs or Yelp ratings. What matters is how the life of a particular public space aligns with our vision of the kind of city we want Seattle to be.

Thank you again!

Thatcher Bailey
Executive Director
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City of Seattle
Seattle Planning Commission

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November 18 2015

Honorable Mayor Edward B. Murray
Mayor of Seattle
City Hall
via email

RE: Seattle 2035 public draft – the major update of Seattle's Comprehensive Plan

Dear Mayor Murray,

As stewards of our City's Comprehensive Plan, the Seattle Planning Commission has closely reviewed the public draft of the Major Update to Seattle's Comprehensive Plan – Seattle 2035. The Commission would like to recognize the high quality work of the Department of Planning and Development (DPD). Per guidance provided by you and City Council in resolution 31577, race and social equity has been elevated as a core value in the Comprehensive Plan. In particular, the equity analysis conducted by DPD is an exceptional and important step that will help inform goals, policies and strategies to help Seattle become a more equitable city as it welcomes 120,000 new residents and 115,000 new jobs. While the draft plan has incorporated equity in many regards, we look forward to the Mayor's proposed Plan being even more explicit in establishing a clear and powerful vision for how the city will grow over the next 20 years as it welcomes new residents and jobs while sustaining and elevating the quality of life for those already living and working here.

Seattle's Comprehensive Plan, which is required through the State Growth Management Act, is the appropriate guiding document for establishing a "cohesive and focused approach to planning and development.[1]" The following recommendations address how the plan can articulate a **more explicit vision for an equitable Seattle**; make the plan more **accessible and relevant** to community members; provide direction for a process through which we **monitor our progress** to achieve racial and social equity in Seattle.

[1] Executive Order 2015-04: Directing the Creation of a New Executive Office to Coordinate Planning and Implementation to Build Thriving and Equitable Communities

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Articulate a more explicit vision for an equitable Seattle.
The plan should set an aspirational tone for the next 20 years and establish a pathway that will help achieve this vision. The existing draft Plan states: "We envision Seattle as a city where growth benefits and increases opportunities for all residents while offering ways to enhance and preserve our natural environment." This is a strong vision that should be echoed through all elements of the Plan. When the Plan was last updated in 2004, the focus on environmental sustainability led to pioneering programmatic changes which have had an enduring impact on the region. *This update should do the same for racial and social equity*.

The public draft incorporates race into the Plan's core value of social equity and many of the Plan elements make great strides in addressing this value. However, more could be done on this front. In late 2014, the Commission participated in crafting equity statements for each element of the Plan. These statements provide valuable models for articulating an equitable vision. We urge that components of these statements be integrated more consistently across the elements with introductory narrative clearly describing the role each element plays in advancing equity. **The introduction to the Community Well Being element;**
"The City of Seattle invests in people so that all families and individuals can meet their basic needs, share in our economic prosperity, and participate in building a safe, healthy, educated, just and caring community.'
is an excellent example of how equity should be discussed and addressed in the Plan.

Furthermore, the Commission supports the urban village strategy which guides most future households and jobs into designated growth areas. The Commission would also like to see the Plan acknowledge and address the inequities and displacement that can be consequences of the growth strategy.

The Commission supports a data-driven approach to the establishment and/or modification of Urban Village boundaries, taking into account ten minute walking access to existing and planned frequent and reliable transit as well as easy access to other essential components of livability (e.g. adequate open space, sidewalks, etc.) as articulated in our Seattle Transit Communities report.

Make the Plan more relevant and accessible to community members.
This update provides a renewed opportunity to establish policies for coordinating and prioritizing investments in infrastructure and services. By prioritizing equity considerations in these policies, this update sets the stage for Seattle's neighborhoods to become complete, compact, and connected communities where everyone can attain the resources, opportunities, and outcomes that improve their quality of life and enable them to reach their full potential.[2]

DPD is working hard to streamline the Plan and make the intent and impact of its policies on people and communities easier to understand. Yet, the Plan remains a long and complicated document that the public may see as bearing little connection to their day-to-day lives. This

[2] From the definition of race and social equity in resolution 31577

challenge is inherent in setting forth a comprehensive set of long-range policies. The final Plan should communicate its relevance and importance by showing more clearly how it guides the regulation of development, and the prioritization and implementation of community services and infrastructure.

The public draft includes some helpful references to other planning documents, such as the Climate Action Plan and SDOT's modal plans. These are functional plans that describe and prioritize how we invest in our communities in alignment with Comprehensive Plan goals and policies. The Comprehensive Plan should communicate these connections more explicitly. Interactive graphics could also be included in individual elements to allow readers to quickly navigate from goals and policies in the Plan to projects that implement the vision.

Seattle is at the heart of a growing region that is grappling with equitable development challenges on a broader geographic scale. Framing equity within the context of our regional growth strategy can help remind readers that of this context. Resolution 31577, which called for the incorporation of race into the core value of social equity, also called for the Principles of Equitable Development, ratified by the Puget Sound Regional Equity Network in 2012, to be included in the Plan. These Principles are currently not in the draft Plan and should also guide Seattle's Comprehensive Plan.

Earlier this year the Commission wrote in support of additional resources that would help ensure that Seattle's Comprehensive Plan is accessible to all residents. We hope that your recommended Plan will include an interactive version with additional graphics that explain complex concepts. The current version does include a diagram that illustrates how the Comprehensive Plan fits within the context of state and regional plans as well as the implementation plans, codes, and initiatives. This diagram should continue to be refined. Current technology allows for web-based and printable pdfs to be developed simultaneously. Because the entire content of the plan is being updated, this is an excellent opportunity to make use of this software. It is especially important to ensure that the Plan is readily accessible for people with disabilities.

Provide direction for a process through which the City will monitor our progress and highlight community-wide efforts to achieve racial and social equity in Seattle. [3]

A strong and sustainable monitoring process is essential for gauging the extent to which the City is making progress toward the vision, values, and goals set forth in the Plan. Monitoring is also necessary to identify whether policies need to be strengthened or implementation strategies changed.

While the Commission generally cautions against incorporating *specific metrics* within the Comprehensive Plan itself, we would like to work with your office and the new Office of Planning and Community Development to provide advice for establishing a process to measure and report

[3] From Executive Order 2014-02: Race and Social Justice Initiative

on the City's progress and highlight community-wide efforts to achieve racial and social equity in Seattle.

Equity Measurements. Resolution 31577 also calls for the City to identify and measure over time "quantifiable city-wide community indicators of equitable growth." Reporting on these equity measures in concert with the broader monitoring process could help make the Plan relevant and accessible to more Seattleites.

Indicators will have to be developed with great attention to measurability and context. Many monitoring processes at city and broader levels have been cut back between major plan updates or have been dropped entirely. It will be crucial to develop a monitoring process that is feasible to sustain throughout the 20-year planning horizon.

Summary of element-specific comments

Following is a summary of key comments and recommendations for the specific elements we reviewed. We offer more detailed comments and suggestions by element in the second section of this letter following page 6.

Seattle's Growth Strategy

- Support added language regarding equity and access to opportunity
- Support revising urban village boundaries consistent with Seattle Transit Communities methodology and policies
- Ensure final equity analysis and mitigation strategies are addressed in the Plan
- Address growth that occurs outside of urban centers and villages - (particularly along frequent transit corridors)
- Clearly articulate how public investments will be equitably prioritized, not based solely on growth

Land Use

- Support proposed change to the Future Land Use Map
- Concerned that single family zoning continues to be designated as an area to be protected and removes these areas from our regional growth boundaries and limits diversity of housing types
- Allow more flexibility to support a diversity of low-density housing options
- Emphasize mitigation strategies that will minimize displacement, particularly for most vulnerable individuals, businesses, and communities
- Confirm which policies are consistent with HALA, revise as necessary those policies that are inconsistent with HALA
- Reiterate support for industrial uses in manufacturing and industrial centers

Transportation

- Support mode share goals that reflect the Climate Action Plan and Seattle Transit Communities policies.
- Support overall connection between this element and implementation as articulated in Seattle's modal plans and maps; the final version of the Plan should include links to these modal plans
- Support recognition of transit-dependent communities rather than just peak-hour commuters
- Support recognition of connections to all business districts in addition to the Port of Seattle
- Support Vision Zero

Housing

- Support extensive incorporation of race and social equity throughout element
- Support policies related to housing for families with children
- Reference Growth Strategy and Land Use element and how housing policies are related to them both
- Acknowledge regional nature of housing challenges
- Reiterate need for more access within single family areas to enable a broader variety of housing
- Appreciate incorporation of health; would like to see Environmental Justice addressed
- Add a policy about monitoring as required by Countywide Planning Policies; could also monitor HALA goals

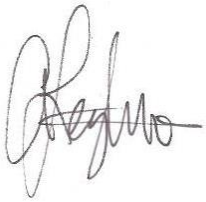
Community Well-Being

- Support how equity is referenced in this element; a great example of including equity in the Plan
- Explain and highlight role of element in the overall introduction – consider moving element to front of Plan
- Support the multiplicity of ways policies advance race and social equity, including promotion of civil rights
- Strengthen connections with Housing, Parks and Open Space and Environment elements; connections to the Growing Seattle and Land Use elements are good.
- Strengthen policies related to emergency preparedness
- Co-location of facilities are important and should be encouraged
- Acknowledge at-risk youth in policies who have already dropped out of school or gotten entangled in the criminal justice and need access to services and opportunities that promote rehabilitation

The Commission appreciates the work of the DPD and in particular Tom Hauger and Patrice Carroll. The Commission would not have been able to do as thorough a review of the public draft without their willingness to attend many meetings and present regularly on their work. The Commission looks forward to your recommended Comprehensive Plan.

Thank you for your consideration of our recommendations and please do not hesitate to contact me or our Executive Director, Vanessa Murdock, at 733-9271 should you have any questions.

Sincerely,



Amalia Leighton, Chair
Seattle Planning Commission

CC: Robert Feldstein, Mayor's Office; Seattle City Councilmembers; Diane Sugimura, Nathan Torgelson, Susan McLain, Tom Hauger, Patrice Carroll, Department of Planning and Development; Patricia Lally, Seattle Office for Civil Rights, Kevin O'Neill, Seattle Department of Transportation

Section	GS#	Goal/Policy/Text	Comments
overall			Support change of element name (previously Urban Village). Recommend clearly stating this is the growth strategy and as such is different from the other elements in the Plan.
Planning for Growth policies	1.5	Monitor urban centers and villages to track changes over time in the number of housing units and jobs, population and public investments and use this information to make decisions about…	Add an additional policy after GS 1.5 and before GS1.6 that says: public investments will be made using an equity lens. Acknowledge past inequities pulling language from the Equity Analysis.
Planning for Growth policies	1.6	Monitor development activity in areas with high potential for displacement of marginalized population…	Requires more specificity in regards to which strategies (Incentives, job to education, etc.) or it should specifically call out the Equity Analysis as the implementing document.
Urban Village Strategy discussion		Second to last paragraph of Discussion: Because urban centers and villages are the places where the City expects to concentrate public facilities.	Support.
Urban Village Strategy discussion		Final paragraph of Discussion: …On the whole, however, the urban village approach continues to direct most new development away from Seattle's single-family focused communities…	Strike this sentence entirely. It is single-family protectionist and doesn't allow access to opportunity that may be presented in single-family areas.
Urban Village Strategy policies	2.8	Direct the majority of future development to centers and urban villages, and limit the possibility of scattered growth along arterials…	Describe what growth along arterials is acceptable. Describe what growth outside of Urban Centers and Village should look like.
Urban Village Strategy policies	2.9	Use zoning and other planning tools in places where growth and development are expected to shape the amount and pace of growth in ways that will control displacement of marginalized populations, community services and institutions.	Support the intent of this policy but is this language consistent with Equity Analysis? Strike "Use zoning and other planning tools" zoning does not create equity and planning tools could be more specific (incentives, etc.)
missing graphics			Map of the urban villages
missing graphics			Graphic that shows what three ideal urban villages would look like if they were to be created. This will give a much needed visual for the reader.
Urban Village Strategy figure 1	F1	Characteristics of Urban Centers and Villages table	Remove Zoning and Land Use, it is confusing to the reader because this plan is above zones and zoning.
Urban Village Strategy figure 1	F1	Characteristics of Urban Centers and Villages table	Add policies about urban village boundaries to the table.
Urban Village Strategy policies	2.11	Permit varying sizes of urban villagese…	move to Figure 1

Section	GS#	Goal/Policy/Text	Comments
Urban Village Strategy policies	2.12	Reflect the area that is generally within a ten-minute walkshed…	move to Figure 1
Urban Village Strategy policies	2.15	Promote meaningful choice for marginalized populations to live and work in urban centers and urban villages throughout the city.	Add to 2.9 or discussion; vague and unnecessary on its own.
Urban Village Strategy policies	2.20	Retain land in manufacturing/industrial centers for industrial uses and develop criteria for evaluating request to remove land from a M/IC…	There has been extensive public process as well as two stakeholder groups to develop this criteria. What will become of this work? What more is there to be done to get to a resolution on this issue?
Distribution of Growth	3		This is EIS alternative 1; is following past trends acceptable for growth estimates? If the purpose is to dramatically change equitable outcomes should we not also change our thinking about growth allocation?
Distribution of Growth	3.4	Base 20 year growth estimates for each urban center and manufacturing/industrial center on:…	
Distribution of Growth	3.5	Encourage a distribution of growth that both fosters opportunity in low-income neighborhoods and provides access for marginalized populations…	
Urban Design			Public safety and crime prevention are covered in the Community Well-Being Element, but there are also opportunities to help prevent crime via design. We recommend the Urban Design, or the Built Environment section of the Growing Seattle Element include a policy on crime prevention through environmental design.

Section	LU#	Goal/Policy/Text	Comments
Introduction		Seattle has a long history as a maritime, manufacturing, and freight distribution center for the region. These activities are now largely located in industrial zones, and clustered primarily in two manufacturing/industrial centers…	Include stronger language regarding the importance of preserving Industrial lands in order to preserve living wage jobs and the transportation efficiencies to be gained through collocating industrial use.
Uses	2	...Allow for a variety of housing types to accommodate housing choices for households of all types and income levels. ...Providing jobs for a diverse residential population.	Support. Good incorporation of equity.
Uses	2.8	Evaluate all new land use regulations to determine if there are potential adverse outcomes that may affect certain groups or individuals unfairly, and seek to avoid or mitigate such potential outcomes.	"*that may affect certain groups*" – is this consistent language with the equity appendix? Who is being referenced by the phrase 'certain groups'? Be more specific on which programs we would likely use to "mitigate".
General Development Standards	5.17	Impose conditions on higher-density development to offset the impacts of increased densities, including consideration of incentives for Landmarks Preservation, additional open space amenities, and affordable housing, and encourage new development to contribute to affordable housing through incentives and code changes that are implemented as part of rezones.	"*Impose conditions*" should be removed. Instead insert language that is more positive. Suggest breking into two policies; one that deals with incentives and the other that deals with affordable housing - distinguish between incentives and mandatory inclusion (HALA).
Off-Street Parking	6.13	Limit parking overall in City parks to discourage auto use and to limit the conversion of park land for parking private cars, and where parking is needed, design parking facilities in ways that preserve open space, green space, trees and other mature vegetation.	Is this for all parks? Are there parks that are an automobile draw that are not easily accessible by transit? Would this policy be better suited in the Parks and Open Space Element? Consider removing "*Limit parking overall in City parks to discourage auto use and to limit the conversion of land for parking private cars*".

Section	LU#	Goal/Policy/Text	Comments
Incentives	7	Use development incentive programs to provide opportunities for increasing density…	Is this section consistent with HALA recommendations and the programs moving forward? Particularly in regards to incentives that would/should prioritize affordable housing. It is our understanding that these incentive programs would start to prioritize components other than affordable housing.
Single-family Residential Areas - introduction		discussion	Single-family discusion should be consistent with that of Multi-family in describing what we hope to see and why we value the land - what types of householdscan be found in these areas. In its current form it simply describes current use.
Single-family Residential Areas	8	Provide detached single-family and other compatible housing options…	Are there other models by which we can start to define our residential areas?
Single-family Residential Areas	8.2	Use a range of single-family zones to…	Strike policy, 8.3 is sufficient.
Single-family Residential Areas	8.4	Recognize detached single-family dwellings as the principle use in single-family residential areas…	Are there other models by which we can start to define our residential areas?
Single-family Residential Areas	8.12	Emphasize measures that can increase housing choices for low-income individuals and families when considering changes to development standards in single-family areas.	Move into the goal rather than being a separate policy.
Multifamily Residential Areas	9	Achieve a residential devleopment pattern consistent with the urban village strategy that includes increased availability of a vareity of housing types and densities…	Support. Good incorporation of equity.
Multifamily Residential Areas	9.9	Establish low-rise multifamily zones to accommodate various housing choices in low to moderate density ranges…	Remove all language about building type to maintain consistency with removal in single-family.
Commercial/Mixed Use Areas		The general commercial zones are considered to be auto-oriented and less suitable for housing…	Allowing housing in close proximity to auto-dependent uses creates a less desirable place to live and is less healthy.
Commercial/Mixed Use Areas	10.7	….Provide opportunities for small local businesses to locate, especially in ethnically relevant business districts throughout the City.	Change "*ethnically*" to culturally.

Section	LU#	Goal/Policy/Text	Comments
Industrial Areas	11.9	Avoid placing industrial zones within urban centers or urban villages. However, in locations where a center or village borders a manufacturing/industrial center, use of the industrial commercial zone within the center or village where it abuts the manufacturing/industrial center may provide an appropriate transition to help separate residential uses from heavier industrial activities.	Why Industrial Commercial and not Industrial Buffer?
Industrial Areas	11.22	Limit the future application of the IC zone inside the M/IC boundaries to prevent the expansion of offices and other non-industrial uses.	Support but with criteria from 4th internal draft (reviewed by SPC in April 2015) re: removing lands from MIC added back in – currently not in public draft Add: GS2.20 Allow land to be removed from a manufacturing/industrial center only when all of the following criteria are met: * A specific use for that land is proposed * There is insufficient appropriately-zoned land elsewhere in the city for the proposed use * The proposed use would not displace an existing industrial use; and * The proposed use would not adversely affect nearby industrial operations

Section	T#	Goal/Policy/Text	Comments
Integrating Land Use and Transportation	F1	Mode Chart Targets table	Support. Previous Commission discussion and recommendation to include income, age, and ability. Ensure consistency with Pedestrian Master Plan metrics.
Making the Best Use of the Street We Have	2.2	Consider safety concerns, modal master plans, and adjacent land uses when prioritizing functions in the pedestrian, travelway and transition zones of the right-of-way.	Support as a clear way to guide readers from Comp Plan to Implementation Plan.
Making the Best Use of the Street We Have	2.8	Develop a decision-making framework to direct future planning, design and optimization of street right-of-way.	Support in response to previous modal hierarchy discussions and as a smart way to be flexible and focused.
Making the Best Use of the Street We Have	2.9	Identify different types of streets with standards that are consistent with street classifications and that reflect the objectives of adopted modal and land sue plans.	Support. Previous Commission discussion and recommendation to include income, age, and ability. Ensure consistency with Pedestrian Master Plan metrics.
Transportation Options - discussion			This discussion tells the story well for the reader.
	3.3	Consider the income, age, ability, and vehicle ownership patterns of populations throughout the city in developing transportation systems and facilities so that all residents, especially those most in need, have access to a wide range of affordable travel options.	Support. Previous Commission discussion and recommendation to include income, age, and ability. Ensure consistency with Pedestrian Master Plan metrics.
	3.5	Prioritize transit investments on the basis of ridership demand, service to populations heavily reliant on transit, and opportunities to leverage funding.	Support prioritization of transit-dependent language as previously noted.
	F4-7	Maps of Priority Corridors for Transit Investments; Planned Frequent Transit Service Network; Recommended Bicycle Network; and Pedestrian Priority Investment Areas	Support the use of maps to illustrate priorities (note: scales, north arrows, etc. should be consistent in all maps and figures).
Environment discussion			Appreciate reference to Climate Action Plan; final version should include links to that site and implementation actions.

Section	T#	Goal/Policy/Text	Comments
Support a Vibrant Economy discussion		...In addition to goods movement, a well-designed transportation network supports a thriving economy by adding to the vibrancy of the city's urban centers and urban villages. It also allows people to access jobs, businesses, employment, school, and leisure destinations.	Support this as a change from talking only about the Port and Industry. Previous Commission support for broadening to include connections to Neighborhood Business Districts.
	5.2	Develop a freight network in the Freight Master Plan that enhances freight mobility, operational efficiencies, and promote the City's economic health.	Will this need to be revised when the network is developed?
Safety	6.1	Reduce collisions for all modes of transportation and work toward a transportation system that produces zero fatalities and serious injuries.	Support.
Measuring Level of Service	9.3	Consider establishing level-of-service standards that include non-motorized modes in order to advance this Plan's goals of encouraging use of travel options, reduce dependence on drive-alone automobile use and accommodate growth in urban centers and urban villages.	Support - Commission would like to continue to be part of this discussion.

Section	H#	Goal/Policy/Text	comments
Introduction			We **support** the combination of policies included to provide housing choice, improve access to locations of opportunity, and address the needs of communities most vulnerable to displacement. The narrative and policies in the draft element clearly attend to equity in addressing locational aspects. We suggest **acknowledging the** regional nature of housing challenges and Seattle's responsibility in this context. Piggyback on Plan Introduction to highlight King County Countywide Planning Policies, which provide guidance for accommodating housing growth and setting affordability goals. We suggest **explaining** how Housing Element is related to the Growth Strategy and Land Use elements. Alternatively, this explanation could go in overall introduction to the Plan. A diagram would be useful in either case.
Equal Access to Housing	1.2	**Promote diverse, inclusive communities** through housing programs that serve extremely low-income to low-income households.	Support incorporation of race and social equity.
Equal Access to Housing	1.4	Seek ways to promote use of tenant-based rental assistance **in compact, complete communities** in greater parts of Seattle.	Support incorporation of race and social equity.
Supply of Housing - introduction		…where housing should be located is being taken into consideration, since location can make a big difference in Seattleites' quality of life….	This section is a strong example of incorporating race and social equity. Suggest moving the referenced section of the introductionto this section (noted to the left) to the introduction of the Housing element.
Supply of Housing	2.3	Promote innovative strategies that increase the supply of housing that moderate- and middle-income households, including families with children, can afford.	Support policy direction to help meet the needs of families with children.

Section	H#	Goal/Policy/Text	comments
Diversity of Housing - discussion		...Seattle needs a broader variety of housing types and spectrum of affordability. Seattle's high housing costs are making it increasingly difficult for lower- and moderate-income households to live in the city. Even middle-income families are struggling, given the high prices for Seattle home sales in almost all areas of the city. The City may need to consider expanding the use of areas currently zoned as 'single family' beyond individual detached single-family houses to other compatible low-density housing types…	Suggest additional, direct language along the lines of - *It is important to increase access to single family areas by enabling a broader variety of compatible housing types in areas currently zoned single-family.*
Diversity of Housing	3.2	Explore ways to align development and design standards with strategies for extremely low-, very low-, and low-income housing, in order to encourage housing production and preservation **in urban centers and urban villages** in order to increase attractive and affordable housing options for households of varied sizes, types, and income levels, including families with children and mixed generation households.	Support incorporation of race and social equity.
Diversity of Housing	3.3	Allow and encourage housing for older adults and people with disabilities, including designs that allow for independent living, various degrees of assisted living, and skilled nursing care, **in or near urban centers and villages** with access to health care services.	Support incorporation of race and social equity.
Diversity of Housing	3.4	Encourage the development of housing with affordable family-sized units in urban centers and villages with access to parks, and other child-focused amenities and services.	Support policy direction to help meet the needs of families with children.
Diversity of Housing	3.5	Consider allowing additional housing types that respect existing neighborhood character in single-family areas, particularly within or near urban centers and villages.	Recommend striking the word *"Considering"* to **make the policy more direct**. Strengthen policy by highlighting the intent to increase access to the benefits that urban centers and urban villages provide.

Section	H#	Goal/Policy/Text	comments
Housing Construction and Design			Appreciate that health has been incorporated in this section. Address environmental justice issues in relation to housing location. Suggest the current draft Plan be screened to ensure that the Plan provides policy direction on this important equity issue.
Affordable Housing			Support incorporation of race and social equity. Recommend renaming the section to Housing Affordability.
Affordable Housing	5	Advance the opportunity for households of all income levels to live affordably in Seattle and reduce over time the unmet housing needs of extremely low-, very low- and low income households in Seattle.	Support. This goal encompasses **making our city more accessible** to a variety of income levels **as well as addressing unmet need for affordable housing among Seattle's low-income residents**. Both aspects are essential.
Affordable Housing	5.1	Recognize that the provision of housing affordable to lower income households can help increase access to education, employment, and social opportunities, support creation of a more inclusive city, and **reduce displacement from a neighborhood** or from the city.	Support incorporation of race and social equity.
Affordable Housing	5.5	**Increase housing choice** and opportunity by funding extremely low-, very low-, and low- income rental housing throughout Seattle, **especially in areas where less rent/income restricted housing is available, including in high-cost areas with high frequency transit, parks, quality public schools, and other amenities where greater subsidies may be needed.**	Support incorporation of race and social equity - wording of this policy is awkward and would benefit from additional editing. Define levels of income and provide a hyperlink to glossary in on line version. Strike "quality" from phrase 'quality public schools'
Affordable Housing	5.6	**Consider access to high frequency transit** and estimated housing and transportation costs when funding extremely low-, very low-, and low-income housing.	Support incorporation of race and social equity.

Section	H#	Goal/Policy/Text	comments
Affordable Housing	5.9	**Address the needs of communities most vulnerable to displacement** due to redevelopment pressure through policies and funding decisions related to extremely low-, very low-, and low-income housing.	Support incorporation of race and social equity.
Affordable Housing	5.13	Ensure that City strategies for community revitalization help meet the needs of marginalized populations **in underserved areas or where people are at risk of displacement** due to increasing housing costs.	Support incorporation of race and social equity.
Affordable Housing	5.20	Encourage major employers to develop…	Support H.20, and suggest some rewording to convey a less narrow intent e.g. change employees to households
Affordable Housing	NEW		Add a policy to monitor the diversity and affordability of Seattle's housing supply and track Seattle's progress in reducing unmet housing needs. While the monitoring policy could include tracking progress toward the HALA production goals, it should also incorporate the broader aspects we describe above.

section	CW#	goal/policy/text	comments
Introduction			Intro is an excellent explanation of how this element complements other elements in the Plan. CW element is consistent with the Urban Village strategy in that the CW emphasizes locating services and programs in Urban Centers and Villages, and that such services to support community well-being are appropriately accommodated and encouraged in the LU element policies (e.g., GS2.2, LU10.6, LUG14, LUG3). At least one of the policies encouraging services for community wellbeing in urban centers and villages should also refer to the importance of proximity to frequent transit.
Supportive and Healthy Communities	1.2	Use relevant and respectful ways to encourage broad participation in neighborhood and community activities and events.	Incorporate use of innovative tools to encourage broad participation, and also communication with people with limited English proficiency.
Access to Food and Shelter			Strengthen **policies and achieve tighter consistency with related Housing element policies.**
Access to Food and Shelter	2.2	Contribute to efforts that help people meet their basic needs, **maintain their independence** as long as possible, and remain in their neighborhoods of choice.	**Replace "remain" with "live" so policy does not assume people's choice would always be the same neighborhood.** Revision will also work better with H3.3, which includes encouraging housing for older adults and people with disabilities "in or near urban centers and villages with access to health care services."
Access to Food and Shelter	2.3	Allow temporary shelter for those who are homeless and invest in services and programs that provide a pathway to permanent housing.	Support allowing temporary shelter and **investing in services and programs that provide a pathway to permanent housing**. However, consider revising policy to place additional emphasis on the latter for consistency with policy H5.4 and associated discussion in Housing Element.
Access to Food and Shelter	2.4	Develop an increased level of emergency preparedness among all segments of the population to help coordinate governmental response and recovery efforts that seek to minimize the adversity of a major emergency or disaster.	Support the policy - additional policies may be needed to provide appropriate level of policy direction on this multifaceted and important topic. In preparing for disasters, suggest focusing on those most adversely affected.

section	CW#	goal/policy/text	comments
Access to Food and Shelter	NEW		There is no direct mention of services and programs to help *prevent* homelessness in the CW element. Add CW element policy that complements related Housing Element policies (e.g., H5.4).
Healthy Growth, Aging, and Lifestyles			While policies in this section address environmental health on several fronts, they do not reflect the importance of outdoor environments free of pollution or the mental health benefits of open space and greenery. Incorporate these additional aspects of environmental health in the Community Wellbeing policies, or note the relationship of applicable policies in other elements (such as the Environmental Justice policies in the Environment Element) to goals in the Community Well-Being Element. Policies 3.5 to 3.9 all relate **to access to food** in one way or another and should be moved to the section titled "Access to Food and Shelter."
Healthy Growth, Aging, and Lifestyles		…Social and Social and environmental factors, as well as access to health care, all contribute to an individual's overall personal health…	Appreciate acknowledgment of environmental factors.
Healthy Growth, Aging, and Lifestyles	3.9	Consider using City land, including parks and surplus property, to expand the capacity to grow, process, distribute, and access local foods.	Support **policies to facilitate co-location and use of existing facilities for services and programs** to advance community wellbeing.
Lifelong Learning	4.6	Work with schools, higher education, libraries, community centers, arts and cultural agencies and organizations to link services into a seamless system that helps students stay in school, such as through co-location or services and joint use of facilities.	
Lifelong Learning	4.7	Support programs that help people who have dropped out of high school to achieve education, personal, and employment goals.	Rephrase to additionally support students who are "at risk" of dropping out.

section	CW#	goal/policy/text	comments
Public Safety			Public safety and crime prevention are covered in the Community Well-Being Element, but there are also opportunities to help prevent crime via design. Recommend that the Urban Design, or the Built Environment section of the Growth Strategy include a policy on **crime prevention through environmental design**.
Public Safety	5.9	Provide competent, professional, and efficient City criminal justice services that hold those who commit crimes accountable, reduce recidivism, and achieve a fair and just outcome.	Support Policy CW5.9, and suggest adding a **policy to help connect adjudicated youth and adult offenders with services and opportunities to promote rehabilitation.** Rehabilitation services are important for many facets of community well-being including reducing dropout rates among at-risk students. Policy HD35 in the *existing* Comprehensive Plan provides direction along these lines and could be refreshed and included in the update. That policy is to: "Work with the state, King County and community organizations to connect local detention facilities with the health and human services systems."
A Multi-Cultural City			Support the multiplicity of ways these policies advance race and social equity, including promotion of civil rights. This set of policies is a **great example of the inclusion of equity** in the Plan. Consider moving this section to the **front** of the element. Incorporate use of innovative tools to encourage broad participation.
A Multi-Cultural City	6.2	Promote culturally responsive and relevant service delivery from City departments and other agencies.	Add language about interpretation and translation.
Coordination of Services	7.8	Encourage use of existing facilities and co-location of services, including joint use of schools and City and community facilities, to make services available in underserved areas and in urban village areas.	Support policies to facilitate co-location and use of existing facilities for services and programs to advance community wellbeing.

November 20th, 2015

Diane Sugimura
Director, City of Seattle, DPD
700 5th Avenue, Suite 2000
Seattle, WA 98104

Dear Director Sugimura,

Seattle Subway is an all-volunteer, advocacy organization that envisions a city and region fully connected by fast, reliable high capacity transit.

Allowing people to live, work and play near transit is the easiest and cheapest way to bring transit to more people. Seattle Subway fully supports the Draft Comprehensive Plan's strategy of focusing growth near fast and reliable transit. We are also very supportive of the plan to focus growth where future transit infrastructure: These plans take a very long time to be realized and we should be keeping our eyes on where growth will be.

With Seattle growing at historic rates we worry that the plan is not ambitious enough. We need to ensure that no one is forced out of the city due to lack of available housing in the city. We believe there need to more Urban Villages (especially around Link Stations) and that restrictive zoning regulations should be relaxed further in our Urban Villages, Hub Villages, Residential Villages, and Multifamily Areas with access to high quality transit.

We also feel that the mode share goals should be more ambitious. For instance 55% non-SOV usage in South Lake Union in 2035 is very low. With the proper investments there is no reason that area cannot have a mode share more in line with downtown. With the Sound Transit extensions to Northgate, Lynnwood, Bellevue, Redmond and Federal Way all coming online within the next years, along with Seattle's own new RapidRide+ corridors we have some very large transportation investments coming soon. Combined with a possible Sound Transit measure linking up even more of our city a mode shift of only 8% in the next 20 years is a very low target. We worry that a low target will be a self fulfilling prophecy.

Seattle is a city on the rise. We need to aim high and then work hard to meet the challenge. The Draft Comprehensive plan is moving in the right direction but we worry that it isn't moving fast enough. Please be bold when considering the future of Seattle,

the Seattle residents of the future will be best served by this approach, and though they probably won't thank you for it - we will on their behalf.

With Regards,

Keith Kyle

President, Board of Directors

Seattle Subway

South Seattle Crime Prevention Council

5606 Sixth Avenue South
Seattle, WA 98108
206.478.9038

November 6, 2015

At the November 4, 2015 meeting of the South Seattle Crime Prevention Council (SSCPC), community members in attendance voted unanimously and vehemently to oppose the City's Growth Alternatives 3 and 4.

The City's own Displacement Risk Index and Access to Opportunity Index maps indicate that South Seattle has the HIGHEST risk of displacement of our vulnerable population and the LOWEST access to opportunity for that same population. It appears the City's "Race and Social Justice Initiative" is meaningless lip service and that Alternatives 3 and 4 were drawn up by planners who lack all human compassion and have no respect for the most ethnically diverse community in Seattle.

Obviously, we are extremely concerned about public safety issues in South Seattle. Those of us with decades of volunteer dedication to our community know that only 15-25% of all crimes are actually reported in South Seattle. Yet our reported crimes are disproportionately high for our percentage of the City's population. Low income people are, unfortunately, most often the victims of crime.

We also know that even in the much more affluent neighborhoods of Seattle, recent increases in density have resulted in increases in crime. "More feet and eyes on the street" do not ensure more safety; rather the opposite. The assumption of density improving safety has proved to be nothing but a fallacy. If density of people guarantees public safety there wouldn't be a single crime or drug transaction taking place in downtown Seattle. Instead SPD constantly struggles with criminal activity precisely where the most "feet and eyes" congregate.

It has been our tragic experience that **Light Rail and the increased pedestrian foot traffic around major transportation stops in South Seattle have resulted in increased street robberies, assaults and injuries.**

The City has historically forced whatever program or challenging social issue, not wanted in other neighborhoods, on the backs of our susceptible population. **Please reverse that trend**. Focus on jobs and economic opportunities for our community members; housing growth and density will **organically** follow. Genuine economic development for our EXISTING population is what is needed by our community.

Sincerely,

Pat Murakami
President, SSCPC

UNIVERSITY DISTRICT COMMUNITY COUNCIL
C/O 4534 UNIVERSITY WAY NE
SEATTLE, WA 98105
(206) 527-0648
udistrictcouncil@hotmail.com

November 20, 2015

Department of Planning and Development
Via email to 2035@seattle.gov

RE: 2035 Comprehensive Plan Proposed Changes

When the Comprehensive Plan was first adopted twenty years ago, DPD's predecessor DCLU promised that increased growth would be focused into so-called "Urban Villages" where transportation and other infrastructure either existed or would be easier to provide. Neighborhoods (including urban villages and centers) were also promised that parking requirements would be retained, landscaping and setbacks would be provided to ensure quality development, and that growth would pay for growth and not unduly burden existing residents. None of this has come to pass. Instead, DCLU/DPD has spent the last 20 years actively working to undermine and/or abrogate any and every compromise it made in order to pass the Comprehensive Plan (and subsequent updates), and nearly all of the costs of accommodating growth have been passed on to taxpayers in the form of increased levies and utility rates, not to mention the value of their time wasted in traffic.

Central to the original "grand compromise" that many thought the original 1994 Plan represented was that single family zoning would be protected, including in the areas around Urban Centers and Urban Villages. The UDCC opposes the following specific proposed changes to the Plan that would undermine this promise:

- LU8.2 'redevelopment or infill development that maintains the single-family character of the area but also allows for a greater range of housing types'

- LU8.3 'redevelopment or infill development near urban centers and villages, where that new development would maintain the low height and bulk that characterize the single-family area, while allowing a wider range of housing types.'

- LU9.10 'designate low-rise multifamily zones in places where low-scale buildings can provide a harmonious transition between single-family zones and more intensive multifamily or commercial areas.'

These are simply bureaucratic ways of saying DPD wants to undermine the promises it made to the community.

DPD should also drop all proposals for extending the Roosevelt Urban Village boundaries south of Cowan and Ravenna Parks. This goes beyond the half-mile "walkshed" for a light rail station and

pays no respect to economic, community or geographic relationships on the ground. Residents in the broadened area are strongly opposed to the extension.

When the Comp Plan was amended over 10 years ago DPD – in a rather telling move – decided to stop tracking individual mode split goals by travel mode. So instead of acknowledging the fact that commuters were not taking up walking, biking, or transit at the rate that all of the original transportation projections of the 1994 Comprehensive Plan were predicated on, DPD instead lumped all of these modes into one "Non SOV" category to paper over the fact that a fundamental tenet of the 1994 Plan simply wasn't working. Most notably, the 1994 goal for 2000 bike mode share was for it to increase from 3 to 5% by 2000, and to 9% in 2010. Needless to say, this has not and will not occur - Seattle is simply too hilly and rainy for bicycles to ever account for more than a tiny fraction of work commute trips no matter how many vehicle lanes are removed in a vain attempt to attract new riders. Public transit use was 16% in 1990, and the goal was for it to rise to 20% in 2000 and to 27% in 2010. This, too, hasn't occurred – and a north/south light rail starter line (over 16 years late in the U-District) and isn't going to change this reality for a long, long time to come.

DPD (and SDOT's) desire to wish away the personal automobile has failed and is failing, and the level of gridlock on our streets is the direct result of the arrogance of city planners who insist on planning for how they want people to behave rather than dealing with how things occur in the real world. If the GMA and concurrency principles were being adhered to, DPD would stop (or at least radically slow down) handing out building permits and upzones, acknowledge that these new projects create more vehicle trips than the street grid can accommodate, and deal with the fact that bikes and transit simply aren't making up the difference.

Members of the UDCC were appalled but not surprised to hear DPD Director Diane Sugimura pooh-pooh legitimate concerns about the pace and scale of current and proposed upzones, tax breaks, and other developer subsidies by dismissing those who raised these issues as simply "fearing change." What citizens fear far more than change is an enormously powerful, unaccountable, and unelected agency whose stated clients are developers rather than the citizens who have to live with (and subsidize) development, both with the time they spend in traffic (during and after construction) and the tax dollars they spend on the infrastructure that is required to keep pace with the unprecedented levels of growth DPD has actively encouraged (all too often by stretching or ignoring the Land Use Code). We also note that DPD has allowed numerous interminable long-term street closures in the U-District to make things easier for developers that would never be allowed in most other cities.

DPD promised to preserve existing unsubsidized affordable housing in the original 1994 Comprehensive Plan and the 2004 update, but have since actively undermined any meaningful attempts to do so. Instead, DPD pushes MFTE tax breaks for developers who are providing housing that is barely cheaper than comparable rental units, and that literally raise the property taxes that the rest of us pay. Actions speak louder than words, and DPD acts at every turn like hypothetical future residents are far more important than the proles who live and work here now. This must change.

DPD has acknowledged the need for more open space in the University District even at existing levels of growth, let alone with the massive new upzones that DPD and the University of Washington are pushing on the neighborhood. DPD's attempt to adopt Land Use Map and Comprehensive Plan changes before firm and binding commitments to ensure that developers provide open space in exchange for the massive public gift of value that upzones provide must be in

place before the any Comprehensive Plan and/or zoning or land use map changes are made. It is also premature to adopt the HALA recommendations and/or make other changes to the land use code and Comp Plan until there is some mechanism to ensure that promises of a long-needed central plaza in the University District (which the UDCC has strongly supported since the adoption of the original University Community Urban Center Plan) are not left by the wayside after the UW and its private "partners" start building skyscrapers. The time to ensure that growth actually pays for growth is before these changes are made – not after.

Twenty years ago, as today, the stated goal of DPD in working to capture a greater share of regional development in the city limits than regional bodies were/are requesting is that Seattle is going to somehow save the region from "sprawl." Planners need to drive out to Newcastle, the Issaquah Highlands, Maple Valley, and a dozen other suburban and exurban locations to see for themselves how that has worked out – it hasn't and won't. Instead, DPD's approach of adding density for its own sake without adequate mitigation will likely drive what is left of the working and lower-middle class residents who are barely holding on in Seattle out to the very suburbs and exurbs it purports to save. For those who grew up in and/or built lives in Seattle, there is nothing at all "sustainable" about that (but that being said, the UDCC supports other citizens who hope to see that word remain in the name of the Comprehensive Plan).

It seems odd to have to remind DPD that much of our neighborhood (and many others) was already upzoned in anticipation of the arrival of light rail. The buildings came, and the fact that rail is 16 years late does not justify further wholesale upzoning of our community or making amendments to the Comprehensive Plan to prematurely set the stage for it. We urge DPD to keep the promises it made when the Comprehensive Plan was originally adopted, and to start treating new development as a phenomenon that needs to be mitigated rather than as an intrinsically beneficial divine force of nature that must be facilitated and publicly subsidized. As it stands now, DPD's approach to the Growth Management Act has been and remains all growth - no management. This too must change, and the proposed 2035 Comprehensive Plan update needs to keep the promises made to citizens that growth would pay for growth and that it would not unduly impact those who already live and work here.

We appreciate your attention to these comments.

Sincerely,

Matt Fox,
UDCC President

CC: Mayor Ed Murray
Seattle City Councilmembers

UNIVERSITY PARK COMMUNITY CLUB

5215 19th Avenue Northeast
Seattle, Washington 98105

November 19, 2015

City of Seattle
Department of Planning and Development
Attn: Seattle 2035
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124-4019

Dear City Officials:

The University Park Community Club (UPCC), as representative of the University Park Neighborhood, appreciates the opportunity to submit our comments on the Draft Seattle 2035 Comprehensive Plan. Although its lists of goals are noble, its details provide us with a mixed sense of priorities. In a convoluted effort to support your guidelines and to justify them as the only solution to inequality of housing, jobs, and quality of life, the city has totally bypassed the established neighborhoods, many facing an onslaught from aggressive and invasive developers. It is the city's attitude and approach that have, rightfully or wrongly, caused neighborhoods and residents to lose confidence that any comprehensive plan will actually achieve the desired outcome. Indeed, even the word 'comprehensive' is questioned, as most of the plan fails to address many of the issues that should be included, examined and intermeshed, if the city truly wants to produce an integrated framework for future growth.

In a fervent effort to draw your attention to the priorities of our neighborhood, we hereby present a summary of several major issues and concerns:

1. One specific example of inconsistent policy is the University District Environmental Impact Statement (EIS): It recommends a major up-zone for our area, but infrastructure issues are discussed in a very cavalier manner, and mitigation measures are only mentioned as possibilities. There is something wrong this this approach. An up-zone must only be approved if issues such as transportation, schools, affordable housing, increased demand for social services, police, open space etc. are addressed in a comprehensive way, including the necessary funding. The 2035 Plan has nice statements, such as T1.1:*"Provide sufficient transportation facilities and services to promote and accommodate the growth…"*

   However, this must be funded, and if the funding is not available, growth should be restricted. South Lake Union is not a glorious achievement. It is a failure to plan in a comprehensive fashion, and we do not want to see this repeated in the University District or elsewhere in Seattle.

2. An example of specific proposals that are in conflict with the Seattle 2035 Comprehensive Plan is the expansion of the Roosevelt Urban Residential Village: This proposed expansion does not follow the 2035 Plans own recommendations. According to the "Urban Village Expansion Board" document on the 2035 website, the proposal for expanding villages is to include areas within a ten minute walk of frequent transit stations. The Roosevelt expansion all the way to the 20th Avenue Northeast Bridge over Ravenna Park is considerably further away than ten minutes from the future light rail station, so there must be another hidden reason for trying to make this expansion. Unfounded recommendations such as this one do not inspire confidence in the overall approach, which is supposed to be fact driven and logical. It should also be mentioned that the Roosevelt expansion is not included in the "Urban Village Expansion Board" document. Why not?

3. The Comprehensive Plan does not address the parking issues in a practical and honest approach:

Despite the overoptimistic talk about the quality of Seattle's public transportation system, cars are going to play a major role in the next twenty years and they have to be parked somewhere. The 2035 plan makes reasonable statements about off-street parking (LUG6, LU6.1, LU6.2), however our experience shows, that there is no will to enforce existing rules, and violations are routine. The plan does not mention enforcement action to ensure compliance with new or old rules. In general, the plan is silent on how to make sure that any new regulations are actually followed. Density increases lead to more conflicts and problems. This must be addressed by improved enforcement, not only for parking but for any regulation.

4. Schools, education and job training are a major concern for our neighborhood, but no quote can be cited, as schools are not even mentioned in the 2035 Plan apart from one page on *"Youth Development"* within ACG3: *"Improved access to arts education in all schools."*

An educated and well trained population is a basic requirement if the growth of our City is to benefit all our population. The fact that the 2035 Plan does not address this issue is a major deficiency.

5. Seattle's goal to provide parks, open space, and public squares become more important and necessary as density is increased and yards around homes shrink. That is why we are encouraged by P1.1, which states: *"Continue to expand the City's park holdings, with special emphasis on serving urban centers and urban villages and areas that have been traditionally under-served."*

The city must provide strategically located green spaces that are safe and clean. In this day of cautiousness, families need to have local play areas within safe walking distance for their children. As a true sense of community is nurtured, the City must also encourage neighbors to look out for the children in their immediate surroundings.

Additionally of concern is the specific infraction of the City Parks Plan's goals within the University District. Although our Parks Plan was recently revised and the 'public plaza' concept was ranked as a high priority, there is yet no clear path to achieving this goal, especially how it will be funded. This is in spite of the fact that this concept and its lofty goals were also a component of the old 2005 plan, with the same recommendation.

How is this going to be funded? Again, if funding for open space is not available to keep up with growth, growth should be correspondingly limited.

6. Throughout the various sections of the Seattle 2035, there are references to neighborhood identity. Specifically, GS4.8 states: *"Preserve characteristics that contribute to communities' general identity, such as block and lot patterns and areas of historic, architectural or social significance."*
Seattle presently has access to a potentially valuable tool to preserve the unique identities of our established neighborhoods: specifically the Neighborhood Conservation District. This concept has a proven track record in cities across the country. So, it is perplexing that this strategy is actively discouraged by the Housing and Affordability and Livability Agenda (HALA) recommendation SF4: *"Opposed Neighborhood Conservation Districts".* We would like to see historic neighborhoods like ours maintained and not destroyed by developers in the name of creating affordable housing, without any guarantee that this will actually happen. Therefore, UPCC requests that the city take prompt measures to enact this strategy as an important feature of Seattle 2035.

7. The city's commitment to historic preservation is admirable, as stated in the Arts and Culture introduction: *"Historic preservation recognizes and protects aspects of the culture in the built environment –buildings, districts, and designed landscapes that link Seattle's past… The benefits of historic preservation are not merely aesthetic. Preservation is integral to our economic development planning, and it enhances our city's attraction as a center for tourism…"*

The UPCC requests that the City also acknowledge the wealth of older homes with fine architectural details which have survived in our various established neighborhoods. Even the city has recognized the contributions of many homes that have graced the University Park neighborhood for around one hundred years, as documented in its October 2014 inventory. This is just one example: *"This historic property retains its relationship to the streetscape, historic building form and a sufficient amount of exterior historic building fabric (design features, cladding and/or window sash/openings) to contribute to the distinct character of the University Park neighborhood. This is a particularly well-preserved historic property that appears to possess architectural and/or historic significance."*

We hereby request that the city encourage restoration over demolition of these fine homes, including compatible alterations, such as owner-occupied Accessory Dwelling Units and Detached Accessory Dwelling Units (ADU's and DADU's) and respectful owner-occupied duplexes. Specifically an issue in our in our neighborhood is the large number of legal and illegal duplexes and triplexes; their presence has created a serious impact on the community. Most of these are rented to students, and some are basically boarding houses. While we have no objection to reasonably managed ADUs or DADUs, we are opposed to loosening restrictions to owner occupancy requirements and to the maximum number of unrelated people allowed in these units. These potential changes are not directly mentioned in the 2035 plan, but are recommended by HALA. Before any such land use changes are implemented, a study should be made to clearly show that the addition of ADUs truly creates low income housing, and is not just a way for developers to squeeze more money out of our neighborhoods.

We further urge the City to recognize and celebrate the historic design and planning by the Olmsted brothers of the University Park streets (Ravenna Boulevard and 17th Avenue Northeast) and plantings as important contributions to the Seattle landscape.

8. The Comprehensive plan discusses the need for transition zones between the Urban Centers or Villages and the adjacent neighborhoods. Specifically, GS4.10 states the following: *"Use zoning tools and natural features to ease the transitions between urban villages' moderate building intensities to lower-density developments of surrounding areas."*

We request that these transition zones be specifically designed for and confined to the peripheral blocks within the boundaries of the Urban Centers and Villages, and that the city proactively mitigates any adverse impact from spillover into the adjacent family neighborhoods, as itemized in the Comprehensive Plan's Draft Environmental Impact Statement (DEIS).

9. In NP1.3, the city states this goal: *"Develop neighborhood plans to be consistent with this Plan's vision and allow neighborhood plans to focus on issues that are unique to their areas."*

This is very important to the health of our various neighborhoods. The City must realize that the proposed changes will have varying impacts throughout the city. For instance, a major concern in our neighborhood is the rule that allows eight unrelated adults to occupy a house/single unit. In other neighborhoods, the introduction of duplexes and triplexes leads to the addition of one or two more families. In our neighborhood, it leads to an additional eight to sixteen more unrelated adults, each with his own life, car and impact on the neighborhood's quality of life. Added to this is the fact that most of these tenants are transient in nature, with no long term commitment to or even acknowledgment of our community. Today they may create a major problem, but tomorrow they are gone, leaving the permanent residents to solve that problem. The UPCC directs the city to review this rule and its impact on various neighborhoods. It would make sense to add tighter occupancy restrictions in our neighborhood and those similarly affected by close vicinity to major institutions, for instance, reducing the number to four to five unrelated adults. Many University Towns have similar restrictions. This is not an undue hardship, as it will also create healthier and safer housing units for our renting population.

10. UPCC believes that Seattle should prioritize preservation and rehabilitation opportunities as a strategy and planning tool in its land use regulations. This should be promoted, especially with regards to historically significant buildings that already provide low-income housing for Seattleites. If these buildings are razed and replaced by new construction, the lost affordable housing units must be totally replaced, along with an increase as dictated by the law; if not, the city will experience an increasing deficit in such housing stock. In fact, Seattle must create a slumlord law, aimed at preventing absentee landlords (like Sisley) from abusing their properties into deterioration, when the only choice becomes demolition. Many of the older buildings have had the same owner for years, but their upkeep has been withheld in anticipation of future profit-making projects. This leads to run–down neighborhoods, which drags the rest of the community down with it.

11. Certain features should be promoted in all residential zones, if the city truly wants to create communities that are welcoming, inviting people to explore and connect by foot, as they get to know their neighbors. This goal is suggested in LU5.9: *"Enhance the visual quality of an area through standards for screening and landscaping appropriate to each zone in order to minimize the visual impact of new development on the surrounding neighborhood, the streetscape, and development in areas with less intensive zoning."*

Basic design standards should be specified and promoted as an integral part of creating opportunities for social interaction. Some options include but are not restricted to the following:

- inviting and street-facing entrances
- appropriate use of hedges and fences that do not create a walled-off and disconnected feeling
- enhanced visual and natural landscaping, rather than the cement walls and paths that are presently popular with the box-like multi-family houses being constructed in family neighborhoods with the approval of the City AND
- setbacks for new buildings to create a sense of warmth, charm, and continuity within the community.

Not only will these basic features improve the streetscape, they will also address a variety of safety concerns, as residents shed their dependency on the automobile in preference to walking and using public transportation. Again, an appropriate strategy for implementing these standards is the Neighborhood Conservation District, a concept of which UPCC strongly approves but one which HALA vigorously opposes.

12. Seattle needs to develop an effective line of communication with all neighborhoods, as proposed in NP1.5: *"Support neighborhood plan implementation to enhance the quality of these urban environments and to promote continued collaboration between the City and neighborhood groups."*

It is only through respectful, open, and honest dialogue that a sense of trust is reached and neighborhoods can believe that the City has their future welfare in focus as a high priority. This includes easier access to the major alterations and deletions within the present Comprehensive Plan during the drafting of Seattle 2035, especially those designed to protect the integrity of Seattle's neighborhoods. An itemized list of those specific policies was buried deep within the official website and only included after citizen complaints. This strategy of 'omission' does not provide the citizens of Seattle with any sense of fairness or transparency.

13. Finally, in the exact wording of the plan, GSG4 states the following: *"Maintain and enhance Seattle's unique character and sense of place, including its natural setting, history, human-scaled development, and community identity as the city grows and changes."*

Most often expressed by the City is the desire to remake and redefine the Seattle. With the disposal of majestic buildings of historical pedigree and the disappearance of architecturally significant homes within our established neighborhoods that are relics of past decades, we have lost

all confidence in our future. We fear that Seattle wants to dilute or even remove our past, sending the city off onto a sea of uncertainty, in which its identity becomes fluid and transient. Those of you who are fortunate enough to visit Europe and witness the amazing historical sites, large central plazas, and ornate architectural features surely must be left in awe at the Europeans' wisdom and foresightedness in placing a high priority on historic preservation and celebration. Does our history not deserve the same acknowledgment and respect? That is why this quote above instills in us much hope that Seattle is committed to not only the diversity of its inhabitants, but to the rich diversity of its historical evolution that has shaped the city's very identity since its incorporation in 1869.

In review of the overall plan, we wish to re-emphasize the "comprehensive" component. In particular this plan must ensure that the growth of our City is managed in a comprehensive fashion, which means added density must be accompanied with the necessary infrastructure improvements. Without a documented path to achieve this we cannot support the 2035 Plan.

There are many other specific details too numerous to include in this letter, but we hope that these comments relay our overall feelings and concerns, as you finalize the details of the Seattle 2035 Comprehensive Plan. While the plan's purpose is to guide city growth in the next twenty years, its impacts, both positive and negative, could take us on a path of no return. The city must reassure us that this path is one that creates the best and the greatest opportunities to revitalize our wonderful city.

University Park neighborhood is grateful to all municipal employees and officials and their dedicated service on behalf of the citizens of Seattle. We look forward to improved cooperation and open dialogue, as the goals of Seattle 2035 are refined and implemented.

Sincerely,

Aileen M. Langhans
Secretary, UPCC
aileenmargaret@yahoo.com
206-522-0203

PS. Let's not forget that Seattle is nearing a major milestone: our 150th Birthday on December 2, 2019. Hopefully it will be a time to truly celebrate.

"We have everywhere an absence of memory.
Architects sometimes talk of building with context and continuity of mind,
Religious leaders call it tradition,
Social workers say it's a sense of community,
But it is memory we have banished.
We have speed and power, but no place.
Travel, but no destination.
Convenience, but no ease.

Howard Mansfield, "In the Memory House"
author of history, architecture, and preservation

The Urbanist

Examining Urban Policy to Improve Cities and Quality of Life
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November 20, 2015

Diane Sugimura, Director
Department of Planning and Development
City of Seattle
700 5th Avenue, Suite 2000
Seattle, Washington

Director Sugimura,

We appreciate the dedicated and thoughtful work the the City and your department has invested in planning for Seattle's future. This city has been at the forefront of visionary, progressive policies that have improved the quality of people's live and their built and natural environment. In that vein, the work of Seattle 2035 is an invaluable community exercise to vet a comprehensive plan that embodies the city's hopes and dreams for today and future generations. It's for this reason that getting policy decisions right now is critical.

During the comment period for the Final Environmental Impact Statement, we urged the City to consider four key policy themes: diversity, equity, opportunity, and accessibility for all. Specifically, we offered the following policy goals for the City to incorporate into the Comprehensive Plan:

1. **All areas of the city have an obligation to support growth, and the right to access the urban benefits that come with it**. Regardless of wealth, race, class, or zoning, each portion of the city must support its share of the city's growth. As an example, single-family residential zones are appropriate for many of the common Missing Middle housing types, such as cottage housing, detached accessory dwelling units, duplexes, triplexes, townhouses, and even rowhouses. These housing options should be broadly allowed with minimal interference from neighbors. These building types are equitable, desirable, and compatible with the character of residential neighborhoods. While this type of growth may seem painful to some, it presents a wide range of opportunities and benefits: proximity to jobs, access to high-quality transit, grocery stores and restaurants, parks, schools, and more. All these benefits come from growth and density, not the other way around. All residents, whether new or old, deserve to partake in these urban benefits, regardless of where they live.

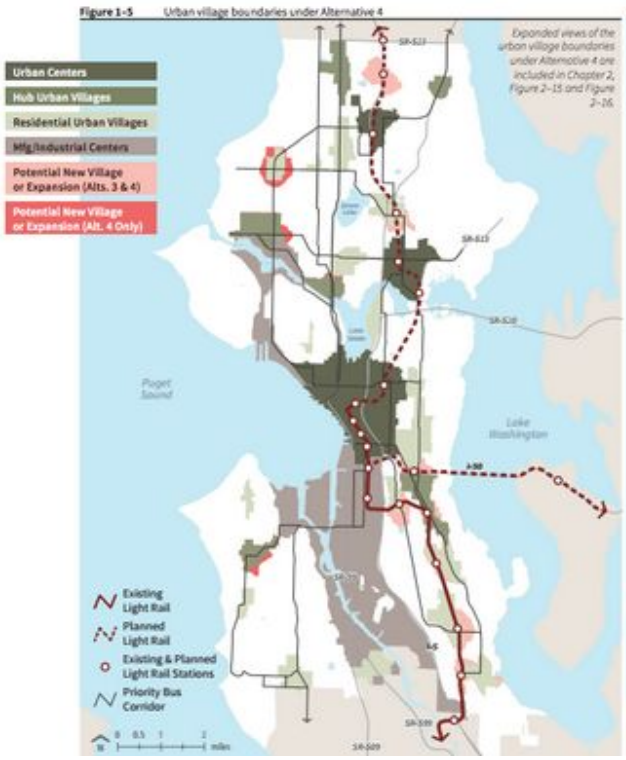
2. **Expand the number and size of urban villages to accommodate growth throughout the city**. There are ample commercial and medium-density residential areas in the city that have no urban center or urban village designation, such as Aurora Avenue (north of N 36th St to N 85th St), Upper Fremont, "Frelard", Westlake, Nickerson, Madison Park, Wedgwood, South Magnolia, Interbay, Graham, and many more. Each of these areas presents an opportunity to absorb growth while providing tremendous urban benefits. The city should also consider extending boundaries in these areas beyond just the immediate medium-density residential and commercial core properties. Transit walksheds extend beyond the core, and bikesheds extend even farther. Connecting bike rides with transit, something that will become even easier with Pronto's expansion, shows that the urban villages can be much larger. Overconcentration of growth leads to targeted displacement and disruption. Only by spreading growth throughout the city can we ensure that no single area experiences an unreasonable share.

3. **Expand urban zoning in urban villages and urban centers**. Designating areas as urban villages isn't enough. The city needs to go further and expand the areas of urban development in urban villages and high-intensity zoning in urban centers, especially where there is extraordinary demand for housing (e.g. Ballard, Wallingford, South Lake Union, and the

University District). This will reduce the number of people that are displaced due to demolitions.

4. **Actively mitigate the impacts of growth in areas where displacement risk is high.** We support adopting policies that will alleviate or prevent actual displacement. This might include mandatory participation in the multifamily tax exemption (or a similar program), mandatory inclusionary zoning or linkage fees, one-to-one replacement of affordable units in perpetuity, focusing housing levy dollars in these areas, using the city's bonding authority for sustainable affordable housing options, and other socially progressive housing strategies through the land use code or city actions in the form of programs and partnerships.

The Draft Plan suggests that the City is pursuing many of these policies in the spirit of the long-established Urban Village Strategy, and we find that incredibly encouraging. Here are just a few of the policy changes that we applaud:



- Targeting policies that will deliver affordable housing options and create racial and social equity;
- Creating higher standards for buildings to achieve for health, safety, and the environment;
- Acknowledging that the proliferation of off-street parking is counterproductive to a growing, innovative, and multi-modal city;
- Enhancing policies for industrial areas, which are integral to the local economy;
- Establishing a Stadium District to recognize the unique attributes of sporting entertainment and complimentary amenities they bring;
- Recognizing that additional housing typologies are compatible within low density residential areas;
- Setting goals for parks and open space that focus on quality instead of quantity;
- Focusing growth where transit is highly accessible;
- Developing superior metrics for mobility and transportation planning of all users in lieu of Level of Service; and
- Establishing high targets for non-driving modes across the city.

Additionally, we recognize that land use discussions are always a challenge for policymakers, but we strongly support the bold proposals envisioned to expand urban villages and even add a new one near NE 130th St and I-5. This is a necessary step to accommodate growth over the next 20 years. But we still believe that the City should evaluate other locations for additional designation as urban village, as suggested above.

Cordially yours,

The Urbanist Board of Directors (Owen Pickford, Stephen Fesler, Ben Crowther, Sarah Oberklaid, and Scott Bonjukian)

Date: 10/06/2015

Name: Wallingford Community Council,Mary Fielder

Draft Plan Element: Economic Development, Transportation

Comment:

Hello. There's a lot to digest in this proposal and I offer the following comments -
First, you can read the entire document and then be surprised to learn that Seattleites actually do drive private automobiles. All planning is directed at walk/bike/transit infrastructure. There's no mention of parking or automobile congestion, and the rare mention of the term "car" is always pejorative. Seattle streets, it seems, are to be devoted to bicycles, pedestrians, and buses. This is so conspicuous, and obviously intentional, that this goal - animus toward
automobiles - should be included in the summary of Core Values. If planners and elected officials intend for Seattleites
to be forced out of their cars, they should have the decency to be accountable for the goal. One of the ironies is that
failure to plan adequately for park-and-ride capability threatens the viability of mass transit infrastructure. WE NEED MORE PARK AND RIDE LOTS IN SEATTLE.
Second, there is no comprehensive plan to pay for any of this growth. What little mention of funding there is is confined to the term "levy" - this means taxpayers and ratepayers. This is not unusual - these comprehensive plans often defer consideration of costs or funding to subsequent initiatives. But they don't have to get into the weeds to
simply state, as a Core Value, that development will pay an appropriate share of its own costs. (These costs paid by
developers will be passed on to the new residents and businesses that are attracted by the new development. To
the extent that existing residents and businesses benefit from the new infrastructure, costs will be apportioned to them
as well). DEVELOPMENT SHOULD PAY FOR DEVELOPMENT.
Third, the plan makes no attempt to visualize what the Seattle economy will look like in 20 years (except that it will be
"green" and "fair"). The economic development piece is deferred to other planning efforts, but they need to make some credible effort to get some of this right - there aren't going to be enough barista and Uber jobs for a city of
1,000,000 people. One obvious example - if the jobs are going to be in outlying areas, that's where the residential/commercial planning needs to focus. Infill is green (as in carbon) to a point, but beyond that point, it's
just green (as in money).
Thank you for all your efforts in this huge challenge, Mary Fielder, Chair, Wallingford Community Council Parking Committee

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PUBLIC FACILITIES DISTRICT

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November 20, 2015

City of Seattle, Department of Planning and Development
Attention: Tom Hauger and Kristian Kofoed
700 5th Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019

Via email: 2035@Seattle.gov ; Tom.Hauger@seattle.gov ; Kristian.Kofoed@seattle.gov

Re: PFD Comments on Seattle's 2035 Comprehensive Plan

Dear Mr. Hauger and Mr. Kofoed:

Thank you for the opportunity to comment on Seattle's proposed 2035 Comprehensive Plan. The Washington State Major League Baseball Stadium Public Facilities District (PFD) strongly supports the designation of a new Stadium District in the area around Safeco Field and CenturyLink Field & Exhibition Center. We also strongly support the Future Land Use Map and the Land Use Goals and Policies associated with the Stadium District (see below). We firmly believe that the Stadium District can be recognized as a unique sports and entertainment district while at the same time protecting freight mobility and industrial activity in the Duwamish Manufacturing and Industrial Center to the south and west. We urge the City to adopt the Stadium District elements of the 2035 Comprehensive Plan.

The PFD is the public entity that developed and owns Safeco Field. The PFD is responsible for overseeing this public asset and it works to maximize the benefits from the public's $335 million investment in the ballpark.

Since 2010, the PFD has been working with our neighbor entity—the Washington State Public Stadium Authority (PSA), the public owner of CenturyLink Field—on ways to enliven the area surrounding the stadiums. The work of these two public entities produced a Stadium District Concept Plan in December 2012 (www.stadiumdistrict.org).

BOARD OF DIRECTORS

Charley Royer, Chair
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Charles V. "Tom" Gibbs
Craig Kinzer
Virginia Anderson
Paul Mar

The purpose of the Concept Plan was to identify the essential elements of a thriving stadium district—one that is economically successful, safe, desirable, innovative, inviting and irresistibly fun to live in and visit. The Concept Plan included a number of guiding principles and key findings. The Plan recommended developing public and private strategic partnerships to achieve the following 10-year targets for development within a 15-minute walk radius of the stadiums:

- threshold increase of 2,000 new market rate housing units
- minimum of 2,000 new parking spaces
- enhanced pedestrian, bicycle and transit facilities and connections, and
- a major new destination open space

In 2013, we participated actively in the City's broadly diverse 20+ member working group for the Stadium District, which developed a formal set of proposed Comprehensive Plan changes. In short, those changes were designed to enrich and enliven the area around Safeco Field and CenturyLink Field for more than just events, and they are generally consistent with the guiding principles of the Concept Plan.

The comprehensive plan changes recommended by the working group for the Stadium District have largely been incorporated into the City's proposed 2035 Comprehensive Plan. We believe that the goals and policies for the Stadium District contained in the 2035 Comprehensive Plan are both consistent with our hopes for the district and are respectful of the concerns expressed by the proponents of the industrial lands to the south of the district. We have always believed that a vibrant Stadium District can be developed while supporting the continued viability of industrial operations in the Duwamish manufacturing and industrial center.

Accordingly, we <u>strongly support</u> the City's adoption of the following elements of the 2035 Comprehensive Plan:

- Designate a new Stadium District on the Future Land Use Map as an independent land use category (including the boundary modification proposed by the PSA).
- Adopt the Land Use Goals and Policies identified for the Stadium District in the land use element of the comprehensive plan (including the changes suggested by the Seattle Mariners and the PSA).
- Allow the complementary uses identified for the Stadium District (e.g., housing and lodging), subject to the location restrictions contained in the plan.

Thank you for the opportunity to comment on Seattle's 2035 Comprehensive Plan. If you have any questions or would like to set up a meeting to discuss, please call our Executive Director, Kevin Callan, at (206) 767-7800 or our Legal Counsel, Tom Backer, at (206) 499-9987.

Sincerely,

Charles Royer
Board Chair

Cc: Via Email
PFD Board Members
Kevin Callan, Executive Director
Tom Backer, Legal Counsel
Bart Waldman, Seattle Mariners
Susan Ranf, Seattle Mariners
Melody McCutcheon, HCMP Law Offices
Gary Johnson, City of Seattle DPD
Geoff Wentlandt, City of Seattle DPD
Ann Kawasaki Romero, PSA

WASHINGTON STATE
PUBLIC STADIUM AUTHORITY

November 20, 2015

City of Seattle, Department of Planning and Development
Attention: Tom Hauger and Kristian Kofoed
700 5th Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019

Via email: 2035@Seattle.gov

Re: WSPSA Comments on Seattle's 2035 Comprehensive Plan

Dear Mr. Hauger and Mr. Kofoed:

The Washington State Public Stadium Authority (PSA) appreciates the opportunity to submit this comment letter in support of Seattle's Draft 2035 Comprehensive Plan. The PSA is the public agency that owns CenturyLink Field and Event Center (CenturyLink) and is charged with protecting the citizens' $430 million facility.

1. The PSA Strongly Supports Creating the Stadium District.

First and foremost, the PSA wants to express it strong support for the inclusion of the Stadium District in the 2035 Comprehensive Plan, and its excitement at seeing the Stadium District identified as amongst DPD's "10 Key Proposals" for the Comprehensive Plan. It has been more than ten years since CenturyLink opened, and more than fifteen years since Safeco Field opened. The PSA believes that it is critical to recognize and protect the substantial public investment reflected in the two event facilities. Toward that end, the PSA and the Washington State Major League Baseball Stadium Public Facilities District (PFD) began a planning effort in 2010 to develop common goals and objectives to protect the public investment and viability of the two facilities. That effort culminated in issuance of the Stadium District Concept Plan in 2012. Thereafter, the PSA participated in the Stadium District Advisory Committee empaneled by the City in 2013, which generated many of the goals and policies proposed in the Draft 2035 Comprehensive Plan.

We support the creation of an independent land use district. The time is ripe to acknowledge how this area has developed over the past decade and to move from a zoning overlay to an independent district that better supports and capitalizes on the sports and events facilities that make up its largest uses.

2. The Stadium District Should Include All PSA-Owned Property.

The PSA owns all of the property north of CenturyLink up to Stadium Place, the Nolo Building, and the planned hotel/office building to the east on King Street. The draft Future Land Map appears not to include all of the PSA-owned property, leaving a portion of the PSA-owned

800 Occidental Ave. S #700 • Seattle, WA 98134 • (206) 381-7940 • (206) 381-7949 Fax • www.stadium.org

property (the portion known as the south half of the north lot) in the Pioneer Square Mixed ("PMS") zone. We can see no reason or benefit to bifurcating the PSA's property into two zones. Instead, all of the PSA-owned property should be part of the new Stadium District and subject to the zoning regulations that will be applicable to the Stadium District.

The PSA was created by Referendum in 1997. Pursuant to that Referendum, the PSA is strictly limited in how it can use its property. The PSA may only use this property for a "stadium and exhibition center," defined as "an open-air stadium suitable for national football league football and for Olympic and World Cup soccer, with adjacent exhibition facilities, together with associated parking facilities and other ancillary facilities." RCW 36.102.050(1), RCW 36.102.010(9).

The PSA has no immediate plans to redevelop the south half of the north lot, but when it does, that property will have to be part of the authorized stadium and exhibition center use. Although a "stadium and exhibition center use" is not prohibited outright under the City Code, the development regulations applicable to the PSM zone and Pioneer Square Preservation District (PSPD) limit development pursuant to that use. *See e.g.,* SMC 23.66.130(C) (discouraging any general sales or services uses or eating and drinking establishments over 3,000 square feet, and any use over 10,000 square feet); SMC 23.66.130(D) (prohibiting any use from occupying more than 50% of the street-level frontage of a block that is 20,000 square feet or more); SMC 23.66.130(B) (encouraging smaller retail and restaurant uses). By retaining the south half of the north lot in the PSM zone, the Draft 2035 Comprehensive Plan inadvertently, but significantly, restricts the development potential of this valuable property.

Moreover, with the recent development of Stadium Place, the Nolo Building and the pending development of the hotel/office building to the east on King Street, the south half of the north lot is effectively buffered from Pioneer Square (and vice versa).[1] When the Pioneer Square Special Review District was first created in 1973, one of the City's concerns was that auto-oriented development in the north lot of the newly developed Kingdome would adversely affect the character of Pioneer Square. *See* Ordinance 102455 (1973). When the Council next revised the Pioneer Square District in 1985, the Council expressly mapped the north lot as a "buffer" between Pioneer Square and the Kingdome, designated the north lot for parking use to support the Kingdome, and did not apply the street level use requirements to the north lot. *See* Ordinance 104709 (1985). Thereafter in 1999, concurrent with plans to replace the Kingdome with CenturyLink, the Council eliminated the parking designation on the north lot, and recognized its likely development with "a mix of uses, including a substantial amount of housing." Ordinance 119484, Section 34 (SMC 23.66.11(C)(4)) (1999).

That mixed-use/residential development is now complete, and provides the transition between the Stadium District to the south and Pioneer Square to the north and west. There is no need for additional buffer between the Pioneer Square and CenturyLink. The north sides of the new mixed use developments mirror many of the historical features of Pioneer Square, while the south sides of those developments match the relative modernity of CenturyLink Field. In light of

[1] Development permitted for the east parcel of the north half of the North Lot includes: 298.974 sqft of hotel (297 rooms), 174,271 sqft of office, and 36,673 sqft of retail/restaurant uses.

this historical evolution of the PSPD and the recent development of the north half of the north lot, we can see no reason to retain the south half of the north lot in the PSM.

Finally, the Draft 2035 Comprehensive Plan contains no explanation for why it is appropriate or necessary to retain the south half of the north lot in the PSM zone. The only explanation provided to date (which is not stated in the Draft Comp Plan) has been that the north half of the north lot was able to develop relatively smoothly under the PSM and PSHD. The north half of the north lot is now owned by a private developer interested in and able to pursue a diverse array of uses. That is not the case with the south half of the north lot, which is owned by a public entity and subject to pre-existing statutory use restrictions.

Now is the time, as the City is first creating the District, to establish the appropriate boundary. That boundary would place all of the PSA-owned property in the Stadium District with other event facilities.

3. The Stadium District Policies Should More Fully Implement the Stadium District Concept Plan.

The Stadium District Concept Plan, created by the PSA and the PFD, was a foundational document for the City's Stadium District Study and the 2035 Comprehensive Plan. As such, DPD should more fully integrate the key components from that Concept Plan into the 2035 Comprehensive Plan, particularly the provisions calling for additional parking, more public open space, and view preservation.

With regard to parking, the PSA appreciates the steps made in Draft 2035 Comprehensive Plan "to address unique event-related parking needs." Draft Policy LU 15.9. Additional affirmative measures are needed to replace the *thousands* of parking spaces that have been eliminated in the District over the past 10 years by the Viaduct replacement/tunnel construction and other developments, and to ensure adequate parking to meet current and future parking demand in the District. The Concept Plan calls for the creation of 2000 new parking spaces over a ten year period. To enable that goal, the PSA suggests adding the following language to Draft Policy 15.9:

> If new parking facilities are added, they should be co-located with or adjacent to existing parking <u>or accessory to a sports or event venue or other public use</u> and designed to be compatible with the pedestrian-friendly character intended for the district.

This minor revision will provide more opportunities in the 2035 Comprehensive Plan to ensure adequate parking supply in the Stadium District.

Second, the PSA believes that the City can and should do more to create public open space in the District. Toward that end – and in support of the draft Stadium District Goal of supporting the continued viability of the industrial area west of the WOSCA site – the PSA encourages the City to begin master planning the WOSCA site now. As the PSA said throughout the City's Stadium District Advisory Committee process, the WOSCA site represents a "once in a century" opportunity for the City and the Stadium District.

DPD undertook master planning for Yesler Terrace. The PSA recommends and requests that the City adopt a master planning process for the WOSCA site as part of implementing the Stadium District. This would give the future owner/developer of the WOSCA property greater certainty about the intention behind proposed policy LU 15.7 ("Encourage new development to contribute to the creation of a network of public spaces and streetscapes . . . ."), and ensure this valuable property is redeveloped in a way that benefits the public and is acceptable to all of its neighbors.

Finally, on the issue of view preservation, the PSA appreciates the efforts reflected in the Draft 2035 Comprehensive Plan to protect important view corridors within the City. *See* Draft Policy LU 15.4, 15.6. The PSA believes that the 2035 Comprehensive Plan can and should do more to protect the valuable view corridors both to and from CenturyLink and Safeco Field in the Stadium District. This could be accomplished by master planning WOSCA and creating development standards on massing and location to avoid higher heights in areas that will cause adverse impacts to views to/from CenturyLink, or otherwise limiting the height of buildings to the west of CenturyLink to 65 feet.

4. <u>The Stadium District Policies Should Recognize the Need for Large Signage to Support Sport Venues</u>.

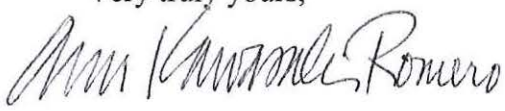
The Stadium District Study included an additional policy that is not reflected in the Draft 2035 Comprehensive Plan related to signage. Specifically, the Study provided:

> Recognize that major sports and entertainment uses have unique needs for oversized signage or displays associated within venues, and accommodate such needs in sign code regulations.

Stadium District Plan (November 2013), p. 53. The PSA requests that DPD include this policy in the 2035 Comprehensive Plan for the Stadium District.

Thank you very much for your consideration of the PSA's comments regarding the Draft 2035 Comprehensive Plan. We strongly support the City's decision to create a Stadium District, and hope that our comments will improve that vision. If you have any questions regarding these comments, please contact me.

Very truly yours,



Ann Kawasaki Romero
Executive Director

cc: Gary Johnson, City of Seattle
Ed Goines, Vice President/General Counsel, First & Goal Inc.
Molly Lawrence, Van Ness Feldman GordonDerr
PSA Board Members

November 20, 2015

Director Diane Sugimura
Seattle Department of Planning and Development
700 Fifth Ave., Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019

Re: Concerns with Seattle's Draft Comprehensive Plan

Dear Ms. Sugimura,

We are a coalition of maritime and industry stakeholders that share significant concerns about the current draft Seattle 2035 Comprehensive Plan (Seattle 2035). Over the last several years, we invested significant efforts working with the City to share our collective perspectives on the land use policies for industrial lands and given the current draft Seattle 2035, we feel that those viewpoints have been largely ignored.

Providing certainty to manufacturing, industrial and maritime businesses in industrial zones is critical in fostering the City of Seattle's previously stated position of maintaining and growing solid, family-wage jobs closely tied to our sectors. As you know, several years ago, the City began an extensive effort "considering land use policies for designated Manufacturing and Industrial Centers (M/IC) that will help preserve these areas for ongoing industrial use. The proposed policies would also discourage the conversion of property to non-industrial uses."[1]

Through collaboration with City staff, these efforts resulted in two carefully crafted industrial protection policies – they were not included in the version of Seattle 2035 currently being considered. While we appreciate the policies that were added, they fall incredibly short of the necessary steps to ensure the protection of industrial lands key to the future of Seattle's maritime and manufacturing sectors.

Of further note, the City's December 3, 2012 Seattle Sports and Entertainment Facility Memorandum of Understanding commits the City to "evaluate the necessary policies, land uses, and zoning mechanisms, such as a Port Overlay District, to protect maritime and industrial uses and reinforce the role of the MIC as a manufacturing and industrial sanctuary."[2] The agreement goes on to state "the objectives of this planning effort are to strengthen the long-term viability of the MIC, protect industrial uses and Port operations."[3] Draft Seattle 2035 fails to do this.

In addition, the creation of a new stadium district, including the allowance of multifamily housing across the street from a busy marine cargo terminal, directly conflicts with other Seattle 2035 proposed policies about buffering industrial uses from residential uses and the long standing zoning principles of

[1] http://www.seattle.gov/dpd/cityplanning/completeprojectslist/industriallands/whatwhy/default.htm
[2] http://www.seattle.gov/council/attachments/2012arena/20121008mou.pdf (p. 29)
[3] Ibid.

separating incompatible uses. Such adjacencies inevitably lead to complaints and lawsuits from the residents once they discover the realities of living next to a marine cargo terminal. This component also does little to strengthen the long-term viability of the MIC.

Mayor Murray, in his opening comments of his May 2014 Maritime and Manufacturing Summit, stated, "I believe it will be a future in which we first protect the manufacturing and maritime jobs that we already have, and then find ways to build on the strengths and advantages your companies provide to create more jobs in these industries." DPD's addressing the policy concerns outlined in this letter would support that vision.

Thank you for your attention on this matter, critical to the future of our industries, the economic activity we generate and thousands of family-wage jobs associated. We welcome the opportunity to discuss these details further.

Sincerely,

Washington Maritime Federation

Warren Aakervik Jr
Chair, Seattle Freight Advisory Board
Vice President, Ballard Oil

David Gering
Executive Director
Manufacturing Industrial Council

Jason Gross
Vice President
ILWU Local 19

Johan Hellman
Executive Director of State Government Affairs
BNSF Railway Company

Herb Krohn
Washington State Legislative Director
SMART-Transportation Division/
United Transportation Union

John W. Lockwood
Rear Admiral, USCG, ret.
President
Seattle Marine Business Coalition

Jill Mackie
Senior Vice President, Public Affairs
Vigor Industrial

Dan McKisson
President
ILWU Puget Sound District Council

Captain Mike Moore
Vice President
Pacific Merchant Shipping Association

John Odland
Vice President
MacMillan-Piper

Vince O'Halloran
Seattle Branch Agent
Sailors' Union of the Pacific

Geraldine Poor
Regional Transportation Manager
Port of Seattle

Cc: Planning, Land Use and Sustainability Chair Mike O'Brien
Planning Land Use and Sustainability Vice-Chair Tim Burgess
Chris Gregorich, Special Advisor for Strategic Initiatives, Office of Mayor Murray
Nathan Torgelson, Deputy Director, Seattle Department of Planning and Development
Roque Deherrera, Maritime and Manufacturing Advocate, Seattle Office of Economic Development

October 26, 2015

Tom Rasmussen, Chair of Transportation Committee
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025
Tom.Rasmussen@seattle.gov

Scott Kubly, Director
Seattle Department of Transportation
PO Box 34996
Seattle, WA 98124-4996
scott.kubly@seattle.gov

RE: Request to defer any consideration of the Occidental Avenue South street vacation

Dear Councilmember Rasmussen and Director Kubly:

We are a coalition that shares significant concerns about the proposed development of a major regional spectator sports arena at the intersection of First Ave. S. and South Holgate St. in the SoDo district of Seattle. Our concerns are centered on the additional vehicular traffic the arena will generate, and its negative economic and environmental impact on Port of Seattle operations, existing sports facilities, Seattle commuters, the maritime industry, and the SoDo business, manufacturing and industrial district.

On September 3, 2015, the Seattle Design Commission voted to recommend to the Seattle Department of Transportation (SDOT) that a portion of Occidental Ave. S. be vacated for purposes of providing land for and access to the proposed sports arena. Under Seattle procedures, the Commission's recommendation moves to SDOT and the City Council.

We respectfully request SDOT and the City Council defer any consideration of the Occidental Ave. S. street vacation petition until all "final transaction documents" (which were defined by the December 3, 2012 Memorandum of Understanding) have been agreed upon by all parties. We believe that neither SDOT nor the Council can today make the requisite finding that the street vacation is "in the public interest." Only after the final arena transaction documents have been negotiated, and all mitigation measures—and impacts that cannot be mitigated—are known, can SDOT and the Council understand the full impacts of the proposed street vacation and make a determination that is based on facts and grounded in the spirit of the MOU.

Background on SoDo Arena Street Vacation

On December 3, 2012, Seattle, King County, and WSA Properties et al. (collectively "WSA") executed a Memorandum of Understanding (MOU) pertaining to the proposed SoDo sports arena.[1] Among other things, the MOU required WSA to obtain "[a]ll permits necessary for construction, use and operation of the Arena, and all parking and other facilities accessory to the Arena."[2] Included in these permits are a Master Use permit and "all other permits or approvals required for the project…"[3] Although not mentioned in the MOU, one of the required approvals is for WSA to obtain a vacation of Occidental Ave. S. because this street directly underlies the proposed arena.

WSA is pursuing this street vacation per Seattle procedures. On or about March 19, 2013, WSA Properties et al. filed a petition for street vacation and this petition was referred to the Seattle Design Commission. On May 21, 2015, the Commission approved the "urban design merit" of the street vacation and, on September 3, 2015, the Commission made a finding that the vacation provided a "public benefit." The Occidental Ave. S. street vacation petition matter now moves to SDOT and the City Council for their respective consideration and approval. It is important to note that the Design Commission's recommendation addresses only a single criterion among the many policy considerations—the project's design merit-- that must be considered in determining whether an arena in this location is in the "public interest."

SDOT now must "prepare an analysis for the City Council including a recommendation whether the vacation should be granted or denied, recommended conditions, mitigation measures, and the specific public benefits of the proposal."[4] Following receipt of SDOT's recommendation, the Transportation Committee of the City Council holds a public hearing on the proposed vacation. The Committee "may accept or alter the SDOT recommendation, including altering or adding conditions or mitigation measures or refining the public benefit proposal." The Committee forwards its findings to the full Council for consideration and final action.

SDOT and the Council Should Defer Consideration of WSA's Street Vacation Petition Until All Final Transaction Documents Have Been Negotiated

We believe neither SDOT nor the Council should act on WSA's street vacation petition until the parties to the MOU (WSA, Seattle, and King County) have negotiated final transaction documents, as anticipated by Section 23 e. of the MOU. It is not until this time that either SDOT or the Council can fully assess the "public benefit" of the proposed street vacation.

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[1] A copy of the MOU can be found at http://www.seattle.gov/council/attachments/2012arena/20121008mou.pdf
[2] MOU § 25 a.
[3] MOU § 4.
[4] http://www.seattle.gov/transportation/streetvacations.htm

Our request for deferral is based on the fact that, at this point in the arena approval process, there are numerous open-ended and unresolved mitigation issues that need to be addressed. Until these issues are resolved, it is impossible for SDOT or the Council to make an informed "public interest" determination. The following highlights several open-ended, unresolved mitigation issues and outlines why they are relevant to whether the street vacation is in the "public interest."

- Consideration of Alternative Sites: The MOU requires the City of Seattle to conduct a State Environmental Policy Act (SEPA) review of the proposed SoDo arena; this SEPA review requires the City to consider alternative sites, including the Seattle Center.[5] Whether the proposed SoDo arena, and the vacation of Occidental Ave. S. underlying the arena, is "in the public interest," however, hinges heavily on whether the Council concludes the SoDo site is preferable to alternative sites. Until the Council resolves this issue neither SDOT nor Council can meaningfully make the determination whether the vacation of Occidental Ave. S. is in the public interest. The Council-sponsored study evaluating future options for Key Arena, and the impact of a new SODO arena on Key Arena and Seattle Center finances, was recently completed. It provides a fact-based analysis that should support the decision process.

- Consideration of Nearby Mitigation: The MOU requires the City, in its SEPA review of the arena project, to consider "a comprehensive traffic analysis, impacts to freight mobility, Port terminal operations, and identification of possible mitigating actions, such as improvements to freight mobility, and improved pedestrian connections between the arena and International District light rail station, the Stadium light rail station, and the SoDo light rail station."[6] Similarly, the MOU requires the City to determine, based on the SEPA documents, whether "it is appropriate to proceed [with the SoDo arena project] with or without additional or revised conditions based on the SEPA review."[7] This means that the City must determine the extent of mitigation and infrastructure improvements and who (the City, County, or WSA) should be required to finance and implement these mitigation measures. SDOT and the Council must make these important mitigation decisions *before* determining that the vacation of Occidental Ave. S. is in the public interest. This should include an accurate and comprehensive identification of impacts that cannot be mitigated and how they impact the "environment," as that term is defined by SEPA.

[5] MOU § 5.
[6] MOU § 5.
[7] MOU § 24 b.

- The SoDo Transportation Infrastructure Fund: The MOU specifies that the final transaction will include a "SoDo Transportation Infrastructure Fund." [8] The purpose of this fund is to provide funding for nearby transportation improvement projects. But the MOU specifically provides that this fund "will not be utilized to fund any Project-specific transportation infrastructure mitigation required through the permitting and SEPA process for the Project."[9] Because it is unknown what the final mitigation requirements will be, it is unclear today the extent to which the arena's SoDo Transportation Infrastructure Fund will offset the street vacation's impact on SoDo transportation corridors.

- Economic Impact Analysis: The MOU required WSA to fund a City-commissioned "economic impacts analysis" of the proposed SoDo arena.[10] It states that the analysis "shall study the net economic costs and benefits of the construction and operation of the arena in the geographical areas that would be affected by the construction and operation of the arena, including without limitation retail, commercial, industrial and freight transportation." We believe the Council must evaluate the arena's own economic impact, and its impacts on the Port and other businesses, before considering whether WSA's street vacation request is in the public interest.

- MOU-Sanctioned Land Use Initiatives: The MOU also includes a clause committing the City to a land use study for the vicinity of the proposed arena, with the participation of stakeholders. The intent of the study is "to develop new land use mechanisms to maximize the economic viability of the Duwamish Manufacturing / Industrial Center, and civic vitality of the Stadium Transition Area Overlay District." MOU 22b. The study was completed in 2013; however, the City still has not taken action on the industrial lands advisory committee study findings and recommendations. In fact, the City's current draft Comprehensive Plan Update does not include the industrial committee's recommendations. This is another area where the MOU-triggered mitigation is not yet defined. Yet, the disposition of the recommended land use provisions is a critical factor in the City's ability to determine "public benefit" for the Occidental Ave. S street vacation petition.

In conclusion, we believe that in the absence of an agreement on the full range of mitigation measures required by WSA, and a clear understanding of any remaining impacts that cannot be mitigated by proposed measures, it would be inappropriate and contrary to sound public policy

[8] MOU § 11 a.
[9] MOU § 11 a.
[10] MOU § 23 g.

for either SDOT or the City Council to proceed with WSA's street vacation petition process. We urge SDOT and the Council to defer any consideration of WSA's street vacation petition until after the Council has approved the final transaction documents.

We welcome the opportunity to discuss this further.

Sincerely,

Joshua M. Berger
Coordinator
Washington Maritime Federation

Terri Mast
President
Inland Boatman's Union

David Gering
Executive Director
Manufacturing Industrial Council

Vince O'Halloran
Seattle Branch Agent, Sailors' Union of the Pacific
Executive Secretary and Treasurer, Puget Sound Ports Council, Maritime Trades Department AFL-CIO

Jason Gross
Vice President
ILWU Local 19

Lindsay Pulsifer
Managing Director
Maritime Division, Port of Seattle

cc: The Honorable Ed Murray
Seattle City Councilmembers

November 20, 2015

Kristian Kofoed
Seattle Department of Planning and Development
PO Box 34019
Seattle, WA 98124-4019

Kristian,

Thank you for the opportunity to comment on the periodic update of Seattle's Transportation Element and (TE) Transportation Appendix. The TE and Appendix address many issues of importance to WSDOT and other agencies. We particularly appreciate the walkability and intermodal focus (TG 3), integration of land use and transportation issues in the urban village and manufacturing/industrial center strategy (TG 1), focus on equitable access (TG 3), use of complete streets standards (TG 6), focus on safety (TG 6), adherence to the Governor's Executive Order on vehicle-miles traveled and greenhouse gas reduction (TG4), and the close implementation of *Vision 2040* shown throughout.

In addition to the specific comments below the City may wish to give further attention to the requirement in RCW 36.70A.070 (6)(a)(iii)(F) regarding the improvements to state and local systems needed to meet current and future demand. This letter includes some additional recommendations along that line for your consideration during the next update.

The letter is divided into comments on the draft TE and the draft Transportation Appendix. We have also included comments on the Container Port Element and a few miscellaneous comments.

Draft Transportation Element

General Comment: Since it is unusual for a TE to be composed solely of goals and policies, we recommend that you direct readers to the Transportation Appendix where the majority of the statutory TE requirements are met.

- TG 1: Transportation investments based on land use

  T1.3: "Invest in transportation projects and programs [that] further progress towards meeting Seattle's mode share goals and reduce dependence on personal automobiles, particularly in urban centers." WSDOT recommends that reference be made here, or in the Appendix, to TDM, CTR, GTEC/Commute Seattle, and other multimodal programs. See requirements in RCW 36.70A.070, RCW 70.94.527, and RCW 70.94.528. Please either provide more information on the Commute Seattle program, or refer to another document that does, during the next annual amendment.

- TG 2: Allocating space between modes

  Discussion: "The City has adopted master plans to address non-automobile modes of travel – pedestrian, bicycle, transit and freight movement – drawing on extensive community input." Inventory and plans for improvement of pedestrian, bicycle, transit, and freight facilities are all requirements of the TE. If Seattle has separate modal plans, the reader should be referred to the plan titles, and provided links if available.

Additionally, the Freight Master Plan (FMP) is still under development as of this review. A draft FMP is expected to be released this fall, and adopted by the City Council in early 2016. The final FMP should either be referred to in the TE, or incorporated into the TE by citing relevant policy and program recommendations once complete.

It may be helpful to include rail and marine systems as alternates to truck freight during the next amendment.

T2.7: "Prioritize mobility needs in the street right-of-way based on the recommended networks and facilities identified in the respective modal plans. Within the travelway, prioritize space to address safety concerns, network connectivity of modal plans and general purpose travel." This is a unique and constructive policy. As discussed, it would be helpful to define the term "activation" when discussing prioritization categories.

- TG 3: "Equitable access; ensuring that people who are dependent on transit or vehicle use because of age, disability, or financial considerations are well served."

  General comments:

  - Seniors tend to span all three of the focus issues mentioned in TG 3. Consider mentioning the bulge in the senior population cohort, and explicitly incorporate planning for that into long-range transportation plans in the next update.
  - The comment that "availability of free parking is also a key determinant in mode choice" could be more directly addressed in the parking section of the Appendix during the next amendment.
  - Please be advised of the following requirements under Title II of the ADA regulations and Section 504 of the Rehabilitation Act:
    - New construction and altered facilities must be "accessible to and usable by" people with disabilities.
    - Individual pedestrians must be reasonably accommodated, where necessary.
    - Transportation providers must evaluate existing facilities, policies, and programs for discrimination and develop a modification or transition plan that includes methods, a schedule for correction/retrofit, and a curb ramp installation schedule. Transition plans were required to be developed within six months of the effective date of the 1992 regulation, and structural changes were required to have been in place by 1995 (28 CFR Parts 35.149 and 35.150). It is therefore strongly recommended that the city develop and implement a transition plan as soon as possible.

  The WSDOT ADA website is a good resource for ADA information, including a sample ADA checklist and links to state and federal guidance and resources.

  T3.2: "Improve transportation options to and within the urban centers and urban villages, where most of Seattle's job and population growth will occur." This is another place where TDM, CTR, and other multimodal programs could be referenced.

  T3.5: "Prioritize transit investments on the basis of ridership demand, service to populations heavily reliant on transit, and opportunities to leverage funding." It may be useful to specify whether this policy would apply only to the service Seattle purchases from Metro or whether it is intended as policy input to Metro for their service guidelines. Also, consider including a specific mention of the work being done with zoning and planning for transit/TOD/Growing Transit Communities.

T3.15 "Create vibrant public spaces in and near the right-of-way that foster social interaction, promote access to walking, bicycling and transit options, and enhance the public realm." This policy could be in conflict with several other policies in the TE, such as T2.4 which discusses the importance of employing the standards and safety requirements in the city's Right-of-Way Improvement Manual, as well as policies from other modal master plans. WSDOT recommends that careful consideration be given to implementation of this policy relative to other essential policies that address transportation policy priorities.

- TG 5: Strengthen the economy

  General Comment: The policies under this goal are a good summary of efforts the city should support to ensure ongoing support and promotion of freight and freight maritime (Port of Seattle) activities in Seattle. WSDOT recommends that these policies be revised as necessary to incorporate key findings and policies from the aforementioned FMP and Seattle Industrial Area Freight Access Project when these studies are adopted by the city.

  Figure 8, Major Truck Streets map: The street identification on this map is illegible; suggest the street labeling be enlarged, or that it be put onto an 11x17 sheet with improved resolution. Another alternative would be to list the truck streets in a table, or referenced in another document such as a freight master plan, where the streets are clearly identified. WSDOT recommends this comment be applied to all maps, particularly where identification of routes or inventorying is required by statute.

- TG 6: Safety

  General comments:

  - Thank you for including the goals (zero fatalities and serious injuries) and three of the "4-Es" implementation approach (engineering, education, enforcement, and emergency medical services) of the state's safety Plan, *Target Zero*. Consider explicitly aligning Seattle's transportation safety goals with the State's, including participation in Community Task Forces and inclusion of emergency medical services as well as a target date of 2030 rather than 2035. *Target Zero* Community Task Forces have been shown to be extraordinarily effective at reducing fatal collisions.
  - Consider including Community Protection through Environmental Design (CPTED) principles.

- TG 7: Coordination with other agencies and governments

  T7.2 "Coordinate with regional, state and federal agencies, other local governments, and transit providers when planning and operating transportation facilities and services that reach beyond the City's borders in order to promote regional mobility for people and goods and support the regional growth strategy." Broadly applied this policy would facilitate implementation of the requirement in RCW 36.70A.070 (6)(a)(iii)(F) regarding improvements needed to meet future demand on state highways.

  T7.3 "Support completion of the freeway high-occupancy-vehicle lane system throughout the central Puget Sound region and continued use of that system for promoting more efficient travel." Note that parts of the freeway HOV system are being converted to high

occupancy/toll (HOT) lanes which should help ensure efficient operation as demand increases.

T7.4 "Limit freeway capacity expansions intended primarily to accommodate drive-alone users to allow only spot improvements that enhance safety or remove operational constraints in specific locations." However, a local policy that attempts to limit potential freeway capacity improvements that would primarily benefit drive-alone users would prove problematic in practice. Not only does alleviating freeway congestion benefit all modes including freight and transit, it also helps reduce pressure on congested city streets. RCW 36.70A.070 (6)(a): (ii), (iii)(C), and (iii)(F); and WAC 365-196-430 (2): (a)(ii), (a)(iii), (b), and (c) specifically require cities to estimate traffic impacts to state facilities in order to help monitor and plan improvements, and to utilize established LOS standards in order to meet current and future demands and to be consistent with state and regional plans. WAC 365-196-430 (2)(b) specifically recommends "The goals and policies [of a city TE] should be consistent with statewide goals and policies." We therefore suggest re-wording of policy T7.4 to more clearly reflect statutory guidance.

- TG 10: Funding

  T10.10: "Identify and evaluate possible additional funding resources and/or alternative land use and transportation scenarios if the level of transportation funding anticipated in the six-year financial analysis, below, falls short of the estimated amount." RCW 36.70A.070 (6)(a)(iv)(C) requires that the TE include a discussion of how additional funding will be raised, or how land use assumptions will be reassessed, to maintain LOS standards.

Draft Transportation Appendix

General comments:

- Please see comment regarding maps provided for the TE.

- Utilization of WACs

  Although the statutory requirements for TEs are identified in RCW 36.70A.070 (6), TE requirements and recommendations are described in more detail in WAC 365-196-430. Note that the first part (1) of the WAC is nearly identical to the RCW and includes only requirements. The second part of the WAC (2) contains recommendations which are not part of the RCW. With the exception of implementation measures in section (m), section (2) does not contain a lot of new material; instead, it goes into suggestions and details of how the requirements may be filled. Requirements and recommendations by topic along with links to numerous resources may be accessed through the *Local Planning Resources* document located on the WSDOT Comp Plan Resources website. This document is frequently updated, so it should be newly downloaded each time prior to use.

- RCW 36.70A.070 (6)(a)(iii)(A) requires an inventory of air, water, and ground transportation facilities and services, including transit alignments and general aviation airport facilities, to define existing capital facilities and travel levels as a basis for future planning. Transportation Figures A-2 (Transit/HOV Lanes), A-3 (Bus Routes), A-4 (Rail & Ferry Routes), A-5 (P&R Facilities), A-6 (Bicycle Facilities), A-7 (Pedestrian Facilities), A-8 (Marine Properties), and A-9 (Airports), all show excellent overviews, but none could be considered an "inventory." Please include tables or more detailed

maps during your next annual update, or refer to separate modal documents or master plans if such contain more detailed inventories. For recommendations on how to comply with this requirement, please refer to WAC 365-196-430 (2)(c).

A. Land Use Assumptions Used in Estimating Travel

Regional Land Use Assumptions: PSRC lists six designated Regional Growth Centers and two Manufacturing/Industrial Centers in the city of Seattle. Seattle's updated Urban Village Map lists 22 Urban Villages, and the Land Use Appendix lists dozens of Urban Centers. WSDOT recommends that the TE or Appendix provide a short explanation of how the designations differ (or refer to the Land Use or another element in which an explanation is provided), and clarify whether there were differences in the assumptions or methodology used for traffic analysis and forecasting between them.

B. Facilities and Services Needs

- Rail

  The description of the freight rail (Class I freight railroads) is reasonable and accurate. However there is one other freight rail (shortline) operator in Seattle that warrants mention, namely the Ballard Terminal Railroad. The Ballard Terminal connects with the BNSF Railway north-south mainline just north of the BNSF Railway bridge crossing of the ship canal. Although it is a small freight rail operation in comparison to the two Class I railroads in Seattle (BNSF and UP), the Ballard Terminal is an important freight rail operation for local freight. This should be included to comply with the inventory requirement in RCW 36.70A.040 (6)(a)(iii)(A).

  WSDOT additionally recommends that at-grade rail crossings be identified and that issues pertaining to safety and mobility on the railroad and roadway system be documented. Consider referencing rail crossing projects undertaken by PSRC and FMSIB.

- Other Intermodal Facilities

  Identify intermodal connector routes. Identify freight facilities, intermodal terminals, and transportation routes (i.e., roadway, railway, and waterway) that are on key statewide supply chains; some supply chains extend far beyond Seattle city limits and some routes are therefore of statewide significance. This should be included to comply with the inventory requirement in RCW 36.70A.040 (6)(a)(iii)(A).

- Water Transportation

  WSDOT recommends that the classifications for Waterway Freight Economic Corridors be identified.

- Freight

  Consider adding a Freight section to the Appendix that identifies the Freight Economic Corridor classifications as the backbone of the freight system. Referencing Freight Economic Corridors will show how multimodal freight transportation systems fit within the state's overall system. Also, consider including here, or in the Freight Master Plan, routes for oversize/overweight truck loads, routes for hazardous materials, and identifying truck bottlenecks, weight-restricted pavements, and bridges. Identify major truck parking locations, both public and private, and areas in need of truck parking.

C. Local Level of Service Standards for Arterials and Transit Routes

- Traffic Forecasts

  Utilizing travelsheds based on screenline V/Cs of "groups of arterials among which drivers logically can choose to travel" is a helpful methodology for a large urban center with numerous principal arterials, and makes sense in a city with six designated regional growth centers and two designated manufacturing/industrial centers, to quote from the Appendix, because it helps to address the broad geographic impacts of development and travel patterns.

  RCW 36.70A.070 (6)(a)(iii)(B) requires a TE to include level of service standards for all locally owned arterials and transit routes to serve as a gauge of performance. Transportation Figure A-10 (Transportation LOS Screenlines) shows the location of travelshed screenlines, and Figure A-11 (LOS: Screenline V/C Ratios) provides corresponding V/C values for existing and horizon years. V/C provides a good operational level of service calculation, and is required in order to determine future needs. However, no LOS standards for local arterials or transit routes are given against which to measure the forecasted operational levels. Please either provide these standards in the figures, or direct readers to the document in which they are provided.

  WAC 365-196-430 (2)(e)(iv) recommends that "to identify level of service standards for public transit services, counties and cities should include the established level of service or performance standards from the transit provider and should reference any relevant planning documents." Seattle currently assumes the transit standard and operating LOS to be the same as the associated arterial. WSDOT recommends that Seattle additionally include the transit providers' own LOS standards and LOS performance analysis for comparative purposes as suggested in the WAC. For ferries, descriptions of existing and proposed ferry route LOS standards are available in the *Washington State Ferries Final Long-Range Plan.* Once LOS standards are included for state facilities, it would also be helpful to provide a crosswalk between operational V/C ratios and said adopted LOS standards.

- State Highway Level of Service Standards

  On p 26 please make the following correction: "Including LOS standards for HSS is a communication and coordination tool in local plans, so that the State of Washington has a current understanding of performance on their facilities. ~~Accordingly, the State legislation that designates HSS also directs the State Transportation Commission to give higher priority for correcting identified deficiencies on highways of statewide significance.~~" This section of the statute was repealed in 2007 (SSB 5412).

- State-Funded Highway Improvements and Local Improvements to State Highways

  On page 26, Table A-12, State Highway Project List, did you add any projects to this list as a result of the PSRC Capacity Project List in Appendix N of *Transportation 2040,* or discussion with the Traffic Office at Northwest Region? You may also want to check projects in the *Connecting Washington* package recently funded by the state legislature. RCW 36.70A.070(6)(a)(iii)(F) requires that identified needs on state-owned transportation facilities be consistent with the statewide multimodal transportation plan, and (6)(c) requires that the TE be consistent with the ten-year investment program required for the state.

D. Estimated Traffic Impacts to State-Owned Transportation Facilities

- Although a range of 33-39% AWDT growth is shown in the table for SR 509, it is not included in the text discussion that follows. The northern-most segment of SR 509 that lies within the city's border is roughly five miles long. Please include that segment in the discussion on pp 29-30.
- Table A-13, State Highway Traffic Volumes, 2013 thru 2035, breaks state facilities into travelshed segments for existing (2013) and horizon (2035) AADT and AWDT by direction, and then shows percent change in AWDT between. This is a useful way to comply with RCW 36.70A.070 (6)(a)(ii).
- For more information, please see the Concurrency and State Transportation Facilities section of Commerce's *Your Community's Transportation System - A Guide to Reviewing, Updating and Implementing Your Transportation Element*, states: "Your community is required to include level-of-service standards for state-owned facilities in your community. These level-of-service standards can then be used to monitor system performance, evaluate improvements and improve coordination with WSDOT and your local RTPO. The concurrency exemption means that your community is not required to deny development if the adopted level of service on a state highway cannot be achieved. However, the exemption is not a license to ignore traffic impacts on state facilities."

  For the next periodic update, please consider including actions the City could take that would help address performance problems on the segments of locally operated state facilities forecast to operate below their adopted LOS standard. WAC 365-196-430 (2)(b) includes recommendations for bringing locally owned transportation facilities or services that are below established LOS standards into compliance. WAC 365-196-430 (2)(g) also contains a series of local network suggestions that may be helpful.

Container Port Element

It appears the most recent version of the Container Port Element (June 2013) will not be revised in concert with the Seattle Comprehensive Plan update. When the Container Port Element is next updated, WSDOT recommends that it incorporate the following:

- **Seattle Freight Master Plan:** All key findings related to Seattle's port and maritime industries as noted in the upcoming Seattle Freight Master Plan (early 2016) be included in the Container Port Element update. This should include identification of key freight corridors connecting the Port of Seattle terminals with intermodal facilities, local/regional distribution centers; first and last-mile port connections as well as city of Seattle/SDOT identified overweight routes to serve the port facilities.

- **Marine Cargo Forecast:** In scoping now, this effort will project current volumes of marine cargo in Seattle and landside impacts to the freight system. It will be complete in 2016. FMSIB, WPPA, and WSDOT are jointly developing this effort.

- **Seattle Industrial Areas Freight Access Project:** WSDOT recommends the Container Port Element update also address and incorporate key findings and recommendations from the city of Seattle's (SDOT) 2015 Seattle Industrial Area Freight Access Project as appropriate. Although the focus of this study is on the identification of truck-freight infrastructure improvements

needed over the next 20 years to keep the Seattle manufacturing/industrial centers of the Greater Duwamish and the Ballard/Interbay area vibrant and relevant for freight, a number of projects from this effort will also support future Port of Seattle operations.

- **Policies:** WSDOT recommends the various policies included in the current (June 2013) Container Port Element be revised as necessary to reflect key findings and policy direction from the Seattle Freight Master Plan and the Seattle FAP plans when they are adopted by the city. The Container Port Element Transportation policy CP 8 discusses the importance of maintaining the city's "Major Truck Streets" while also ensuring "support other modes maybe considered in these streets." It might be beneficial to clarify how the operational and safety needs of these modes can be accommodated.

Other Elements

Although these comments are not on the Transportation Element or Appendix per se, they do feed into the overall transportation planning effort. Please forward these to other offices as appropriate.

- **Seattle Growth Strategy:** Consider referencing PSRC's Industrial Lands Analysis. This will show how the City's industrial lands fit within the region's overall land use vision.

- **Industrial Areas**: Consider adding language that explains the importance of protecting land used for freight that is adjacent to rail and waterway transportation facilities. This is discussed in the PSRC document mentioned above.

Thank you again for the opportunity to comment on Seattle's Periodic update. Please contact me or Leah Bolotin (206-440-5057) if you wish to discuss any of these comments.

Sincerely,

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