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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:09 AM  
**To:** Staley, Brennon  
**Subject:** FW: house the un-housed

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**From:** Kay Abramson <[REDACTED]>  
**Sent:** Monday, August 22, 2022 3:56 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** house the un-housed

**CAUTION: External Email**

Clear our public parks, roadways, streets green belts of overnight camping.  
Provide services and housing for those who personally cannot afford such amenities.  
Kay Abramson  
Sent from [Mail](#) for Windows

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**From:** Jim Moser <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 10:13 AM  
**To:** Staley, Brennon  
**Subject:** EIS comments

**CAUTION: External Email**

Hi Brennon,

Thanks for the public comment forum. The chat thread appears to be getting spammed by a “none of the above, Option 6 please” group so we’re reaching out privately via email.

We’ve owned a rental house in victory heights, on NE 15th, for 14 years. It is a 910 sf footprint on a 12,600 sf lot near the intersection of 15th and Northgate way, on a bus line.

We’re interested in max density on our lot which would provide housing to many tenants . In January our lot size variance application was denied as the block is R 7200 and we’re just shy of two lots. We’d hoped to build a duplex plus a DADU on a separate lot.

On one lot as current, the backyard cottage option does not cash flow as a rental add on and we don’t wish to create a couple of condo cottage units with more yard then they need, which would just sell to wealthy residents anyway. Currently there is no incentive for us to do anything with this wasted gigantic backyard, other than wait for the city to grab the obvious low hanging fruit of re zoning us to R 5000 like all the surrounding neighborhoods.

Which of options 1-5 would create the greatest likelihood that we could build space for 10+ units of apartments or townhomes, on our lot ? That is the answer we support.

Thank you  
Jim Moser  
Laura Adriance

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:36 AM  
**To:** Staley, Brennon  
**Subject:** FW: Ending single family zoning

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**From:** keith anderson <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 4:50 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Ending single family zoning

**CAUTION: External Email**

Before we make Seattle a series of high rise canyons where you have to ride a bike or walk any place, lets concentrate on bringing our dismal public transportation up to at least poor.

I know there are those who want to make Seattle like New York ( succeeded on the crime front) but New York has excellent public transportation that facilitates not needing a car to get around.

An interesting city is a diverse city with a variety of living arrangements.

Keith Anderson

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:13 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comment

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**From:** Jeri Arbuckle <[REDACTED]>  
**Sent:** Monday, August 22, 2022 11:16 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comment

**CAUTION: External Email**

Hi-

I am new to this process and I am just educating myself with the information on the website. I think I am missing something since the write up lists 5 Alternatives for potential study, but I see many comments regarding "Alternative 6." So my comment may be off base, but I wanted to provide some input within the time frame for comments. I am very supportive of the process you are undertaking!

Please take this from my limited knowledge about the Plan. I purposely did not post it.

New Nodes and Transportation Corridor density. Studying a combination of Alternative 2, creating additional smaller neighborhood nodes, and Alternative 4 additional density housing and mixed uses along transit corridors, allows for significant development that can result in varied housing (rented and owned), fewer cars and commuters, and respect the character of Seattle's neighborhoods. The uniqueness of each neighborhood is the fiber and soul of Seattle. Those who have spent countless hours and energy creating communities, and those who choose to live in a neighborhood *because* of its unique nature, can be empowered to creatively incorporate nodes and increased housing opportunities that will enhance their area. New neighborhoods could emerge and add to the eclectic mix. This combination of Alternatives solutions could incentivize thoughtful and inclusive development that is embraced – and initiated – organically in neighborhoods, while allowing more rapid development around transportation corridors.

Thank you for your good work!

- Jeri Arbuckle

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**From:** shannon b <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 11:06 PM  
**To:** Staley, Brennon  
**Subject:** OPCD comments

**CAUTION: External Email**

I support options 2 or 4 for the newer comprehensive plan, assuming that the ability for ADU, AADU and DADU's will still be allowed.

Options 2 or 4, done correctly, will give people access to housing while maintaining a quality of life that everyone deserves. These options do not increase uncontrolled growth - growth that would mostly benefit developers. It also adheres to the vision of walkability by not adding to increased car traffic - and thereby more pollution, global warming and an overall decrease in everyone's quality of life.

Density in neighborhoods can be attained by allowing the building of ADU, AADU and DADU

What we are lacking is affordable housing - both for renters and for people who want to be homeowners. Building more housing is one way of addressing this. However it doesn't guarantee that the housing will be affordable. But it isn't the only way. Expanding housing vouchers to help people with rent will help people stay, or get, housed. For those who want to buy the city should explore how it can become a partner in home ownership with people who want to buy. We need to look at alternative options that avoid depleting resources by tearing down usable, functional buildings and then using more resources to build more buildings. Instead we should capitalize on how to best use the resources that the city currently has. Again, ADU, AADU, DADU.

Under options 3 or 5 the wealth gap would be increased. Is there anyone who believes that Broadmoor, Sandpoint, Windermere, Laurelhurst or other such communities would be a place where the options under 3 or 5 would be viable? So there will be the wealthier neighborhoods - and there will be everywhere else.

Options 2 or 4 also help decrease the impact of the loss of trees and the tree canopy - a vital component to keeping Seattle a living city and a player in the health of the planet. We cannot expect the peoples of the rainforests to fight a fight for the health of the planet without contributing our share to the battle. Every tree counts in this battle. And options 2 or 4 can help with this.

Yes - housing is important. But so is the health of the planet for all of its occupants. We need to take a holistic approach in addressing the housing problem - which is also a problem of overpopulation, a racial disparity problem, a cultural problem, a wealth distribution problem and a sustainability problem.

Options 2 and 4 come the closest to taking this approach, combined with ADU, AADU, and DADU.

Thank you for adding my voice to this issue

Shannon Bailey

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:36 AM  
**To:** Staley, Brennon  
**Subject:** FW: Urban Forest Health

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**From:** Anita Barcklow <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 5:18 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Urban Forest Health

**CAUTION: External Email**

To Whom It May Concern:

I hope it concerns all of us. Trees and restoring tree canopy needs to be of vital consideration in an ever growing city that wants more density and certainly more affordable housing.

Trees provide shade and cool off heat islands. They provide beauty that seems to be in short supply these days and not on enough " radar screens" in terms of mental health and human well - being. The Japanese encourage " forest bathing" as a stress reduction technique.

Trees are the "lungs of the Earth" and help in our climate crisis providing more oxygen and taking up carbon dioxide. They also provide animal and plant habitats. Humans are responsible for the protection and restoration of Mother Earth. I hope Seattle takes this opportunity seriously !

Anita Barcklow

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**From:** Maria Batayola <[REDACTED]>  
**Sent:** Tuesday, August 23, 2022 12:20 AM  
**To:** Staley, Brennon  
**Cc:** Beacon Hill Council (Group Email); BHC-EJtaskforce  
**Subject:** Beacon Hill Input to Seattle Comprehensive Plan EIS Scoping (CPEISS)  
**Attachments:** 22 BHC Input to Seattle Comprehensive Plan Scoping 8-22-22.pdf

**CAUTION: External Email**

*Attached and below is the Beacon Hill Input to Seattle Comprehensive Plan EIS Scoping.*

August 22, 2022

E-Distributed Brennon.Staley@seattle.gov

Brennon Staley, OPCD

Re: Beacon Hill Input to Seattle Comprehensive Plan EIS Scoping (CPEISS)

I am writing on behalf of the Beacon Hill Council in Seattle. We are a neighborhood of 40,601 BIPOC residents (41% API, 16% Black, 10% Latinx and 1% Native American) with 40% immigrants and refugees. We live in vulnerable SE Seattle neighborhood. Seattle Times declared us as most gentrified based on Census data. We impacted by air and noise pollution from roads, airplanes, and indoor oil heating, which generate considerable Green House Gasses. We live in a tree dessert. Trees are critical for filtrating air and noise pollution and for climate resiliency from heat and flooding. We are a residential neighborhood with some small businesses and 2 large employers.

We appreciate the city infusing the One Seattle vision with equity and climate, particularly since the EIS appeal process does not have an equity lens. We will consider the Seattle Comprehensive Plan successful when it addresses disinvested redlined communities, such as ours, to resolve the cause and effect of health disparities and improve our social determinants.

Please fully consider our input on these areas and the alternatives:

**EARTH & WATER** Air quality and Greenhouse Gas Emissions

1. Data analysis for policy guidance re impact and cumulative impact of air pollution from roads, airplanes and home oil heating on health and other social determinants.

**NOISE** Land Use Patterns & Urban Form

1. City does not include nor monitor noise from aircraft. This is a serious environmental health and climate justice issue for us because parts of Beacon Hill are under the direct flight path experiencing noise as often as every 90 seconds anywhere from 70-90 decibels. Beacon Hill is not eligible for mediation.

## POPULATION & EMPLOYMENT Housing & Displacement

We appealed the Mandatory Housing Affordability Act EIS and lost because the appeal process did not have an equity lens. As a result, Beacon Hill has been identified as most gentrified based on Census 2020 data by Seattle Times reporter.

We ask that you include in the CP EIS Scoping:

1. Data analysis of BIPOC displacement based on 2010 AND 2020 census data
2. Data analysis of housing stock (that includes old homes and rental stock) on how it meets housing needs by various levels of AMI. Beacon Hill seeks a stronger stay in place policy and program for older homeowners. (Note: Their family and friends are more likely to access home ownership from them as home prices are out of reach for many.)
3. Data analysis of how many low income housing and affordable housing development are built/in the pipeline at the current MHA 1/3 in-lieu fee and model how many said units can be built at 100% in-lieu fee or build onsite. **Beacon Hill recommends policy change to remove MHA in-lieu fee and build onsite to in all neighborhoods and stop/slow down resegregation.**
4. Data analysis of MHA revenue investment by: 1) geographic area, b) levels of AMI, and c) total rental units v homes for purchase.
5. Data analysis of housing demand by AMI levels and housing supply that includes not only new development, but older housing and rentals.
6. **Analyze our policy recommendation to require concurrency (green spaces, roads, utilities, schools, digital infrastructure, police/fire services...etc.) when developing in disinvested BIPOC communities.**
7. Data analysis of mixed used neighborhoods and prohibition of development in polluted areas where the pollution is a risk factor eg Duwamish Valley superfund site.

## PLANTS & ANIMALS Energy and Natural Resources

1. Climate/Equity Data analysis of tree canopy using 2022 data and not 2016 Lidar data.
2. Data analysis and modeling for Seattle goal for 30% tree canopy and for Beacon Hill 40% to mitigate air and noise pollution from roads, aircraft and indoor oil heating.
3. Data analysis for increasing climate resiliency with trees given a weak tree ordinance and that 30% of trees are in public land and 70% are in private land. Model where tree canopy should be planned for growth.
4. Create urban forestry plan and implement at both public, commercial, and private lands.

## HISTORIC RESOURCES Relationship to Plans, Policies & Regulations

1. Include in EIS not only historic sites, but sites included in the City's historic inventory.
2. Analyze the harmful impact of allowable development of 17 story buildings in Chinatown ID historic buildings with its BIPOC residents and vulnerable businesses. We are inter-related

with Chinatown ID residents - there is a saying – Beacon Hill has the API families and Chinatown ID has the grandparents.

3. Analyze funding sources for landmarking historic resources in the Dept. of Neighborhoods (DON) historic surveys. Beacon Hill has 47 properties in the north Beacon Hill urban village that has been identified by DON as meeting the criteria for historic sites. Council resolution requested Mayor Durkan DON to complete the historic landmarking for preservation purposes and Mayor Durkan ignored the resolution.

## TRANSPORTATION, SERVICE, UTILITIES

1. Data analysis of carbon recapture initiative from Sound Transit Light Rail stations to assist low income Transit Development funded building renters to reduce their utility expense towards placing the savings towards purchasing a home (wealth building).
2. Data analysis of digital equity for households and businesses.

As to alternatives:

Alternative 1: No action is not acceptable. It is guaranteed to get worse.

Alternative 2: “Increase opportunities to grow “complete neighborhoods” where more people can walk to everyday needs.”

1. Data analysis with a climate and equity lens should be conducted to discern which industries are appropriate for neighborhoods and which should stay in commercial districts.
2. Data analysis for just transition training/development to be able to participate equally in these new opportunities.

Alternative 3: Increase home ownership by allowing duplexes, triplexes and four plexes in more areas. This is a mirage – duplex, triplex and fourplex ADUS and DADUS are rentals. Home ownership opportunity is very small. This begs the question of why create housing for those who can already afford it.

1. Data analysis of various policies on how to keep neighbors in place at Beacon Hill.
2. Multiplex units on the same lot are counter to the EDI funded Beacon Hill Anti-Displacement showed we need housing for larger extended families.

Alternative 4: transit service to keep pace with increase density in the transit corridors. This would be much appreciated.

Salamat for the opportunity to give input. We look forward to your full consideration of our input and the resulting DEIS.

Sincerely,

Maria Batayola

Beacon Hill Council Chair

c: Beacon Hill Council (BHC)

BHC EJ Task Force



August 22, 2022

E-Distributed Brennon.Staley@seattle.gov

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Salamat for the opportunity to give input. We look forward to your full consideration of our input and the resulting DEIS.

Sincerely,

[Maria Batayola](#)

Beacon Hill Council Chair

c: Beacon Hill Council (BHC)  
BHC EJ Task Force

---

**From:** [REDACTED]  
**Sent:** Sunday, August 21, 2022 5:57 PM  
**To:** Staley, Brennon  
**Subject:** Scoping Comments on One Seattle Plan  
**Attachments:** Scan0002.pdf

**CAUTION: External Email**

Dear Mr. Staley,

Attached is my Scoping Comments letter on One Seattle Plan. If for some reason, you need the text within the email, not as an attachment, I will re-send it. Please confirm receipt.

Sincerely yours,

Judith E. Bendich

1754 NE 62<sup>nd</sup> St.  
Seattle, WA 98115

Judith E. Bendich

Seattle, WA 09115

August 21, 2022

To: City of Seattle Office of Planning and Community Development  
Attn: Brennon Staley, [brennon.staley@seattle.gov](mailto:brennon.staley@seattle.gov)  
RE: Scoping comments on One Seattle Plan

Dear Mr. Staley,

I (and many others) remember the distinctly unpleasant experience of participating in the previous Comprehensive Plan EIS and the MHA EIS processes because the Mayor and Office of Planning and Community Development disregarded much of the public comments and concerns and set a predetermined agenda of its own. Many of the issues raised in this letter require advance planning and policy determinations. I truly hope these are not disregarded because Seattle desperately needs: (1) housing for all middle-income working people, low-income people, and their families; (2) prevention of displacement and strategies to prevent displacement (which occurred *en masse* under the MHA, mostly to middle-and low-income people, communities of color and economically disadvantaged residents); (3) mature trees and significant ground cover in every neighborhood as part of any and all development; without these basics - earth and water quality, plants and animals - the livability and quality of life cannot equitably exist; (4) adequate infrastructure, including parks, schools, neighborhood services; (5) meaningful identification of and protection for historic resources. All of these “topics” that will be evaluated in the EIS are interlocking. Increased density requires increased infrastructure, and must include analyses of the impacts, alternatives, and mitigation regarding **Plants & Animals, Historic Resources, Housing Displacement, etc.** Importantly, it is simply mindless to propose increased density in every or any neighborhood unless it is established in advance that affordability and equity objectives will be met.

I emphasize that the scoping comments are focused on the analyses and alternatives that should be sufficiently and comprehensively analyzed in the EIS for the One Seattle Plan, as is the intent of SMC 25.05.408, and not just comments on the proposed draft conceptual alternatives that were included in the City’s scoping documentation, which are narrow categories that do not think outside the box or address the real need. Many of the comments here are overarching ones.

**Housing, Public Benefit, and Displacement.** The type of housing and the design of housing cannot simply be categorized by limiting it to the “Matrix of Conceptual Alternatives.” **The first question needs to be answered: How do we, in the City of Seattle, provide adequate housing for middle-income working people and low-income/economically disadvantaged populations and their families?** Simply stating adding “more housing” citywide or limiting development to certain sections of the city, or limiting the height (“low-scale housing options”), without having concrete policies and programs in place, fails to address this question. As we know, developers want to make the maximum profit in the shortest period of time. Simply adding increased zoning density, does not nothing to solve providing adequate affordable

housing for middle- and low-income residents. Therefore, I reject all the five alternatives in the “Matrix of Conceptual Alternatives” because none address this fundamental issue.

I note that OPCD recently commissioned a study of housing needs. The report states that middle- and low-income people cannot afford the townhouses and condos that are currently being built, which start at more than \$500,000, with most far-exceeding that cost.

Before embarking on what the city should look like in the future, first the City has to inventory the housing we now have. Although the City purportedly did this in the MHA process, it did not identify the *specific* properties that were affordable and low-rent, or properties that are now owned by middle- and low-income residents (*e.g.*, Beacon Hill, Rainier, Othello, North Rainier, Westwood, South Park, Georgetown, areas and pockets in Eastlake and north of the ship canal). As a result, these properties were automatically upzoned, affordable apartment buildings and other housing were razed, and areas became gentrified. Displacement resulted at a rapid pace with residents forced out of the city and their homes. The One Seattle Plan needs to stop this from happening again, and identify such properties so that they can be excluded from upzoning.

The housing needs must also consider “family” needs (which includes not only families with children but multi-generational households, as exists in many communities. The rental housing built since MHA is predominantly efficiency and one bedroom, and as noted above, the cost of larger dwellings, such as townhouses, are too high for the population that needs them most.

Therefore, the One Seattle Plan needs to address at the outset what policies and programs need to be in place, and part of every project, in order to result in affordable, equitable housing citywide. The Seattle One Plan should require that low- and work-force housing be included in *every* neighborhood. It is not enough to have developers or others contribute to MHA. Off the top of my head, since I am not a housing expert, alternatives could include mandating that *every* new project include affordable units (NY City requires this) and affordable family-sized units; increasing the MHA percentage that developers must pay (which is far below the rate charged in other areas, even Bellevue); establishing a low-interest revolving loan fund for middle- and low-income buyers, and for home-owners to build affordable ADUs and DADUs (which cost minimally \$250,000 and up); rent control. For purposes of the One Seattle Plan, these policies can be categorized as alternatives. No zoning changes for increased density would occur until such policies are actually in place.

In the event that the City decided to increase density citywide and had the above policies and/or other similar policies been in place to assure adequate increased housing for middle- and low-income people and their families, and if all neighborhoods were included in the Plan, there should be no exclusions for presently gated or restricted areas, such as Broadmoor, Sandpoint Golf Course neighborhood, *etc.* There should, however, be exclusion of properties that would result in displacement and historic districts (which are already zoned for ADUs and DADUs and many already have affordable rent within the district). The reasons are explained in the section of this letter on **Historic Resources**.

Additionally, the **Housing** component would also have to address the other elements, “green” requirements, setbacks and sufficient space for **Plants & Animals -Trees and green cover, Historic Resources,** and infrastructure to provide adequate **Services.**

**Historic Resources, Relationship to Plans, Policies & Regulations.** Historic resources too often get short shrift, falling between the broad reviews done as part of environmental analyses for non-project actions, such as comprehensive plans, and project-level reviews for specific developments. The City has not adequately funded, in advance, the identification of potential residential historic districts, nor adequately identified historic properties in every Seattle neighborhood. This should be the very first step before any changes in zoning or projects occur.

It is essential to recognize in comprehensive planning actions that adverse impacts on historic resources and historic districts are for the most part *irretrievable* losses. The One Seattle Plan needs to address how adverse impacts on both historic districts and historic resources will be meaningfully avoided, minimized, and/or mitigated. This cannot be done without first identifying these resources. This will require that the EIS focus in more detail on historic districts and historic resources at the policy and planning levels, not only at the project level, and also address cumulative impacts meaningfully.

What is missing is the fact that for historic districts, while one property might seem insignificant, loss of historical elements erodes an entire district until it no longer has sufficient integrity to survive as a historic district nor provide meaningful historic interpretation. The whole district may be greater than the sum of its parts, but when too many parts are missing, the whole is no longer viable. Cumulative effects on historic resources are critical and must be taken into consideration. This is a major concern and potential threat to the current National Historic Districts in Seattle, as well as such yet-unidentified historic resources in other neighborhoods. A related concern is that if project review is geared to “efficiency” with focus on density, analyses of historic elements can often be overshadowed.

I request that the EIS include exemption of upzones in all historic districts as a sub-alternative for each action alternative. For those historic districts that are largely residential, the overall reduction in density would be quite low, and the “single-family” zoned properties in these districts can already include up to three units given current zoning. The EIS preferred alternative(s) should also be compared with a “historic district mitigation alternative” that shows the same alternative except without upzoning historic districts, which should include both City and National Historic Districts. Also, mitigation measures that could allow historic districts and historic properties to survive and coexist successfully with newer developments should be detailed carefully in the EIS so they can become policies that are part of the One Seattle Plan; these might include improved incentives and flexibility for preservation efforts, more rigorous review of potential effects on historic structures and properties in all neighborhoods; better recognition of the wide diversity of historic and cultural elements that are important to neighborhoods and support for protecting these, consideration for historic districts for contributing to both educational and recreational aspects of our city, increased opportunities for interpretation of historic districts and properties, and so on. Historic districts and historic properties tell the stories of our City, and will continue to do so as long as they can survive.

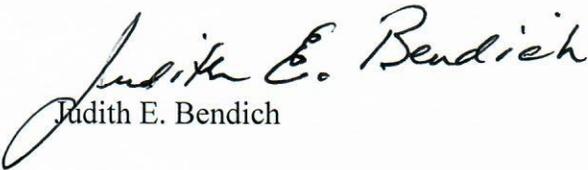
**Tree Canopy—Plants and Animals.** Seattle’s tree canopy has been shrinking due to both redevelopment and climate issues, as well as the lack of parks in underserved communities. This is a serious negative trend for our city that hurts livability for Seattle’s populations. Too many trees have been lost in the name of increasing density, and with each step toward that goal, more trees and ground cover are threatened. Tree protection and plant protection must be meaningfully included as an important mitigation element in the EIS for the One Seattle Plan. Also, the EIS needs to address trees, area of vegetation cover, and urban birds and wildlife as an issue under Plants & Animals.

As an alternative, the Plan needs to detail that development include limitations on building size, design, and scope in order to protect trees (6-inch girth or more) and significant ground cover, such as mature shrubs (*e.g.* rhododendrons, camelias, and other shrubs that provide significant canopy and animal habitat and require years to mature). And, the EIS needs to address the adverse impacts on Seattle’s tree canopy and plant ground cover if these protections are not provided, and possible mitigation.

Furthermore, it is important to acknowledge that Seattle’s lower-density older areas provide a significant amount of tree canopy and green cover, including historic districts and historic properties, by nature of their age and configurations, also include and nurture many exceptional trees and large shrubs. (Historic districts tell not only the story of the historic built environment but also of our landscape heritage.) Thus, this should also be addressed as a **Historic Resource**.

**Services: Police, Fire, Parks, Utilities & Schools.** The MHA EIS found lack of parks, particularly in communities of color, was an adverse impact and that Seattle was out of compliance with the per capita park acreage requirements. That is still the case. It seems we hear daily about the dire shortage of police officers. Obviously, additional density requires more infrastructure. As an alternative, the City should identify all vacant City land and underdeveloped areas that could be turned into park space, from small “pocket parks” to larger areas.

Thank you for your consideration,

  
Judith E. Bendich

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:08 AM  
**To:** Staley, Brennon  
**Subject:** FW: One Seattle Comprehensive Plan: Trees and density can go together in Seattle

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**From:** Barbara Bernard <[REDACTED]>  
**Sent:** Monday, August 22, 2022 2:36 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>; LEG\_CouncilMembers <council@seattle.gov>  
**Subject:** One Seattle Comprehensive Plan: Trees and density can go together in Seattle

**CAUTION: External Email**

## Trees and density can go together in Seattle

Trees and density can go together in Seattle. For too long, developers have used the argument that new construction alone can bring down prices. There has been plenty of time to measure the data and it all points that the building boom is not creating affordable housing opportunities for those in most immediate need. The city could require stricter regulations that force developers to build a certain amount of affordable units rather than paying a fee towards them for the future, (we need the housing now- not in a future to be determined project). However it is probable that developers would naturally be opposed to aggressive regulation that is needed to control costs, because it impacts their bottom line.

However, it seems overlooked in this conversation, is whether existing buildings, the ones in the city that are already standing but un- or under-utilized, can be effectively transformed into residences, adding more units to the market without the ecological and social disruptions of building new construction. No need to remove trees when repurposing existing buildings. Seattle's downtown alone has so much space that could be converted.

The climate crisis has made it clear that Seattle can no longer allow the removal of mature trees to build for density. There are ways to have the needed density while preserving trees, but it is almost never the approach of the developers simply because it impacts profits.

Seattle must incentivize the developers to keep the existing trees, build smarter on existing lots and start to investigate on how adaptive reuse of existing structures is an ecologically smart approach.

By not considering the preservation of our mature trees and the benefits they provide us, we are negatively impacting every living being long term, in the region permanently.

Thank you for including tree retention and protection in any decisions that are made.

\*Barbara Bernard

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:08 AM  
**To:** Staley, Brennon  
**Subject:** FW: Keeping Urban Spaces Green

-----Original Message-----

From: Madeleine Betz <[REDACTED]>  
Sent: Monday, August 22, 2022 2:56 PM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Subject: Keeping Urban Spaces Green

CAUTION: External Email

Trees on our streets enhance quality of life especially since our climate is heating up. I support a large urban forest space in all our neighborhoods and support existing old growth trees which are often destroyed due to convenience and new development. A few years ago I witnessed four large oaks being cut down in front of an older apartment house on 4th Ave West because the shade kept grass from growing. What a shame! Trees provide shade for walking, cools down sidewalks during hot weather especially and perhaps tones down street noise. I am a downtown dweller and appreciate First Hill shade trees for daily walks. Everyone else should have the same opportunities especially those poor neighborhoods in the Rainier Valley.

I believe in sustaining existing single family homes existing neighborhoods while enhancing low rise homes in some. Downtown Seattle should be the go to high rise zoned region. I strongly support the idea that developers are required to add trees, or sustain and protect old growth in front of their new development as part as the City's environmental plan. Sincerely, Madeleine Betz

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:08 AM  
**To:** Staley, Brennon  
**Subject:** FW: Feedback on the Comp Plan Updates

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**From:** Janice [REDACTED] <[REDACTED]@seattle.gov>  
**Sent:** Monday, August 22, 2022 12:46 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Feedback on the Comp Plan Updates

**CAUTION: External Email**

I vote Alternate 1, no change.

Alternatives 2-5 only make things worse for most residents and does not solve the housing crisis. The numbers don't work; we know this. They do not provide adequate affordable housing and results in older modest family homes being torn down, replaced with multimillion dollar town homes, built lot line to lot line, decimating green space. It's simply gentrification that primarily favors developers and wealthy new comers who have no historical knowledge or interest in the community. And it leads to continued removal of mature trees that ALL neighborhoods and the planet need. Seattle's tree canopy at, what, 28%, is a national embarrassment. Developers don't give a shit about trees. We see the violations every day and Seattle decision makers are unwilling to confront their developer friends. Why do we see so many new tree companies, local, national and "no name" tree companies prowling our area? It's a burgeoning wild west business.

I ask: Who are the stakeholders here? Who's benefiting the most from the development we've seen the past five to ten years? And to what end? And we're invited to agree that we should do "more of the same" but on a grander, more intrusive scale? Does that make sense?

I don't need to preach this. If you're paying attention, you know this. I understand, it's complicated, but it's not THAT complicated. I believe there is a solution for every problem and in these challenging times, we need to innovate. Think bigger bolder and try not to be so beholden to big developers. They will keep writing their checks.

Think bolder, Seattle: I recommend the development of city-owned, vacant and underutilized land and other abandoned large, privately owned parcels be developed (by the city) as low and medium income housing, protected from market forces, perhaps with a mechanism leading to home ownership. Make them large, beautiful, tree-canopied "nodes" that we can be proud of.

I can already hear the dismissals, the "buts", the historical explanations why something can't be done. Thus, I am prepared for decision makers to do nothing more than "more of the same at an escalating pace". So, let's please, just stop the B.S..... At a minimum, placate us by evaluating and calculating the loss of our urban canopy, green spaces and parks every single time a permit is submitted. Oversee developers and fine them until it hurts when they shirk our tree laws. Let's quit talking about livability and environmental justice. Actually do it and do it now. We will never get back what is being taken away.

(If you've read this far, you can tell I'm pissed. Thanks for giving me your time.)

Janice Brookshier

[REDACTED]

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**From:** Carroll, Patrice  
**Sent:** Monday, August 22, 2022 3:07 PM  
**To:** PCD\_OneSeattleCompPlan  
**Cc:** Staley, Brennon; Hubner, Michael  
**Subject:** FW: No issues with SCL re: EIS scoping

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**From:** Brueger, Maura <Maura.Brueger@seattle.gov>  
**Sent:** Monday, August 22, 2022 2:28 PM  
**To:** Carroll, Patrice <Patrice.Carroll@seattle.gov>  
**Subject:** No issues with SCL re: EIS scoping

**Maura Brueger**  
**Director of Government & Legislative Affairs**



O: 206-684-3015 | M: 206-707-3306 | [maura.brueger@seattle.gov](mailto:maura.brueger@seattle.gov)  
We Power Seattle [seattle.gov/city-light](http://seattle.gov/city-light)

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:08 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comments on Comprehensive Plan

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**From:** Ronnie Budge <[REDACTED]>  
**Sent:** Monday, August 22, 2022 11:59 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comments on Comprehensive Plan

**CAUTION: External Email**

Thank you for the opportunity to comment on Seattle's comprehensive plan. I am a relatively new resident of Seattle. I came from a rural area with easily accessible open space and forested areas, and was apprehensive about moving to a densely populated urban area.

But I have discovered that one of the amenities of Seattle is its greenery. The abundance of street trees makes walking its sidewalks a pleasure. Trees in urban areas, along the streets and also in easily reached parks, provide shade, reduce pollution, lower the ambient temperature, limit noise, and generally reduce stress for residents. They make the urban environment liveable.

I sincerely hope that the final comprehensive plan includes a requirement that all neighborhoods have an abundance of trees along their streets and sidewalks, and also that there be trees concentrated in nearby areas to create urban forests.

-- Ronnie Lee Budge, [REDACTED] Seattle WA 98101

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:12 AM  
**To:** Staley, Brennon  
**Subject:** FW: High rise condos with small footprints

-----Original Message-----

From: Charles Buitron <[REDACTED]>  
Sent: Monday, August 22, 2022 4:40 PM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Subject: High rise condos with small footprints

CAUTION: External Email

I've often visited Vancouver and noted at their light rail stations condos that rise over 20 stories which allows a higher density with open area for parks and vegetation. We're obsessed with keeping all buildings at 6 or fewer stories. We'll planned they can contribute to solving housing shortage and have open space on the ground

Charles Buitron  
[REDACTED]  
Seattle

Sent from my iPhone

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**From:** Carol Burton <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 8:27 PM  
**To:** Staley, Brennon  
**Subject:** scoping for One Seattle plan EIS

**CAUTION: External Email**

Hi Brennon - my comments on the scoping for the EIS are below. Thank you  
Carol T Burton

[REDACTED]  
[REDACTED]

1. The EIS needs to look at tree canopy especially in light of climate change. Trees provide shade among other benefits.
2. We need to consider parks and open space which help to build healthy communities. Dense housing requires neighborhood parks (pocket parks) that can residents can walk to easily.
3. Transit options such as bus or light rail are essential to reduce the need for cars.
4. Infrastructure such as grocery stores, schools, community centers. All needed if you're going with dense populations.

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**From:** Cathcart, Paul <pacathcart@seattleschools.org>  
**Sent:** Monday, August 22, 2022 4:09 PM  
**To:** Staley, Brennon  
**Cc:** Podesta, Fred (Seattle Public Schools); Narver, Gregory C; Best, Richard L; Asencio, Rebecca S  
**Subject:** EIS Scoping - SPS Comments  
**Attachments:** SPS comments \_ Seattle Comp Plan Update EIS Scoping.pdf

**CAUTION: External Email**

Hello Brennon,

Attached are comments from Seattle Public Schools regarding EIS scoping for the City's Comprehensive Plan Update.

Please let me know if you have any questions or need further information.

Thank you.



Paul Cathcart (he/him)  
*Senior Facilities Planner*  
Capital Projects and Planning  
e: [pacathcart@seattleschools.org](mailto:pacathcart@seattleschools.org)  
p: 206.252.0788



August 22, 2022

Brennon Staley, Strategic Advisory  
City of Seattle  
Office of Planning & Community Development  
Via e-mail

Re: Seattle Comprehensive Plan Update; Seattle Public Schools EIS Scoping Comments

Dear Brennon,

Thank you for the opportunity to provide comments on the scope of the environmental impact statement for the update of the One Seattle Comprehensive Plan. Seattle Public Schools (SPS/District) welcomes the opportunity to partner with the City of Seattle in developing a future vision for the City that is inclusive of all voices and provides equitable opportunities for current and future Seattleites.

SPS educates over 48,000 Pre-Kindergarten through 12<sup>th</sup> grade students, their families, and staff throughout the city. The District has a significant interest in the future development patterns within the City of Seattle and the policies and regulations that influence those patterns. The quality of life for the City's residents, workforce and visitors will be the better for a thoughtful, equitable and transparent approach to the future vision of the City.

We provide our comments on the scope of the EIS as a partner in the development of a shared vision for the future of the City of Seattle and in service to our shared constituents. We strongly encourage the City to incorporate the District's Strategic Plan into the work of the Comprehensive Plan update.

The District recognizes there will be, and looks forward to participating in, opportunities for future comment on the draft alternatives for the EIS and comprehensive plan draft.

## **EIS Alternatives - Topics of Analysis**

### *General Topics*

The project overview provided for the Comprehensive Plan Update EIS Process provides an opportunity for public review and comment on the proposed EIS alternatives and the topics to be analyzed. The District provides these comments in the spirit of partnership of providing services

to our shared constituents and the recognition that delivery of quality educational programming to our youth is a shared public value.

### **Earth and water quality**

Consider the benefits of educational program delivery that impervious surfaces provide. Many SPS campuses rely on impervious outdoor areas for physical education, recess, and other educational programming. This reliance on impervious surfaces is, in part, due to its year-round accessibility. Other surface types require more maintenance and provide less accessibility and usability during winter months. SPS supports improvements to the water quality in our urban watersheds and understands that discouraging the use of impervious surface is tool to improve watershed health. However impervious surfaces on school sites provide spaces for needed, reliable educational program delivery. This benefit should be considered in the analysis of water quality.

### **Air quality and greenhouse gas**

Consider air quality benefits from city investment in pedestrian and bicycle infrastructure on primary pedestrian routes near public schools.

### **Plants and animals**

Consider the need for actively programmed space on educational campuses. The size of most public school sites is relatively small compared to the programmed needs and uses of the site. The District makes investments in and maintains landscaping on schools sites, however the active programming of most school sites provides few opportunities for the preservation of significant amounts of plants or animal habitat. School sites should not be seen as a significant opportunity for environmental conservation.

### **Energy and natural resources**

Historic preservation requirements of public school buildings often limit building improvements the District can make to improve energy efficiency.

SPS has adopted a clean energy resolution with a goal to eliminate fossil fuel use by 2040. The District is undertaking a significant effort to examine all aspects of its operations to meet this goal and operationalize an implementation plan. The city's scoping process should acknowledge the efforts SPS, and other organizations, are making to cleaning their energy use and the benefits this will provide.

### **Noise**

Consider the benefits to city residents and its workforce of less traffic noise through city investments in pedestrian and bicycle friendly improvements to city infrastructure.

## **Land use patterns and urban form**

Consider the benefits of locating housing affordable to families within walking distance of or transit availability to schools.

The update of the comprehensive plan provides an opportunity to update land use policies and regulations to accommodate modern school design.

## **Historic Resources**

Consider the impacts to educational program delivery and energy efficiency historic preservation regulations may impose on public school buildings. In some instances this affects occupant comfort and educational programming capability.

## **Population and Employment**

Consider the impact to student capacity of public schools in the evaluation of alternative growth scenarios. The District's capital planning efforts include identification of schools with enrollment that is over its student capacity. Once identified, it can take the District several years to provide permanent student capacity in school buildings. The District's Board of Directors would like to reduce the District's use of portable classrooms buildings to address student capacity issues at schools throughout the District. Doing so improves educational program delivery. SPS maintains a right-size capacity for all school buildings. The analysis of this topic within the EIS should include estimates of the type (single family, multifamily, mixed housing, etc.) and number of housing units that would be generated with each alternative analyzed within each SPS school boundary as well as an estimation of the impact of new housing to SPS student draw.

## **Housing and Displacement**

Consider housing types that support schools. The neighborhood school model supported by SPS is based on having enough family affordable housing units within the boundary area of each school to maintain student enrollment to keep the school open. The District can provide support to this effort by estimating the impact to student enrollment to each of the alternatives considered.

Consider the benefits of housing affordability for student families and staff within each school capture area. Make school proximity a key determinant in each alternative approach.

## **Transportation**

Consider the benefits of prioritizing city investments in pedestrian and bicycle infrastructure on routes that serve PK-12 schools.

Consider the ease of use and safety benefits of strategically locating transit routes and stops that serve secondary schools.

## **Services**

Consider maintaining capacity for SPS use of pools, baseball, and soccer fields; planning physical education and recreational capacity for any new school needs to dovetail between SPS and Seattle Parks and Recreation. The District recommends a continued commitment for the city and District to participate in the Joint Athletic Facilities Development Program and Joint Use Agreement.

## **Utilities**

Consider what investments will be needed in public infrastructure to support the alternatives growth patterns considered in the EIS.

## **Suggested Additional Topics of Study for the EIS**

### **Heat Island/Tree Canopy**

Consider the impacts of heat islands and the inequitable distribution of the urban tree canopy.

### **Resilience and Response to Natural Disasters**

Each growth alternative should consider impacts to residents' response to natural disasters and the city's ability to provide emergency management services with increase population density.

### **Recreation**

Consider the benefits to public health of additional recreational opportunities such as additional bicycle lanes as well as active and passive recreational opportunities.

### **Equity and Climate (Climate Analysis Framework)**

Consider that other organizations are developing and implementing their own climate action plans. The scope and schedule of these plans and investments should be accounted for and be allowed to meet City regulations where applicable.

### **Displacement**

Analysis of displacement should also identify changes in housing types (single family , multi-family, etc.) within each school boundary. The viability of neighborhood schools is dependent on sufficient housing for families within the boundary of each school.

## **EIS Draft Alternatives**

SPS does not have specific comments on the proposed draft alternatives. Generally, however, we suggest each alternative be evaluated for its potential for providing housing affordable to families throughout the city. Each alternative should also be evaluated to determine the readiness of the public infrastructure to accommodate population growth proposed in each alternative.

While not necessarily a topic for EIS consideration, the update of the comprehensive plan provides an opportunity to identify funding needed for infrastructure upgrades to accommodate each alternative.

Thank you again for the opportunity to provide comments on the scope of the EIS. Please feel free to contact me with any questions you might have.

Sincerely,



Paul Cathcart  
Senior Facilities Planner

C:

Becky Asencio, Capital Planning Manager  
Richard Best, Director, Capital Projects and Planning  
Fred Podesta, Assistance Superintendent of Operations  
Greg Narver, General Counsel

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:11 AM  
**To:** Anna Clemenger  
**Cc:** Staley, Brennon  
**Subject:** RE: Unable to access Engagement Hub

Hi Anna,

So sorry that you were having trouble with the Engagement Hub website. Commenting on the Scoping period is now closed, but given that you were grappling with tech issues, we are happy to receive your comment at this time. Please send your comments directly to Brennon Staley, copied on this email, and they will be logged accordingly.

Best,  
The OPCD Team

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**From:** Anna Clemenger <[REDACTED]>  
**Sent:** Monday, August 22, 2022 4:12 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Unable to access Engagement Hub

**CAUTION: External Email**

Hello, I just found out about this engagement opportunity today and when I have tried to reach the Engagement Hub via the link on your website, I keep getting an error message saying the connection timed out and the page was not able to load.

Anna Clemenger

=^\_^=

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**From:** Thaler, Toby  
**Sent:** Monday, August 22, 2022 3:36 PM  
**To:** Staley, Brennon  
**Cc:** Hoffman, Kate  
**Subject:** Comp Plan Scoping Comment

Please add this D6 constituent email to the Comp Plan scoping comments.

Thanks,

Toby Thaler

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**From:** Marla Coan <[REDACTED]>  
**Sent:** Wednesday, August 10, 2022 3:09 PM  
**To:** LEG\_CouncilMembers <council@seattle.gov>  
**Subject:** Zoning and affordable housing in Seattle

**CAUTION: External Email**

Good afternoon,

I am a true Seattlelite, born and raised. I am very disappointed with what is happening under your leadership. Zoning has changed to accomodate affordable housing? I don't think so. I live in Ballard and have watched affordable housing get demolished and get replaced with expensive Townhomes. People have been priced out of the rental market in the city of Seattle. We no longer have neighborhoods/communities and we surely do not have affordable housing. From my standpoint, you have allowed the developers to be in charge and you are ruining my city. Elections have consequences, and I will be very careful when I cast my vote next time you run.

Thank you,  
Marla Coan

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:37 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comprehensive plan needs to guarantee room for large trees

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**From:** treesyes <[REDACTED]>  
**Sent:** Monday, August 22, 2022 8:04 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comprehensive plan needs to guarantee room for large trees

**CAUTION: External Email**

NO plan addresses the actual problem: in order to save large trees or add new ones (large trees provide the most benefits) impermeable lot coverage must be reduced. Open space must be increased. Otherwise there won't be room for tree roots and canopies.

Townhouses in theory could allow more space for trees but currently they just fill the entire lot to generate maximum profit. FYI they are NOT low income housing. Some large developments provide a few units of 'market rate' in exchange for zero or little on site parking (saves the developer money). I expect developers will fight any reduction in the size of their McMansions or other projects. It's all profit driven aka greed.

I'm located close to the Crown Hill Upzone, where the zoning was changed from single family to seemingly 'anything goes' (except for industry). There has been an incredible slaughter of trees, and lack of proper care/protection of trees that were supposedly saved.

Thank you for considering my comments.

Tina Cohen  
District 6. Seattle resident since 1976

Tina Cohen, ISA Certified Arborist #PN0245A  
ISA Tree Risk Assessment Qualified  
Member American Society of Consulting Arborists  
Registered Consulting Arborist #473, **retired**

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**From:** laura cooper <[REDACTED]>  
**Sent:** Monday, August 22, 2022 1:15 PM  
**To:** Staley, Brennon  
**Cc:** Quirindongo, Rico  
**Subject:** 2024 Comprehensive Plan Feedback  
**Attachments:** One Seattle Comprehensive Plan feedback.docx

**CAUTION: External Email**

August 22, 2022

Brennon Staley  
Office of Planning and Community Development  
PO Box 94788  
Seattle, WA 98124-7088

Dear Brennon Staley:

I am responding to your request for feedback on the One Seattle Comprehensive Plan.

I live in Ballard, have a degree in Environmental Policy and used to sit on the Ballard District Council before former Mayor Murray disbanded the City's district council system.

- 1) Ballard has experienced unprecedented growth and loss of tree coverage in the last two decades. If the City is determined to continue to densify, then some strong development restrictions and development-funded systems need to be implemented.
- 2) When trees are cut down for development purposes and we lose tree canopy, then a required solar panel installation to mitigate the loss or some other system should be a mandatory (not optional, not tradable) requirement.
- 3) If more homeless housing is brought into a neighborhood, then mandatory resources need to be funded.
- 4) If more people move to an area, then better public transportation needs to be provided.
- 5) Developers have had way too much power in Seattle. The EIS analysis framework needs to be a real tool for evaluation and impact, not a pro-forma process.

Currently Ballard has too few police, a closed and fenced off city park, a light rail scheduled for 20 years from now and businesses closing due to lack of safety and vandalism. These issues will not get better, they will get worse with more density, so they need to be addressed first, or at least in conjunction with any plan you are developing.

Additionally, the District Council system, which was an effective neighborhood feedback process around the City should be reinstated.

Thank you for your attention to these critical issues.

Sincerely,

Laura K. Cooper  
[REDACTED]

August 22, 2022

Brennon Staley  
Office of Planning and Community Development  
PO Box 94788  
Seattle, WA 98124-7088

Dear Brennon Staley:

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- 2) When trees are cut down for development purposes and we lose tree canopy, then a required solar panel installation to mitigate the loss or some other system should be a mandatory (not optional, not tradable) requirement.
- 3) If more homeless housing is brought into a neighborhood, then mandatory resources need to be funded.
- 4) If more people move to an area, then better public transportation needs to be provided.
- 5) Developers have had way too much power in Seattle. The EIS analysis framework needs to be real tool for evaluation and impact, not a pro-forma process.

Currently Ballard has too few police, a closed and fenced off city park, a light rail scheduled for 20 years from now and businesses closing due to lack of safety and vandalism. These issues will not get better, they will get worse with more density, so they need to be addressed first, or at least in conjunction with any plan you are developing.

Additionally, the District Council system, which was an effective neighborhood feedback process around the City should be reinstated.

Thank you for your attention to these critical issues.

Sincerely,

Laura K. Cooper  


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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:36 AM  
**To:** Staley, Brennon  
**Subject:** FW: Seattle 2035 Comprehensive Plan public comment

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**From:** diane coyne <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 11:00 PM  
**To:** Hubner, Michael <Michael.Hubner@seattle.gov>; PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Seattle 2035 Comprehensive Plan public comment

CAUTION: External Email

Hi,

I hope this is where I send public comments. I have a major concern about our sewer system. We have miles of sewer main past its useful life. We have regular clogs.(I've experienced them at different locations, including a sink hole.) We need to reline/replace our sewer lines.

I know builders have been replacing a hodgepodge of lines around the city. That's great. But it would be better if we prioritized getting all our lines replaced or lined. We would save a fortune in maintenance. We can't just keep multiplying households and not repair the old lines that don't sit directly in front of new construction. It doesn't help downstream. Could we just charge builders a fee that would go toward city sewer reline/replacement? (beyond the sewer capacity charge, which is NEVER paid by the builder.)

Also, everyone now uses more efficient toilets that use less water. That's great, but sewage doesn't move as smoothly, especially with old worn out sewer lines. FOG clogs are occurring at a much higher rate than regular maintenance can keep up with.

We need a comprehensive sewer repair plan like San Diego. Every neighborhood benefits from functioning sewer lines. (See attached link.)

<https://www.governing.com/community/san-diego-to-update-sewer-water-lines-with-new-pipes-drones.html>

It's not the most exciting topic. . . until your sewer line fails. Please include our sewer lines in our comprehensive plan.

Thank you for all your work! Stay well!

Best,  
Diane

Diane Coyne | she | her | ██████████

Owner | Managing Broker

Picket Fence Real Estate

Ban high-capacity magazines & assault weapons. Save lives.

---

**From:** Brian Derdowski <[REDACTED]>  
**Sent:** Monday, August 22, 2022 9:02 PM  
**To:** Staley, Brennan  
**Cc:** Hubner, Michael; Quirindongo, Rico  
**Subject:** Comment on 2024 Update EIS Scope  
**Attachments:** Comment to Seattle 2024 Comp Plan Update EIS Scope.pdf

**CAUTION: External Email**

Hi Brennan,

Michael suggested that you would be the one who should receive my comment letter on the 2024 Comprehensive Plan Update EIS scoping process.

Please see attached PDF.

Thank you,

Brian Derdowski  
[REDACTED]

August 22, 2022

Rico Quirindongo  
Acting Director  
Office of Planning and Community Development

Brennon Staley  
Strategic Advisor  
Office of Planning and Community Development

Michael Hubner,  
Long Range Planning Manager  
Office of Planning and Community Development, City of Seattle

*via e-mail*

Re: Seattle Comprehensive Plan Environmental Impact Statement Scoping Comment Letter

Thank you for this opportunity to provide our feedback as part of the scoping process for the Environmental Impact Statement (EIS) being prepared by the Office of Planning and Community Development (OPCD) as part of the State Environmental Policy Act (SEPA) review for the 2024 major update to the City of Seattle Comprehensive Plan.

The Scope of the Environmental Review should be amended to include the following work scope:

- 1. The EIS shall review prior adopted Environmental Impact Statements (EISs) related to land use planning and development review with the objective of identifying whether the impacts and mitigations described in those EISs were accurate and implemented. This information shall inform the EIS review of the 2024 Comprehensive Plan.**

Discussion:

All of the City's land use plans, zoning and development regulations have been written over time informed by SEPA review. Changed circumstances, failure to implement mitigation measures or errors in analysis have, and may likely have, made those earlier

SEPA reviews inaccurate or inadequate. Where this has occurred, the City has a duty under SEPA to conduct additional analysis to inform the Environmental Review of the 2024 Comprehensive Plan Update (Update).

This duty applies even if the prior Environmental Reviews were about issues that are not specifically addressed in the Update because impacts of various land use actions are interrelated, sometimes directly.

For example, if the City adopts a critical areas ordinance informed by a SEPA analysis, but changed circumstances or failures to adopt and enforce implementing measures are not adopted as anticipated, then a SEPA gap exists that needs to be addressed in the Update EIS. In this example, the Update EIS could not assume that existing regulations would protect critical areas, and would need to consider cumulative effects of that deficiency.

Another example might be where a prior Environmental Review calculated impervious surfaces in a planning area that turned out to be lower than what occurred over time. The resulting additional runoff and watershed degradation needs to be considered when additional development impacts are considered in the Update EIS.

Another example might be where the City adopted density and land uses to a planning area based on a prior Environmental Review but implementing projects increased that level of development without considering environmental impacts because projects were exempt or bonus densities were interpreted differently.

Yet another example might be where the City identified mobility impacts in an Environmental Review that turned out to be greater than assumed or that relied on mitigation measures that didn't materialize. The Update EIS would need to analyze currently existing transportation demand and levels of service.

**2. The EIS shall assume that site specific environmental review may not be done at the implementing project level in the future, so important project level impacts should be considered in the Update EIS. Where this is not practical, the EIS should identify those impacts and set forth policies that will enable them to be fully addressed at project level review.**

#### Discussion:

The last three decades have seen a consistent diminution of site specific SEPA reviews. Through the use of Planned Actions, Development Agreements, and Exemptions, many

development applications that used to have their own SEPA review no longer undergo such review. The Legislature has been lobbied every session by the development industry to eliminate all project action SEPA reviews arguing, erroneously in our view, that the Growth Management Act and Comprehensive Plan SEPA reviews are sufficient. The probability of such a legislative action must be considered high, so the Update should make this assumption and plan accordingly.

Without site specific SEPA review, the only authority to apply SEPA conditions is through legislative action based on Comprehensive Plan SEPA review. This requires the Update's EIS to include cumulative site specific impacts as well as location specific environmental impacts.

Development regulations that address each and every circumstance that may exist on individual sites are difficult if not impossible to write. The legislative process doesn't make this any easier due to its inherent deliberative limitations. One solution legislative bodies use to address this is to delegate administrative decision making authority. In land use, Planning and Development Directors often fulfill this role.

Where Development Directors are given wide discretionary authority as might happen if all site specific SEPA review were eliminated, the public and applicants would need an administrative remedy to address what they perceived as errors or arbitrary determinations. Without SEPA appeals, the only avenue for addressing environmental impacts would be through administrative or judicial appeals to those kinds of development applications that are subject to public notice and appeal. But an increasing number of applications are being exempted from such reviews, and the subject areas of those applications often don't get to important areas of the environment.

Without assurances that future developments will undergo site specific SEPA review, or without development regulations that are strong enough to mitigate the full range of site specific impacts on every site in the City, the City is left with only one viable option: the consideration of as many project level impacts in the Update's EIS, and a comprehensive review of the City's development regulations to determine their efficacy in defining and conditioning all project level impacts.

- 3. The EIS shall identify and analyze municipal service levels at local scales that are sufficient to identify differences between neighborhoods and quantify specific impacts from increased development on those neighborhoods.**

Discussion:

The Update is considering major policy and land use map changes that will affect large sections of the City uniformly, or are City-wide. These changes may have disparate impacts between neighborhoods.

For example, a neighborhood may have sewer/stormwater conveyance problems that would require costly improvements and create significant disruptions to correct if additional development impacts were approved.

Another example might be where a neighborhood has little access to park or open spaces and so additional development would need to be conditional on public investment of open space and park services.

Another example might be where existing traffic conditions are unsafe with blind curves, narrow shoulders and lanes, deferred maintenance and other public safety problems that would need to be improved before additional development could be served safely.

Yet another example might be where water pipe infrastructure is old, unsafe, or undersized.

Planning for the full range of urban services to accommodate urban growth is a fundamental goal of the Growth Management Act, but the City's planning in the past has too often been so generalized as to be woefully inadequate at ensuring future growth is served appropriately. The Update needs to do much better, especially considering its high growth projections and an ongoing diminution of project level reviews and regulations.

Growth impacts are too often considered at the macro level, but are felt at the micro level. Renters are displaced, street parking becomes unavailable, school enrollment boundaries changed, sewage backs up during heavy storms, open spaces are paved, parks become uncomfortably crowded; to name just a few impacts. It is incumbent on the City to identify these impacts at the level where people live, and make land use decisions that are informed by and disciplined by the local availability of municipal services and commonly valued and important amenities.

**4. The EIS shall identify and analyze development impacts at phased intervals and localized areas within its 20 year time-horizon. These intervals shall be based on reasonably predicted infrastructure investments and benchmark criteria such as housing availability, utility capacities, and key municipal service levels. These areas shall be based**

**on quantified ‘conditions on the ground’ including municipal service capacities and recent development history.**

Discussion:

Development Impacts that occur rapidly are usually more difficult to mitigate than those that occur over time. This may seem obvious, but Comprehensive Plans tend to consider build-out impacts at the end of the planning cycle. The Update EIS should consider what the impacts would be if, say, the City was confronted with 20 years of employment growth in the first five or ten years. Similarly, the EIS should consider the impacts of 20 years of population growth served by 10 years of housing construction. There are many other instances where the timing of impacts needs to be analyzed.

A macro analysis of the match over time of housing/employment/population is an easily understood imperative. Less so is the match between municipal services and these growth components. The EIS needs to provide information that accurately predicts the actual lived impacts that residents in all the diverse areas within the City will experience as growth occurs. The lived experience of residents living in (or used to live in) areas of the City that have experienced rapid growth is instructive and should be sought out and documented.

Fundamental to the Growth Management Act is that urban services should be directed first to those urban areas that are best able to provide urban services. For example, if a major sewer pipe upgrade in a planning area is forecasted for 2030, that area probably isn't the first place that should see much additional development. Another example is a planning area that has experienced rapid growth over the last few years, and is struggling to adapt and provide services, shouldn't be targeted for even more growth during the first years of the 20 year planning horizon.

The EIS should inform decision makers about the potential for addressing impacts better and at lower public and social costs by timing employment and housing development in various areas within the City. These timing mechanisms might include potential zoning where actuation of additional development densities are conditioned on the achievement of identified public investments and future availability of municipal services. During my tenure on the King County Council, we effectively used this technique of potential, or phased, zoning to direct growth to unincorporated areas that were best able to accommodate it.

Without a deep and detailed understanding of the disparate impacts to its neighborhoods and planning areas, the City may simply open the floodgates, as it were, everywhere in the City and effectively turn its planning function over to private

developers who will simply apply their own financial calendars to the critical issue of employment/housing/population/services balance.

Many of the negative outcomes that residents have experienced in rapidly growing areas have been caused by promises of enhanced services and amenities that didn't materialize. Architectural renderings and generalized service reviews don't tell an accurate story. The Update EIS needs to provide detailed information in a realistic format so that decision makers and the public can fully see what will be the result of permitting additional development.

When decision makers are provided this kind of information in an EIS, they can develop regulations and performance standards that can ensure that development occurs as represented. And, they can develop realistic timeframes that don't overwhelm residents before infrastructure and urban amenities can be constructed. This is the way the City can maintain the trust and confidence of its residents that growth can be accommodated without harming the local economy and quality of life of residents.

**5. The EIS shall analyze the impacts of the City's growth in employment/housing/population based on alternative levels and timing of these growth components.**

Discussion:

The Growth Management Planning Council's adopted Housing/Employment/Population forecasts for the City of Seattle are the result of demographic analysis and political considerations. As with all such forecasts, they may or may not occur as forecasted. The EIS should consider the consequences of different rates of growth because decision makers should be informed about how impacts may be affected by the timing and scale of their zoning decisions, infrastructure investments, and economic development initiatives.

The City is required to plan in a manner that is consistent with the Growth Management Act and the Countywide Planning Policies, but it is not obligated to mandate any growth outcomes. In fact, growth rates are affected by many, many factors and actions at all levels of government and the private sector. This is one reason why growth "allocations" among cities are not considered mandatory or enforceable, and no legal mechanism exists to compel a local government to take actions to force a particular growth outcome on its constituents.

The City has experienced an extraordinary period of growth, during an extraordinary period of time. The largest generation in history came of age. Foreign immigration grew at historic rates. A prolonged period of stimulative interest rates and rapid employment growth by Amazon and other companies occurred.

It is not at all clear that these conditions will continue into the next two decades. Just as the Great Recession years have been discounted by growth forecasters as an anomaly, so the more recent growth rates should not be extrapolated into the future without much examination.

The EIS can inform better decision making by fully analyzing a range of growth rates for employment/housing/population. And within the Update's time horizon, the EIS can identify areas that are good prospects for additional development in the early part of the Update's time horizon and those that would be better developed later.

A cautious, phased approach to accommodate growth targets will better respond to changed circumstances that might change future growth forecasts. Additionally, this approach will be less disruptive to neighborhoods and, properly informed by the EIS, better balance housing demand and supply.

Given the current state of affordable housing it may make sense to "catch up" by zoning for a higher ratio of housing than employment during the first half of the Update's planning horizon. This may be problematic because developers benefit from a tight housing market, and high rates of employment growth create tight housing markets. They may be disinclined to build housing if employment levels off, frustrating the goal of "catching up". New Employers also contribute to this problem because they seek out communities with cheaper public infrastructure including affordable housing. The more housing Seattle creates, the more attractive it will be to new employers.

The Update's EIS should examine this complex interplay of market forces so that decision makers can formulate zoning and policy approaches to intervene effectively.

Recently, transportation planners have learned that communities can't actually build themselves out of traffic congestion; increased demand always offsets improvements. To some extent, a similar phenomenon applies to housing as the preceding paragraphs suggests. As is often the case, the solution involves a deliberate and careful balancing of demand through use of the full range of government's legal tools. These tools include phased zoning to moderate growth, development fees that redirect general government subsidies toward specific policy goals, targeted government investments, effective environmental protection regulations, and careful monitoring and intervention into markets. These same actions will also promote the City's progressive equity goals.

It would be a mistake for the City to make what some might consider radical changes to its neighborhoods and environment in an effort to turn a demographic prediction into a self-fulfilling prophecy.

In order to try to stimulate more housing, the City could eliminate all zoning, reduce all development standards, and weaken its environmental protections, but the result would be a Pyrrhic victory as unrestrained market forces exploited the Commons and recreated the same economic stresses and inequities, albeit with a larger population living in a degraded community.

The City's decision makers have many legal tools available to them to phase and shape growth in such ways that may be gracefully served by municipal services and that results in enduring prosperous communities, social solidarity and equity, and environmental protection. These tools need a truly comprehensive EIS to provide the policy and legal foundation.

## **6. The EIS shall analyze alternative components of employment growth, population growth, and housing growth.**

### Discussion:

Comprehensive Plans generally focus on analyzing different kinds of housing growth. What is often lacking is an analysis of who will occupy those homes and what kinds of jobs they will hold.

Some of the current housing affordability stress that the City is experiencing is due to rapid and unpredicted demographic and employment changes. The City is not alone in this regard. The affordable housing challenge is a worldwide phenomenon, and in fact, Seattle compares reasonably well compared to many cities in the world, ranking only 78<sup>th</sup> worst in the world according to the Demographia International Housing Affordability 2022 Edition Report <https://fcpp.org/wp-content/uploads/Demographia-International-Housing-Affordability-2022-EditionCORR.pdf>

In order to properly inform the City's decision makers, the EIS should analyze the detailed components of the City's projected population growth. For example, what percentage of the City's projected growth will bring equity from other markets, have high paying jobs, or multi-generational households? How much of that growth will need

to be served with low income housing? How much of that growth will be first time home buyers or long term renters?

It has become popular among development circles to say that housing that is built for higher income households frees up housing for lower income households. This is a variant of the “trickle-down economics” theory that was widely discussed during the 1980s. It is a notion that has many critics, and has not been rigorously empirically tested.

The Public and its representatives should empower themselves to make decisions about what gets built in the City and when. The EIS analysis is needed to establish that discretionary authority.

It is far better for the City to target its zoning and subsidies to directly meet the needs of its existing and future residents. To do that, the City needs to have a detailed picture of what housing demand will look like. The EIS can do that. But that analysis should identify various possible components of housing demand because those components can change quickly and are affected by many factors.

For example, if the City and State stimulates economic development in sectors that have lower wages, such as tourism, then the City needs to adopt zoning and direct subsidies that create enough lower income housing to serve those new employees.

If the City and State encourage and welcome refugees on understandable humanitarian grounds, then they need to step up and provide transitional and permanent housing to accommodate those new residents.

A 2019 Stanford study *“Tight housing, immigration are shifting pressure onto Seattle’s black neighborhoods, Stanford sociologist finds”*

<https://news.stanford.edu/2019/08/28/immigration-seattle-driving-urban-change/>

provides some insight into how macro- economic factors have real impacts on existing residents. Balancing the rate and type of growth with municipal service levels and quality of life indicators is a pre-requisite for a healthy social compact between diverse peoples and interests.

Current policies tend to impose the costs and burdens of growth on existing residents, especially lower income groups. It is politically popular to promote jobs and economic development, but doing so without the discipline afforded by established service standards, development impact fees and realistic capacity analysis is unfair. Existing

low income residents should not be forced to take the brunt of increased demand for the housing and services that they need while developers and businesses reap the benefits.

The Public and its representatives should also empower themselves to make decisions about the timing and kinds of economic development as well. Consider how the Borough of Queens refused to accept Amazon into their “Plan”. There, existing residents realized that their lives would be irreparably harmed if Amazon were allowed to exploit the Borough’s public infrastructure and development capacities for its own benefit without making commensurate public investments in return. New Yorkers understand the concept of a “growth budget”.

The Public and their representatives need to make decisions as to how Seattle’s “growth budget” is spent. Water, land, older housing stock, existing transportation systems, schools, green spaces....all of these are finite to some degree. Once growth reaches a certain level the costs to provide these services rise quickly. The cost of living and taxes go up accordingly, and at some point, further growth becomes unsustainable. Good planning and policies can extend that endpoint somewhat, but there is a limit to what conservation, smaller footprints, and reduced service expectations can accomplish.

The Update EIS should put real numbers on the development capacities of its planning areas, and the costs of improvements that are needed to accommodate different levels of growth. The EIS should identify on each growth/infrastructure cost curve the inflection point where costs vs. benefits steepen.

The nature, timing and financing of employment/housing/population growth is a public decision, not a pre-determined decision handed down by a demographer or interest group. Allowing all growth to occur without control or restriction is a public decision by default. The Update’s EIS will best serve the decision makers and public by considering and analyzing various growth scenarios and the factors that drive them.

**7. The EIS shall assess the current state of the City’s natural environment including an inventory and analysis of significant changes since the last adopted Comprehensive Plan EIS. This assessment shall include tree canopy, wetland functions and values, stream flows and ecology, groundwater, shorelines, natural areas and parks, wildlife habitat and utilization, stormwater pollution, air pollution, noise pollution, light pollution, and urban heat effect zones. The EIS shall identify a menu of development regulations that will protect and enhance the City’s natural environment.**

Discussion:

The City has never done a snap shot comprehensive inventory and analysis of all of the components of its natural environment. Efforts have been piecemeal, and data has been incomplete. The Update EIS has a duty to provide this information.

There has probably never been a time in the City's history where a truly comprehensive and detailed natural environment analysis was needed more.

The land use and development revisions being considered by the Update would profoundly affect the entire City's natural systems. This Update is occurring at a time where extreme housing affordable stresses are driving a 'build as much as you can, wherever you can, as rapidly as you can', however you can' mentality. This is occurring against a backdrop of increased pressure to remove SEPA reviews and a call to eliminate certain permit review safeguards.

The City's decision makers need to have a clear understanding about the specific risks and fragility of Seattle's environment. The EIS can do that. And, the EIS can provide the findings of fact and policies that will support truly effective development regulations.

The EIS should provide the resources necessary to get a clear picture about what needs to be done to protect and enhance Seattle's environment. The voices of independent environmental experts should be centered in the EIS' analysis. The scopes of their reviews should be broad, and their findings should be presented unadulterated by political considerations.

The Public and Decision Makers need to know all of the inconvenient truths. Without major revisions to the City's permit review processes and regulations, the high rates of growth contemplated in the Update will irreparably damage the City's environment....for everyone.

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Thank you for considering these seven suggested additions to the scope of the Environmental Impact Statement. We will continue to participate in this process as it proceeds. Please add us as a party of record and send all related notices and information to me at the email address below.

Our comments are offered on behalf of Public Interest Associates, a network of people who engage a range of public policy issues, with members in the City of Seattle and other communities.

I am personally available to answer questions regarding these comments or to provide additional input as you may consider helpful.

Thank you for your work in support of the public interest.

Sincerely,

Brian Derdowski  
Public Interest Associates

[REDACTED]

[REDACTED]

---

**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:07 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comments

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**From:** Tahoma Doyon <tahomarealty@outlook.com>  
**Sent:** Monday, August 22, 2022 11:07 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comments

**CAUTION: External Email**

Hi, I have been a Seattle resident my whole life and do real estate in the area. It would be nice to change the new construction code so that rooftop decks have to be plumbed with a water spigot. Not only does this increase safety but it will help the Seattle tree canopy goal. Unless your rooftop deck does not have water it is very unlikely you will have any plants or trees on your roof. Having trees and plants on the peoples rooftops not only increases the canopy but will shade and cool the home in the summer which will lower energy costs and demand. Also, if there are other incentives to have rooftop plants/trees that would help as well. I also think incentives for high-rises to add a green component to their siding would be nice as well. Singapore has lots of examples of buildings with plants on the sides and it adds a lot of benefit.

**Tahoma Doyon**  
Real Estate Broker  
C: 206-335-9305 | tahomarealty@outlook.com  
Tahoma-Realty.com



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**From:** Jean Durning [REDACTED] >  
**Sent:** Sunday, August 21, 2022 11:08 AM  
**To:** Staley, Brennon  
**Subject:** Scope of EIS for One Seattle plan

**CAUTION: External Email**

Sent from [Mail](#) for Windows

Most important is Option 5, widely expanding housing opportunity across all of our city. Please include lots of options for trees and access to other green space (including on rooftops) to all communities, including those traditionally left out.

Thank you,  
Jean Durning

[REDACTED]  
Seattle 98101

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**From:** Kristie L Ebi <krisebi@uw.edu>  
**Sent:** Tuesday, August 23, 2022 1:19 PM  
**To:** Staley, Brennan  
**Subject:** Comments on One Seattle Comprehensive Plan  
**Attachments:** One Seattle.docx

**CAUTION: External Email**

Dear Brennan:

The person from whom I got your email address spelled your name incorrectly, so this message did not go through very early this morning. I apologize for the delay and hope that my comments may still be useful.

Kind regards,

Kris

Kristie L. Ebi, Ph.D., MPH  
Professor, Center for Health and the Global Environment (CHanGE)  
University of Washington  
Seattle, WA 98195  
USA  
[krisebi@uw.edu](mailto:krisebi@uw.edu)  
<http://globalchange.uw.edu>

*I live and work on the lands of the Coast Salish peoples, land that touches the shared waters of all tribes and bands within the Duwamish, Suquamish, Tulalip, and Muckleshoot nations.*

Begin forwarded message:

**From:** Kristie Ebi <[krisebi@uw.edu](mailto:krisebi@uw.edu)>  
**Subject:** Comment on One Seattle Comprehensive Plan  
**Date:** August 23, 2022 at 1:46:24 AM PDT  
**To:** [brennan.staley@seattle.gov](mailto:brennan.staley@seattle.gov)

Good morning Brennan:

I was traveling yesterday and was unable to submit my comments on the One Seattle Comprehensive Plan (attached). I would be happy to answer any questions or provide further explanation.

Thank you for the opportunity to submit my comments.

Kind regards,

Kris

Kristie L. Ebi, Ph.D., MPH  
Professor, Center for Health and the Global Environment (CHanGE)  
University of Washington  
Seattle, WA 98195  
USA  
[krisebi@uw.edu](mailto:krisebi@uw.edu)  
<http://globalchange.uw.edu>

*I live and work on the lands of the Coast Salish peoples, land that touches the shared waters of all tribes and bands within the Duwamish, Suquamish, Tulalip, and Muckleshoot nations.*

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan.

I am a Professor in the Center for Health and the Global Environment at the University of Washington. I will focus on the importance of explicitly incorporating adaptation into a comprehensive strategy to increase resilience to climate change in the One Seattle Plan.

As outlined in the Climate Change Issue Brief, climate change is affecting Seattle now through a range of exposure pathways and sectors. However, the Issue Brief focuses on facilitating rapid transformation of the energy and transport sectors to reduce greenhouse gas emissions. Although climate adaptation and resiliency are listed as major issues, the activities noted do not provide a comprehensive plan for addressing the challenges of climate variability and change to health and well-being, agriculture, critical infrastructure, water resources, and other sectors, while reducing inequities.

The June 2021 heatdome illustrates the consequences of limited preparedness for the impacts of climate change. Heat is the deadliest weather-related cause of death in the United States. Although cities throughout the region quickly implemented measures to reduce the impacts of the heatdome, over Washington, Oregon, and British Columbia, there were over 800 excess deaths. These were people who would not have died during the heatwave or a short time afterwards. Heat exacerbates pre-existing conditions, particularly cardiovascular and respiratory diseases. Further, on June 28 alone, there were 1,038 heat-related emergency department visits in the U.S. Department of Health and Human Services Region that includes Alaska, Idaho, Oregon, and Washington, compared with nine visits on the same date in 2019. The mean daily number of heat-related illness emergency department visits in the region for 25-30 June 2021 (424) was 69-times higher than during the same days in 2019. Emergency departments were overwhelmed with the additional presentations, during the COVID-19 pandemic. The heatwave also affected the cherry and wheat crops; resulted in the death of approximately one million shellfish; and affected critical infrastructure such as roads and rail. The extremely high temperatures dried out soils, moving large areas of the state into drought and increasing wildfire risk, a growing risk to human health. Seattle was fortunate to have had limited power outages compared with other regions.

This event was virtually impossible without climate change. And will not be the last extreme weather and climate event that will affect Seattle. Experiences in other cities demonstrate that heat action plans save lives and reduce consequences of heatwaves for other sectors. Seattle is now developing a heat action plan, a critically important activity. This heat action plan would be even more effective if it was part of a comprehensive adaptation plan.

Lessons learned from developing adaptation plans at city to national scales reinforces that systems-based approaches are most effective, acknowledging compounding and cascading risks and that choices made in one sector can affect other sectors. The process should identify urgent and immediate adaptation needs, along with required investments in human and natural systems, and medium and longer-term needs, considering that not just the climate will change. Urbanization, population growth and aging, and other changes will affect the vulnerability to and capacity to manage additional climate change.

Seattle and King County Public Health published a valuable and informative report that could inform developing a comprehensive adaptation plan << <https://kingcounty.gov/services/environment/climate/actions-strategies/strategic-climate-action-plan/climate-change-health-blueprint.aspx>>>. The report focuses on:

- ***Climate change impacts the quality of human health and life.*** For instance, as temperatures rise, hot air around cities can trap pollen, causing the allergy season to start earlier and last longer.
- ***Natural systems are connected.*** For instance, wildfire smoke from other states and countries can wreak havoc on our local air quality, exacerbating health issues.
- ***People of color and people who are poor will be hit hardest by the negative effects of climate change.*** For instance, extreme weather events will create additional financial and health threats.
- ***Public Health's role is critical in preventing climate change and mitigating its effects***

In summary, the One Seattle Plan needs to include a strategy for climate change that details approaches to adaptation and mitigation to build resilience, while protecting health and well-being and reducing inequities.

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:35 AM  
**To:** Staley, Brennon  
**Subject:** FW: need for tree cover

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**From:** Andrea Faste <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 12:22 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** need for tree cover

**CAUTION: External Email**

to the extent possible, trees need to be protected from removal to make room for housing. It is imperative to keep trees for the many ways they make housing more livable, from providing shade to storing water, to prevent heat islands and enhance property values.

the Seattle comprehensive plan needs to strengthen provisions for saving trees and woodland.

"In the end we will conserve only what we love. We love only what we can understand. We will understand only what we are taught." -- Baba Dioum, 1968

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:09 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comprehensive Plan Comments

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**From:** Greg Flood <[REDACTED]>  
**Sent:** Monday, August 22, 2022 3:06 PM  
**To:** Staley, Brennon <Brennon.Staley@seattle.gov>; PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Cc:** Pedersen, Alex <Alex.Pedersen@seattle.gov>; Thaler, Toby <Toby.Thaler@seattle.gov>  
**Subject:** Comprehensive Plan Comments

**CAUTION: External Email**

Thank you for the opportunity to comment on the forthcoming update to the Comprehensive Plan. I appreciate being allowed to comment “outside the box”, as the issue is not so much the actual increase in density, which the City can likely easily accommodate, but one of *how the increase in density is implemented*.

No matter which “plan” is selected, there are many common areas where the policy may be improved. Many of the comments below can be applied to any of the plans ultimately selected. Thank you for taking the time to consider these comments.

1. *Incentivize wise choices in housing* - Current policy appears to incentivize the “5-pack” vertical townhomes, which is a very inefficient use of space and is not very flexible in user served, i.e. seniors or families.
2. *Require (or don’t require) an HOA* uniformly to both townhomes and flats. Flats are more flexible of use by couples, families, and age-in-place seniors and are typically a more efficient use of materials.
3. *The vertical townhome format is wasteful*. Between 25 and 30-percent of its floor area is lost to the staircase. This is a very inefficient use of materials that translates to a high cost per useable square foot.
4. *Mitigate the bulk of new projects* in former single-family zones by not allowing the stair penthouse bonus, which raises the height of new projects by up to 10 feet *with zero gain in useable floor area*. An outside stair uses the same amount of space, yet provides 360-degree views and a larger roof deck area. Outside stairways are a win-win.
5. *Protect Solar Panels* - Encourage extra protections for rooftop solar installations that were installed under the prior zoning. Such systems were often designed to accommodate the maximum potential for development that was in place at the time of the install.
6. *Protect all our large trees* by eliminating the developer loophole which appears to allow a developer to cut down an exceptional tree if the tree impacts their ability to develop the property. We need our trees. Plan for the future by encouraging developers to design with respect for the surrounding environment.
7. *Include density limits in all zoning and up-zoning* to encourage construction of larger units and flats, better suited to age-in-place seniors and young families, as well as couples.
8. *Incentivize construction of units that facilitate downsizing*. Build more units suited for age-in-place seniors, such as flats, in order to provide a pathway for seniors to downsize, yet remain in the city, and free up existing housing for new families.
9. *Incentivize ownership opportunity* by limiting access by corporations and large-scale rental conglomerates to the housing market. It will understandably be difficult to incentivize first access to the housing market to the folks that wish to actually live in the home. However, it seems important to accomplish in order to provide access to generational wealth via home-ownership.

10. *Consider the social value of ground-level communal open space* by limiting the credit favoring roof decks.
11. *Any up-zoned residential areas should have density limits*, such as 1 unit per 1300 sq ft lot area in order to help mitigate the primary adverse impacts of higher density development projects - scale, bulk and parking. There are plenty of areas in the City where 18-unit SEDU projects can be built besides former single-family zones.

Thank you again for including protections such as the above in whatever path is chosen for growth. There is no reason that increased density has to be painful or punitive to those already living in a neighborhood. Mitigating the adverse impacts is a fair request.

Sincerely,

Gregory Flood

████████████████████

Seattle, WA 98103

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**From:** Greg Flood <[REDACTED]>  
**Sent:** Monday, August 22, 2022 3:06 PM  
**To:** Staley, Brennon; PCD\_OneSeattleCompPlan  
**Cc:** Pedersen, Alex; Thaler, Toby  
**Subject:** Comprehensive Plan Comments

**CAUTION: External Email**

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Thank you again for including protections such as the above in whatever path is chosen for growth. There is no reason that increased density has to be painful or punitive to those already living in a neighborhood. Mitigating the adverse impacts is a fair request.

Sincerely,

Gregory Flood

████████████████████  
Seattle, WA 98103  
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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:08 AM  
**To:** Staley, Brennon  
**Subject:** FW: One Seattle Comprehensive Plan Update Comments  
**Attachments:** NAIOP Comprehensive Plan DEIS Scoping Letter\_8.22.22.pdf

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**From:** Peggi Lewis Fu <peggi@naiopwa.org>  
**Sent:** Monday, August 22, 2022 2:27 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Cc:** natalie@nataliequick.com  
**Subject:** One Seattle Comprehensive Plan Update Comments

**CAUTION: External Email**

Good afternoon. On behalf of NAIOP Washington State, the Commercial Real Estate Development Washington State (NAIOP) and our more than 1,000 members, we are writing to provide comments on the One Seattle Comprehensive Plan Update; letter enclosed.

Please feel free to reach out if you have questions.

**Peggi Lewis Fu** | Executive Director  
**NAIOP Washington State**  
Hours: Mon-Fri | 7 am – 3 pm  
P.O. Box 24183, Seattle, WA 98124  
(206) 382-9121 (main) | **(206) 512-8915** (direct)



COMMERCIAL REAL ESTATE  
DEVELOPMENT ASSOCIATION

WASHINGTON STATE CHAPTER

August 22, 2022

One Seattle Comprehensive Plan Update Comments  
c/o Brennon Staley  
City of Seattle Office of Planning and Community Development  
600 4th Ave, Seattle, WA 98104  
Sent via email to [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

Dear Mr. Staley,

On behalf of NAIOP Washington State, the Commercial Real Estate Development Association (NAIOP), and our more than 1,000 members, we are writing to provide comments on the City of Seattle's 'One Seattle' Comprehensive Plan Environmental Impact Statement (EIS) scoping.

This update process represents the policy direction that will guide growth for the City of Seattle through 2050, no doubt shaping Seattle in ways that will transform the city for decades to come.

NAIOP and its members are strong supporters of focused urban residential, retail and office development, as well as transit-oriented development and industrial growth that reflects a 21<sup>st</sup> century view of the industry and its future.

The following comments on the proposed scope of the future Draft Environmental Impact Statement (DEIS) are made with these parameters in mind.

- All alternatives in the DEIS scoping document assume the same job growth as the no-action alternative (132,000 jobs). For a world-class city that historically is one of the nation's strongest office markets, explicitly encouraging new job growth should be strong reflection in the 2050 Comprehensive Plan DEIS. The Puget Sound Regional Council's (PSRC) VISION 2050 number is 146,700 jobs, for example. We ask that the Draft EIS include robust job growth as part of its alternative options in a way that mirrors housing growth, as housing typically follows jobs.

- We applaud the strong focus on residential growth and encourage the city to continue to push the boundaries of how residential should look by 2050. Re-examining single-family zoning, expanding current neighborhood commercial zones, expanding opportunities for low-rise in-fill and supporting strong density near transit nodes are appropriate areas of focus for the 2050 Comprehensive Plan DEIS.
- The DEIS should strongly reflect future Sound Transit 3 light rail stations and evaluate commercial and residential nodes around these multi-million dollar taxpayer investments in new transit connectivity. Zoning should reflect these natural opportunities for dense urban growth. We strongly encourage the DEIS to not be silent on this important connection.
- Similarly, the DEIS should not ignore many of our industrial lands that are not currently in 21<sup>st</sup> Century industrial use. Our city's working waterfront along Elliott Bay and the Ballard ship canal should be preserved and protected, as should areas that are key for rail transportation and freight mobility. That said, the definitions of industrial in the city's land use code have not been updated in decades and the industry continues to rapidly change. Much of the city's 5,000 acres of industrial lands are not in industrial use, are lying fallow and underutilized. The DEIS should drive future opportunities that will fuel new jobs and investment in these areas, especially in industrially-zoned areas with Sound Transit 3 stations.

We thank OPCD for the opportunity to comment and will continue to work with the City of Seattle to ensure this process reflects the bold residential, commercial, and industrial growth strategies that will guide Seattle successfully to 2050.

Sincerely,



Pegg Lewis Fu  
Executive Director  
NAIOP Washington State

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**From:** Katie Garrow <katie@mlklabor.org>  
**Sent:** Monday, August 22, 2022 6:41 PM  
**To:** Staley, Brennon  
**Cc:** PCD\_OneSeattleCompPlan; Hubner, Michael; mayor@seattle.gov  
**Subject:** Labor Council Statement on Comprehensive Plan EIS

**CAUTION: External Email**

Brennon Staley, Office of Planning and Community Development —

As the City of Seattle works toward the 2024 Comprehensive Plan Update, the MLK Labor Council urges you to include in the Environmental Impact Statement an alternative that allows all forms of housing in all areas currently zoned for residential use, including those zoned Neighborhood Residential. This recommendation is the result of a Resolution passed at our August 2022 Delegate Meeting. You can read that resolution in full here:

<https://www.mlklabor.org/resolutions/resolution-on-residential-zoning-in-seattle/>

The housing affordability problems in Seattle and King County have been at a crisis level for more than a decade. Experts on housing policy agree that a significant driver of skyrocketing rents and home prices are due to a lack of supply which is in part constrained by strict residential zoning restrictions. In order to address this crisis, we need bold solutions, including a full array of options to study and consider. It would be irresponsible for the City not to study the impact of the elimination of single-family residential zoning restrictions as an option for the Comprehensive Plan Update.

Changing zoning to allow for all types of residential development on land that is currently zoned for residential purposes will allow for denser housing and an increase in the supply of homes. Not only will this bring relief to homebuyers and renters, but it will lead to a more livable and sustainable city. This can all be done without changing our limited supply of industrial lands which supports thousands of good union jobs and vital industries.

Thank you for your work on Seattle's Comprehensive Plan. The Labor Community looks forward to being a partner throughout this important process.

Katie Garrow  
Executive Secretary-Treasurer  
MLK Labor

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**From:** Gelb, Richard <Richard.Gelb@kingcounty.gov>  
**Sent:** Monday, August 22, 2022 9:06 PM  
**To:** Staley, Brennon  
**Cc:** Healthy Environments  
**Subject:** Comments on EIS Scoping for City of Seattle Comprehensive Plan Update  
**Attachments:** Public Health Comment letter on City of Seattle Comp Plan EIS scoping 8-22-22.docx

**CAUTION: External Email**

Hi Brennon -

Public Health—Seattle & King County protects the public from threats to their health, promotes better health, and helps assure that people are provided with accessible, quality health care. Our mission and function are to identify and promote the conditions under which all people can live within healthy communities and can achieve optimum health.

The priority for health and health equity in our planning is articulated in Vision2050 Regional Collaboration Policy 3: **Make reduction of health disparities and improvement of health outcomes across the region a priority when developing and carrying out regional, countywide, and local plans.** Given this regional policy imperative and concerns of expanding inequities, health considerations should be centered in all Comprehensive Plan updates and begin with the EIS scoping process.

Toward this end, it will be important to understand how the growth alternatives will vary in the degree they result in adjacent building occupants being in a 'zone of concern' for vehicular pollution sources.

Proximity to high-volume roadways can result in negative health impacts from air pollution and noise. Exposure to ultrafine particulates are strongly correlated with increased risks of developing cardio-pulmonary, respiratory, and inflammatory diseases,<sup>[Link]</sup> higher PM2.5 and CO<sup>2</sup> are correlated with reduced cognitive function of children and workers,<sup>[Link]</sup> and noise pollution can contribute to high blood pressure, heart disease, sleep disturbances, and reduced school performance.<sup>[Link]</sup>

Vehicle pollutant concentrations for building occupants are higher closer to the roadway, with highest levels within the first 500 feet of a roadway and reaching background levels within approximately 2,000 feet.<sup>[Link]</sup> High-volume roadways are typically considered those carrying daily averages of 15k or 20k vehicles.

To ensure the EIS addresses health equity-related effects of potential growth patterns, my request is to include an assessment of the how alternatives result in varying degrees of adjacent building occupant exposure to vehicle-generated noise and air pollution. Please let me know if I can assist in setting up this analysis. Thank you for including an analysis of this important health equity consideration in the final EIS.

Richard Gelb (he/his/him)  
Environmental Health Planner  
Healthy Communities Planning and Partnership Team  
Public Health, Seattle/King County  
(206) 477-4536

August 22, 2022

TO: Brennon Staley, City of Seattle Office of Planning and Community Development, sent via email

FM: Richard Gelb, Environmental Health Planner, Healthy Community Plans and Partnership Team, Public Health—Seattle & King County

RE: Comments on EIS Scoping for City of Seattle Comprehensive Plan Update

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The priority for health and health equity is articulated in [Vision2050 Regional Collaboration Policy 3: \*\*\*Make reduction of health disparities and improvement of health outcomes across the region a priority when developing and carrying out regional, countywide, and local plans.\*\*\*](#) Given this regional policy imperative and concerns of expanding inequities, health considerations should be centered in all Comprehensive Plan updates and begin with the EIS scoping process.

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Vehicle pollutant concentrations for building occupants are higher closer to the roadway, with highest levels within the first 500 feet of a roadway and reaching background levels within approximately 2,000 feet. [\[Link\]](#) High-volume roadways are typically considered those carrying daily averages of 15k or 20k vehicles.

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:08 AM  
**To:** Staley, Brennon  
**Subject:** FW: More trees for Seattle

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**From:** Annemarie Godston <[REDACTED]>  
**Sent:** Monday, August 22, 2022 1:37 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** More trees for Seattle

CAUTION: External Email

Hi,  
I do not choose to be on another mailing list so I will explain here that I thoroughly support the greening of Seattle. Trees will help our water resources by holding onto water, rather than having it run off into drains and right into the bay and rivers. Trees will help provide shade for us in the great outdoors of the city as our climate warms. Trees will also provide places for birds, insects, and animals to find shelter and food.

Count me as YES for this proposal.

Annemarie Godston

[REDACTED]  
Seattle, WA 98101

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"Courage is knowing it might hurt and doing it anyway. Stupidity is the same. And that's why life is hard!" **Jeremy Goldberg**

If you're interested, perhaps you'd like to "check out" my book?<https://www.amazon.com/Year-My-New-England-Garden/dp/1503130320>

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:13 AM  
**To:** Staley, Brennon  
**Subject:** FW: comment submission

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**From:** Lindsey Grad <LindseyG@seiu1199nw.org>  
**Sent:** Monday, August 22, 2022 11:09 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** comment submission

**CAUTION: External Email**

Hi, I am getting a very long buffering when trying to submit comments via the portal so I thought I would email them in as well before midnight. Please let me know if there are any questions, thanks!

The following is submitted on behalf of SEIU Healthcare 1199NW:

Our union of 32,000 healthcare workers includes thousands of members who live and work in the City of Seattle. Too many of them, however, work but cannot live in the city they serve. We represent doctors, nurses, social workers, technicians, dietary and environmental services workers in clinics and hospitals across the city as well as workers in behavioral health, housing, homelessness, and human services—these workers are serving the people of Seattle at some of the most well-known and best-regarded institutions in their field. They are also good, union jobs with strong contracts that keep the healthcare industry in our region a reliable place to fight for economic security in an economy with vanishing options for securing a stable career.

And yet despite laboring for their community's health and welfare and building a strong union to provide for themselves and their families too many are facing housing insecurity. The priced-out caregivers of Seattle often times commute from cities and counties more than an hour commute away or worse—this is despite a 24/7 work schedule and on call requirements that mandate they be within 30 minutes of their hospital workplace. People who worked for decades to build economic security find that their kids cannot find housing in the same city or county they were raised in, or that they cannot downsize within their neighborhood when they have an empty nest. Homelessness and housing workers find themselves qualifying for subsidized city housing that they work during business hours to try to enroll clients into. And wage increases are outstretched by rising housing costs. All of this is caused at least in part by inadequate and inappropriate land use in our City.

The health impacts of the current land use plans are legion. Long commutes literally shorten lives either through automobile accidents or extra hours of sitting every day—to say nothing of the precious free time workers and their families lose. These commutes also increase particulate matter and carbon emissions which drive respiratory illness, heart disease, and cancers amongst impacted communities. Urban villages concentrate this pollution so that renters face a disproportionate amount of the negative impacts, as do BIPOC communities. The climate impacts of increased emissions are also a health crisis as weather-related disasters increase and diseases and pathogens grow in risk.

There is arguably no greater health crisis affecting our city today than homelessness, though. Our inadequate housing supply is a guaranteed losing game of musical chairs for those working in lower wage jobs, those without financial safety nets, and those facing additional barriers like developmental or physical disabilities, behavioral health needs, or memory care needs. There will be no way to end the human suffering on the street or the related overuse of hospital beds without having the zoned capacity, investing, and operating enough housing for these targeted populations. Our current land use plans make this impossible to address at scale, and in fact create a larger population of people experiencing and at risk of homelessness every day.

It is known that our existing land use laws are the result of racial discrimination. Until we overhaul them to produce opportunity for all we will be stuck in a scarcity model that racism ensures will disproportionately harm BIPOC individuals and families. The greatest risk of continued displacement will happen under the status quo; the second greatest risk of displacement will happen under targeted approaches that drive growth into narrow swaths of our city while hoarding wealth, privilege, and opportunity for others.

Reduced housing costs are one victory we can achieve by substantially increasing allowable units across all parts of our city. Opportunity to live near jobs, schools, parks, amenities, and people is a freedom that needs to be wide open to all and not a privilege accessed by the few. Health equity across all zip codes can only be achieved through housing equity. And all of this matters exponentially when we factor in the rights and needs for those who will be moving to our city in the years to come, whether motivated by our strong economy or the need to relocate due to the impacts of climate change.

Our existing urban villages model was meant to focus growth into walkable, mixed-use, transit friendly neighborhoods. But there is no reason why these realities should be limited to urban villages. Every Seattle resident should have a walkable neighborhood with transit access and access to shops, amenities, and services. Every neighborhood should be a welcoming place that no longer is shaped by the legacy of redlining and has grown to fit all corners without displacement pressures.

The only option that provides this is the combined option, but that should be the floor. Every neighborhood should allow triplexes and quadplexes, but substantial parts of our city should go well beyond that to include deeper density that will allow for condos, apartments, rowhouses, cottages and more. All neighborhoods should also allow for the economic activity and community support of small businesses including restaurants, bars, shops, and services. This kind of flexibility and responsiveness to community will allow true community identity to flourish from the ground up as opposed to the often-invoked 'community character' that is used today to keep new residents out and that stagnates our system, preserving it for those with the most means while harming every one else.

Today, healthcare workers who take care of us cannot live in our city. In this pandemic they are perhaps the most sympathetic group to think about needing a stable and affordable home. And we are rightfully self-interested to want to be sure healthcare workers have a place in our city. But the same thoughts apply to every single worker and individual. Everyone deserves a stable and affordable. And no city can be fully realized without having space for all corners. Seattle for everyone is a moral proposition, an economic proposition, and can be a reality with a plan that truly prioritizes us all equally. The combined plan is the only one of the listed options that comes close to this, and in reality we should demand and plan for more.

Lindsey Grad  
Legislative Director  
SEIU Healthcare 1199NW

c: [425-919-9018/lindseyg@seiu1199nw.org](mailto:lindseyg@seiu1199nw.org)

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:36 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comment on EIS Scoping

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**From:** [REDACTED] >  
**Sent:** Monday, August 22, 2022 1:08 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comment on EIS Scoping

**CAUTION: External Email**

The general topics listed for consideration in the EIS are:

1. Earth and water quality
2. Air quality and greenhouse gas emissions
3. Plants and animals
4. Energy and natural resources
5. Noise
6. Land use patterns and urban form
7. Historic Resources
8. Relationship to plans, policies, and regulations
9. Population and employment
10. Housing and displacement
11. Transportation
12. Services: Police, Fire, Parks, and Schools
13. Utilities

Trees are an essential part of our present and future. The alternatives in the EIS likely have very different effects on trees – and that has cascading effects on other quality of life issues. Please distinguish among the alternatives in their impacts on trees. Trees and their benefits fit under a number of the general topics to be covered in the EIS. Animals need trees, trees help with soil, water and air quality, older trees match our built historical resources, trees are a natural resource and store carbon, reducing CO<sub>2</sub> emissions, parks with trees provide an important service. Trees matter in relation to plans, policies, and regulation, such as those related to equity and environmental justice, tree canopy goals, water temperature standards.

As alternatives are developed, please evaluate ways to maintain existing trees and to add trees, while increasing housing density. We need trees for a livable place and have committed to 30% tree canopy.

We are heading for hotter times: Trees help keep us cooler. Evaluate how they may save energy. Evaluate projected increases in urban heat domes and heat island impacts as building density and lot coverage increases and tree canopy decreases.

Evaluate the effect of increased density without maintaining tree cover on birds, particularly migratory birds, and on other wildlife. Calculate the ecosystem services and natural capital currently provided to the city and the change that would occur under each different proposals. Calculate the potential loss or gain of habitat and biodiversity of plants and animals under the different proposals.

Evaluate ways to increase areas with street trees, where power lines are not an issue. Can they be required? Trees should not be limited to parks and traffic corridors. Evaluate how to modify building and lot guidelines so that development leaves space (and light) for trees. Evaluate larger setbacks on multi-family lots for trees that will reduce heat impacts. Evaluate the effect of larger buildings on loss of trees and resulting loss of climate resiliency. Evaluate the use of trees and plazas near transit and commercial areas. Evaluate adding trees to existing parking lots. Evaluate the need for more parks with shade trees as density increases.

Evaluate the potential for incentives – regulatory or economic – to protect trees. Look at additional building alternatives and zoning that create space for residents to have trees and open green space on building sites.

Trees improve the quality of life for people and for equity should be part of all residential communities. Address how each plan would work to increase tree equity and environmental justice across the city. Calculate potential economic, social, environmental and health impacts on racial and ethnic minority communities under the proposals.

Thank you

Elly Hale

████████████████████

Seattle WA 98125

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:07 AM  
**To:** Staley, Brennon  
**Subject:** FW: Protect Seattle's tree canopy

-----Original Message-----

From: Patricia Halsell <[REDACTED]>  
Sent: Monday, August 22, 2022 11:13 AM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Subject: Protect Seattle's tree canopy

CAUTION: External Email

Whatever we do, we MUST protect and increase Seattle's tree canopy. This is critical for our future quality of life, given the worsening effects of climate change. Lower income residents deserve both housing AND trees. We can both protect our tree canopy AND increase housing; creative designing would allow for both. I strongly believe that focusing only on increased development, without simultaneously increasing our tree canopy and protecting the older trees we already have, will defeat our goals of improving the quality of life for all our residents, regardless of income.

Sent from my iPhone

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:34 AM  
**To:** Staley, Brennon  
**Subject:** FW: Trees and climate

-----Original Message-----

From: Joanne Halverson <[REDACTED]>  
Sent: Sunday, August 21, 2022 8:31 AM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Subject: Trees and climate

CAUTION: External Email

I agree with urban density but not at the expense of cleaner air, better mental health and more climate crisis and urban heat pockets.

We must preserve green spaces and trees.

In the long run health and mental health are more important than big earnings for developers.

Our leaders need to show a value of life and future generations over profit.

Protect our trees and our lives in this plan.

Thank you

Dr. Halverson

Sent from my iPhone

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**From:** Judith Henchy <[REDACTED]>  
**Sent:** Monday, August 22, 2022 10:48 AM  
**To:** Staley, Brennon  
**Subject:** EIS Comment

**CAUTION: External Email**

Dear Brennon,

I just listened to your Comprehensive plan EIS presentation. I appreciate the dilemma that the city faces and can see the need to develop further urban hubs. As a cyclist it would be lovely to have cycling access to a wider range of amenities. However, from my single-family residence in the Thornton Creek run-off area to the West of Lake City Way, I am also aware of the environmental impact of such development. While I would appreciate more walkable and welcoming local facilities on LCW itself, I am concerned about the preservation of the hillside areas (including the re-wilding area of the Creak along 98<sup>th</sup>). As far as I can tell, this is an area that would be designated for some greater density around LCW, but I don't see any specific recognition of the environmental sensitivity of the hillside. Most importantly, I see no reference to the **critical tree canopy** in this area. We have seen from the recent heat maps of Seattle, that this mature canopy is vital in maintaining the livability of the city in these times of climate crisis. I see no recognition of this fact in your planning documents. Mitigating the devastating impacts of building density with a few shrubs and some beauty bark is not sufficient. The current tree protections are insufficient to ensure that expansion doesn't result in urban desertification. We know that quality of life is affected by both the heat and availability of green space, but destroying the overall environment of the city in the name of equity helps no one.

As a small aside, I see that one of the targets of the Lake City development plan is to alleviate the community division caused by Lake City Way cutting through the neighborhoods. Again, as a cyclist, can I suggest the very cheap solution of fixing the traffic light change triggers for bikes? The lights at the cross streets never change for bikes now, since the road markings are lost and the triggers usually don't work. You have to get off your bike and go to the pedestrian crosswalk to get the light to change.

Respectfully submitted,

Judith Henchy  
[REDACTED]

Sent from [Mail](#) for Windows

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**From:** Matt Hutchins <matt@castarchitecture.com>  
**Sent:** Sunday, August 21, 2022 10:18 PM  
**To:** Staley, Brennon  
**Subject:** comment on EIS scoping  
**Attachments:** high quality urban form.jpg

**CAUTION: External Email**

Brennon-

With the EIS, please provide images of the kind of high quality urban form and places that each alternative is planning, so we have some context for making choices. For those who won't get into the details, the images have to be evocative places, capture the essence of the urban design, and illustrate what to expect.

This is not only about building type, but also the nature of the streetscape, the integration of non-automobile mobility and a plan to expand street trees everywhere.

There are so many precedents for great cityscapes, and we should be aspiring to an urban fabric worthy of a world class city.

I've modified the original info sheet with great shopping streets, eco-districts, woonerfs, classic 6 plexes, rowhomes and some good recent design work from local architects.

Thank you for all your work and assistance with the studio this past Spring. I hope that there is inspiration there as well!

--

**Matt Hutchins, AIA CPHD**  
**Principal - CAST architecture**  
115-C North 36th Street, Seattle, WA 98103  
matt@CASTarchitecture.com  
206.256.9886 x.102  
[website](#) [instagram](#) [facebook](#)

# PROVIDE HIGHER QUALITY EXAMPLES OF URBAN FORM AND PLACES, SO WE CAN GET EXCITED ABOUT OUR GROWTH OPTIONS

**urban center**  
Regionally designated neighborhoods with diverse mix of uses, housing, and employment

**urban village**  
Areas with a wide range of housing types and transit, amenities, and jobs

**smaller nodes**  
Places with diverse housing and mixed uses to support complete neighborhoods

**corridors**  
Additional housing growth in Neighborhood Residential zones near frequent transit and amenities

**Neighborhood Residential areas**  
New flexibility for housing choices and other uses throughout Neighborhood Residential areas



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Regionally designated neighborhoods with diverse mix of uses, housing, and employment

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Areas with a wide range of housing types and transit, amenities, and jobs

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Places with diverse housing and mixed uses to support complete neighborhoods

**corridors**  
Additional housing growth in Neighborhood Residential zones near frequent transit and amenities

**Neighborhood Residential areas**  
New flexibility for housing choices and other uses throughout Neighborhood Residential areas

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**From:** Paul Inghram <PInghram@psrc.org>  
**Sent:** Sunday, August 21, 2022 11:47 AM  
**To:** Hubner, Michael; Staley, Brennon  
**Subject:** Draft Seattle Letter  
**Attachments:** Draft Comment Ltr Seattle Comp Plan Scoping.docx

**CAUTION: External Email**

Michael and Brennon,

Thank you for taking time to talk with Liz and me about the comp plan update. We appreciate all the work the city is doing to plan for housing options and to align with VISION 2050.

Please see the attached DRAFT comment letter for SEPA scoping. Let us know if this covers the areas you would expect and if you have any questions or concerns. We plan to submit the letter through the engagement site on Monday.

Thanks!

Paul Inghram

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# Puget Sound Regional Council

1011 WESTERN AVENUE, SUITE 500 ||| SEATTLE, WA 98104-1035 ||| psrc.org ||| 206-464-7090

August 22, 2022

Brennon Staley  
Office of Planning and Community Development  
P.O. Box 94788  
Seattle, WA 98124-7088

Subject: Comments on One Seattle Plan Environmental Impact Statement Scoping

Dear Mr. Staley,

Thank you for the opportunity to comment on scoping for environmental review for Seattle's 2024 comprehensive plan update. The Puget Sound Regional Council (PSRC) appreciates the work the city has done to engage residents, businesses, public agencies, and other interested parties in planning for the city's future. The comprehensive plan is critical in mapping out the city's future, and PSRC has a role in ensuring consistency with regional and state policy in this work.

Adopting a plan consistent with and that advances VISION 2050 policies will aid certification of the updated Seattle plan, which in turn qualifies the city for regionally allocated federal transportation funds. VISION 2050 emphasizes the important role that Seattle plays in accommodating growth and serving as a civic, cultural, and economic center for the region.

Seattle has seen significant growth since the 2015 plan update and is undertaking a robust comprehensive plan update to prepare for the future. In 2021, the King County Growth Management Planning Council adopted 2019-2044 targets for Seattle of 112,000 housing units and 169,500 jobs. It is reasonable for the analysis to consider different distributions of growth and understand the implications if actual future growth will continue to exceed forecasts.

VISION 2050 includes a policy and action for Metropolitan Cities to expand middle density housing capacity in the face of rapid employment growth and displacement (MPP-RGS-7, RGS-Action-8). PSRC's Regional Housing Strategy encourages local actions to increase housing choices in single family zones, provide greater opportunities for middle housing, and to provide transit-supportive housing options near transit stations. The evaluation of the plan alternatives should assess how well they support and implement these policies and strategies.

VISION 2050 and PSRC's plan certification program emphasize substantial consistency between the comprehensive plan and adopted countywide growth targets. PSRC recognizes that land use capacity for housing and jobs should exceed the 20-year growth targets to ensure the appropriate location, types, and timing for actual development. In reviewing capacity and distribution for growth, the city should consider the new requirements of HB 1220 and whether the city has sufficient capacity at each income band to accommodate future growth, while recognizing the importance of county and regional coordination. If the city anticipates overall growth that is significantly more than the adopted target it should seek to adjust the target through the Growth Management Planning Council.

Additionally, PSRC will look for consistency between the comprehensive plan and Seattle Transportation Plan. Based on discussions with city staff, some components of the 20-year Seattle Transportation Plan will inform the Transportation element and appendix of the comprehensive plan. Certification will require demonstrating consistency in the analysis and development of both long-range plans.

Thank you for providing this opportunity to comment on SEPA scoping for the comprehensive plan, and we look forward to continuing to be involved with this important work. Please don't hesitate to reach out if we can provide any support or provide any additional information about VISION 2050 and comprehensive plan certification.



Paul Inghram, FAICP  
Director of Growth Management Planning

DRAFT

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:13 AM  
**To:** Staley, Brennon  
**Subject:** FW: crucial importance of protection and addition to Seattle's =life saving tree canopy

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**From:** Livia Jackson <[REDACTED]>  
**Sent:** Monday, August 22, 2022 9:04 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** crucial importance of protection and addition to Seattle's =life saving tree canopy

**CAUTION: External Email**

Greetings,

With climate change coming to us at a ferocious speed it would be madness not to protect and expand the presence of as many trees as possible here- for cooling, carbon capture, protection from heat waves, wind storms and drought, absorption of pollution, habitat for wildlife, birds... and 1000 other ways...

I completely agree with the points that I've studied here-by friends of the forest. Please heed their fantastic suggestions to evaluate and calculate the incredibly important decisions that will affect our health and wellbeing for Seattle's viable future. Thank you, Livia Jackson

- Evaluate in all options the impacts on trees and urban forest canopy cover in the ability of Seattle to reach 30% tree canopy in Comprehensive Plan while also increasing density to meet housing needs. We need both more housing and trees to keep Seattle livable.
- Evaluate the changing ratios of park and open space acres per 1000 residents as population and housing increases under the different proposals
- Evaluate tree canopy impacts on neighborhoods near freeways and other major transit corridors, including SeaTac Airport and Port of Seattle that exist and how each proposal would address pollution and urban forests
- Evaluate projected increase in urban heat domes and heat island impacts as building density and lot coverage increases and tree canopy decreases
- Evaluate options to add trees to existing parking lots and other built areas
- Evaluate loss of climate resiliency as trees are removed for denser building across the city
- Evaluate possible new building guidelines and lot coverage that could increase retaining more trees during development.
- Evaluate requiring setbacks on multifamily lots to require more trees and shrubs along sidewalks and roads to reduce heat impacts.
- Calculate the ability to create more parks, including pocket parks in each scenario to provide more greenspace, tree covered areas and playgrounds for residents and families
- Calculate the ecosystem services and natural capital currently provided to the city and the change that would occur under each different proposals
- Calculate the potential loss or gain of habitat and biodiversity of plants and animals under the different proposals

- Calculate potential economic, social, environmental and health impacts on BIPOC and other racial and ethnic minority communities under the proposals
- Look at ways to increase street trees under the different proposals, including making street trees mandatory on all proposals in all zones and planting large trees where there is no overhead power lines.
- Look at additional building alternatives and zoning that create space for residents to have trees and open green space on building sites.
- Consider eliminating residential small lots and allowing multiplexes on the existing lots if they set aside a portion of the lot for a designated tree protection area. This could increase protection for larger form trees like exceptional trees or a tree grove.
- Address how each plan would work to increase tree equity and environmental justice across the city

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:34 AM  
**To:** Staley, Brennon  
**Subject:** FW: Seattle Comprehensive Plan

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**From:** Michelle Jacobsen <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 11:40 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Seattle Comprehensive Plan

**CAUTION: External Email**

To Whom this may concern,

As you update the Comprehensive Plan, it is critical that you study the coming effects of climate disruption. I am in favor of denser sustainable green affordable housing. That stated, please also create more green spaces and plant more trees. Seattle just broke the record for most days above 90 degrees in a year. If not for the shade of trees, it would have been almost unbearable. I just read about cities that are currently planting lots of trees on school properties to provide students and neighbors a refuge from the heat. There are numerous other creative solutions on providing more tree canopy in denser areas. Wealthy neighborhoods should not be the only ones that provide refuge from the heat.

Respectively yours,  
Michelle Jacobsen  
98112

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:11 AM  
**To:** Staley, Brennon  
**Subject:** FW: We need to save our trees!!

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**From:** Gayle Janzen <[REDACTED]>  
**Sent:** Monday, August 22, 2022 4:13 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** We need to save our trees!!

**CAUTION: External Email**

Hello - here are my comments regarding the five alternatives for Seattle's future growth:

The only alternative I support is Alternative 1 and I barely support that as that is what is currently going on in the city. I see huge apt. buildings everywhere and the building never ends. There is lots of talk about increasing our tree canopy, yet the developers continue to cut down our mature trees that are one of the the best tools we have to combat climate chaos that is getting worse and worse. Nowhere in the list of alternatives is anything about saving trees. I'm sure you are aware that mature trees absorb CO2, help keep the city cool, are homes to wildlife and their presence just makes the city more livable.

It IS possible to build more housing AND save the trees. Here is an example of a building in N. Seattle:

Tall buildings and complexes can co-exist with established trees. For a visual example please view three photos of Cedarvale House ([Summary of References #10](#)) <https://www.seattlehousing.org/properties/cedarvale-house> that is a low income public housing complex located in Seattle at 11050 8th AVE NE Seattle, WA 98125 . At the very least the established trees have been allowed to stay and protect the southern exposure of this building. They were not destroyed. They continue to provide shade, sequester carbon dioxide, and provide an esthetic benefit to residents in the area.

To reiterate, designing around established trees, given our climate emergency, must take priority with development now whenever feasible. We all must confront this serious issue head on, which includes saving established trees in a given area. Simply replanting

with a few young trees requires a growth period of around 20-30 years for the trees to be established enough to have any benefit and that is much too late on the climate emergency trajectory ahead. They will never equal the level of carbon sequestering that established trees can do so well right now.

Seattle is already a developers' dream come true and all the alternatives continue to feed their coffers with little thought to saving our trees. We cannot keep doing business as usual during this time of climate chaos. I urge you to start thinking outside the box when thinking about future development. Many of us love our gardens and trees and worry that we will be surrounded by bigger dwellings with few if any trees. And how many of all the buildings that are proposed will be low income? All we hear about is that too many people can't afford their rent or are unable to buy homes, yet with all the construction going on, why is that still an issue?

It's time to concentrate on building low income housing AND save the trees instead of constantly building housing that is already expensive with the rents continually going up. I hope you can come up with some alternatives that actually solve the problem instead of just more of the same that only create more problems.

Gayle Janzen  
N. Seattle

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**From:** Larry Johnson <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 11:00 AM  
**To:** Staley, Brennon  
**Cc:** Pedersen, Alex; Harrell, Bruce; LEG\_CouncilMembers  
**Subject:** RE: Scoping comments on One Seattle Plan

CAUTION: External Email

To: City of Seattle Office of Planning and Community Development

Attn: Brennon Staley

Dear Mr. Staley,

On behalf of the Friends of Ravenna Cowen, we submit the following scoping comments regarding the One Seattle Plan. The Friends of Ravenna Cowen (FORC) is a not-for-profit community organization whose mission is: “To preserve and protect the history and natural environment of the Ravenna-Cowen neighborhood as a shared community resource for all, and to support other neighborhoods and not-for-profit organizations in their efforts to preserve and protect their heritage as a shared resource.” Our comments largely focus on the Ravenna-Cowen North National Historic District (RCN National Historic District), but apply to other historic districts as well. Also, our comments largely pertain to historic resources and tree protection.

We emphasize that our scoping comments are focused on the analyses and alternatives that should be sufficiently and comprehensively analyzed in the EIS for the One Seattle Plan, as is the intent of SMC 25.05.408, and not just comments on the proposed draft conceptual alternatives that were included in the City’s scoping documentation; thus, many of our comments are overarching ones.

**Historic Resources.** Historic resources too often get the short shrift, falling between the broad reviews done as part of environmental analyses for non-project actions, such as comprehensive plans, and project-level reviews for specific developments. What is missing is the fact that for historic districts, while one property might seem insignificant, loss of historical elements erodes the entire district until it no longer has sufficient integrity to survive as a historic district nor provide meaningful historic interpretation. The whole district may be greater than the sum of its parts, but when too many parts are missing, the whole is no longer viable. Cumulative effects on historic resources are critical and must be taken into consideration. This is a major concern and potential threat to the RCN National Historic District, which includes a remarkably intact architectural body of Early 20<sup>th</sup> to Mid-Century homes. A related concern is that if project review is geared to “efficiency” with focus on density, analyses of historic elements can often be overshadowed.

It is essential to recognize in comprehensive planning actions that adverse impacts on historic resources and historic districts are for the most part *irretrievable* losses. The One Seattle Plan needs to address how adverse impacts on both historic districts and historic resources will be meaningfully avoided, minimized, and/or mitigated. This will require that the EIS focus in more detail on historic districts and historic resources at the policy and planning levels, as well as the project level, and also address cumulative impacts meaningfully.

**Historic Districts and Alternatives.** We request that the EIS include exemption of upzones in all historic districts as a sub-alternative for each action alternative. For those historic districts that are largely residential, such as the RCN National Historic District, the overall reduction in density would be quite low, and the “single-family” zoned properties in

these districts can already include up to three units given current zoning. The EIS preferred alternative(s) should also be compared with a “historic district mitigation alternative” that shows the same alternative except without upzoning historic districts, which should include both City and National Historic Districts. Also, mitigation measures that could allow historic districts and historic properties to survive and coexist successfully with newer developments should be detailed carefully in the EIS so they can become policies that are part of the One Seattle Plan; these might include improved incentives and flexibility for preservation efforts, more rigorous review of potential effects on historic structures and properties in all neighborhoods; better recognition of the wide diversity of historic and cultural elements that are important to neighborhoods and support for protecting these, consideration for historic districts for contributing to both educational and recreational aspects of our city, increased opportunities for interpretation of historic districts and properties, and so on. Historic districts and historic properties tell the stories of our City, and will continue to do so as long as they can survive.

**Tree Canopy—Plants and Animals.** Seattle’s tree canopy has been shrinking due to both redevelopment and climate issues. This is a serious negative trend for our city that hurts livability for Seattle’s populations. Too many trees have been lost in the name of increasing density, and with each step toward that goal, more trees are threatened. Tree protection must be meaningfully included as an important mitigation element in the EIS for the One Seattle Plan. Also, the EIS needs to address trees, area of vegetation cover, and urban birds & wildlife as an issue under Plants & Animals.

Furthermore, it is important to acknowledge that Seattle’s lower-density older areas provide a very significant amount of tree canopy. Also, historic districts and historic properties, by nature of their age and configurations, also include and nurture many exceptional trees. Historic districts, like the RCN National Historic District, tell not only the story of the historic built environment but also of our landscape heritage. Thus, this should also be addressed as a historic resource.

**Housing and Public Benefit.** One of the interesting qualities of the RCN National Historic District is that it conveys the history of residential development during a time of growth in Seattle, and the resulting neighborhood was a mix of “blue-collar” workers and some professionals; a young doctor or professor may have lived next to a boilermaker, a baker, a carpenter, a railroad worker, etc., all without any mansions—we uncovered so many fascinating histories of the RCN National Historic District’s residents over the decades. FORC wants healthy and equitable diversity to be key in our City’s future. Based on a recent house-to-house survey, we note that despite the increase in home values over the years, the RCN National Historic District continues to have affordable rental homes where groups of unrelated adults live, ADUs and DADUs at affordable rental rates, as well as homes divided interiorly into affordable apartments. The RCN National Historic District also includes a significant number of multi-generation homes.

While urban density cannot be accomplished without some adverse impacts, we request that the One Seattle Plan require that low- and work-force housing be included in **every** neighborhood. It is not enough to have developers or others contribute to MHA. Unavoidable impacts to neighborhoods to allow increased density must be offset by public benefit in the form of affordable housing in all neighborhoods as part of every action alternative.

Thank you for your consideration.

Friends of Ravenna Cowen (FORC)

Larry E. Johnson, President

Lori Cohen, Vice President and Secretary

Judith Bendich, Treasurer

John Stewart, Board Member

Francesca Renouard, Board Member

Lani Johnson, Board Member

Larry E. Johnson, AIA

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** Susan Jones <Susan@atelierjones.com>  
**Sent:** Saturday, August 20, 2022 11:18 PM  
**To:** Staley, Brennon  
**Cc:** Alice Lockhart; Ingrid Elliott  
**Subject:** RE: Comp Plan input by Aug 22  
**Attachments:** 2022\_8\_20\_Seattle Comp Plan EIS Comments .pdf

**CAUTION: External Email**

Hello Brennon,

I am attaching this letter in support of revising the Seattle Comp Plan to include additional heights for our Land Use Zoning codes, if construction includes the lower-carbon Mass Timber construction.

As founding architect of the local, woman-owned and woman-led firm atelierjones, I worked for six years, between 2016-2022 to help pass these Tall Wood Building codes at a national and state level, including overseeing critical fire testing in 2017-2021 and supporting life-cycle analysis work in 2018-2021 to better understand and provide critical data points to help understand its fire/life-safety and lower-carbon performance better. These Tall Wood codes were passed with strong margins throughout the national Code Community in 2019 and 2022.

Currently, my firm, atelierjones is building an 8-story, middle-income housing building for Community Roots Housing up on Capitol Hill on 14<sup>th</sup> and Union. We are setting the pre-fabricated mass timber elements on site this month. I invite you and your office to take a look at this first use of the Type IV-C code in the country. The building superstructure represents an approximately 43% lower carbon footprint than a typical concrete and steel building at 8-stories. And, it is providing 126 units of workforce housing in its 67,000 SF of construction for Seattle, set within a biophilic, residential unit.

Thank you for your urgent help in moving our city, and our AEC industry towards lower-carbon solutions, and, to provide critical housing for our city.

Sincerely,  
Susan

**SUSAN H. JONES, FAIA**                      **atelierjones llc**

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[susan@atelierjones.com](mailto:susan@atelierjones.com)    [www.atelierjones.com](http://www.atelierjones.com)

**Affiliate Associate Professor | CBE | Architecture**

**UNIVERSITY OF WASHINGTON | SEATTLE**

**atelierjones llc**

August 20, 2022

Brennon Staley  
Office of Planning and Community Development  
P.O. Box 94788  
Seattle, WA 98124-7088

Re: [Seattle Comp Plan Input 2022 | EIS Scoping Period 2022](#)

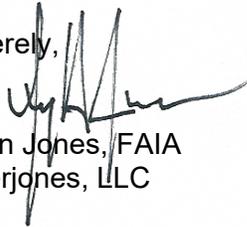
Dear Brennon,

The International Code Council (ICC) recently passed 2018 and 2021 International Building Code changes to allow Tall Wood Buildings up to 270' feet, or 18 stories for both Business (B) and Residential (R) Occupancies. After a lengthy, highly engaged 2.5 year process, the ICC Ad Hoc Committee on Tall Wood Buildings – of which I was a member –recommended the expanded use of mass timber for Tall Wood Buildings under new Type IV-A, B and C construction types. This was a monumental step forward for lower-carbon construction throughout our US cities, wherever an 85'/180'/270' building can be supported given existing Land Use Codes. Now, Tall Wood Building codes are now available for adoption throughout the US, by any Authorities Having Jurisdictions (AHJ), assuming they have adopted the ICC codes. This letter is to urge Office of Planning and Community Development (OPCD) to adopt Comp Plan measures that allow for higher zoning heights, to be able to construct these lower-carbon buildings, and supply critical housing for our city.

Rigorous life-cycle analysis testing shows that Tall Wood Buildings have a carbon footprint that is lower by 26-73% than conventional concrete or steel construction. This is a major impact on our Building Industry's embodied carbon footprint, which currently contributes up to 11-15% of our global carbon emissions. Additionally, rigorous testing has demonstrated that mass timber has similar fire-resistance characteristics to non-combustible construction materials. Critical fire tests have been performed with some of the finest Fire Protection Engineers in the world regarding Mass Timber performance. I was very closely involved with both of them, advising as an architect and mass timber specialist. The first set of five tests were completed at the Bureau of Alcohol, Firearms and Tobacco in June 2017; the second set of tests were completed in October 2020, at the Research Institute of Sweden. Full fire test reports are available upon request.

I hope this background information provides strong data about the lower-carbon footprint of large, at-scale buildings, that can also meet the critical need for our cost-effective, affordable and workforce housing in Seattle. Please adopt these measures.

Sincerely,



Susan Jones, FAIA  
atelierjones, LLC

911 Pine Street  
Floor Two  
Seattle, WA 98101  
[www.atelierjones.com](http://www.atelierjones.com)  
206.624.9966 office  
206.624.9957 fax

---

**From:** Abigail Juaner <abigail@pugetsoundsage.org>  
**Sent:** Monday, August 22, 2022 4:54 PM  
**To:** PCD\_OneSeattleCompPlan; Hubner, Michael; Staley, Brennon; Quirindongo, Rico  
**Cc:** Fernando Mejia Ledesma  
**Subject:** Puget Sound Sage - One Seattle Plan EIS Scoping Letter August 2022  
**Attachments:** Puget Sound Sage - One Seattle Plan EIS Scoping Letter August 2022.pdf

**CAUTION: External Email**

Dear Mr. Staley, Hubner, and Quirindongo:

Please see attached Puget Sound Sage’s letter regarding the One Seattle Plan EIS analysis. We join many other organizations calling for a more racially and economically just future for Seattle. Our contribution is to call for non-market driven development outcomes at a significant scale, e.g., that up to 1/3 of land in high displacement risk areas be owned and stewarded by non-profit or public entities. To assess this potential, we suggest the following actions:

1. City planners should model potential outcomes for location of low-income households, BIPOC communities, immigrants and refugees, queer people, and disabled persons (all of whom currently face barriers in the real estate market and are at risk of displacement) for each of the alternatives.
2. In all analyses of the alternatives, the City should assess what large-scale, community-led development and land ownership would mean for racial equity and environmental benefits.
3. The City should assess the impact of preserving all older multi-family residential buildings and the contribution that would make to climate resilience, affordability, and racial equity.

Puget Sound Sage charts a path to a living economy in the South Salish Sea and Duwamish River Valley regions by developing community power to influence, lead, and govern. We advocate for policy that makes racial and social equity a top goal for decision makers at all levels of government. We believe communities of color can prosper in place by directing market forces and public investment, with their own vision for growth at the center of local planning. For the past 15 years, Sage has been fighting for deep investment in affordable housing, anti-displacement of BIPOC communities, and climate justice in King County.

### **A Vision for Community Stewardship of Land**

Puget Sound Sage, along with dozens of BIPOC-led community organizations across the city and county, have developed a long-term vision for our communities to thrive in place, which we call “Community Stewardship of Land.” CSL centers people historically excluded from land power and rejects commodification of land, housing, and neighborhoods as the driver of land use policy.

Within a CSL framework, Black, Indigenous, and People of Color permanently own or control land for long-term, collective self-determination - primarily through land trusts, cooperatives, and other non-profit models. We also steward land holistically to meet all our housing, jobs, small business, cultural, service, food security, health, and recreational needs. We believe CSL is the only antidote to unending cycles of displacement for BIPOC communities. Only with our homes and neighborhoods protected from real estate speculation can we withstand the global forces that have dispossessed BIPOC communities of their places for hundreds of years. The more land we take off the real estate market and into collective ownership, the more stable our communities will be, now and far into the future. Furthermore, community and public ownership of land has been proven to be the most critical ingredient to broad housing affordability and community stability in cities around the world that have remained inclusive of households of all incomes. (For more details, please check out our [website](#).)

Sincerely,  
Ab Juaner and Fernando Mejia Ledesma

**Ab Juaner** | Equitable Development Program Manager  
pronouns: they/them



[Website](#) | [Facebook](#) | [Twitter](#)

414 Maynard Ave S.  
Seattle, WA 98104

#### **OUR LATEST WORK**

[\*The Power of Community Stewardship of Land\*](#)

[\*Disaster Gentrification in King County and How to Stop it From Happening Again\*](#)

[\*Powering the Transition\*](#)



**Puget Sound Sage**  
414 Maynard Ave S  
Seattle, WA 98104

(206) 568-5000  
pugetsoundsage.org

August 22, 2022

Brennon Staley, Strategic Advisor  
Michael Hubner, Long Range Planning Manager  
Rico Quirindongo, Acting Director  
Office of Planning and Community Development  
Seattle, Washington 98124

*Via email transmission to: [Brennon.Staley@seattle.gov](mailto:Brennon.Staley@seattle.gov), [Michael.Hubner@seattle.gov](mailto:Michael.Hubner@seattle.gov),  
[Rico.Quirindongo@seattle.gov](mailto:Rico.Quirindongo@seattle.gov), & [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)*

### **Re: One Seattle Plan Environmental Impact Statement Scope**

Dear Mr. Staley, Hubner, and Quirindongo:

Puget Sound Sage recommends the following strategies for EIS analysis of One Seattle Comprehensive Plan Alternatives:

1. City planners should model potential outcomes for location of low-income households, BIPOC communities, immigrants and refugees, queer people, and disabled persons (all of whom currently face barriers in the real estate market and are at risk of displacement) for each of the alternatives.
2. In all analyses of the alternatives, the City should assess what large-scale, community-led development and land ownership would mean for racial equity and environmental benefits.
3. The City should assess the impact of preserving all older multi-family residential buildings and the contribution that would make to climate resilience, affordability, and racial equity.

### **Puget Sound Sage**

Puget Sound Sage charts a path to a living economy in the South Salish Sea and Duwamish River Valley regions by developing community power to influence, lead, and govern. We advocate for policy that makes racial and social equity a top goal for decision makers at all levels of government. We believe communities of color can prosper in place by directing market forces and public investment, with their own vision for growth at the center of local planning. For the past 15 years, Sage has been fighting for deep investment in affordable housing, anti-displacement of BIPOC communities, and climate justice in King County.

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Puget Sound Sage, along with dozens of BIPOC-led community organizations across the city and county, have developed a long-term vision for our communities to thrive in place, which we call "Community Stewardship of Land." CSL centers people historically excluded from land power and rejects commodification of land, housing, and neighborhoods as the driver of land use policy.

Within a CSL framework, Black, Indigenous, and People of Color permanently own or control land for long-term, collective self-determination - primarily through land trusts, cooperatives, and other non-profit models. We also steward land holistically to meet all our housing, jobs, small business, cultural, service, food security, health, and recreational needs.

We believe CSL is the only antidote to unending cycles of displacement for BIPOC communities. Only with our homes and neighborhoods protected from real estate speculation can we withstand the global forces that have dispossessed BIPOC communities of their places for hundreds of years. The more land we take off the real estate market and into collective ownership, the more stable our communities will be, now and far into the future. (For more details, please check out our [website](#).)

Furthermore, community and public ownership of land has been proven to be the most critical ingredient to broad housing affordability and community stability in cities around the world that have remained inclusive of households of all incomes.

### What would a CSL future in Seattle look like?

Imagine Seattle in 2050 with an abundance of housing for all people and communities, quick access to culturally relevant services, thriving small businesses, high mobility, food and energy security at a local level, and stable neighborhoods for people who need it the most. Human scale, multi-use buildings dominate the urban landscape combined with swaths of publicly accessible open space.

Further imagine that one third of the land in low-income, BIPOC-majority neighborhoods, such as Southeast Seattle, Lake City, Delridge Way, the CID and the Central District, has been permanently removed from speculation and stewarded democratically by tenants, community non-profits, and the public. Private home ownership and real estate investment still create opportunities for entrepreneurship, but our neighborhoods are protected from wholesale displacement.

To help grasp that vision, we imagine a proliferation of community-driven projects built in Seattle or underway, such as:

- El Centro de la Raza’s **Plaza Roberto Maestas**
- Africatown Community Land Trust’s **Liberty Bank Building** and **Africatown Plaza**
- Chief Seattle Club’s **ʔáɫʔal** (Home) building in Pioneer Square
- Interlm’s **Uncle Bob’s Place** in the CID
- Rainier Beach Action Coalition’s **Food Innovation District**
- Na’ah Illahee’s **Native Neighborhood Project**
- Multicultural Community Center’s **Cultural Innovation Center**
- Lake City Collective’s **Little Brook Project**
- Little Saigon’s **Landmark Project**
- Cham Refugee Community’s new **sharia compliant Community Center**
- House Our Neighbors’ **Social Housing Developer projects** (when adopted by ballot initiative)
- And many more! [See the City’s Equitable Development Initiative project list](#).

These projects – envisioned and developed by BIPOC communities – represent high density development, permanently removed from speculation, and open to everyone (e.g., not gated). They are long-term infrastructure that benefits the whole city. Consider Pike Place Market, the most well-known example of CSL right under our noses, it modestly sized public facility generates more economic activity for the City than any other attraction.

### **Can the Comprehensive Plan Bring About CSL?**

The State does not give Seattle and its peer cities great authority to make a Comprehensive Plan real. It certainly does not lead to large-scale progressive revenues needed to reshape the urban landscape. But the State does give cities authority to create meaningful regulations, like zoning, labor standards, and environmental protection, for the health and welfare of its residents.

With the power the City has, we believe that the Comprehensive Plan can and should help even the playing field between community-driven or public development and land speculation. One major barrier, of course, is raising an enormous amount of capital to buy up and steward 30% of the land in majority-BIPOC communities. But community-based and non-profit housing developers also cannot compete for land with global financial capital, which is owning a larger share of urban land and buildings.

We recommend, then, that One Seattle center BIPOC communities and public or non-profit developers as the preferred entities to control and develop land for a healthy city, especially in areas at high risk of development. The plan should set out as a goal to proliferate the kinds of community-driven projects discussed above. The plan should prioritize land use policy that will achieve that end. Whether land is in non-profit or quasi-public ownership is an easy enough metric to measure.

### **What's At Stake with EIS Scoping?**

The largest question on the table with One Seattle alternatives 1-5 is whether to lift single family zoning or not. Other things matter too, but reimagining single-family neighborhoods unveils deep-seated property and homeownership interests like nothing else. Public debate so far in Seattle shows a willingness by many to upzone, driven in part by a desire to undo racial segregation, but the Comprehensive Plan must dive deeper into racial equity outcomes to find a more comprehensive solution.

The case has been well made by many others to get rid of single-family zoning, such as: 1) we need more land to accommodate the people who are already here or will move here in the next 25 years; 2) we must increase density to take advantage of Seattle's transit rich urban corridors and nodes to fight climate change; and 3) single family zoning was a tool of systemic racism, resulting in segregation and multi-generational loss of wealth for BIPOC people, and must be rejected.

But will lifting single family zoning really accomplish these things? To address number one, we need to upzone significantly. Looking at the experience of Minneapolis, it is unclear that single family property owners will rush to sell or convert their homes for triplexes and townhomes, even in a hot real estate market. To take advantage of Seattle's rich transit service (relative to the suburbs), we need all the new people moving with high incomes to give up their cars – but it is unclear that is happening either. And finally, to repair the harm done to BIPOC communities over the last 100 years, it is unclear that a wave of new construction in single family zone areas will increase affordability or accrue benefits to BIPOC households.

Below are three scenarios that could emerge from proposed alternatives from One Seattle EIS scoping, and subsequent land use regulation such as zoning. We explore the potential impacts to low-income BIPOC communities and displacement outcomes.

1. *Alternative 3 (Broad): Allows a wider range of low-scale housing options, like triplexes and fourplexes, in all Neighborhood Residential zones*

Assuming Alternative 3 does not allow low-rise apartment buildings in areas zoned NR, this alternative would allow tear down and replacement of single-family homes with up to fourplexes across the city. The intent is to allow homeowners and developers to profit from tearing down a home and building several more, or at least adding more units to a property. Recent experience from Minneapolis shows that such a change by itself could be glacially slow – so far, only dozens of new homes have resulted from the new policy. For BIPOC households below 80% AMI, this creates more units on such a slow timeline that current displacement trends will not likely abate. Furthermore, the City and the State have few programs that subsidize small multi-family development (the vast majority goes to larger multi-family apartment buildings), resulting in near zero affordability relative to area median income. Surely some BIPOC households would benefit, especially multi-generational ones, but overall, the racial equity benefits are narrow.

2. *Alternative 4 (Corridor): Allows a wider range of low-scale housing options only in corridors near frequent transit and amenities*

Frankly, this feels like a little more of what we have right now, but with more, wider corridors. Most homeowners in NR zoned areas will not see notable change. Low-income BIPOC households will continue to be displaced by better-off households as older buildings are torn down, rents go up from new construction, and there is not considerable relief from the overall inadequate supply of housing.

However, one way to make this scenario significantly better is to imagine that all the existing, older apartment buildings along the corridors are purchased and preserved as permanently affordable buildings. While an expensive proposition, this could be achieved through a combination of Seattle Housing Authority, non-profit developers, land trusts, community-based groups, and the new Social Housing Developer (when approved by ballot initiative). Preservation of older, more affordable buildings is the single quickest, most effective way to stop displacement and stem loss of affordable units in the market to redevelopment and repositioning. Compared to a solution like MHA, it does not take years for the units to come online.

This would keep households more likely to use public transportation near transit corridors. It would disproportionately benefit communities at risk of development and ensures people who are not afraid of density live next to property that should be redeveloped. While we are not recommending Alternative 3 in any way, we are highlighting that additional elements to an alternative can be assessed for racial equity outcomes.

3. *Alternative 5 (Combined): Results in more areas identified as appropriate for more housing and mixed uses*

Assuming Alternative 5 allows six-plexes and low-rise apartments everywhere in the city, this is the most likely scenario under which significant swaths of single-family homes are replaced with denser housing. As with Alternative 3, the intent is to allow homeowners and developers to profit from either more units to a property or tearing down a home and building new. As a result, supporters hope for tens of thousands of new housing units, increasing the overall supply so we are not depending on urban villages. With more supply, the theory goes, home prices and rents will fall as moderate-income housing seekers will not be taking up units that could otherwise go to lower-income households. However, we must ask - who will benefit the most from this kind of transformation?

First, most single-family homeowners are white, and when they sell their property, their family will benefit and build on their generational wealth. Fewer BIPOC households will benefit simply because fewer own their homes. If land values go up after the upzone (as higher density increases economic return), these property sellers will also receive a windfall above and beyond the already high values we have now.

Second, we already know that in urban hubs and villages, new multi-family development is out of reach to households at 80% AMI and below. New apartment buildings and condominiums sprouting up in NR zones will likely not be deeply affordable either – it is the nature of new construction costs and expected real estate returns to investment.

For home ownership, let us assume six-plexes, townhomes, or row houses become desirable. If an original home on a 9,000-acre lot is valued at \$1 million (well out of reach for the median income earner) would the replacement units be significantly cheaper? Maybe not – again, because of new construction costs and required rates of return, six new townhomes may go for \$750,000 each, still out of reach for 80% AMI households and below. And the new people buying those homes will look like the people buying now – mostly white and doing well.

So, at best, benefits to low-income BIPOC families will be indirect from an overall increase in supply. Public revenues generated from MHA (assuming MHA applies to the newly zoned areas) may help create subsidized housing, but at a maximum rate of about 1 in 10 units (more likely 1 in 20 units). This is not enough to stem displacement and new affordable units will lag behind market projects by 4-5 years.

We highlight these scenarios to make a critical point – relaxing single-family zoning is not a magic bullet and, by itself, may exacerbate existing racial inequity and disparity. We acknowledge and agree that racialized zoning got us into this mess, and that single-family zoning continues to be a problem. But getting rid of it, alone, does not undo the damage.

- In no way does it restore the loss of multi-generational wealth to BIPOC communities specifically name in racial covenants.
- In no way does it guarantee a right to return to all the families and households pushed out over the last 30 years.
- In no way does it guarantee future BIPOC households the opportunity to move into these newly re-zoned areas.
- Finally, unless done with explicit centering of their needs, it may not even give BIPOC communities a shot at creating generational community and family wealth in the future.

With these observations in mind, we offer the recommendations for constructing the EIS alternative models and how to compare them.

### **Recommendations for Alternatives and Metrics**

We join many other organizations calling for a more racially and economically just future for Seattle. Our contribution is to call for non-market driven development outcomes at a significant scale, e.g., that up to 1/3 of land in high displacement risk areas be owned and stewarded by non-profit or public entities. To assess this potential, we suggest the following actions:

1. City planners should model potential outcomes for location of low-income households, BIPOC communities, immigrants and refugees, queer people, and disabled persons (all of whom currently face barriers in the real estate market and are at risk of displacement) for each of the alternatives. It is not enough to project that more housing supply will automatically increase equity. The City must estimate who will live where after the changes to zoning, who will economically reap the rewards, and who is most likely to be displaced. We urge the City to find sophisticated consultants and analysts who know how to develop models that drill down to race, ethnicity, gender, and ability. This data will be critical to make an informed choice.
2. In all analyses of the alternatives, the City should assess what large-scale, community-led development and land ownership would mean for racial equity and environmental benefits. There is evidence that higher density options will create more available land for development and that could include community stewardship of land. But what happens when we assume stable, low-income BIPOC neighborhoods in both high-risk and low-risk displacement areas, based on widespread community stewardship of land? In many ways the City's own pre-EIS analyses call for projecting actual people and demographics into the land use and housing maps. It also helps reveal the environmental benefits of economic and racial diversity. How would community stewardship of land help public transit use? How does it impact open space, resiliency, and sustainability? Etc. (We note here that our proposed modelling aligns with House Our Neighbors' and Real Change's proposal for a Social Housing Alternative.)
3. The City should assess the impact of preserving all older multi-family buildings and the contribution that would make to climate resilience, affordability, and racial equity. The assessment should apply across all alternatives the City chooses to study. As noted above, preserving older buildings is the most effective strategy to stabilize communities in the face of gentrification and redevelopment, both residential and commercial. Again, this kind of analysis reduces the wishful thinking that increasing building envelopes creates opportunity for all – instead, it allows us to imagine what equity would look like and provide opportunity for real comparison.

Sincerely,

Fernando Mejia Ledesma, Co-Executive Director of Programs  
Ab Vergara Juaner, Equitable Development Program Manager

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**From:** William Justen <williamj@justencompany.com>  
**Sent:** Monday, August 22, 2022 11:54 AM  
**To:** Staley, Brennon  
**Subject:** One Seattle Plan-comments

**CAUTION: External Email**

Hello Mr. Staley,

After reviewing the EIS five Alternatives, I'm submitting the following comments to be considered in the EIS scoping.

In order to plan and accommodate the projected growth in Seattle Alternative 5 which combines the Alternatives 2, 3, and 4 is obviously the planning direction that is needed for Seattle's future.

However, alternative 4 allowing a wider range of low scale housing options in corridors near frequent transit and amenities should be enhanced by allowing larger scale housing on certain corridors near transit and amenities.

A great example would be along the six block corridor of E. Olive Way between E. Howell St. and Broadway. This corridor is in the Station Overlay District within the First Hill/Capitol Hill Urban Center.

This corridor spans between the downtown core and the Capitol Hill Light Rail Station, but properties in this corridor are very underdeveloped as more than half of the properties consist of tired old one-story buildings with uses consisting of: drycleaners, small markets, marginal shops, many bars/lounges and parking lots. The zoning along E. Olive Way is NC3P-75 (M), which has not attracted much new residential development. If the zoning on this corridor was changed to allow four additional stories with an allowable height of 115' and with an FAR of 9 for residential development, that would incentivize more development in this corridor making steel, concrete and mass timber construction feasible. With a 115 foot allowable height, that could accommodate 15 feet for ground-floor commercial uses and 10 stories of multifamily. Incentivizing development in this six block corridor on the underdeveloped properties could yield more than 1,000 new housing units with the following benefits:

1. No existing housing would be displaced
2. This corridor is walkable to jobs, shopping, services and entertainment in the downtown core
3. This corridor connects to the Capitol Hill Light Rail Station
4. This corridor connects to the Broadway commercial retail and services corridor
5. This corridor is next to Seattle Central College.
6. This corridor leads to the public amenity of Cal Anderson Park
7. This corridor is surrounded by Mid-Rise MR zoning with 80 foot (8 story) height limits which would be a compatible scale surrounding a new height limit of 115 foot (11 story) for multifamily buildings.

This E. Olive Way corridor offers unique advantages for increased housing growth. Some similar advantages were considered for greatly increasing residential density in the U District rezoning several years ago and other corridors should be studied for increasing density around walkable, mixed-use neighborhoods with great transit.

Thank you for the opportunity to comment on the

**William Justen**

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**From:** Thornton Creek Alliance <thorntoncreekalliance@gmail.com>  
**Sent:** Sunday, August 21, 2022 1:00 PM  
**To:** Staley, Brennon  
**Subject:** One Seattle Plan Comment Letter  
**Attachments:** One Seattle Plan Letter.pdf

**CAUTION: External Email**

Via Email Only - Please see attached.

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[www.thornton-creek-alliance.org](http://www.thornton-creek-alliance.org)

[www.facebook.com/Thornton.Creek.Alliance](https://www.facebook.com/Thornton.Creek.Alliance)



Thornton Creek Alliance  
Post Office Box 25690  
Seattle, WA 98165-1190

August 21, 2022

Mr. Brennon Staley  
Office of Planning and Community Development  
Post Office Box 94788  
Seattle, Washington 98124-7088

**Re: One Seattle Plan – Conceptual Alternatives**

Dear Mr. Staley:

As volunteer stewards of Thornton Creek, northeast Seattle's watershed, Thornton Creek Alliance (TCA) has played a decades-long role in working to support and enhance the watershed's eco-services to our community and to the wildlife that relies on them. Therefore, we have concerns and a strong interest in the environmental review process for the 'One Seattle Plan' that is now under way.

We note that the Thornton Creek watershed includes Census Tract 12, Highest Disadvantage, and seven tracts of Second Highest Disadvantage, neighborhoods of great need. Equity is a significant matter here. As an environmental group, we will not address the very real problem of displacement, although we do not endorse policies that might encourage it.

We further note that sidewalks are lacking in much of the watershed. Unhoused vehicles are filling parking strips and pushing pedestrians into the streets. Increased density is already impacting pedestrian safety and safe access to watershed natural areas. This situation is especially problematic for the differently-abled.

We are aware that you are hearing a loud chorus of 'build, build, build' from a vocal faction that seems to believe a simple laissez faire policy, loosening land use codes and allowing private developers to do as they will, will mitigate the deeply systemic problems of our housing supply. We are concerned about the limitations of putting this urgent public need in the hands of the private sector.

A holistic approach is critical to adding needed affordable housing while providing livable, healthy communities for all. An important part of this is preserving and enhancing a thriving tree canopy, creek buffer zones, and accessible greenspace.

While the City of Seattle is striving to meet a 30% tree canopy coverage goal, Kirkland and Bellevue have goals of 40%. Trees mitigate heat island effects and help clean the air and polluted run-off. Further, according to Seattle Parks and Recreation, NE Seattle is short of park land.

As you are certainly aware, in the last census, Seattle actually lost population in the past year. This chart from Wikipedia is based on US census figures:

[https://en.wikipedia.org/wiki/List\\_of\\_United\\_States\\_cities\\_by\\_population?fbclid=IwAR0uXncAtkZhlQjrDm3FTIzvzvwmrGeEBTuREewlM7H\\_im7A6rrjv8vujL4](https://en.wikipedia.org/wiki/List_of_United_States_cities_by_population?fbclid=IwAR0uXncAtkZhlQjrDm3FTIzvzvwmrGeEBTuREewlM7H_im7A6rrjv8vujL4). You will see that many cities are losing population, and Seattle, with a population density of 8795 persons per sq. mi., is included. The startling part is that nearly every city with a density of over 5444 per sq. mi. is losing population. Other statistics show that this trend began in some places before the pandemic. To all appearances, many people are now choosing to live in the bedroom communities and suburbs. Many office and tech workers no longer have to visit the office every day.

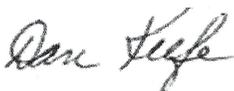
All of this means that Seattle may or may not resume its previous rapid growth. In order to preserve the intent of the Growth Management Act, our city must pay close attention to population and demographic shifts and at the same time strengthen equity, livability standards, and 'curb appeal'.

In light of all these considerations, we prefer Alternative 2, Focused. This will allow for planned growth and create a greater variety of neighborhood housing while minimizing the need for vehicle use in those neighborhoods. It should not be such a difficult matter to speed up or slow down the pace of new construction as appropriate and maintain open space and walkable communities.

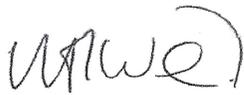
Our second choice is Alternative 1, No Action, which would keep us on the current course of having greatest density and services near transit hubs, and eliminate much of the need for vehicles in those neighborhoods. If the rate of population growth returns to past projections, we can revisit amending the Comprehensive Plan once more.

Thank you for your consideration. We look forward to continued participation in this process.

Sincerely,



Dan Keefe,  
President



Ruth Williams,  
Land Use Committee Chair

**THORNTON CREEK ALLIANCE (TCA)**, founded in 1993, is an all-volunteer, grassroots, nonprofit organization of over 165 members from Shoreline and Seattle dedicated to preserving and restoring an ecological balance throughout the Thornton Creek watershed. Our goal is to benefit the watershed by encouraging individuals, neighborhoods, schools, groups, businesses, agencies, and government to work together in addressing the environmental restoration of the creek system including: water quality, stabilization of water flow, flood prevention, and habitat improvement through education, collaboration, and community involvement.

[www.thornton-creek-alliance.org](http://www.thornton-creek-alliance.org)

[www.facebook.com/Thornton.Creek.Alliance](https://www.facebook.com/Thornton.Creek.Alliance)

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:12 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comprehensive Plan

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**From:** Kathleen Kerkof [REDACTED] >  
**Sent:** Monday, August 22, 2022 4:54 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comprehensive Plan

**CAUTION: External Email**

Dear Sir or Madam

In reviewing the Comprehensive Plan options, I am concerned that there is no mention or consideration of trees, green space, urban heat domes, or environmental impacts. If we are to have a viable city in the future, then these things must be considered and planned for. A number of climate tipping points are nearing the point of being activated and the changes we are already experiencing will then accelerate even faster than now. Increasing urban heat is a major concern and it is deadly. If we create a brutally hot city, then I think that anybody who has the financial means will leave and only the elderly and poorer people will be left. Certainly, we got a preview of this during the covid shutdown.

It is agreed that we need to create more housing and, personally, I lean towards Option 5. But that is not the only need. Please consider the following ways to evaluate including trees no matter which options is chosen.

- Evaluate in all options the impacts on trees and urban forest canopy cover in the ability of Seattle to reach 30% tree canopy in Comprehensive Plan while also increasing density to meet housing needs. We need both more housing and trees to keep Seattle livable.
- Evaluate the changing ratios of park and open space acres per 1000 residents as population and housing increases under the different proposals
- Evaluate tree canopy impacts on neighborhoods near freeways and other major transit corridors, including SeaTac Airport and Port of Seattle that exist and how each proposal would address pollution and urban forests
- Evaluate projected increase in urban heat domes and heat island impacts as building density and lot coverage increases and tree canopy decreases
- Evaluate options to add trees to existing parking lots and other built areas
- Evaluate loss of climate resiliency as trees are removed for denser building across the city
- Evaluate possible new building guidelines and lot coverage that could increase retaining more trees during development.
- Evaluate requiring setbacks on multifamily lots to require more trees and shrubs along sidewalks and roads to reduce heat impacts.
- Calculate the ability to create more parks, including pocket parks in each scenario to provide more greenspace, tree covered areas and playgrounds for residents and families
- Calculate the ecosystem services and natural capital currently provided to the city and the change that would occur under each different proposals

- Calculate the potential loss or gain of habitat and biodiversity of plants and animals under the different proposals
- Calculate potential economic, social, environmental and health impacts on BIPOC and other racial and ethnic minority communities under the proposals
- Look at ways to increase street trees under the different proposals, including making street trees mandatory on all proposals in all zones and planting large trees where there is no overhead power lines.
- Look at additional building alternatives and zoning that create space for residents to have trees and open green space on building sites.
- Consider eliminating residential small lots and allowing multiplexes on the existing lots if they set aside a portion of the lot for a designated tree protection area. This could increase protection for larger form trees like exceptional trees or a tree grove.
- Address how each plan would work to increase tree equity and environmental justice across the city

Remember the city is an ecosystem too. Any changes we make affects the whole system. So let us be wise and comprehensive in our planning and actions.

Sincerely,

Kathleen Kerkof

██████████

Seattle, WA 98107

██████████

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**From:** Vicki King <[REDACTED]>  
**Sent:** Monday, August 22, 2022 3:24 PM  
**To:** Staley, Brennon  
**Subject:** Comments on the scope of the Seattle Comp EIS

CAUTION: External Email

I'm opposed to eliminating single-family neighborhoods. Climate change is here and now and getting worse. Packing houses, apartments, condos, as densely as possible throughout the city will only make living in Seattle less desirable. No one wants to live in an endless rabbit warren.

Given today's economics, I don't see how to make Seattle more affordable. The newly-constructed apartment buildings are more expensive than the cheaper ones that were torn down to make way for the new. Smaller houses in our area (View Ridge) are torn down and replaced by mega-mansions that cost several million dollars. Inflation is hitting everyone's pocketbook.

Even assuming there was enough subsidized housing to help reduce homelessness, who's going to pay for those subsidies? We have supported programs for decades to help but it costs a lot to live in Seattle. Our property taxes are sky high, utilities, etc. continue to rise in cost..

Please prioritize trees throughout the city. Protect the existing large diameter trees wherever development is planned and add trees to the maximum extent possible, especially in areas where trees are lacking to add shade and to reduce temperatures .

The City must continue to provide parks, natural areas, and open spaces to keep our city liveable.

I have yet to see any real progress solving the homelessness crisis, despite the millions and millions of dollars that have been spent, year after year.

Best wishes,  
Vicki King

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:12 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comment on Comp Plan

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**From:** Andrew Kirsh <[REDACTED]>  
**Sent:** Monday, August 22, 2022 4:57 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comment on Comp Plan

**CAUTION: External Email**

Hello,

I have lived in Seattle since 1985 without owning a house or a car.

It's curious that the matrix of alternatives mentions only impacts on jobs and housing, when the EIS will supposedly cover environmental impacts.

The current land use code does not provide adequate tree protections. New multifamily development, especially row houses and townhouses, is essentially lot-line to lot-line, with permanent loss of space in which to grow trees to replace those that are usually destroyed when a smaller structure such as a single-family house is replaced. Canopy data from the City GIS show this: considering a sample of 1045 contiguous parcels in the Capitol Hill lowrise zone, comprising many single-family houses, townhouses, apartment buildings, etc., replacement of all the remaining single-family houses with townhouses would result in the loss of 5 acres of tree canopy, based on the area-weighted average canopy cover of those two building forms. While townhouse and row house canopy may increase with time from their almost negligible current contribution of columnar, low-volume trees, there simply isn't room to replace the significant lost canopy under the current codes, nor will street trees replace it: they are already in place, or if new, their growth will be limited by overhead wires and the greater proximity of new buildings to the street, and their often relatively short lives. Given the visible die-back in street trees (e.g., elms and flame ashes on Capitol Hill), the city also seems to be experiencing increased tree loss due to disease and climate heating. Allowing these housing forms or others with similarly inadequate space dedicated to preserving and increasing the tree canopy across single-family zones is likely to significantly damage Seattle's climate resiliency and make it a worse place to live.

The loss of permeable ground surface around Puget Sound is known to contribute to the decline in its water quality. How will the alternatives affect this?

Because the code is insufficiently responsive to these issues, only Alternatives 1, 2, and 4 will effectively limit damage to the city's environmental infrastructure. The benefits of mature trees in the city are largely local. Planting replacement trees miles away doesn't replace the local benefits. Tree canopy volume is not fungible across City goals: canopy loss is canopy loss, no matter what justification for it is offered. Putting more housing where public transit and commerce are already established seems like the most environmentally responsible option, given the current building code.

New housing built in many single-family neighborhoods is unlikely to be affordable, and upzoning increases property prices. Many single-family houses are rentals. How will the various alternatives differ in eliminating these rentals by encouraging owners to sell to developers, and how much displacement will result?

The City approved HALA knowing it would increase displacement, and the EIS should address this effect of upzoning. Seattle is not a closed system, and the Council has championed more "churn" of residents in the past (cf Rob Johnson). Many of the expensive townhouses in my neighborhood stand where shared single-family rental houses used to be. The city's policy has been to encourage the destruction of one of the most affordable housing options in favor of one of the least affordable. How will upzoning single-family zones will continue this trend?

I support all the points below.

- Evaluate in all options the impacts on trees and urban forest canopy cover in the ability of Seattle to reach 30% tree canopy in Comprehensive Plan while also increasing density to meet housing needs. We need both more housing and trees to keep Seattle liveable.
- Evaluate the changing ratios of park and open space acres per 1000 residents as population and housing increases under the different proposals
- Evaluate tree canopy impacts on neighborhoods near freeways and other major transit corridors, including SeaTAC Airport and Port of Seattle that exist and how each proposal would address pollution and urban forests
- Evaluate projected increase in urban heat domes and heat island impacts as building density and lot coverage increases and tree canopy decreases
- Evaluate options to add trees to existing parking lots and other built areas
- Evaluate loss of climate resiliency as trees are removed for denser building across the city
- Evaluate possible new building guidelines and lot coverage that could increase retaining more trees during development.
- Evaluate requiring setbacks on multifamily lots to require more trees and shrubs along sidewalks and roads to reduce heat impacts.
- Calculate the ability to create more parks, including pocket parks in each scenario to provide more greenspace, tree covered areas and playgrounds for residents and families
- Calculate the ecosystem services and natural capital currently provided to the city and the change that would occur under each different proposals
- Calculate the potential loss or gain of habitat and biodiversity of plants and animals under the different proposals
- Calculate potential economic, social, environmental and health impacts on BIPOC and other racial and ethnic minority communities under the proposals
- Look at ways to increase street trees under the different proposals, including making street trees mandatory on all proposals in all zones and planting large trees where there is no overhead power lines.
- Look at additional building alternatives and zoning that create space for residents to have trees and open green space on building sites.
- Consider eliminating residential small lots and allowing multiplexes on the existing lots if they set aside a portion of the lot for a designated tree protection area. This could increase protection for larger form trees like exceptional trees or a tree grove.

Thanks for your attention.

Andrew Kirsh

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Sunday, August 21, 2022 7:25 AM  
**To:** Staley, Brennon  
**Subject:** FW: One Seattle Comprehension Plan

-----Original Message-----

From: Linda Korbus [REDACTED] >  
Sent: Tuesday, August 16, 2022 10:27 AM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Cc: Pedersen, Alex <Alex.Pedersen@seattle.gov>  
Subject: One Seattle Comprehension Plan

CAUTION: External Email

Hello ,

I would like to make some general comments about any comprehension plan proposed. I live in the Wallingford area and have seen first hand some of the issues that have occurred due to the major upzoning and what MHA has done to the neighborhood.

1. When the plan describes that the City is committed to 'repair past harms of previous plans', is it referring to the upzoning and changing the definition of the zoning when the MHA was instituted? The City said we will get affordable housing but all we have seen is developers making huge profits and basically no affordable housing in our neighborhood. What was accomplished was to let developers and Wall Street get away with ridiculous profits. In my neighborhood, a definite fixer-upper was bought by a developer for one and a half times the typical cost for a house. There is no way a first time home buyer would be able to compete.
  2. The current plan gave the City no impact fees, no real affordable housing, no housing for families or elderly. The 12 foot wide by 30 ft high townhouses that are peppering the neighborhoods are not friendly to families with one room per floor and are not useful for elderly who can not maneuver stairs. Stairways in these townhouses take up 25 to 28 percent of the living space which isn't an efficient use of space. Typically these housing units are so close to the property line that maintaining these units will be impossible. How is anyone going to paint the side of the townhouse when it's 3 feet from the property line fence? How are fire fighters going to access the building in the back when they only have a 3 feet wide access?
- MHA 'required' affordable housing but the smaller 5 townhouse projects typically just 'buy out' of the MHA requirement and no affordable housing is built in the neighborhood that has been affected with the upzoning. This should not be acceptable.
3. One Seattle Plan states as one of its goals is to 'mitigate and address the impact of climate change'. The City Council and the One Seattle plan needs to address saving what we already built or grown such as existing solar and trees. Below is a few examples of current impacts.

Impact. Demo of 100 year old homes with salvageable material. We shouldn't just throw away that resource and fill up a landfill with a demolished house. Incentivize the use of existing house to become duplexes.

Impact. Solar access. Seattle encouraged solar roof panels to contribute to offsetting global climate changes. Families have invested millions in solar panels based on the pre MHA upzoning. Now with the MHA upzone, the code allows taller building adjacent to homes with existing solar panels. The City should require that the solar panels installed prior to the upzoning are not impacted.

Impact. Trees. Make sure Exceptional trees are truly protected because if a developer can just say they can not fully develop their property that exceptional tree could be cut down. That is not tree protection.

President Biden just signed the bill to finally start addressing global changes. Everyone needs to help out in all the little ways. That's how we survive. We need to protect everything we already have. Like the solar that are already on people's homes, like the beautiful sun shading trees. Whatever plan the City wants to focus on needs to also address these issues.

Thank you for listening  
Linda Korbus  
40 year resident of Seattle  
Sent from my iPad

Sent from my iPad

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**From:** Mary Lou Krause <[REDACTED]>  
**Sent:** Monday, August 22, 2022 12:12 PM  
**To:** Staley, Brennon  
**Subject:** One Seattle Plan

CAUTION: External Email

I would prefer Alternative 1, no action except to plant more trees wherever possible. Make Seattle a huge carbon sink so everyone can breathe clean air. I have filled my back yard with trees and have never owned a car so I appreciate all public transportation.

More trees please! I walk daily in the parks near me; Volunteer Park, a meadow with many large old trees, where people like to meet and socialize, Interlaken Park, a peaceful, sacred space in a ravine with many native trees, and the Arboretum, our park museum of trees from around the world. Besides bringing beauty to the people in Seattle, these are good carbon sinks. Don't hurt them. Just help people plant more trees.

From Mary Lou Krause on  
Capitol Hill

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**From:** Megan Kruse <[REDACTED]>  
**Sent:** Monday, August 22, 2022 6:03 PM  
**To:** Staley, Brennon  
**Subject:** Comp Plan Scoping Comments  
**Attachments:** Comp Plan Scoping Comments Kruse.pdf

**CAUTION: External Email**

Hi Brennon,

Here are my comments on the EIS Scoping documents.

Thank you,

Megan

## Public Comment on Comprehensive Plan EIS Scoping Documents

Megan Kruse

8/22/22

Affordable, livable and equitable housing and efficient, clean and safe transportation are among Seattle's top challenges as we strive to densify. The Comp Plan EIS Scoping document explores various housing options and mentions transportation but both elements leave out key considerations that are required to give a full picture to plan for adequate funding.

Please consider the following comments on Transportation and Housing.

### Transportation

This element intersects with all others, particularly. environmental justice/climate change, livability, jobs, and the economy. Yet it is barely mentioned in the Comp Plan.

Seattle has had proven success reducing car trips and increasing transit use, particularly in the urban core. However, according to the EPA, commercial vehicles account for 80% of the country's GHG's and **the City does not include these vehicles in its mode shares for transportation planning.**

My comp plan amendment #4 was submitted again this year, called for the adding trucks and rideshare vehicles (TNCs) as mode shares in the transportation element of the comp plan. Please see that submission as it explains in depth why this is so important.

Without freight planning and accountability Seattle's problems with congestion, emissions and safety will continue to accelerate. Both these modes put up to three times the vehicle miles traveled (VMT) on the roads compared to SOVs. And, as the city works to achieve 15-minute neighborhoods, it won't be just an urban center problem, unplanned freight deliveries will expand to smaller nodes and neighborhoods, putting wear and tear on streets and increasing interactions with people.

As a city we've known about this issue for at least 5 years. A 2018 UW study commissioned by the city showed urban freight has been growing at double digits long before the pandemic. That report said without any increase in population, urban truck deliveries would double by next 5 years. That was before e-commerce deliveries spiked dramatically in the pandemic.

The 2018 study called for adequate commercial loading at the curb and off the street. But an Alleys, Loading Berth and Solid Waste (ALBSW) amendment to implement some of this has been shelved indefinitely.

We don't have to guess at the fallout from our inaction, it was quantified in a more recent UW study showing 2900 delivery trucks in the city center have been circling up to 18 extra minutes searching for places to unload.

Even national researchers have documented Seattle's subpar freight policy. A 2020 national study by Texas A&M Transportation Institute ranks Seattle 15th in annual truck delays and dollar costs from congestion. It also ranks the city as 13th in excess CO2 from congestion.

**Despite these alarming statistics, the EIS scoping documents for the Seattle Transportation Plan and Comp Plan Update only focus on the movement of people, not goods. If freight and TNCs aren't tamed, these will impact everyone's ability to enjoy the use of our shared right-of-way's.**

As the Texas study indicates, commercial delivery and service vehicles circling blocks for parking release more emissions and increase contact with pedestrians and cyclists. Finding places for trucks to unload will have a direct impact on our Climate and Vision Zero goals.

The failure to articulate and actively manage a freight policy also has real economic consequences for our city. A UW report said freight movement in Seattle accounts for over \$50 billion in economic activity and employs more than 62,000 people. And as we continue to grow, so will those numbers.

## **Transportation Recommendations**

- 1) UW cordon studies have already measured the number and type of delivery, construction and freight vehicles entering the city from the north and the south. **Build upon this data and create a mode share category(ies) for trucks and their high VMT counterparts.** Failure to capture these vehicles' impacts will render moot any estimate for future transportation levies.
- 2) **Require off-street loading and waste storage/staging for all new multifamily development.** Related work would be codifying the space required for these vehicles to park and unload and building design that contains transportation and waste functions within the new building and keep the right of way more accessible and able to be shared by all users and other modes.
- 3) **Do not rely on electrification to solve the transportation problem.** Eventually electric vehicles may make a small dent in emissions, but congestion and pedestrian and cyclist safety will still be an issue. Also, the freight industry is decentralized and made up of many small players. We don't have the necessary infrastructure to support electric vehicles and it will take time to do so.
- 4) **Rethink the curb use priorities based on the surrounding building uses.** We can predict the freight and commercial vehicle service and delivery traffic generated by commercial and multi-family buildings. Codify best practices for design and don't let a project pass design review without complying with them.

## Housing

If Seattle wants to solve its housing crisis, it needs to give a full picture and produce a plan that addresses the need for housing at all levels.

**However, at a July 18<sup>th</sup> Comp Plan public forum, OPCD staff confirmed that the housing unit targets in all alternatives are *only for market rate housing*.** Staff clarified that the state require each municipality collect data on other housing needs, **but they are not reflected in the Comp Plan alternatives.**

Ignoring housing projections for citizens with low and moderate incomes, or for those transitioning from homelessness, or those in need of permanent supportive housing, guarantees they will remain stuck in the margins of piecemeal planning and will not find a place in all neighborhoods as the city plans to expand increased zoning across Seattle.

Creating a comp plan just for market rate housing, ensures that the affordable housing shortage, inequity, and disparities will continue.

The alternatives to increase more density in traditional residential zones is a good and needed. But we've learned from density in the urban core and villages. As we continue to pursue density we need to adjust and mitigate the unintended consequences that have not been good for the environment or people's health, i.e., transportation-related congestion, pollution, heat islands and pedestrian and cyclist safety threats.

### **Housing Recommendation**

- 1) **Include all housing projections, not just market rate housing, in the Com Plan.** We have that information.
- 2) **As part of the updated EIS scoping, include strong and clear procedures to establish and encode best land use and transportation practices that encompasses the built environment and transportation design.** These practices should address the need for urban tree cover, open space, access to daylight and clean air, and management of urban freight.

Thank you for your consideration.

Megan Kruse

District 7



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**From:** aileen langhans <[REDACTED]>  
**Sent:** Monday, August 22, 2022 2:06 PM  
**To:** Staley, Brennon; aileen langhans  
**Subject:** Family Comment Letter during the Scoping Phase  
**Attachments:** Comment letter during the Scoping Phase - the Langhans Ladies.pdf

**CAUTION: External Email**

Dear Mr. Brennon Staley:

Enclosed, as an attachment, is our family comment letter regarding the Scoping Phase within the creation of the new "One Seattle Plan". Please review and record it into the records.

Last month, I had the opportunity to be involved in a Webinar, through which I was able to submit several questions. Although my internet service kept bouncing me out of the video (we have Xfinity), I learned so much and most of my questions were answered. Thank you so much.

Sincerely,  
Aileen M. Langhans, on behalf of the Langhans sisters

PS. I believe you responded to an email I sent in the past, but my vision has been so limited that I have not been able to do much reading. I apologize for not acknowledging your correspondence. Thank you for reaching out to me.

# The Langhans Ladies

Seattle, Washington 98105

August 22, 2022

Mr. Brennon Staley  
Office of Planning & Community Development  
P.O. Box 94788, Seattle, WA 98124  
[brennon.staley@seattle.gov](mailto:brennon.staley@seattle.gov)

## **RE: The Scoping Phase of the One Seattle Plan (Comprehensive Plan updates)**

Dear Mr. Brennon Staley (OPCD):

Our family has resided in the University Park Neighborhood since 1955; this 100-plus-year-old community is nestled in the NE corner of the University District. Though small in actual geographical area, it is surrounded by the recently up-zoned Urban Center of the U District, with its increased density, height, and bulk. The enactment of the Up-Zone was quickly accompanied by a spike in construction of skyscrapers around the light-rail station on Brooklyn Ave NE, a trend which is still proceeding and expanding outwardly. At the time of the up-zone, a buffer layer, called the Transition Zone, was inserted to protect our community's integrity as a single-family neighborhood. That protection layer is now being challenged by contract rezone applications and, more recently, through the City's elimination of the 'single-family' designation; declared as merely an administrative name change, it has now been revealed as a first step toward preparing for this latest rendition of the Comprehensive Plan, purposefully titled the "One Seattle Plan".

Heralded as the boldest solution to the lack of low-income housing in vulnerable communities, the Up-Zone has predictably fallen short of fulfilling the affordable housing aspirations of the City, in spite of additional measures, such as the loosening of the DADU/ADU regulations. Frustration has led Seattle to widen its aim toward those neighborhoods once protected, in order to seek out more affordable land on which to create low-income housing units. Of course, this latest knee-jerk reaction by the City has occurred absent of any self-reflection over what has gone wrong thus far.

So what could go wrong now, and what is especially disheartening about the new ONE SEATTLE PLAN?

Unfortunately, the City doesn't appreciate the fact that Seattle is not "one", in that its many districts and neighborhoods have unique heritages, cultures, and issues. Any city-wide, "one-size-fits-all" approach will fail to address the particular needs and pressures facing each neighborhood.

For this reason, we would like to represent the multitudes of communities and their marvelous contributions to our town, by submitting our reflections and offering our own specific feedback. In order to make practical, positive changes to the Comprehensive Plan which will enhance and honor Seattle's diversity, the City must not only encourage, but give viable opportunities for honest, city-wide, dialogue and debate, one that involves all levels of geographically defined neighborhoods as well as community organizations that are centered around like-minded groups. All should be welcomed to the table.

## Here is a summary of the “One Seattle Plan”:

***“The updated Seattle Comprehensive Plan will guide City decisions about where we locate housing and jobs, and where and how we invest in transportation, utilities, parks, and other public assets. Our goal is to make the city more equitable, livable, sustainable, and resilient for today's communities and future residents.”***

Unfortunately, if we look into the details, this becomes a quagmire of uncertainty and vagueness, with built-in assumptions which may be lofty, but are obscure, passe, and unreliable, all while creating a false sense of optimism. Given the City's past efforts, pardon our skepticism as to who is in charge, who will be represented as decisions are made, who will benefit, and who will be held liable and responsible.

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For this reason, we would like to discuss the following “W’s”:  
**WHY, WHERE, HOW, for WHOM, and by WHOM....**

### **WHY?**

1. Note that this current process of updating the Comprehensive Plan on the part of Seattle may be a state requirement; nevertheless, it should also be viewed as an opportunity to reflect on what was done in the past that needs to be improved, given new statistics and trends. In order to rectify past assumptions, the pending legislation should actually contain wording which mandates independent, objective, and on-going analyses throughout the process and once the legislation has been passed. Caution: the enactment of this law is not the end result, but the beginning of a new vital phase – the enforcement/assessment phase. Without such measures, the City will continue to repeat the same assumptions, announce the same bold plans, and ultimately fall short once again. Soon, they will run out of land to raid for their idealistic vision of Seattle - whether achievable and practical or simply lofty and noble.
2. Other discussions must involve undoing the ‘paths to least resistance’ given to aggressive developers through the MHA loopholes, which allow them to avoid creating on-site, low-income housing for families of all sizes by paying into a fund, with little pain in the “pocketbook”. This has been proven to be a disaster, as there have been no meaningful increases in affordable housing in the areas in which the funds were raised. The fact is, many of the older, and even historic, apartment buildings, that have provided such housing over several decades, are now being razed and replaced with skyscrapers or larger structures, most of which cater to the single population by providing mainly efficiency apartments. In the case of the University District, the skyscrapers are actually large dormitories for the UW students, thus alleviating the University of its responsibilities while it reaps all of the benefits, while failing to make any dent in the dearth of affordable housing for neglected, low-income families.
3. During the current process, will the City finally acknowledge the poor results of their bad policies without correcting them by arrogantly widening their nets to include family neighborhoods in order to meet the goals they promised but failed to deliver?

### **WHERE?**

1. If our City Officials believe that one ‘master plan’ can be applied uniformly to disparate neighborhoods with positive outcomes, then perhaps they should review the history of Seattle

and how the many communities were gradually annexed over decades; most of these communities are still recognizable by their histories, such as the Scandinavian Ballard District and the International District. Unfortunately, with their unique pasts also come unique issues and pressures which must be acknowledged and resolved, without destroying their character.

2. Note that the characteristics of the many diverse pockets of Seattle invite its residents and encourage them to roam and explore; but they also entice guests from around the world. We recall that in our youth, many tour buses would drive down 17<sup>th</sup> Ave NE through our neighborhood and we would greet them with a wave on our way home from school. This type of diversity must not be ignored or erased in an effort to quickly make up for the lack of housing options, a situation that should have been anticipated long ago, especially given that so many corporations have made their headquarters here. Instead of planning with anticipation, the City waited until the rushed migration began in order to start planning; what could have been a seamless transition to a positive future has now become an effort to catch up with this onslaught.
3. In order to provide an example of how various neighborhoods might be impacted by a city-wide approach, we would like to discuss our own experiences as a family neighborhood, abutted on all sides by student housing, fraternities, sororities, and a larger high-density district. While we are a family neighborhood with detached homes surrounded by lawns, this appearance is somewhat a mirage, which the City uses to accuse us of not providing enough density to address the growing population in our district. Hidden behind many of these homes, now gobbled up by speculators (many of whom do not leave in our state or country), you will find great concentrations of students living as in dormitories or rooming houses. Unfortunately, this impact comes with many uncontrolled, negative results, such as garbage, noise, parking, parties, and traffic, all of which are not being acknowledged or addressed by the powers that be.

In all honesty, contrary to the City's assumptions, we would gladly welcome families of all sizes and backgrounds. But the City must entice them here, not by congratulating the absentee landlord and slumlord, but by providing improved infrastructure, such as schools, safe sidewalks, etc. (When we grew up in this neighborhood, it was known as a place to raise a family, because children could walk from Kindergarten to College.)

## HOW?

- a. **How** will new construction fit in with the surrounding neighborhood, its character, its historical contributions to the City, and its personality? It is not that we want identical architectural structures built, but we want compatible styles. Toward that end, we propose that the City renew its past efforts to create "Conservation Zones", but only through more general design standards, such as roof options that are compatible with the local architecture; yards and gardens that are enticing to the passersby and our non-human neighbors; and inviting and engaging entrances that greet the neighbors in conversation, etc. Toward this goal, permits for any new construction or major addition, even DADU/ADUs, should require the notification of the neighborhood and request that the developer make contact with them.

In a city that declares itself to be 'pedestrian-friendly', its neighborhoods should provide ample reasons for people to walk around – the welcoming feeling of a true sense of community. All of this can be accomplished while still promoting increased densities and ensuring a sense of security, privacy, and safety for all.

- b. **How** will any new construction, including ADU/DADUs, add to the affordable housing for

families, especially now that the State of Washington allows limitless numbers of unrelated adults per unit, which, in our case, will drastically increase the student population only? The City must be required to actually monitor house prices and rents in a systematic, real-time format, in order to hold developers accountable to the spirit and the letter of any new law—an effort that was recently struck down by Mayor Bruce Harrell.

- c. **How** will our residents with disabilities be integrated into the newly popular cloning of townhouses, with their multiple stories and numerous staircases, which actually reduce the living space per floor and interfere with mobility? Furthermore, often these townhouses are built to take up entire lots; then they are divided into sublots, void of gardens and yards, and sold for large profits.
- d. **How** will Seattle fulfill its promise to address the needs of displaced families, especially those of minority groups? Many people purchase homes in which to reside while raising a family and perhaps even into retirement. Many minorities live in extended, intergenerational family units and often seek houses where their family members can support each other - those that are near schools for the children, as well as close to transit, community centers, libraries, parks, and other public services.
- e. **How** can a true sense of community be fostered without a more stable population of long-term residents? Will most of the new construction be simply a way to get people “off the streets” or out of shelters? That framework of thinking will only lead to the creation of units that will still be for shorter-term occupancies, until those families are able to find and afford more permanent options and opportunities, especially those with other amenities, such as yards and gardens. .
- f. **How** will developers be made to realize and take the initiative to incorporate new features in their housing units, especially the smaller, efficiency apartments, given the new “lifestyle” that has emerged as a result of COVID19? As people and families adapted to living from, working from, and studying from home, they discovered many flaws in their current living conditions. New features should be incorporated into apartment complexes as an incentive to potential renters. The existing alternatives may no longer be palatable, specifically where every activity is done on the kitchen counter, especially in apodments and studio units.
- g. **How** can Seattle make a simple promise toward safe neighborhoods for families? They can make sure that all residential areas have safe sidewalks and curbs, to secure children when they are outside playing or going to school. Why are there so many neighborhoods without these features?
- h. **How** will the process toward creating the One Seattle Plan through the scoping and EIS phases be representative, with all voices heard, not just those in agreement with the City’s agenda, through paid community organizers?
- i. **How** can the City encourage developers to create designs appropriate to the surroundings of their projects? One way is to provide examples of success stories. One excellent example near us is the ReNew Roosevelt development just north of the bridge on 15<sup>th</sup> Ave NE. The developers purchased houses and transplanted them onto an expanded lot within an established family neighborhood, creating a unique community of its own. While their bold approach and layout add significantly to the density of housing, this was accomplished while blending in with the small-scaled character of the surrounding neighborhood.
- j. **How** should the City attain its anticipated increases in housing units while still specifically

accommodating the needs of displaced families within established neighborhoods? They must recognize that what constitutes a viable and healthy neighborhood is the presence of long-term residents, such as families of all backgrounds. In addition to the rapid construction of small efficiency apartments for the more transient adult population, developers must be encouraged to create larger housing units (3-4 bedrooms). A true sense of community cannot exist if its population is in constant flux. This could be accomplished by accumulating larger lots and creating clusters of duplexes, etc. – but surrounded by yards and gardens, NOT cement walls, barriers and paths. Quantity is not a substitute for quality!

k. **How** should the City require the developers to give back to the communities most impacted the their projects? For instance, the U District is lacking many supportive amenities, which could be rectified through certain incentives:

1. Providing funds toward the construction and expansion of our local YMCA with greater amenities to support the rapidly growing population of the U District. (This branch hasn't changed since our youth.)
2. Providing funds and space for the creation of a HUB for disasters, not just earthquakes but other potentially dangerous events due to the proximity to the UW, where experiments of all sorts are constantly underway. A HUB will help unite this community in flux by providing a location for disaster victims to receive support. (Note that if there is an earthquake, the City has warned us about having provisions to care for ourselves and our loved ones for at least five (5) days. Where will such supplies be stored in small efficiency apartments?)
3. Helping to create a community center for gatherings of all residents: the young and old, the transient student population and the long-term residents, etc.

NOTE that many of these improvements will become positive attractions to more long-term residents, while also providing a healthier, safe community for gatherings among people of all backgrounds and ages.

## **For WHOM?**

The “**For whom**” is a complex matter that is as unique as the numerous communities in Seattle — due to various factors, including job opportunities, the existence of larger institutions, and the flavor of their local businesses, eateries and populations. The most important concern we have is that in order for a community to flourish, it must have a stable population of residents, such as families, and not be in constant flux by large groups of temporary residents, such as students, who make major impacts with no long-term commitments. The “One Seattle Plan” may state bold goals, but there is no proof (especially given past results) that these will be achieved. In the U District, thanks to the State of Washington, absentee landlords are now able to cram as many tenants as possible into our beautiful older homes. So what incentives do they have to tear down these profitable houses and spend the time, energy, expense, and risk to replace them with duplexes, etc., while adhering to the new “green” building codes?

## **By WHOM?**

1. Finally, the “**By whom**” cannot be understated. The City may make the rules, but they really need the cooperation of all residents and developers to create the reality they want.
2. Thus, the following efforts must be set in motion:
  - a. The new regulations must not be ambiguous—the letter of the law must be congruent with the spirit of the law. Furthermore, they must include periodic review standards that are

objective and responsive.

- b. Developers must not be allowed to bypass codes with contract rezone and subplot requests, even if they offer certain ‘favors’ —a situation that ends up poking holes in the Master Plan, thus diluting the overarching guidelines of that plan. The City should not permit a mosaic of zoning on city blocks to the profit of individual property owners. Otherwise, broad zoning guidelines will become obsolete and unenforceable in short order.
  - c. The various departments must work together to enforce code and to review, in real time, any implementation of the new plan on future development, before irreversible damage is done. They should also streamline the process for residents to report suspicious activities and verify certain regulations, instead of the current system of passing off any inquiries to another department.
3. Upon which assumptions will the newly structured legislation be hoisted and supported? How much of this process is being prompted by a deal between the City Officials and the State Legislature/Governor, given the efforts to pass state-wide zoning, soon to morph into federalized zoning, including the elimination of family neighborhoods through the force of the federal infrastructure purse?
- 

Upon all considerations and research, we cannot commit to any of the proposed alternatives at this time, as they pigeonhole us into totally unacceptable choices while compromising too many of our values and ignoring most of our concerns and warnings. Instead, we ardently request that the City reach out more formally to neighborhoods by holding workshops in the various City Districts, perhaps to be organized through our District Representatives. This will allow small groups to gather and work together to discover and formalize more practical solutions, ones that will achieve the ultimate goals of Seattle, while retaining the unique cultures and histories of its multi-faceted communities. Let’s create a wonderful place in which to live, filled with areas for us to explore and for our guests to marvel at. The greater and broader the participation in the process, the more positive the outcomes will be.

The word “ONE” in the new plan is a powerful 3-letter concept: it provides a sense of unity, while also seeking and promoting a sense of uniformity, that, if followed to the letter, will lead to a City that is monolithic and boring, void of any sense of diversity. Equity and equality do not need to be confined to standardization; fostering a true sense of community that is welcoming, affordable, safe, and even convenient can be accomplished while still celebrating Seattle’s wonderful heritage. There is no reason to sacrifice one for the other.

We fervently request that you to reflect on our feedback, with honest and open minds and without the filter of preconceptions. We also urge you to realize that, if no off-ramp or detour route is provided, any long-term and perhaps irreversible destinations of this entire process could lead to negative ramifications, which will outlast your service to the City and may be harmfully irreparable.

We thank you for this opportunity to submit our feedback, as we look forward to future opportunities to share and learn from others throughout this process. As always, we are grateful to you for your service to the entire City of Seattle.

Sincerely,



Aileen M. Langhans, for the Langhans Family

CC: Mayor Bruce Harrell  
City Council  
Councilmember, Alex Pedersen, District 4  
UPCC board  
Mr. Don Blakeney of U District Partnership  
Seattle Fair Growth  
Mr. Cory Crocker of UDCC

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**From:** Aileen Langhans <upark.secretary@gmail.com>  
**Sent:** Monday, August 22, 2022 2:10 PM  
**To:** Staley, Brennon; aileenmargaret@yahoo.com; raykraft@gmail.com  
**Subject:** The Formal UPCC comment letter during the scoping period  
**Attachments:** UPCC comment letter during the scoping phase.pdf

**CAUTION: External Email**

Dear Mr. Brennon Staley:

Attached is the formal comment letter from the University Park Community Club, during the scoping period for the pending "One Seattle Plan". Please review and record the document.

Have a great week,

Aileen M. Langhans  
UPCC board secretary

# University Park Community Club

Seattle, Washington 98105

August 22, 2022

Mr. Brennon Staley  
Office of Planning & Community Development  
P.O. Box 94788, Seattle, WA 98124  
[brennon.staley@seattle.gov](mailto:brennon.staley@seattle.gov)

## RE: The Scoping Phase of the One Seattle Plan (Comprehensive Plan updates)

Dear Mr. Brennon Staley (OPCD):

University Park Community Club (UPCC) represents the family neighborhood known as the University Park Neighborhood; it is nestled in the NE corner of the University District. Though small in actual geographical area, it is surrounded by the recently up-zoned Urban Center of the U District. At the time of the up-zone, a buffer layer, called the Transition Zone, was inserted to protect our community's integrity as a single-family neighborhood. Currently, this protection is facing obliteration, due to the City's decision to eliminate the 'single-family' designation in preparation for this latest update of the Comprehensive Plan, or the "One Seattle Plan".

Unfortunately, the City doesn't appreciate the fact that Seattle is not "one", in that its many districts and neighborhoods have unique heritages, cultures, and issues. Any city-wide, "one-size-fits-all" approach will fail to address the particular needs and pressures facing each community. Thus, we would like to submit these concerns and feedback into the permanent record:

- In drafting the Comprehensive Plan, city officials should acknowledge, respect, and protect the uniqueness of individual neighborhoods, including their personalities. This mandates that city regulations be flexible enough to anticipate, in advance, any of the many negative pressures and impacts that might result from new legislation. The regulations must also incorporate real-time reassessments in order to address any unexpected challenges before they become unmanageable.
- Seattle should reactivate the concept of "Conservation District" (at one time heralded by the City Council and the Office of Neighborhoods), but only in a broader, less restrictive format. In order to preserve the identities of neighborhoods, while encouraging the construction of new affordable housing, design guidelines and standards specifically tailored to the concerns of individual neighborhoods must be created to provide a practical, yet non-burdensome solution to hold developers accountable for the impacts of their projects on local communities. **(Note: Although the City of Seattle stated its desire to move away from the design review process, they have just announced a formal effort to initiate neighborhood design guidelines for Crown Hill! – See the Seattle City Council public hearing announcement dated August 15, 2022)**

This simple step would discourage the now popularly cloned creation of out-of-scale housing, such as large LEGO-boxy houses and townhouses, which replace gardens with cement retainers and walks; as well as other multi-unit housing which substitutes inviting entrances that engage with the streetscape and passersby with nondescript entrances obscured in location and hidden behind walls.

**In a city that declares itself to be ‘pedestrian-friendly’, its neighborhoods should provide ample reasons for people to walk around – the welcoming feeling of a true sense of community as displayed by their uniqueness of character. All of this can be accomplished while still promoting increased densities and ensuring a sense of security, privacy, and safety for all.**

- Any new construction, including DADUs and ADUs should require advance notification of the neighborhood, including street signage. Currently, by the time we become aware of the new development, it is too late for us to formally submit our concerns and other feedback. Developers should also be asked to contact the neighborhood groups and offer to discuss their plans.
- If Seattle is to welcome displaced families into our neighborhoods, they must be prepared to provide the support needed, including infrastructure, such as schools, libraries, parking access, open green space, etc.
- If the City’s concerns for displaced families are genuine, especially those of minority ethnicities, those in charge must realize that many of them live in intragenerational homes. This special family relationship must be acknowledged by the variety of houses encouraged through city code. For instance, the latest trend of tall townhouses with multiple layers of stairs would be inappropriate to the elderly population, thus removing that choice from those families that seek a long-term commitment to their choice in residence - one that is close to schools for the children and yet accessible to their elderly or others with limited mobility.
- Seattle must finally address the fact that affordable family homes disappear when such properties are snatched up by corporations—a growing trend that is now being discussed in Congress.
- **Seattle must use planning and zoning codes to encourage an increase in the housing stock for families, not simply be satisfied with a numerical increase in housing units, especially if they are mainly apartments or efficiency and studio apartments. Quality and choice must not be supplanted by statistical increases in the number of units as a major mark of accomplishment.**
- Seattle must acknowledge the new post covid19 lifestyle—people working from, studying from, and living at home. Many families are now eagerly seeking homes that have private yards, where they will not be restricted by future shutdowns and where their children can gather safely and have fun. Construction of multi-unit housing projects often fail to provide these amenities.
- While it is important for housing to address the needs of single people, who tend to be more transient, it is also vital to the health and robust nature of a community to pivot to more permanent housing for long-term residents, such as families. A true sense of community cannot exist if its population is in constant flux. This could be accomplished by accumulating larger lots and creating clusters of duplexes, etc. One excellent example is the ReNew

Roosevelt development just north of the bridge on 15<sup>th</sup> Ave NE, where houses were brought in to establish a unique community of its own. While its bold approach and layout add significantly to the density of housing, this goal was accomplished while blending in with the character of the surrounding neighborhood.

**In conclusion:** Upon reflection of the five (5) proposed alternatives for the EIS (Environmental Impact Statement) Phase, we have determined not endorse any option at this time, as they pigeonhole us into totally unacceptable choices while compromising too many of our values and ignoring most of our concerns and warnings. However, we intend on keeping alert to any and all new details as they are rolled out during the EIS phase in order to determine which, if any specific alternative, is congruent with our priorities and expectations.

Note that this current process of updating the Comprehensive Plan on the part of Seattle may be a state requirement; nevertheless, it should also be viewed as an opportunity to reflect on what was done in the past that needs to be improved, given new statistics and trends. In order to rectify past assumptions, the pending legislation should actually contain wording which mandates independent, objective, and on-going analyses throughout the process and once the legislation has been passed. **Caution: the enactment of this law is not the end result, but the beginning of a new vital phase – the enforcement/assessment phase. Without such measures, the City will continue to repeat the same assumptions, announce the same bold plans, and ultimately fall short once again. Soon, they will run out of land to raid for their idealistic vision of Seattle - whether achievable and practical or simply lofty and noble.**

We fervently request that you to reflect on our feedback, with honest and open minds and without the filter of preconceptions. We also urge you to realize that, if no off-ramp or detour route is provided, any long-term and perhaps irreversible destinations of this entire process could lead to negative ramifications, which will outlast your service to the City and may be harmfully irreparable.

**As a family neighborhood whose future may be negatively impacted, we hereby state our determination to remain actively involved in the process going forward. Please keep us informed as to future opportunities, such as local workshops, through which we can continue to promote our ideas and pose our concerns. We must be given the opportunity to work with other neighborhood groups to ensure that the new ordinance will not become a one-size-fits-all, city-wide debacle.**

Thank you so much for your dedicated service to the citizens of Seattle.

Respectfully submitted,



Aileen M. Langhans  
UPCC board secretary  
[aileenmargaret@yahoo.com](mailto:aileenmargaret@yahoo.com)  
[upark.secretary@gmail.com](mailto:upark.secretary@gmail.com)

**CC: Councilmember Alex Pedersen, District 4**  
**UDCC: Mr. Cory Crocker**  
**U District Partnership: Mr. Don Blakeney**  
**Seattle City Council**  
**Mayor Bruce Harrell**

**PS. “A conclusion is the place where you get tired of thinking.” (Arthur Bloch).**  
*Please refuse to become complacent in your efforts to create a better Seattle for tomorrow by acknowledging that there can be no final conclusion.*

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:35 AM  
**To:** Staley, Brennon  
**Subject:** FW: Seattle trees need your comments!

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**From:** Joan Lawson <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 2:23 PM  
**To:** info@dontclearcutseattle.org; PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Re: Seattle trees need your comments!

**CAUTION: External Email**

Trees are necessary for shade, birds, four-footed creatures, and are beautiful. Put them especially in neighborhoods that do not have any or many.

On Sun, Aug 21, 2022 at 5:30 AM Katy, Dont' Clearcut Seattle <[info@dontclearcutseattle.org](mailto:info@dontclearcutseattle.org)> wrote:



Every 10 years Seattle updates its **Comprehensive Plan**, which is required by the state from each large city, showing how growth will be managed. The city is currently asking for comments on five different scenarios related to housing growth in the city.

The proposals vary from no change in zoning to up zoning everywhere in the city. Information on the 5 proposals can be found [here](#). Please review this material and comment on how you would like to see Seattle and your neighborhood grow. **Comments are due Monday August 22nd by 5 PM.**

**SUBMIT YOUR COMMENTS!**

We realize this is short notice; fortunately submitting comments can be a quick process (directions below). Also note that your **comments can be emailed directly to**

[OneSeattleCompPlan@Seattle.gov](mailto:OneSeattleCompPlan@Seattle.gov) in addition to, or instead of posting on the public forum.

There are currently over 600 comments from the public, mostly urging building everywhere and as dense as can be done throughout the city. Few of these comments mention the need to retain trees or the value of Seattle's urban forest. Many people are facing a housing crisis in housing availability and affordability. At the same time, we are facing a climate crisis that we need to respond to and a glaring inequality in our urban natural environment across the city.

Our trees and urban forest are a critical element in our Emerald City. They are important for reducing heat island impacts and stormwater runoff, our mental and physical health, animal and plant habitats, reducing air and water pollution, and for noise and stress reduction.

We need to both support increased housing and protect and enhance the city's urban forest at the same time. We need to plan for growth and build communities across the city that are healthy, equitable and livable for everyone.

*Click the following link to submit your comment. You will be prompted to log in or create an account when you begin to enter a comment. A quick way to get ideas for your comments is to enter "tree" or "forest" in the comment search box and see what other tree-friendly people have also said. If you have a couple of extra minutes, also consider upvoting tree-friendly comments that you agree with.*

Also note that your **comments can be emailed directly to** [OneSeattleCompPlan@Seattle.gov](mailto:OneSeattleCompPlan@Seattle.gov) in addition to, or instead of posting on the public forum.

**SUBMIT YOUR COMMENTS!**

**More Information:**

[One Seattle Comprehensive Plan EIS Scoping Fact Sheet](#)

[One Seattle Plan homepage](#)

Thank you for supporting Seattle trees!

Katy, [Don't Clearcut Seattle](#)

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Sent via [ActionNetwork.org](https://ActionNetwork.org). To update your email address, change your name or address, or to stop receiving emails from Don't Clearcut Seattle, please [click here](#).

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**From:** mona\_lee [REDACTED]  
**Sent:** Sunday, August 21, 2022 10:37 PM  
**To:** Staley, Brennon  
**Cc:** 'Daphne Schneider'; 'Dick Burkhart'; 'Patrick Taylor'; mona\_lee@centurylink.net  
**Subject:** Comments on Proposed Changes to Seattle's Comprehensive Plan (Five Options)

**CAUTION: External Email**

To City of Seattle Comprehensive Plan Comments:

For many years I have been a member of the Othello Station Community Action Team and have been involved in helping to guide development in my neighborhood.

I have looked at and compared the five options. I presume the problem is how to come up with lots more, much needed affordable housing options without spreading apartment buildings all over everywhere. We need to keep nice single family neighborhoods like mine that are within easy walking distance of urban villages like Othello's with its parks, apartments, shopping, and transit/light rail station.

I think Othello is nearly an ideal place. We have single family neighborhoods, **certainly not gated communities**, but nice single family homes and duplexes along streets that people can freely walk through to get to parks, transit, and the business district to do their shopping and access public transit especially light rail. Around the business district and Othello Park, is where apartment buildings (many of them designated affordable housing) are being concentrated.

Looking at the five options, I would only rule out #1 and #5. I think the city's comprehensive plan should take from:

#2 "expanded urban villages and new smaller nodes"

#3 more housing near existing large parks and other neighborhood amenities

#4 a wider range of low scale housing options only in corridors near transit and amenities.

**In addition, I think many of the apartment buildings need to be publicly and/or grant funded and built by nonprofit developers like Homesight, LIHI, SEED, Mount Baker Housing, etc.**

**I hope my input will be helpful.**

**Thank you,**

**Mona Lee**

████████████████████

**Seattle, WA 98118**

████████████████

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:36 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comp plan.

-----Original Message-----

From: Shelly Leonard <savethetrees@live.com>  
Sent: Monday, August 22, 2022 4:50 AM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Subject: Comp plan.

CAUTION: External Email

Comprehensive plan for Seattle is currently: add sports teams North, Homeless village on Aurora in the North end and convert a hotel in the Northend to homeless housing.

Lack of clear planning has an explosion of high rise apartments, especially in Northgate, Lake City, Ballard.

So far zoning appears to be: avoid any area that might antagonize people with enough money to sue the city.

I suggest, no more high rise apartments in the North end. No more industrial companies next to residential areas (recycler in North end). Height restrictions in all areas. Nothing higher than the average height of homes in a one mile radius of where a building will be built, if being built in current residential zone. That average must include 32 single family residence. If a new apartment building along a road like Aurora, Greenwood, Lake City they must include green space surrounding building and parking. At least 5 ft of green space per story, (green space is wall to property line) surrounds building. That green space is to be GREEN, not rock, cement or brick. If a new apartment building bordered a residential, that building cannot block views and must have adequate parking at least one parking place per bedroom. Commercial and medical must also have adequate parking. (Go underground with parking— can be gated).

TREES MUST BE KEPT! No more removal of trees on property lines. All houses and apartments must have trees on property, especially evergreen trees to combat heat in summer and cold in winter. At least two trees to each RESIDENCE. Property lines must NOT be 0 lot lines. Structures must at a minimum, be 5 ft from a property line.

Homes, must have at least a 15 ft square piece of property on a lot for each house on the lot. Note that is a square piece of land, the size of a master bedroom dedicated to green space per home. To clarify further: if a lot has a duplex, then there must be two 15 ft squares of green space, NOT PARKING. No hedging/waivers allowed for this requirement!!!

New houses, apartments, condos, must have sidewalks. In the Northend, this has not been a requirement, consequently new houses and “condo” owners have taken to parking in areas where local residence try to walk. Putting people directly into traffic! If the city wants people to get hit by cars, continue as is. If the city wants to protect people and not put in sidewalks, at least speed bump the area, Or add stop signs, or even good style of round about should be included in areas with new houses, apartments, and condos.

Areas currently single family must remain single family. Zoning must keep Seattle single family residential areas in place. No more condos in single family areas. As long as the lot can have parking, and green space as described before, a lot can be a duplex or triplex. Homes near shopping centers, must be protected from homeless.

Shopping areas, like the strip malls on Aurora, an example is the strip mall between 130th and 145th on Aurora should be surrounded, I repeat SURROUNDED by green space, as in trees, grass, small shrubs.

Miles of cement, asphalt and dirt— need to have offsetting healthy areas to absorb the carbon and other poisonous particulates in the air... the very reason for the green space requirements mentioned before.

If the city wants families, then the city needs parks and green space! Those amenities must be in SAFE walking distance to homes. No crossing 4 lane busy streets. No crossing 2 lane busy streets with stop lights.

Every area needs space for children and parents. That space cannot continue to be the street in front of their home.

Schools can count as parks, as long as there are NO fields with field lights, NO fields that can be rented, and NO signs preventing families from bringing their pets along on an outing.!!! There must also be a play area for small children.

Businesses with huge parking lots, like Lowes, Home Depot, Sams Club, strip malls, schools must have trees in parking lot. Every 10 parking spots = 2 trees. Those trees must be replaced if they die.

New buildings, must have green space— if a food court, it must have an area with plants and skylights. That space must be walkable, and accessible to all users of the building. There is plenty of grey and rain in the city, if you are going to have large areas of inside space, make the space have natural light and plants.

Public Restrooms must be in all public businesses, a code or key or buzzed in can be used. Public restrooms must be added to every city block and transit station—they can be honey buckets, I don't care.

Restrooms are lacking in this city. It is a basic need for every individual in this city to have a place to go to the bathroom!!!

So, this city needs: a dept of green space whose job it will be to monitor compliance with lot lines, green space, tree plantings and keeping alive.

The city will need a bathroom "police" whose job it will be to make sure public restrooms are usable.

And just to make sure families are welcomed in this city for every 50 apartments 11 must be 3 bedroom (or an equivalent percentage of apartments.) And Every apartment building must have an indoor space for children on every floor. And there must be an outdoor space for pets!

Cities want families? Then plan for what families need... yards, play areas, pets, inviting spaces, restrooms (children might need to go to the bathroom on that hour long bus ride from Magnolia to downtown).

If you DON'T want families build high rise apartments (studio, 1 or maybe 2 bedrooms, 7 or more stories) 0- lot lines, no parking, no walking zones and no green zones. Make sure shopping, industrial and residential overlap, so there can be easy division of low income to high income. And keep the homeless away from the people who will sue the city.

I am saying: build a city, but make it livable. Homes, and apartments can be neighbors, as long as there are reasonable height restrictions, and space between them. Trees and green space are inviting. Grey upon grey cement is not.

Realize, to be livable, there will be a limit to how many people can live in the city limits. Realize, that a lot of people are moving — so they can have a small green space, and a bit of distance from the neighbors and parking near their own house.

Shelly

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:34 AM  
**To:** Staley, Brennon  
**Subject:** FW: Keeping TREES As We Grow

---

**From:** Judith Leshner <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 10:27 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Keeping TREES As We Grow

**CAUTION: External Email**

Good Day:

As our city grows in the coming years I know that housing will be one of the most important issues facing our decision makers. No matter the project I hope that **trees** will be part of those decisions. We have big trees that should be valued and saved when designing a new housing project. Too often our big trees are taken for granted and that they can be replaced with new smaller trees. We forget that it takes decades for those big trees to grow.

Planting new trees should be in the plans, also, and done with the knowledge of an arborist who can determine the right tree in the appropriate space. Let's take some lessons from Paris on saving our trees.

<https://www.nytimes.com/2022/08/09/travel/paris-trees.html>

Thank you for your consideration.

Sincerely,  
Judith Leshner  
[REDACTED]  
Seattle, WA 98119  
[REDACTED]

---

**From:** Audrey Livermore <[REDACTED]>  
**Sent:** Monday, August 22, 2022 4:22 PM  
**To:** Staley, Brennon  
**Subject:** One-Seattle-Plan

CAUTION: External Email

Hello,

Thank you for reaching out for public comments on this very important subject.

Sincerely,

Audrey Livermore, Seattle resident

## Make Seattle home to more people and more trees

Alternative #5 combines many ideas to make Seattle's density more diverse and promote healthy, liveable neighborhoods. Success is measured by thoughtful design choices.

Seattle has traditionally been a "City of Neighborhoods." Local community involvement leads to better solutions. Unlike the current spate of "shoebox" development, when done right, increased density can be "hidden in plain sight." It can blend into, and reinvent, the current housing stock to increase density at an appropriate pace, for all income levels. Good public transit is essential to increased density. Local small businesses make complete neighborhoods.

A priority must be placed on preserving and planting our urban forest in all parts of Seattle. Native plants and evergreen trees contribute to a healthier, more sustainable, city of the future.

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**From:** Cameron Lloyd <[REDACTED]>  
**Sent:** Monday, August 22, 2022 5:46 PM  
**To:** Staley, Brennon  
**Subject:** Dire need for alternative 6

**CAUTION: External Email**

Hello,

I am a homeowner and worker in Wallingford and I strongly believe Seattle can have a phenomenal future if we build abundant housing everywhere in the city. None of the proposed alternatives meet the challenge of solving Seattle's housing crisis, plain and simple.

A much better option would be an Alternative 6, which at a minimum would:

- Allow high-rises across the entire city
- Allow mid-rises across the entire city
- Incentivize and enable permanently affordable, cross-class, social housing to be developed
- Ensure all major services are within a 15-minute walk of every single household
- Allow much more multi-family housing to be built away from noisy, polluted arterials

If the city of Seattle adopted this proposed Alternative 6 option, then we would be able to:

- Enable many more people to live closer to their jobs and reduce their commute times
- Ensure the best health outcomes for children, which have been shown to occur inside mixed income neighborhoods
- Enhance housing security of renters and low-income folks
- Reduce rates of homelessness
- Reduce greenhouse gas emissions
- Reduce segregation and begin to correct the legacy of redlining

The other options (Alternatives 1-5) fall short for many reasons, including the following:

- Seattle already faces a housing shortage of dire proportions and none of the current options allow enough housing to be built throughout the city.

- The current options maintain Seattle's failed "arterial focused development" Urban Village strategies, which have forced almost all existing multi-family homes to be located on noisy, polluted roads. Equitable growth means the entire city can grow together, rather than concentrating narrow pockets of development.

The city of Vienna, where more than 60% of the city's residents live in social housing and homelessness is not an issue, is a good example of what I would most like Seattle to become.

Please study this proposed Alternative 6 so that we can truly begin to solve the housing, homelessness, climate, inequality, and affordability crises in Seattle.

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**From:** Derek Lum <dlum@interimcda.org>  
**Sent:** Monday, August 22, 2022 4:16 PM  
**To:** Staley, Brennon; Harrell, Bruce; Juarez, Debora; LEG\_CouncilMembers; Quirindongo, Rico  
**Cc:** Leslie Morishita (Real Estate Development Director); Tom Im (Deputy Director); Pradeepta Upadhyay (Executive Director)  
**Subject:** InterIm CDA comment on Comprehensive Plan update Scoping  
**Attachments:** ICDA Comprehensive Plan Update letter.pdf

**CAUTION: External Email**

Dear Brennon, Mayor Harrel, Director Quirindongo, Council Member Juarez, and all others,

It is my pleasure to submit our comment letter on the Comprehensive Plan Update. We believe this comprehensive plan update is a chance for the city to work with communities of color at risk of displacement in unprecedented ways. We have written our comment letter to this effect and look forward to engaging more on these efforts and issues. If you have any questions, please do not hesitate to reach out.

My very best,

Derek Lum (He/Him)  
Policy and Advocacy Manager  
InterIm Community Development Association  
310 Maynard Ave South  
Seattle, WA 98104  
E: dlum@interimcda.org

## InterIm CDA Comment on Comprehensive Plan Update

Dear Mayor Harrel, Director Quirindongo, Council President Juarez, and other officials,

InterIm CDA is submitting our comment letter for the public comment period on the EIS scoping process of the Comprehensive Plan update. We are a non-profit organization that has served the Chinatown-International District (CID) community for over 50 years, as well as other low income, immigrant, refugee, and API communities. We do this through a variety of community development services and social services, including affordable housing development, rental assistance services, youth leadership programs, resident services programs, community garden programs, and equitable development policy and advocacy organizing.

We think about issues of land use, urban planning, and related policies through the lens of Equitable Development. So, regarding the Comprehensive Plan we start with these kinds of questions, specifically for the communities we serve and other communities of color at risk of displacement.

- Does the plan promote economic opportunities for small community serving businesses and marginalized and low-income people?
- Does the plan increase economic equity by fostering community based financial intelligence, opportunities for wealth creation, and high-quality jobs, that prevent displacement of residents and small businesses?
- Does the plan promote stability for marginalized populations, community serving small businesses, and cultural and community organizations, towards sustaining their ability to stay in the neighborhood.
- Does the plan promote marginalized BIPOC local community character, cultural diversity, and values?
- Does the plan preserve and strengthen existing marginalized BIPOC cultural communities, existing community networks, and social cohesion?

- Does the plan integrate transit into walkable, livable, and affordable land use practices to enhance healthy living, access to the city, services, and access to amenities for all, including low income and marginalized populations?
- Does the plan enhance BIPOC, marginalized community health through access to public amenities, healthy, affordable and culturally relevant food, and safe environments for everyone.

We begin our letter with these questions because it is our experience, over the last 50 years of serving the Chinatown-International District community, that city leadership has severely harmed the community in innumerable ways. This does not mention the many times when other government bodies, alongside the city, committed racist harms against the CID. Some examples of racist harms that the municipal government has perpetrated on the community include the include the following,

- 1970 Ozark Ordinance: Fire code legislation passed leading to the closure of hundreds of SRO units, and the loss of hundreds of units of affordable housing in the urban core.
- 1972 Construction of King Dome: Stadium users begin to take significant parking from restaurant/grocery/service users.
- 2012 Livable South Downtown Upzones: Increased potential building height, property values, brought little benefit to low-income residents.
- 2015 Streetcar Construction: Beginning of multiple years of construction impacts only to have it abandoned in 2020.
- 2017 Mandatory Housing Affordability Legislation: Implemented upzones that intensify gentrification and displacement pressures in the CID, brought benefit primarily to mainstream moderate income populations.

We expect the City of Seattle to account for, a full list of the policies and practices that have harmed BIPOC populations in the Chinatown-International District and other neighborhoods where similar dynamics exist. Then, to identify avenues to repair past harms in BIPOC communities through the updates to the Comprehensive Plan.

## **Overall Themes**

We have identified specific themes of focus that are applicable to each of the Comprehensive Plan Update strategies mentioned. We have maintained some comments on certain strategies.

## **Displacement and Community Accountability**

Since our regions tech fueled growth started in the early 2010's displacement has been an existential threat for many BIPOC communities in Seattle. Specifically, our CID community experienced explosive gentrification and displacement pressures from the 2012 Downtown upzones, and the 2017 HALA/MHA upzones. Other BIPOC and marginalized neighborhoods have felt similar upzones and are under similar level of threat against displacement. Based on your own 2035 Equity and Growth Analysis, our community, along with Columbia City, Rainier Beach, Othello, and others are at high risk for displacement.

An approach which centers these communities well being is one which draws away zoning changes that will result in further displacement pressures. It would question if any zoning changes made are to the benefit of the marginalized communities of color that are living in these area's, and if the displacement pressures brought by zoning changes are balanced by community benefits that actually serve the marginalized community members. The Urban Village Growth strategy has resulted in many communities of color shouldering the responsibility for our regions growth without adequate community benefit. For these communities of color at risk of displacement, they must be a partner in the zoning changes and be truly enthusiastic about the change happening in their community.

These community benefits involve policies, planning, and investments which support the marginalized BIPOC communities living in high risk of displacement area's. This includes strategies to incubate, maintain, and celebrate historically culturally meaningful small businesses and organizations which are rooted in the community. Of special importance is ways to make commercial space viable and affordable to these businesses. This would also include rental and ownership housing which is not only permanently affordable and directly accountable to the community of color but also serves the appropriate incomes of those most at risk of displacement in that community. Anti-Displacement policies like Community Preference and Affirmative Marketing must be used. Investments and programs run by the city or community organizations would need to ensure that these communities of color at risk of displacement can take advantage of new housing or small business opportunities. Finally, the city needs to work with the appropriate organizations in each high risk of displacement neighborhood to ensure the that zoning changes meet the community's vision and that the benefits of zoning, land use, or housing policy reform flow adequately to the community of color at risk of displacement.

We do applaud the stated goal of the Comprehensive Plan update to prevent displacement. Within the many people who are at risk of displacement the focus needs to be on people who are from, low income, BIPOC, immigrant, refugee, and communities where those identities intersect. We are also still unsure about how the CID's growth, or other communities of color,

will be affected by this plan, given some of the vague wording used in the displacement explanation. Some of the proposed methods are improvements and begin to repair some past harms done to communities of color. While needed, an expansion of housing type choice will not be accessible to low or moderate income BIPOC people. Therefore, these changes must come with a dedicated affordable rental or homeownership housing requirement or fund, to ensure that the benefits of these changes do flow to those community members most at risk of displacement.

## **Environmental Justice**

We support comprehensive plan strategies which align our need to address climate change, by building denser, more whole communities where people do not need to use their cars, and the need ensure this change benefits “environmental justice” communities, including all of the communities of color at risk of displacement. Any Comprehensive Plan strategy needs to ask if, in trying to create more dense or complete communities, are communities of color at risk of displacement being harmed? If the answer is yes then policies, investments, and practices need to be enacted to ensure that these communities are able to participate in and stay rooted during this transformation, and that the transformation aligns with what the community sees as its own vision.

## **Strategies**

### **No Change**

We find that this potential comprehensive plan strategy is unacceptable. The Urban Village growth strategy is a significant part of what has led to our modern day gentrification and displacement crisis. It is not appropriate for the city's growth to mostly be born by a handful of neighborhoods. The implications of segregation and redlining, which is coupled with both general and racialized wealth and wage inequality, makes it so certain communities of color like the CID are very vulnerable to redevelopment, displacement, and the loss of historically culturally relevant businesses. So far, city investments have not kept pace with the amount of gentrification and displacement we have seen in the various communities of color.

### **Focused**

This strategy would come with the concerns we have outlined above. It would also spread growth out into different parts of the city, which can relieve displacement pressure from established urban villages where communities of color at risk of displacement reside. However,

it also is very similar to the Urban Village Growth Strategy, which means it carries many of the same potential for harm that the Urban Village Strategy did. It also does not carry as much ability to expand access to homeownership as other strategies. This would also not be our preferred growth strategy.

## **Broad**

Please see our overall thoughts.

## **Corridor**

Please see our overall thoughts.

## **Combined**

Please see our overall thoughts.

## **Conclusion**

Thank you for the chance to comment on the EIS Scoping period for the 2022 Comprehensive Plan update. This plan is incredibly important for everybody who works, lives, or plays in Seattle. But it is doubly important for communities of color. As each year passes the existence of many people or businesses in our communities become more precarious. The Comprehensive Plan is a place where the city can partner with our communities in a authentic, meaningful way and help us realize our long term visions for our communities. This comment letter seeks to help the city do that and to ensure nobody is left behind by Seattle's growth.

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:12 AM  
**To:** Staley, Brennon  
**Subject:** FW: Is this where I comment on the plan?

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**From:** Carol <[REDACTED]>  
**Sent:** Monday, August 22, 2022 4:57 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Is this where I comment on the plan?

**CAUTION: External Email**

Your website is unclear on how to comment. I have always appreciated the HUB idea. It seems cost effective to concentrate businesses, high rise housing, and transit. There is still a lot of space available on arterials leading to the hubs, so I do not understand the need to infiltrate low rise neighborhoods with high rise buildings. It seems to me that housing availability is being helped by the addition of ADU and UADU to single family lots, though use as short-term vacation rentals should be restricted. I do have questions, however, about the development in my neighborhood. Smaller houses are being torn down and replaced with three multi story units that are pretty pricey. Who are these for? How does it help low income adults, families, and seniors to tear down relatively affordable, accessible homes to create housing stock that is mostly stairs? What I like about living in my neighborhood is that it is quiet, walkable, has parks, lots of trees to cool and clean the air and provide habitat for birds. I understand this is not true for everyone who lives in the city, but can we concentrate on providing more green space, more trees to underserved areas, and not destroy the liveability for everyone else by doing away with current zoning?

Thank you,  
Carol Mabbott

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Sunday, August 21, 2022 7:25 AM  
**To:** Staley, Brennon  
**Subject:** FW: OneSeattle 2035 Comprehensive Plan comments  
**Attachments:** LCC Comp plan comments 2035.docx

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**From:** McAleer <[REDACTED]>  
**Sent:** Monday, August 15, 2022 10:09 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Cc:** Staley, Brennon <Brennon.Staley@seattle.gov>; Harrell, Bruce <Bruce.Harrell@seattle.gov>; Pedersen, Alex <Alex.Pedersen@seattle.gov>  
**Subject:** OneSeattle 2035 Comprehensive Plan comments

**CAUTION: External Email**

Hello OneSeattle 2035 Comprehensive Plan team members,

Please find our comments for your attention in the 2035 OneSeattle Comprehensive Plan.

Thank you for your work on this important planning,

Colleen McAleer  
President  
Laurelhurst Community Club



**Laurelhurst Community Club**  
*Serving Seattle's Laurelhurst Community since 1920*

August 15, 2022

To: OneSeattle Comp Plan (via electronic mail) oneseattlecompplan@seattle.gov  
brennon.staley@seattle.gov  
Seattle Office of Planning & Community Development  
From: Laurelhurst Community Club  
RE: Comments on scoping the 2035 Comprehensive Plan

Laurelhurst Community Club in conjunction with Washington State's Growth Management Act (GMA), and the City of Seattle 2035 Comprehensive Plan offers the following scoping comments for consideration as the City plans for its future, and considers the impacts from the proposed changes.

The overarching goals should be based upon the City's ability to grow for predicted employment and residential units while maintaining or reducing the adverse impacts to the City's quality of life and its natural environment. In the past several cycles of the State's GMA, the City of Seattle has taken on more than its "fair share" of the regions' growth during the past 10 years, and no doubt will continue that commitment for 2035. However, spreading the proportionate growth throughout the Puget Sound area to adjacent municipalities is strongly warranted to provide for more equitable choices of transportation and affordable housing options for the region's new residents and employees. For example, Seattle could lose a cumulative 5% of its tree canopy if OPCD and SDCI regulations and policies allow structures to be built on every bit of its greenspace, which would destroy its exceptional and mature trees. Conversely, if nearby Mercer Island's 2017 stricter tree regulations prohibit tree removals to add more detached units, it will increase its tree canopy over time about 5%. Creating a disparity, its commuters who live among the trees while local residents live in a more barren Seattle. The same is true for many of Seattle's adjacent cities and towns or who daily drive or ferry in, and return to their residences without experiencing and sharing the impacts from the GMA 2025 policies and goals. **Planned GMA growth is more equitable when shared throughout the state.**

Predicting the potential adverse impacts of the new growth, the GMA planning, investments, policies and priorities is the role of scoping for OneSeattle2035. We offer our comments regarding what OneSeattle should study in the SEPA process for the 2035 Comp Plan's EIS:

**1. Infrastructure**-With the explosive population and job growth in the past 20 years, the amount of new buildings all over the Seattle has stressed the City's existing infrastructure. **Energy use and type** in the built environment must be studied and identified for new improvements to reduce greenhouse gas emissions, and improve air and water quality to combat Climate Change.

The EIS for the OneSeattle Comp Plan for 2035 must include a study and plans to upgrade utility capacity, especially for the **electrical grid** in the light of projections for more electric vehicles in the City's fleet and for individuals. **Utility poles are also holding up thicker wires** and more utility poles are being added with safety and visual blight concerns. **Scoping should include burying new developments' utility lines** for safety and reducing visual blight.

With the use of natural gas phasing down, and non-carbon energy sources such as **solar, geothermal and wind power coming more feasible, these energy sources must be studied for efficient storage and use** in the EIS scoping. Installations that support these alternative energy sources must be imbedded in the OneSeattle Plan infrastructure, with a rapid timeline for coming on board to incentivize use of these new technologies, especially in light of the new Federal Deficit Reduction legislation.

**The network of Seattle's streets have been sorely neglected** with lumpy irregularities, reappearing potholes, sinkholes and reduced capacity. **The scoping of OneSeattle should include an inventory to identify safety issues and urgency for repair.** As the City adds new structures, it also needs to invest in permanent and quality upgrades to support streets to serve more transit, bikes, scooters, delivery trucks and all vehicle users. **Impact fees from developers should be studied to pay for the "fair share"** damages inflicted on the streets from building projects as well. The policy from SDCI is always, "no impact", but there are

impacts, especially in more dense urban villages and upzones, and the City budget should not have to pay for developers' damage to its streets.

The City's bridges have already had a safety assessment inventory, and the bridges at risk for failure should be studied for prioritizing repairs and upgrades for replacement before another catastrophic event occurs like the West Seattle Bridge. The City should also **study its specifications for its streets and bridges to withstand more severe Climate Change events, such as heat buckling.**

Sewers, drainage and overflows of **stormwater** has experienced some federally mandated upgrades, but the EIS should study and **identify more upgrades to reduce the spills of sewage into City's waterways.** For example, the Yesler Creek CSO system runs along residential Surber Dr. NE. It has overflowed into the Union Bay with rare bird habitat much more these past 10 years and was attributed to the addition of over 1400 new apartments using the old, narrower SPU pipes that cannot accommodate that extra flow of sewage. **Scoping should include a study of sewer width and capacity where changes of zoning are proposed.** The EIS should study a fee structure to pay for the increase SPU capacity to the system before building permits are issued.

**Cellular towers and internet cables** should be studied and identified in the EIS to be certain **that ALL neighborhoods are served at an affordable price** for more equitable access. The City itself passed legislation supporting this goal.

Waste removal should be studied in providing more incentives to producing less waste, and study requiring all buildings to provide non-spill type containers **with on-site container storage**, and not permit them on streets and sidewalks after pick up, especially in MHA housing units so all streets can be free from refuse container blight.

**Natural Disaster emergencies should be studied in the EIS scoping.** Seattle has a patchwork of Earthquake preparedness HUBS and systems, but the EIS should study its **adequacy of response to major emergencies** such as pandemics, tsunami, floods, earthquake, fire or even acts of war. Plans for emergency services and survival should be studied, identified and **built into** Urban Villages and centers.

**Transportation system (part of Infrastructure) options** that are **frequent and reliable** should be studied in the EIS as it is intrinsically linked to providing more affordable housing options for families with lower incomes. New York City figured it out 118 years ago when it built its first major rapid transit subway system in 1904 to provide a commuter option for "a nickel" from expensive Manhattan to more affordable City neighborhoods including Queens, Harlem, Roosevelt Island, Brooklyn and more including to their intercity train system. Later in September 2015, NYC expanded its subway once again to attract new business and residential development along the City's West Side in Chelsea and Hell's Kitchen and it enabled more affordable housing to be built in a traditionally less desirable part of its city.

Seattle never planned and executed that level of a major and inexpensive commuter system, and only recently has expanded the Light Rail to reach a few destinations along the I-5 corridor, north and south, and soon to expand to the east and west. **Thus, housing affordability remains a "pressure cooker" scenario attempting to provide housing for all income levels within the City limits, and spilled to adjacent municipalities.**

However, on the near horizon, the Light Rail system will have many new operable branches to connect the mainline to Seattle's more bedroom neighborhoods, such as to West Seattle, or north to 130th or 145th Streets and west to Interbay. **Scoping should include building new Urban Villages with residences at these new Light Rail stations for easy access and to reduce reliance on SOVs.** In addition, the **foot ferry capacity can be studied** for accommodating more commuter growth in West Seattle or potentially north and south points of Lake Washington to the University of Washington.

**Housing units -Scoping should determine capacity and impacts of creating various types of housing in new vibrant urban villages around the new Light Rail destinations/stops and other frequent transit options.**

**2. Housing units types and forms. Scoping for the EIS should include how many units of residential units and office space have already been submitted through any channel of SDCI or OPCD with an expected timeline.** The study for the EIS should start with the pipeline and existing inventory not yet occupied:

How many are planned already to be built in the next 10 years?

Is there a disproportionate number of types of structures given new work-from-home options.

What is the office buildings vs. residential occupancy predicted for apartments or condominiums?

Should and can those planned and existing **structures be repurposed for housing?** ( Example, Pacific Place retail development, with declining retail tenants is converting to other uses)

**Noise generation, changes in daylight in existing homes and ability to grow kitchen gardens and use outdoor spaces and even requiring air conditioning should be scoped with any change in zoning patterns.** For example, the **Comp Plan should study impacts from potential infill of tall barren townhouses without any trees or traditional setbacks next to detached residents** with yards. It can potentially create unintended impacts and destroy the quality of life by removing sunlight in yards, or, permitting additional height for roof top party levels that emits loud noise and artificial light into adjacent family/childrens' bedrooms every night.

**Before replicating the next set of planned urban villages, the EIS should identify and study some basic measurements of success.** The City should learn what is working well, and what is not as successful as planned.

Measurements of viability for urban villages may include some of the following:

- Are residential units more affordable than units than options within 2 miles?
- What is the turnover rate of residents, and what causes departures?
- Is the small business community stable, growing?
- Are there gaps in services not provided?
- Is the crime rate within the Urban Village different than adjacent areas?
- What is the percent of car ownership for its residents?
- Is there adequate parking for residents, visitors?
- What transit options have been the most utilized, or least used?
- Is there diversity among neighbors, singles, families, seniors of a variety of ethnicity and ages?
- Have residents or businesses expressed "gaps" that were missed in planning the urban village?
- Has the tree canopy been impacted with infill from new buildings? Is there adequate shade or has it become a heat island in summer?
- Is the new vegetation replacement adequate and maintained for tenants to have community gardens or gathering spaces?

OneSeattle Comp plan has offered 5 conceptual alternatives for the public to comment on with names associated with "brownies, cookies and chocolate chips" to describe them, but real and permanent impacts on the natural resources of the City will be created.

All five options assumes 132,000 additional jobs in 20 years, and with most new building spaces concentrated in denser downtown or in South Lake Union, so LCC will not comment on jobs.

**None of the 5 OPCD housing alternatives provide the lower income renter a path to become a home owner, because the land and construction costs in Seattle are very expensive. The City will need to find public or repurposed parcels to build permanent low income housing to achieve below market prices.**

Deep reading of the City's contracted study in the Berk Housing Report of April 23, 2021, it notes that the **households below the AMI will not be able to achieve home ownership because the cost of the land and to the and maintain the units/buildings will outpace their low wage paying incomes.** Thus, units produced in Seattle to house low income residents will have to be subsidized by the government, or other non-profits who can provide and **sustain the below market rate units.** The extra few lesser priced units paid by developers for added height expire in short period and revert to market rate prices, displacing the lowest income residents one more time. **The City should study the feasibility of adding land masses out over the I-5, SR99, SR520 highways to "create" buildable land, and own it.** Scoping should be done for feasibility if it could be used to build **permanent affordable new housing units on new land** that would provide a basis for lower income housing near transportation corridors. The EIS scoping should study partnering with non-profits like **Habitat for Humanity** to reduce costs by enlisting future residents' **"sweat equity" to build their new homes on the new land which becomes a pathway to building wealth through home ownership.**

The other options that should be studied might before the City to provide rent vouchers to very low income residents to subsidize their rents and prevent their displacement, and provides predictability. This type of **subsidy could also be attached to working in a service occupation within the City itself to fill its vacancies, and build employee's skill sets to raise wages.** Other methods to raise wages include more educational opportunities in the trades or higher learning.

Lastly, for reducing costs for the lowest income housing options, the City should **study creating small co-op models,** especially where a mix of families with children are housed with active seniors on a limited budget, and could share child or senior care, meals, social events, etc. within small scale multifamily buildings.

Regarding the 5 OPCD options offered for scoping, below are LCC's comments:

**Alternative #1**-No action with its past focus on building urban centers and villages in mixed use areas of the City. The Comp plan assumes creation of 80,000 housing units **in 20 years**. Alternative #1 (existing) has **produced 70,000 new units in 10 years**, according to the OPCD fact sheet. The Comp Plan to 2035, is based on 132,000 new jobs. The 2020 Census finds that there are **2.08** persons per household (dwelling unit). That translates into a housing demand of **63,462** (132,000 /2.08) **new units needed in 20 years, or**, using the OPCD's higher estimate of 80,000. **Alternative #1 then has produced 70,000 in 10 years so using the same Alternative #1( the current Comp plan) it could produce 140,000 housing units in the next 20 years with no zoning changes.**

**Since Alternative #1 exceeds the 80K unit demand, it is a solid viable option with the least displacement** from changing existing zoning. This alternative **would continue to build out concentrated new locations of urban villages and centers where the new infrastructure of Light Rail will be added, such as north to 130th and the 145th streets and southwest to West Seattle, west to InterBay and to Southeast Seattle.** The existing urban villages, closest to the downtown are already very dense such as Ballard, University Village, Rainier Valley, Roosevelt and South Lake Union, and show not add to their growth by 2035. **To create more diverse and equitable opportunities for housing throughout Seattle, future growth of urban villages should be studied in various other parts of the City which best utilizes the new transportation infrastructure, such as Light Rail.**

On page 45 of the April, 2021 Berk study, it found that the supply **of moderately priced single family homes is decreasing**. The demolition of 1650 detached homes were lost from 2010-19, and split into 2 lots, to create over 3300 units for a net gain of 1650 units. However, the report found that **2 more expensive homes were created** even more than the one home, which raises concerns about displacement of existing owners and house renting tenants. This practice of pressuring long time homeowners to split their lots helps developers flip and make a profit, but **does NOT contribute added inventory to the affordable housing stock for middle income households**. The City should then study ADU additional units on site in the detached housing zones which can potentially add 4500-6500 new units and are more moderately priced, and do not displace existing moderate priced housing stock.

**Alternative 2-** This option **emphasizes 15 minute walkable neighborhoods , and should be studied with priority in the EIS .** Not only it is the "greenest" option to use feet instead of vehicles to combat the impacts and prevent more GHG of Climate Change, **it provides more sustainable and integrated neighborhoods**. Studies should identify neighborhoods access to food, both groceries as well as prepared hot and foods for at least the lunch through dinner hours. Drugstores are also essential and could be part of a large grocery store . As families are busy and seniors downsize their food preparation, this type access to food is essential, and should be studied in the EIS as a policy requirement. Parks & Recreation community centers, medical access and other community facilities such as senior centers, libraries and schools should be studied to provide the hub for community building. **Facility deficits should be studied and augmented with more funding and resources in areas lacking these City facilities the 2035 Comp Plan scoping to make 15 minute neighborhoods work for all neighborhoods, and reduce reliance on vehicles.**

This Alternative #2 aligns with existing Alternative #1 which should be able to produce even more than the 140,000 new housing units in the next 20 years, with the focus on expanded or new urban villages or adding smaller version nodes, and should exceed the goal of producing the 80,000 new residential units, while reducing GHG.

**Alternative #3-**Plans to include duplexes, triplexes and fourplexes in detached housing zones. Allowing the demolition of detached housing units has NOT produced more **affordable housing units**. As noted above, the dividing of lots for townhouses is a **"developer's dream" to ignore well planned zoning to produce higher priced homes from the demolition of existing houses**. The EIS must study the potential displacement of the current residents, who cannot afford to remain, or physically cannot climb 3 flights a day in these new type of 3 level townhomes. In addition, the "squeeze" of these town homes and row houses usually strip out all vegetation and destroy Climate Change protective mature trees. **They often are cheaply built, and have no relationship to the character of the existing neighborhood.** The EIS should study the impacts on the City's **tree canopy** from replacing these units on lots previously deemed a detached structure. Note that the existing residential neighborhoods are home to 72% of the City's tree canopy, on 67% of the land.

See below, existing triplex on NE 50th St. with trees and vegetation before and next to "development "of 6 rowhouses that are 3 years old, priced at 1,325,000 each. No character nor mature vegetation preserved.



Affordable triplexes and fourplexes existing **before** development across the street on 44th Ave NE



**Townhouse replacements for the tri and fourplex residences 3 years ago after development as it remains today stripped of most vegetation and stark white in color.**

**Alternative #4-** Seattle has already allowed substantial infill and upzoning with HALA a few years ago, and therefore this alternative is not new. Transit oriented development should be studied again and its successes applied building more types of housings near the new Light Rail Station expansions areas at NE 130th St, NE 145th St, Interbay, West Seattle, SE Seattle and to Aurora Ave North with its Rapid Ride Metro bus transit corridor.

There is no need to study changes to existing detached zoning because it is not needed, and will not produce affordable housing units **The Berk study (page 46) noted that the capacity for new housing development is 140,182 units in the high density zones** and conversely, low density zones such as detached houses can produce only 3735 units. Thus, the City should study the high density zones before changing the overall zoning which will not solve the housing shortage problem. Existing policies and zoning, and replication, can produce at least the 140,000 units as Alternative #1 (existing), and **prevent displacement and preserve the tree canopy from tearing down existing affordable housing with Alternatives 3, 4 or 5.**

**Alternative #5- This combination alternative allows a developers' "free for all", and will not only destroy the City's natural beauty and neighborhoods' character, but also creates owners' and developers' chaos, each new structure vying for a special departure or added height or short set back covering residents green spaces, and view corridors.** A study should measure the decrease in the predictable value and character of this alternative to residential areas which do not have the infrastructure to accommodate high density. Excess new noise, parking scarcity and inability for utilities to serve the new and existing residents and other users should be studied.

**Alternative #5 should be studied because it alleges that it creates a better distribution of housing, but in fact, the land itself is so expensive that it will not achieve that goal.** There was a decline in the City's population in the past 3 years, so the scoping should study what the causes were for existing residents to leave the City, and if their housing needs were not met. As previously noted, the most units of housing can be produced in high density zones without changing the zoning in lower density, so Alternative #5 should be scoped to see if it really is a viable alternative with no end caps.

**3. Tree canopy and urban habitat.** The City of Seattle has a tree canopy that defines its moniker as the Emerald City. To that end, preserving its exceptional and mature trees also will preserve its viability. **The EIS for the Comp Plan must study the impacts of its growth strategy policies on its trees, especially the mature and exceptional trees. These are the trees that clean the ever increasing pollutants in the air, and provide shade to buffer the impacts of hotter temperatures due to Climate Change.**

The Comp Plan should study methodology for building more new housing but also retaining mature trees. See example on 32nd Ave NE and NE 65th St. More dense housing can be accomplished with more tree preservation requirements.



Saving mature trees on 32nd Ave NE enhances denser development , saves urban critter habitat & blends with adjacent streets

**5. Air quality** must be a priority in scoping plans for OneSeattle 2035. **We must study how the City's policies going to improve or identify if it will degrade air quality with new transportation modes, and is able to require building new structures that are carbon neutral?**

**6. Food.** Scoping **for residents access to food should be studied in the OneSeattle Comp Plan to provide full line grocery stores** with fresh produce and protein, deli or prepared foods. The current "mixed use" zoning does not explicitly ensure healthy food access is built into the housing alternatives, and this should be studied in the EIS. Residents cannot be fed exclusively from small "coffee shops" in mixed use developments.

**Spaces for larger restaurants capable of serving 3 meals/day should be studied as a requirement** in large new residential areas and urban villages. Food-to-go options should be studied as a requirement for efficient meal options for singles, families elderly, and those who have no time or space (apodments) to prep meals at home

The OneSeattle EIS should **study the inclusion of community garden spaces and community kitchens** in urban villages and centers for building community, sharing diversity in cultures and educating people about food prep from ages 3-93 years.

**7. Health-** The **Comp Plan 2035** scoping should include County and State Health **Departments projections for hospital bed** availability, including trauma centers and behavioral health facilities for Seattle. Harborview (the City's public hospital) is bursting at the seams and should be studied for its future capacity needs.

8. **Public access to parks and public recreation facilities** should be studied, and include an inventory of the existing public community centers, parks, swimming pools, golf courses and beaches and identify deficits in coverage, especially in new urban villages. This is the core of creating Alternative #2 which is 15 minute walkable neighborhoods. Providing City services near residents, rather than rely on more car trip generation to access City public parks and community centers must be studied. **The OneSeattle EIS should study how to build capacity among youth as future life guards for summer beach safety jobs.**

9. **Public facilities such as libraries, senior centers and daycare** should be studied to see if they have the capacity to serve the growing community of all ages to provide access to the internet, reading materials and research as well as provide some public meeting spaces. Hours should be studied to identify if they meet the needs of nearby users in 15 minute neighborhoods.

10. **Police and Fire and Harbor Patrol services-** The City of Seattle has had an overarching responsibility in its City Charter to provide adequate police and fire safety protection for the public. The past 5 years has been chaotic and unpredictable for public safety staffing requirements. **The EIS for the Comp Plan should study and quantify the needed number of officers, detectives and support staff to provide adequate patrols and crime solving. Harbor Patrol should be studied to find resources to restore its services for rescue and public safety on Seattle's vast waterways,** and enforce public safety statutes. **Fire fighters** are the City's very first responders and their staffing should be studied for optimal response times to accommodate the City's residential and employment growth. **New technology should be studied to police and aid first responders** effectiveness.

11. **Seattle Public Schools, including Preschool for all** must be scoped in the OneSeattle EIS in terms of needed capacity and any **re-alignment for locations of the schools, based upon trends in population and school enrollment patterns.** This is particularly true of the more dense, downtown population, as it grows without any elementary school to send its residents. **Public schools should also be studied to provide space and resources to provide evening classes for English language learners or computer access and literacy.** This study could suggest programs and the access to learning tools that immigrants can use to achieve better jobs, and elevate their households out of low paying jobs .

12. **Historic preservation of significant places, sites and building should be studied** in the OneSeattle 2035 should study neighborhood landmarks including buildings, sites and places that are the cornerstone of its collective history. What happened to Africa Town, aka. the original Central District, when piecemeal developers bought out property owners of residences, churches and small businesses. In one generation, the whole history and character of the former neighborhood was lost, and replaced by taller rectangles and new residences and stores. *To prevent that loss of "place",* **the City should study and produce an inventory of its most historically significant icons, buildings, sites and places. This list in addition to the City's official landmarked buildings and places can be utilized for preventing a loss or displacement of the heart and soul of its people past and into the future for their roots.**

13. Character and quality should also be studied to assess the lifespan predicted of its new buildings, and integration into existing neighborhoods. Building for 100 years is more "green" and will become the bedrock of our City's future. The OneSeattle Comp plan **should study policies to expanding our City's character and taking architectural cues from adjacencies to help integrate new structures into the existing built environment and retain the character and lasting quality that Seattle defines itself.** This also helps to prevent further displacement from permitting lower quality structures that need to be replaced every 25 years.

End of comments

Thank you for your work on this important OneSeattle 2035 Comp Plan.

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:36 AM  
**To:** Staley, Brennon  
**Subject:** FW: Public Comment regarding Seattle Comprehensive 10 Year Plan

-----Original Message-----

From: Brent McFarlane <[REDACTED]>  
Sent: Sunday, August 21, 2022 11:31 PM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Subject: Public Comment regarding Seattle Comprehensive 10 Year Plan

CAUTION: External Email

The Seattle 10 year Comprehensive plan must take into account climate warming and the need to restore and grow the urban tree canopy across the city. Planting trees in neighborhoods that need them the most and retaining tree canopy wherever and whenever possible. The urban heat island effect makes this an urgent public health and quality of life issue. We must plan for 10 years of restoration, conservation and replenishing of our the tree canopy citywide.

It's urgent that we find ways to increase street trees under the range of proposals, including making street trees mandatory on all proposals in all zones and planting large trees where there are no overhead power lines. We need building alternatives and zoning that will create space for residents to have trees and open green space on building sites. We must require that developments set aside a portion of a lot as a designated tree protection area. This could provide protection for larger trees, exceptional trees or a tree grove.

We must also consider and address how each plan would work to increase tree equity - public health and environmental justice across the city

Thank you,  
Brent McFarlane  
Seattle, WA

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**From:** Bakker, Patricia  
**Sent:** Monday, August 22, 2022 1:32 PM  
**To:** Staley, Brennon  
**Cc:** Lerman, Sharon; Hazelhoff, Aja  
**Subject:** UF Commission Recommendations re: Comp Plan EIS Alternatives  
**Attachments:** ADOPTEDCompPlanEISAlternativesRecommendations081722.pdf

Hi Brennon,

Please see attached the UFC's recommendations regarding the EIS alternatives to be analyzed for the Comp Plan update. Please let me know if you have any questions.

Thanks,  
Patti



**Patti Bakker** (she/her/hers)  
Interim Urban Forestry Commission Coordinator  
City of Seattle, [Office of Sustainability & Environment](#)  
206.684.3194 | [patricia.bakker@seattle.gov](mailto:patricia.bakker@seattle.gov)  
[Facebook](#) | [Twitter](#) | [Blog](#)



**Julia Michalak** (Position #1 – Wildlife Biologist), Co-chair  
**Joshua Morris** (Position #7 – NGO), Co-Chair  
**Elby Jones** (Position #2 – Urban Ecologist - ISA) • **Stuart Niven** (Position #5 – Arborist – ISA)  
**David Moehring** (Position # 8 – Development) • **Blake Voorhees** (Position # 9 – Realtor)  
**Laura Keil** (Position #10) • **Jessica Hernandez** (Position #11 – Environmental Justice)  
**Jessica Jones** (Position # 12 – Public Health)

August 17, 2022

Brennon Staley  
Office of Planning and Development  
700 5<sup>th</sup> Avenue  
Seattle, WA 98104

**RE: Urban Forestry Commission comments on 2024 Comprehensive Plan EIS Scoping Alternatives**

Dear Office of Planning and Community Development,

Duwamish Lands (Seattle, WA) – The Urban Forestry Commission (UFC) has identified the 2024 Comprehensive Planning update process as a key priority for commission engagement and input. The UFC is grateful for your early engagement and is looking forward to active involvement in this work.

Seattle’s urban forest within public and private lands plays important roles in our city’s ecology, economy, climate resiliency, and the health and wellbeing of people who live, work, and play here. Ensuring the urban forest is healthy, growing, and equitably distributed are critical aspects for meeting the City’s racial and social justice and sustainability goals.

Since urban forestry requires long planning horizons, trees must be a clear feature in our vision for future growth and development. The UFC recommends that urban forestry and related themes be a central element in the Comprehensive Plan Environmental Impact Statement process, with existing explicit Comprehensive Plan goals integrated throughout the final plan.

**Our recommendations pertaining to the EIS process and analysis are as follows, elaborated further below:**

1. Analyze the impact of all growth strategies on urban ecosystem services.
2. Analyze the impacts of all growth strategies on biodiversity.
3. Analyze the impacts of all growth strategies on human health and equity
4. Include an alternative that provides more evenly distributed density than Alternative 5.
5. Include an alternative based on an EcoDistrict planning model.
6. Consider a larger diversity of place types.
7. Consider a greater diversity of housing choices
8. Add additional biodiversity and climate impact considerations to Council’s request in Resolution 32059.

**(1) Analyze the impact of all growth strategies on urban ecosystem services.**

The EIS analysis for each alternative should examine impacts to our urban ecosystem services, many of which are provided by the urban forest, including existing trees and the potential for new trees. The UFC recommends following Barron, Sheppard & Cordon's<sup>1</sup> performance indicators: physical access to nature, canopy cover, stormwater control, habitat provision, air quality improvement, visual access to nature, available growing spaces, and greenhouse gas sequestration as key performance indicators.

**(2) Analyze the impacts of all growth strategies on biodiversity.**

The EIS analysis for each alternative should examine impacts to the city's biodiversity, including changes in the availability, quality and sustainability of terrestrial and aquatic habitat, and impacts to orca, salmon and other wildlife in the Salish Sea and connected waterways. The UFC also recommends assessing how each alternative could impact or enhance connectivity between parks and natural areas. Connectivity is the extent to which the landscape facilitates ease and safety of movement between parks and natural areas for non-motorized traffic. Connectivity should be considered for wildlife, including mammals, birds, pollinators and other insects, as well as people.

**(3) Analyze the impacts of all growth strategies on human health and equity.**

The EIS analysis for each alternative should examine impacts to human health outcomes, including negative effects associated with traffic and pollution, and positive effects associated with access to natural areas and open space. For example, Alternative 4 ("corridor") and Alternative 5 (combined), could focus or promote new development along corridors with frequent transportation. This could concentrate noise and pollution burdens on those who live along the corridors and also improve access to natural areas.

**(4) Include an alternative that provides more evenly distributed density than Alternative 5.**

Many "One Seattle" online responses are calling for a strategy that opens all zones to higher density development, including multi-family zoning everywhere, high rises in urban villages, and light industrial and commercial in residential zones. The City needs to explore all options available to address the housing crisis while planning for equitable canopy cover within all residential areas (considering the 2016 Tree Canopy Assessment that indicates that the greater the density, the extent of canopy cover is reduced). The UFC supports examining how less restrictive land use regulations could impact housing affordability, job creation, equitable urban forest, and wildlife habitat<sup>2</sup>.

**(5) Include an alternative based on an EcoDistrict planning model.** The UFC recommends analyzing how EcoDistricts – park-oriented, high-density development containing a diversity of housing types, including social housing, co-ops, market-rate housing and more – can be deployed in Seattle to promote diversity in housing, affordability and low-carbon living. The UFC recommends the Office of Planning and Community Development invite the Mayor, Seattle Planning Commission and City Council Land Use Committee to review Larch Labs' (and others) [presentation](#)<sup>3</sup> on alternative land use and urban forest

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<sup>1</sup> Barron, Sara, Stephen RJ Sheppard, and Patrick M. Condon. "Urban forest indicators for planning and designing future forests." *Forests* 7.9 (2016): 208.

<sup>2</sup> Most of Seattle's tree canopy cover is on land currently zoned as Neighborhood Residential. Sweeping changes in land use policy could have significant consequences for the urban forest.

<sup>3</sup> Digital recording of July 20, 2022 meeting; Larch Labs presentation starts at recording time stamp 25:20

planning initiatives, and benchmarking cities with similar context. These urban development strategies have been tested globally and provide compelling case studies for dense, livable communities with reduced needs for cars and a prioritization on the human experience.

**(6) Consider a larger diversity of place types.**

In addition to urban centers, urban villages, smaller nodes, corridors, and neighborhood residential areas, the UFC recommends including industrial zones and major institutional overlays in analyses. The study should consider appropriate modifications to land uses where the incremental completion of Sound Transit 3 transit growth through 2040 will result in greater access to jobs and denser mixed-use communities.

**(7) Consider a greater diversity of housing choices.**

The alternatives mention triplexes, fourplexes, townhouses, apartments, and commercial spaces. The UFC suggests expanding the consideration of housing types to also include high rises, co-ops, sixplexes, social housing, multi-family homes, stacked townhouses and rowhouses, accessory dwelling units and detached accessory dwelling units, cottages, tiny homes and more.

**(8) The UFC Supports Council’s Resolution 32059 prioritizing resilience.**

The UFC commends City Council for adopting [Resolution 32059](#), committing to address climate change and improve resilience as part of the One Seattle update to the Comprehensive Plan. The UFC supports the resolution and seconds its call to specifically develop new or revised goals to reduce greenhouse gas emissions, foster resilience, and work toward environmental justice in Seattle. The UFC offers to be a resource and partner to help develop policies and ideas for improving resilience of natural areas, enhancing tree canopy, identifying natural areas and infrastructure that may be vulnerable to changing environmental conditions, and more. The UFC’s key overarching additions to Resolution 32059’s goals and considerations are to:

- Call out the need to study the potential impacts of new and more deleterious pests and pathogens as a climate-related impact. For example, the emerald ash borer is an insect that infests trees in the genus *Fraxinus*. It has already killed tens of millions of trees in 30 US states. In July 2022, the emerald ash borer was found in a city near Portland, Oregon. The Seattle Committee on Invasive Pests is preparing for its arrival in our city. Fewer days of extreme cold due to climate change will allow the emerald ash borer and other pests to move further north or be active longer. More pests and pathogens will come. The future of our urban forest depends on our ability to be ready.
- Explicitly name “holistic urban biodiversity management” as a goal. Maintaining biodiversity is key to maintaining long-term ecosystem services and function<sup>4</sup>. Yet we tend to manage parks, natural areas, public and private land trees, wildlife, a small number of species (e.g., Great Blue Herons), and other natural assets discretely. Further, biodiversity conservation and climate change mitigation need to be more consciously coupled<sup>5</sup>. The two crises are related and can create feedback loops that exacerbate or complement each other.

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<sup>4</sup> Oliver, Tom H., et al. "Biodiversity and resilience of ecosystem functions." *Trends in ecology & evolution* 30.11 (2015): 673-684.

<sup>5</sup> Roberts, Callum M., Bethan C. O'Leary, and Julie P. Hawkins. "Climate change mitigation and nature conservation both require higher protected area targets." *Philosophical Transactions of the Royal Society B* 375.1794 (2020): 20190121.

The UFC makes the following additions to Council’s resolution, with **UFC recommended additions in bold**:

*Section 1. As part of the One Seattle update to the Comprehensive Plan, it is the City’s intent to address greenhouse gas emissions reductions, climate resiliency and adaptation, and environmental justice. City staff is directed to study and develop new and revised goals and policies founded in science that include, but are not limited to, the following:*

*A. Reducing overall greenhouse gas emissions, and other harmful pollutants that exacerbate climate impacts, including:*

- 1. Reducing per capita vehicle miles traveled within the city limits of Seattle;*
- 2. Increasing the amount and diversity of housing and providing amenities near housing to reduce dependence on cars;*
- 3. Planning for future transportation investments to equitably meet forecasted multimodal transportation demands across the city, **including safe walking and biking routes**; and*
- 4. Updating level of service standards for all locally owned arterials, transit routes, and active transportation facilities.*
- 5. **Assessing where street and alley or off-street parking can strategically be converted to plantable space for trees to reduce climate impacts and promote tree equity.***

*B. Fostering the resilience of natural and human systems to climate impacts and natural hazards, including:*

- 1. Enhancing the resilience of existing natural areas, including wetlands, riparian areas, and vital habitat for safe passage and species migration;*
- 2. Increasing resilience against natural hazards created or aggravated by climate change, including sea-level rise, landslides, flooding, drought, heat, smoke, wildfire, **pests and pathogens**, and other effects of changes to temperature and precipitation patterns;*
- 3. Leveraging investments in natural and “gray” infrastructure to increase climate resiliency and provide co-benefits, such as stormwater management, salmon recovery, and other ecosystem services; and*
- 4. Enhancing tree canopy to reduce airborne pollutants, decrease stormwater runoff, and mitigate urban heat island effects, particularly in residential areas with low canopy coverage.*
- 5. **Establishing goals and strategies for holistic management and conservation of Seattle’s urban biodiversity.***

*C. Working toward environmental justice by:*

- 1. Reducing environmental health disparities;*
- 2. Prioritizing work in communities that have experienced disproportionate harm due to air, water, and soil pollution or will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change;*
- 3. Providing opportunities for communities that have been displaced to return to the city in healthy environments and addressing the needs of those at risk of being displaced; and*

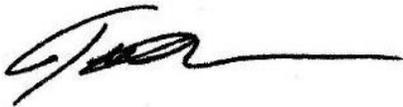
4. *Incorporating strategies to prevent displacement of vulnerable communities that could result from implementation of measures to address climate change and resiliency.*

*Section 2. The City should consider the following information when revising and adding to the Comprehensive Plan's goals and policies:*

- A. *Analysis of climate-related trends to identify current and anticipated impacts, including from the Seattle Hazard Identification and Vulnerability Analysis;*
- B. *Identification of vulnerable populations and assets (including social, cultural, and economic assets);*
- C. *Classification of risks, capital facilities and utilities, and community assets to determine where change is most needed to equitably address climate change, with a specific focus on vulnerable populations;*
- D. *Inventories of air, water, and ground transportation facilities and services, including transit alignments, active transportation facilities, and general aviation airport facilities;*
- E. *Analysis of disparities in health, environmental burden, and access to green space;*
- G. *Identification of natural areas and infrastructure that may be vulnerable to changing environmental conditions;*
- H. *Identification of environmentally critical areas, including habitat **and noting those that are rare or limited (e.g., native prairie), vital for safe passage and species migration;***
- I. ***Identification of trends in and projected climate impacts to Seattle's biodiversity, within city limits and within the natural areas and watersheds managed by the city that provide drinking water and utilities; and***
- J. ***Tree canopy assessment and trends in tree canopy cover across land use types and development patterns.***

The preservation of trees and open space is integral to reducing the impacts of natural hazards and improving quality of life for all Seattleites. The UFC looks forward to seeing the maintenance and growth of green spaces prioritized in Seattle's urban growth strategy.

Sincerely,



Julia Michalak, Co-Chair



Josh Morris, Co-Chair

cc: Sharon Lerman, Aja Hazelhoff

Patti Bakker, Interim Urban Forestry Commission Coordinator  
City of Seattle, Office of Sustainability & Environment  
PO Box 94729 Seattle, WA 98124-4729 Tel: 206-684-3194  
[www.seattle.gov/UrbanForestryCommission](http://www.seattle.gov/UrbanForestryCommission)

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:08 AM  
**To:** Staley, Brennon  
**Subject:** FW: Protect Seattle's Trees; Plant More Trees; Re-wild when possible,

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**From:** Anne Miller <[REDACTED]>  
**Sent:** Monday, August 22, 2022 1:43 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Protect Seattle's Trees; Plant More Trees; Re-wild when possible,

**CAUTION: External Email**

Hello,

I hope that as Seattle plans for the future that you will carefully consider how we can make our city more livable by both protecting, preserving and planting trees to help ensure that residents will have cleaner air and places that provide shade and cooling. Please also plan for increased biking and walking as well as free public transportation. We need to move quickly away from polluting forms of transportation.

Thanks for your consideration,  
Anne Miller

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:13 AM  
**To:** Staley, Brennon  
**Subject:** FW: Save our trees for a better and healthier environment

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**From:** Bonnie Miller <[REDACTED]>  
**Sent:** Tuesday, August 23, 2022 5:51 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Save our trees for a better and healthier environment

**CAUTION: External Email**

- Evaluate in all options the impacts on trees and urban forest canopy cover in the ability of Seattle to reach 30% tree canopy in Comprehensive Plan while also increasing density to meet housing needs. We need both more housing and trees to keep Seattle livable.
- Evaluate the changing ratios of park and open space acres per 1000 residents as population and housing increases under the different proposals
- Evaluate tree canopy impacts on neighborhoods near freeways and other major transit corridors, including SeaTac Airport and Port of Seattle that exist and how each proposal would address pollution and urban forests
- Evaluate projected increase in urban heat domes and heat island impacts as building density and lot coverage increases and tree canopy decreases
- Evaluate options to add trees to existing parking lots and other built areas
- Evaluate loss of climate resiliency as trees are removed for denser building across the city
- Evaluate possible new building guidelines and lot coverage that could increase retaining more trees during development.
- Evaluate requiring setbacks on multifamily lots to require more trees and shrubs along sidewalks and roads to reduce heat impacts.
- Calculate the ability to create more parks, including pocket parks in each scenario to provide more greenspace, tree covered areas and playgrounds for residents and families
- Calculate the ecosystem services and natural capital currently provided to the city and the change that would occur under each different proposal
- Calculate the potential loss or gain of habitat and biodiversity of plants and animals under the different proposals
- Calculate potential economic, social, environmental and health impacts on BIPOC and other racial and ethnic minority communities under the proposals

- Look at ways to increase street trees under the different proposals, including making street trees mandatory on all proposals in all zones and planting large trees where there is no overhead power lines.
- Look at additional building alternatives and zoning that create space for residents to have trees and open green space on building sites.
- Consider eliminating residential small lots and allowing multiplexes on the existing
- 
- 
- lots if they set aside a portion of the lot for a designated tree protection area. This could increase protection for larger form trees like exceptional trees or a tree grove.

Sincerely,

Bonnie Miller



Seattle, WA 98101-1730

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:36 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comment regarding Tree Ordinance

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**From:** Tess Morgan <[REDACTED]>  
**Sent:** Monday, August 22, 2022 6:06 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Cc:** Tess Morgan <tessmorganlimitless@gmail.com>  
**Subject:** Comment regarding Tree Ordinance

**CAUTION: External Email**

Dear Committee Members,

Exceptional trees are not possible to replace in our current warming climate, and deserve the respect of your decisions in weighing the legacies of the Pacific Northwest heritage against short term gains of property development goals. Sometimes things are irreplaceable. This is one of those situations. For public health reasons, trees are essential.

It's possible to design housing that includes trees and Nature. Please consider the seven generations of our future in every decision you are making.

Most Respectfully,  
Tess Morgan  
Volunteer  
Forest Steward  
Registered Voter

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:12 AM  
**To:** Staley, Brennon  
**Subject:** FW: Trees for Seattle

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**From:** Melanie Moser <[REDACTED]>  
**Sent:** Monday, August 22, 2022 5:14 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Trees for Seattle

**CAUTION: External Email**

Trees are important for reducing heat island impacts and stormwater runoff. They provide shade and a place for many birds to make nests. Seattle and Washington state is also losing birch trees because of a evasive disease (birch bark borer) and at the very least perhaps a program can be instilled to help fight the disease or replace dead ones with replacements.

Melanie Moser

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**From:** Anna Nissen <[REDACTED]>  
**Sent:** Monday, August 22, 2022 4:35 PM  
**To:** Staley, Brennon  
**Subject:** Comments on the Scoping of the Programmatic Environmental Impact Statement on the Seattle Comprehensive Plan for 2024

**CAUTION: External Email**

Brennon,

I must take exception to the impression given to the press/academia (i.e. Crosscut and UW radio) that DEIS scoping is as I just heard on the latter that today is "the last day to comment on the update of Seattle's Comprehensive Plan, pretty much along the same premise as crosscut "reported". Your organization knows better, or at least should, although I have now been "participating" longer than most of you have been in service.

[Enough said. I only have time at my age to cut to the chase.as opposed to an extensive raft of direct environmental comments to avoid side-stepping answers. Please refrain from taking advantage.](#) I posted the following (approximately) on your Scoping link that requires becoming "membership", i.e. "telling who I am from a limited multi-choice list. It is not clear the purpose of connecting comments with this multi-choice labeling. Hence:

Please accept the following formally as "Comments on the Scoping of the Programmatic Environmental Impact Statement on the Seattle Comprehensive Plan for 2024".

<https://crosscut.com/news/2022/07/how-seattle-planning-quarter-million-more-residents>

The slippery new version of "racial zoning"?

"The urban village strategy, Hubner said, has not done enough to address "the legacy of exclusionary zoning in the city" which limited [where Black residents and other residents of color](#) could live and shut them out of the wealth building opportunities of homeownership in many cases."

New Goal:

"Hubner also said that while racial equity was an important part of the last comprehensive plan update in 2016, today the planning department is "more cognizant of the history of systemic racism in public policy and private practices such as real estate.""

Objective:

"Seattle has gotten much-needed apartments, though most are studios or one-bedrooms not suited for families. The strategy also doesn't produce many new opportunities for homeownership, since in single family zones you mostly get a one-to-one replacement of old houses with new houses."

End of quote.

Solution 1: expand urban village concept [Alternative 2]

Problem?: "It would increase the number of apartments, but not add much new housing to buy."

Check: study ratio rental to purchase and costs to consumer of new unit construction,

Real problem: ignoring huge working class market (low side of income divide) in favor of high side of divide, unlike 1950-60s that filled the suburbs and made Boston's Beacon Hill a cheap heaven for young spats well into the 70s.

Solution 2: allow new housing types across the city, including triplexes and quadplexes in neighborhoods that ~~"currently only allow single homes on each lot"~~ already allow them, and also including along arterials, bus and rail ways, and within walking distance of transit. [Alternatives 3,4, & 5].

Problem?: Birds pick cherries off trees all over town, problem continues.

Check: study rents of new ADUs, triplexes, etc in formerly SF already relabeled city-wide for MF (rentable units); study ownership in changes in these zones, and compare different neighborhoods, i.e displacement areas vs areas now branded elite and inequitable.

Real problem see above and below.

Solution 3: Call "Uncle." [~Alternative 1]

Problem? Enough seat-of-the pants regulation has already been adopted, both pre and post Defund the Police, and while in the midst of Covid to no avail.

Check: the city and all others interested wade deep into the results of those regulations, seriously evaluate, predicate possible futures, and THEN aim democratically at intentional ones most likely to match the times: grossly mismatched working class housing supply/demand, increasingly missing mental health.

Real problem: Takes time, but far less time and misery than never addressing the real problem and instead taking advice from interests dependent upon the continuation of problems.

Anna Nissen

Architect

██████████ District 7

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**From:** Chris Okuda <[REDACTED]>  
**Sent:** Monday, August 22, 2022 12:36 PM  
**To:** Staley, Brennon  
**Subject:** One Seattle Plan: EIS Comments for Scoping Period

**CAUTION: External Email**

Dear Mr. Staley,

This comment is about emphasizing people-centered goals and principles in developing strategies for a One Seattle Plan. Please analyze how changes from each strategy would impact the quality of life and well-being of existing and future residents in the proposed neighborhoods and houses. Look beyond the numbers and at people's lives. Will it truly be livable for those who live here? I understand that strategies are not detailed at this stage, but they will lead to scenarios and details with impacts and consequences. The following are some concerns.

1. Seattle is not an affordable place for many of us, and home ownership is out of reach. A growth plan needs to look at this fundamental problem. Variations on the same thing will continue disparities. Former co-workers left Seattle when they retired because affordability, mobility, public safety, and other aspects of the city are not friendly to seniors who have lower fixed incomes and are not young and athletic. Middle- and lower-income people cannot afford the high-end apartments, condominiums and houses that are allowed to be built. Dormitory-like pods may suit a narrow group of single college students and adults who mostly live their lives outside the home, but pods are confining for couples, families, and those who live and work at home. Please look for livable housing models that will provide long-term, affordable and stable rents and mortgages for those with modest means. For example, provide or subsidize land for the construction of affordable houses, condominiums, long-term rental units, and other moderate-density residences.
2. Please stop allowing the crowding of tall large, residential buildings into urban villages. They create heat islands and other negative impacts. Increased heat is absorbed and radiated by large building masses. Apartments with no cross-ventilation or air-conditioning build up heat inside and do not cool off at night. Breezes are blocked by surrounding tall buildings, inhibiting air circulation and natural cooling. The warming climate exacerbates this all. Most existing residential buildings do not have air-conditioning. If the city continues to create heat islands, it should also consider mitigating impacts by providing air-conditioners to residents.

The development of dense urban villages has other significant impacts. Upsizing the Roosevelt neighborhood for Sound Transit's Roosevelt Station has so far caused a decade of continuous construction impacts from the successive building of the Sound Transit tunnel, light rail station, and many surrounding apartment buildings, bus stops and street modifications. Traffic disruptions and construction noise, vibration, dirt and glare have occurred during the day, night and weekends. A decade of cumulative construction impacts is not temporary, and more buildings are still planned. It is fatiguing and affects quality of life and well-being. Requests to Sound Transit to mitigate impacts were not addressed. Please do not repeat this at Chinatown International District or in any residential neighborhood.

I also suggest that the allowable height and mass of buildings be reviewed. Large, tall buildings are out of scale for human beings and have an anonymous, dehumanizing atmosphere. Packing a lot of people

into large buildings does not lead to a feeling of belonging and community. Massed buildings create canyon effects where noise and light bounce off the walls. Air pollution increases. Civility deteriorates. Behaviors and driving are louder and more aggressive. The feeling of safety and quiet has diminished. The blocky, harsh edges and colors of new construction also do not engender well-being. Please see the architectural book titled *A Pattern Language* by Christopher Alexander et al. which describes the link between the height of buildings and the mental and social well-being of residents. It recommends that inhabited buildings be of a comfortable human scale and no more than four stories high (see Pattern #21, Four-Story Limit).

3. Increasing tree canopies for cooling and other ecosystem benefits is an attractive solution, and needs to be designed with the surrounding homes to be effective. Dense, lush trees that shade homes in single-family residential neighborhoods are wonderful. In contrast, mature street trees next to an apartment building may shade only the lowest one or two floors and not the floors above. Trees that could grow taller would take a decade or more to mature and still may not reach the height of five- or seven-story buildings. Street trees on narrow sidewalks may cool passing pedestrians and cars at street level, but are often not given enough space above- and below-ground to grow tall, full and forest-like to cool adjacent buildings and their residents inside. They are not planted densely enough to offset the heat island effects caused by large buildings.

If there are overhead power lines, the trees are injured and stunted when they are severely pruned to protect the power lines. Since there is so much active street improvement work, why not under-ground the power lines so that the power lines and trees are equally protected?

4. The decrease in on- and off-street parking over the past decade, especially in the densified neighborhoods, has increased barriers for those who need to drive for mobility. I mostly walk and use public transit, however, when I've been injured or seriously ill, need health care, or need to transport heavy objects, I need to drive. Street parking has become saturated. I drove to Fremont recently to buy a heavy item but left and drove to another neighborhood's store when I couldn't find street parking in Fremont. There are many situations where car ownership and parking are needed for mobility.

Please center the voices of our most vulnerable residents -- minorities, young, elderly, economically disadvantaged and the least privileged. Consult with social psychologists, architects, arborists and other experts who understand the issues and solutions around quality of life and well-being.

To more directly understand the impacts of proposed changes on the quality of lives and well-being of diverse residents, I invite planning staff and decision-makers to live in our shoes: bring your multi-generational families to live in our apartment buildings for several months or a year to help with your analysis and to inform your decisions.

Thank you,

Christine Okuda

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:11 AM  
**To:** Staley, Brennon  
**Subject:** FW: Shaping the Plan: Comment on the Environmental Review

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**From:** Joe Olson <[REDACTED]>  
**Sent:** Monday, August 22, 2022 4:26 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Shaping the Plan: Comment on the Environmental Review

**CAUTION: External Email**

Please enter this comment regarding the One Seattle Comprehensive Plan.

The most important thing that needs to be addressed in any of these plans is that Seattle needs to restore the amount of tree and shrub coverage. That is, we need to increase the green space in our city. This is not mutually exclusive of increasing the amount of housing available for people. In fact, increasing density can allow us to grow our urban forest. For example, if two single-family lots were cleared for multi-story apartments or condos, one of the lots could be set aside as a forested park and the multi-story building on the second lot could have a green roof. Since global warming is only accelerating, Seattle has the responsibility to lead the way in reducing heat islands created by cities. There is no more time to kick the can down the road for future generations to struggle with.

Options 2, 3, & 4 are fine for increasing housing, but you must include a substantial increase in trees, shrubs, and overall green-space no matter which option moves forward.

Sincerely,  
Joe Olson  
Ballard

## Yasir Alfarag

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:08 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comment on update to Seattle's Comprehensive Plan

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**From:** Carol Olwell <[REDACTED]>  
**Sent:** Monday, August 22, 2022 11:57 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comment on update to Seattle's Comprehensive Plan

CAUTION: External Email

This ADU with a two car garage is being built behind 2111 5th Ave. W, and reflects what I feel is construction insensitive to the rest of the neighborhood, and overwhelms the owner's lot. I favor alternative 2 because the increased housing density needed in Seattle needs to be more thoughtfully approached, rather than open up every lot to be covered by as much housing as possible. EIS studies need to be done to insure that increasing density does not destroy Seattle's urban forest, already under siege. A viable urban forest contributes enormously to keeping a city cool while reducing pollution and CO2. Again, I favor alternative 2. Thank you. Carol Olwell



Sent from my iPhone

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**From:** Gordon Padelford <gordon@seattlegreenways.org>  
**Sent:** Monday, August 22, 2022 4:00 PM  
**To:** PCD\_OneSeattleCompPlan; Staley, Brennon  
**Subject:** Comments on the One Seattle Plan 2024 Comprehensive Plan update from Seattle Neighborhood Greenways  
**Attachments:** 2022 Seattle Comp Plan scoping letter - Seattle Neighborhood Greenways.pdf

**CAUTION: External Email**

August 22nd, 2022

Rico Quirindongo, Acting Director  
Brennon Staley  
Office of Planning and Community Development

### General Comments

The 2024 update to Seattle’s Comprehensive Plan must address the overlapping homelessness/affordability crisis, climate crisis, and traffic safety crisis.

**Equity:** All the EIS alternatives should center equity by seeking to reverse displacement and create housing for all by radically rethinking our land use policies to allow people of all incomes to live and thrive in Seattle. Furthermore, the plan should seek to foster affordable commercial and creative spaces so that it is easier for small local businesses and artists to get started or stay in town.

**Climate:** All the EIS alternatives should seek to address our climate crisis by creating a city where everyone can easily walk or “roll” (by roll, we mean use a wheelchair, powerchair, or other mobility device) to their daily needs, and access to transit and bike routes for less frequent trips. Each alternative should create a city where people with disabilities, kids, and older adults have equal access to all aspects of daily life. Sometimes called the 15 Minute City, this concept should be a fundamental part of every alternative.

**Safety:** All the EIS alternatives should allow dense housing away from dangerous and polluted multi-lane arterial streets. According to SDOT, these types of streets are where 80% of all fatalities happen. Continuing a strategy of concentrating growth along them, without completely redesigning the streets, will endanger people. To be clear, the city must aggressively work to completely redesign these streets and make them safe and healthy places, but this will take time. And housing for all types of people and families should be available on arterials and non-arterial streets. Furthermore, every alternative should analyze the increased exposure to dangerous and polluted (noise, particulates, and more) streets as outlined by Futurewise in their 8/11 EIS comment letter section labeled “assess the impacts on exposure to environmental harms.” We also support their call for mitigation “We recommend that the City study appropriate mitigation measures for increased exposure to traffic emissions and hazards—including, a) establishing mandatory pedestrian/cyclist safety features for transit corridors, and b) establishing mandatory minimum requirements for the amount of transit corridor right of way space that must be reserved for emission-free transportation modes and non-transportation uses.”

### Comments on the Proposed EIS Alternatives

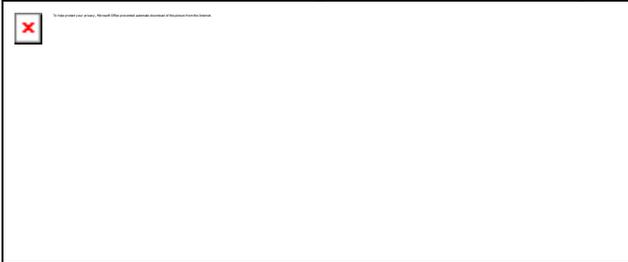
**Alternative 2 Focused:** Alternative 2 purports to be the 15 Minute City option, but must be expanded so that everyone has access to their daily needs within a short walk or roll. This concept must be rigorously developed with SDOT and other experts to ensure it results in meaningful shifts to walking and rolling for transportation to local destinations, and is not merely window dressing on an expanded Urban Village strategy.

**Alternative 4 Corridor:** Alternative 3 is problematic since it concentrates growth along the corridors where 80% of traffic fatalities occur. The linear nature of it also makes it more difficult to develop walksheds where people can walk and roll to all their daily needs. It should not be considered as an alternative on its own, or at a minimum should be expanded to a 15 minute walkshed around transit stations to shift towards a 15 Minute City model.

**Alternative 6 — New:** We support the growing chorus calling for a new and bolder alternative, alternative 6, that goes further to meet Seattle’s goals. This alternative should seek bold rezones that allow for sufficient housing (of all kinds including public, social, cooperative, market rate and more) to make Seattle affordable. This alternative should also thoroughly implement a 15 Minute City concept so that everyone has their daily needs within a short walk or roll. Finally, this concept should propose a land use plan that supports a superbloc strategy that creates streets for community gatherings, trees, play, and so much more.

Thank you,

Gordon Padelford  
*Executive Director*  
On behalf of Seattle Neighborhood Greenways



August 21st, 2022

Rico Quirindongo, Acting Director  
Brennon Staley  
Office of Planning and Community Development

Subject: Comments on the One Seattle Plan 2024 Comprehensive Plan update from Seattle Neighborhood Greenways

### **General Comments**

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Gordon Padelford  
*Executive Director*  
On behalf of Seattle Neighborhood Greenways



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**From:** Gordon Padelford <gordon@seattlegreenways.org>  
**Sent:** Monday, August 22, 2022 5:59 PM  
**To:** PCD\_OneSeattleCompPlan; Staley, Brennon  
**Subject:** Re: Comments on the One Seattle Plan 2024 Comprehensive Plan update from Seattle Neighborhood Greenways

**CAUTION: External Email**

Apologies,

"Alternative 4 Corridor: Alternative 3 is problematic since" should read "Alternative 4 Corridor: Alternative 4 is problematic since." Please accept this clarification for the record.

-Gordon

(206) 963-8547  
Executive Director  
Seattle Neighborhood Greenways  
[Website](#) - [Twitter](#) - [Facebook](#)

On Mon, Aug 22, 2022 at 4:00 PM Gordon Padelford <[gordon@seattlegreenways.org](mailto:gordon@seattlegreenways.org)> wrote:  
August 22nd, 2022

Rico Quirindongo, Acting Director  
Brennon Staley  
Office of Planning and Community Development

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Thank you,

Gordon Padelford  
*Executive Director*  
On behalf of Seattle Neighborhood Greenways



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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:34 AM  
**To:** Staley, Brennon  
**Subject:** FW: Plan for trees

---

**From:** BJ Patch <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 9:55 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Plan for trees

**CAUTION: External Email**

If you open Google Maps and zoom out from Seattle, you'll see an island of concrete-grey surrounded by miles of natural greenery. Seattle is not what the Pacific Northwest looks like. Some neighborhoods, like SODO, look like a desert.

Lush greenery is why people choose to live here instead of Phoenix or Las Vegas or Los Angeles. But this is no Emerald City. Other cities plan, nurture and protect their urban canopy. Seattle has neglected its natural advantages. Please include significant investment in trees in our urban planning.

Brian Patch

[REDACTED]  
Seattle



SEATTLE CITY COUNCIL | DISTRICT 4

# COUNCILMEMBER ALEX PEDERSEN

August 20, 2022 (due August 22, 2022)

Rico Quirindongo, Acting Director, Office of Planning and Community Development  
P.O. Box 94788  
Seattle, WA, 98124-7088  
sent via email to [Rico.Quirindongo@seattle.gov](mailto:Rico.Quirindongo@seattle.gov)

**Re: Comprehensive Plan Scoping Request for an Alternative “L” to Prevent Displacement and Allow Greater Density for 100% Low-Income Housing Along Frequent Transit Corridors**

Dear Director Quirindongo:

Thank you for the opportunity provided by the Office of Planning and Community Development (OPCD) to all Seattle residents and businesses to [comment](#) by August 22, 2022 on the scoping of the Draft Environmental Impact Statement (DEIS) for Seattle’s Comprehensive Plan overhaul, a 20-year planning document which State law requires City policymakers to update in a major way every ten years to establish parameters for land use, housing, and related policies.

I appreciated OPCD’s [presentation](#) to the City Council’s Land Use Committee on May 11, 2022. In considering that presentation and related information presented thus far, I have concluded that the five initial [alternatives](#) presented by OPCD for public comment are inadequate in the face of our city’s affordable housing and homelessness crises because no alternative prevents the demolition of existing affordable housing and no alternative requires any production of low-income housing in exchange for giving away increased density benefits to the for-profit real estate development market.

If we truly want to produce more low-income housing (both rental and homeownership) and prevent displacement, then I believe the scope of the “One Seattle Plan” EIS should explicitly include assessments of the displacement impacts as well as proven mitigation measures for all the alternatives. Ultimately, the “One Seattle Plan” itself should include policies that require implementation of prevention and mitigation measures (such as immediate one-for-one replacement of affordable housing units lost) before the City grants final approval to another upzone or a proposed development project likely to result in increased displacement (i.e., requiring prevention and mitigation before displacement occurs). **In addition, I propose adding to the “One Seattle Plan” EIS an alternative that directly meets the goals of preventing displacement and producing low-income housing:**

**Alternative L: “the Low-Income Housing Alternative”:**

(1) On existing frequent transit arterial corridors in Neighborhood Residential zones, permit multifamily developments of *up to* 6-unit stacked flats (per each 5,000 square foot lot) requiring **100%** low-income housing [defined as rental units affordable to households below 50% of area median income (AMI) or homeownership units affordable at 80% of AMI] and (2) to prevent displacement, projects demolishing existing, affordable single family *rentals* or affordable multifamily housing *in any zone* would need to adhere to existing zoning (i.e. not allowed to profit from density increased after 2022). *The “L” stands for low-income housing, because that’s what we need.*

An equal opportunity employer

600 Fourth Avenue, Floor 2 | PO Box 34025, Seattle | Washington 98124-4025

Phone (206) 684-8804 Email [alex.pedersen@seattle.gov](mailto:alex.pedersen@seattle.gov)

One may try to argue this new Alternative L could fit into OPCD's [Alternative 4](#) (see below for OPCD's initial alternatives). I disagree that my proposed Alternative L would fit into Alternative 4, because OPCD's Alternative 4 does not require any low-income housing, it does not prevent demolitions of affordable housing, and -- in a move that could encourage an increase in the use of polluting single occupancy vehicles -- it gives free reign to developers "near" frequent transit rather than strategically on transit corridors.

#### Focus on Low-Income Housing Production:

If we want and need low-income housing to address our city's affordability and homelessness crises, then let's not beat around the bush -- let's require just that. The "housing of all types" slogan in the emerging "One Seattle Plan" appears to give away all discretion to the private, for-profit market with no low-income housing requirements. The private market would surely attempt to maximize profits from changes in City policy by demolishing existing affordable housing and then developing small units and/or townhomes that are less accessible to people with impaired mobility, including seniors who want to age in place and families needing larger units along transit corridors. When considering Alternative L, the focus must be not on the allowance for up to 6 units where 1 unit may currently exist on the frequent transit arterials (increased density), but rather on the requirement that all these new units be low-income housing (100% of the units at 50% AMI for rental and 80% AMI for ownership). In other words, no low-income housing, no new upzone. The Comp Plan should be about increasing low-income housing, not altering City policies in a way that enriches landowners.

#### Prevent Displacement by Preventing Demolitions:

The materials from OPCD about "[displacement](#)" seem to imply that preventing displacement means allowing demolitions of existing housing to build more market-rate units. After already approving more than 25 upzones just three years ago, why quickly change our existing zoning again to encourage more demolitions, if demolitions equal displacements? Where do those Seattle residents go after their buildings are demolished and housing that is more expensive is built over two years later in its place?

We are still trying to understand the impacts, including demolitions of affordable housing, displacement of residents, and market-rate development capacity of the upzones of more than 25 neighborhoods in 2019. After the upzones of the University District by a previous City Council, we have seen demolitions of naturally occurring affordable housing at a higher rate than promised and we have seen nearly all developers opting out of building affordable housing in that neighborhood where many struggle to pay rent. A similar pattern appears to be unfolding in many of the communities upzoned recently in conjunction with "Mandatory Housing Affordability" (MHA) policies. Instead of providing the affordable housing onsite, these developers have written a check to pay an "in-lieu" fee that the City uses to fund different projects approximately three years later somewhere else, which is not ideal. Words and assurances and resolutions don't prevent displacement (or build low-income housing integrated into a neighborhood). Preventing demolitions prevents displacement. To learn from Seattle's experience, let's not confer additional development benefits to projects that will demolish existing affordable housing.

[Council Bill 120325](#), approved by a majority of City Council this year, would have engaged a research university to collect data on existing rents throughout the City, thereby providing the block-by-block analysis needed to know where density can be increased in a way that avoids the demolition of existing affordable housing. The failure of the executive to adopt that legislation brings into question how City departments can accurately assess displacement risk and comply with the City's displacement prevention policies. This lack of data on in-place rents for existing rental units further necessitates a clear alternative in the Comp Plan that more widely discourages demolitions of existing affordable

housing (my Alternative L), as well as putting in place displacement mitigation requirements before upzones go into effect with any of the other alternatives.

More reasons to insist on encouraging only low-income housing and preventing demolitions:

One can argue that today's allowable development capacity from the existing "2035 Comp Plan" adopted in 2016 can already accommodate the growth envisioned by the forthcoming 20-year Comp Plan dubbed the "One Seattle Plan": a total of 112,000 new units is only 5,600 additional units per year. During the six year period from 2016 through 2021 (which includes two years of the pandemic), 47,514 new units were produced, which is an average of nearly 8,000 new units per year. Because sufficient capacity for "housing of all types" already exists, any additional upzones should serve the public benefit of enabling production of more low-income housing and should certainly not incentivize the demolition of it. Unless MHA fees are increased, MHA will be inadequate. City officials claimed MHA would produce 6,000 low-income units through 2025, and it has produced just 3,300 low-income units through 2021, while losing unquantified numbers of naturally occurring affordable units due to demolitions.

Therefore, in the midst of a homelessness crisis, the new Comp Plan should not be a vague, scattershot call to build "housing of all types" (i.e. whatever developers deem most profitable that may or may not trickle down eventually to benefit the public), but rather a call to action to quickly create the housing the City needs the most -- for those most in need: 100% low-income housing. We should not squander this ten-year opportunity by giving away to the private market additional profits and land values without receiving the public benefits the City actually needs: 100% low-income housing. The "One Seattle Plan's" land use and housing policies should achieve these public benefit goals, which I believe requires the inclusion of Alternative L to create 100% low-income housing and prevent additional displacement.

I will continue to discourage City Hall from implementing new land use policies that give away additional monetary value to those who intend to demolish affordable housing and who are not building housing actually affordable to low-income households in Seattle during the homelessness crisis.

Thank you, again, for the opportunity to comment on OPCD's scoping for the forthcoming Comprehensive Plan. I'll look forward to OPCD's updated alternatives for the Draft EIS in October 2022, the Draft EIS in April 2023, and the Final EIS and Mayor's Recommended Plan in April 2024.

Please contact my office at 206-684-8804 or email [Alex.Pedersen@seattle.gov](mailto:Alex.Pedersen@seattle.gov) with any questions about this request. Thank you.

Regards,

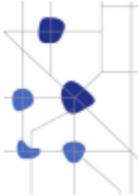
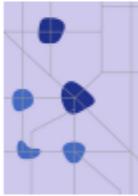
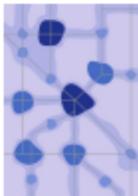


**Alex Pedersen**

City Councilmember and Chair of the Transportation & Seattle Public Utilities Committee  
<https://www.seattle.gov/council/pedersen>

cc: Mayor Bruce Harrell and Deputy Mayor Tiffany Washington  
Esther Handy, Ketil Freeman, Lish Whitson, City Council Central Staff  
Brennon Staley, Michael Hubner, Jason Kelly, OPCD

Attachment: OPCD’s initial 5 scoping alternatives for the new Comp Plan EIS from June 2022 Fact Sheet: <https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanEISScopingFactSheet.pdf>

One Seattle • Comprehensive Plan • EIS Scoping Fact Sheet • June 2022			
<b>Matrix of Conceptual Alternatives</b>			
Conceptual Alternatives	Description	Housing	Jobs
<b>Alternative 1: No Action</b> 	<ul style="list-style-type: none"> <li>Required under SEPA</li> <li>Assumes no changes to the Comprehensive Plan are made</li> <li>Maintains strategy of focusing most housing and jobs within the existing <b>urban centers</b> and <b>urban villages</b> with no change to land use patterns</li> </ul>	<ul style="list-style-type: none"> <li>New housing is primarily rental apartments concentrated in existing mixed-use areas</li> <li>Most land outside urban villages remains limited to high-cost detached houses</li> <li>No new strategies to increase housing supply and exclusivity</li> <li>Assumes 80,000 new housing units over 20 years</li> </ul>	<ul style="list-style-type: none"> <li>Predominately in existing urban centers and villages</li> <li>Similar mix to past growth</li> <li>Most office in Downtown and South Lake Union</li> <li>Assumes 132,000 new jobs over 20 years</li> </ul>
<b>Alternative 2: Focused</b> 	<ul style="list-style-type: none"> <li>Adds areas of focused growth, including new and expanded urban villages and/or new smaller nodes</li> <li>Addresses City Council’s request for an alternative that supports the development of “15-minute neighborhoods” where more people can walk to everyday needs</li> </ul>	<ul style="list-style-type: none"> <li>Creates greater range of housing options near amenities and services in more neighborhoods</li> <li>New housing remains primarily rental apartments</li> </ul>	<ul style="list-style-type: none"> <li>Similar level of jobs as No Action Alternative</li> <li>Slight increase in at-home and retail businesses due to a larger number of people living in Seattle</li> <li>Additional retail jobs likely in more neighborhood centers</li> </ul>
<b>Alternative 3: Broad</b> 	<ul style="list-style-type: none"> <li>Allows a wider range of low-scale housing options, like triplexes and fourplexes, in all <b>Neighborhood Residential zones</b></li> <li>Addresses City Council’s request for an alternative that provides additional housing capacity and housing type diversity in neighborhood residential areas</li> </ul>	<ul style="list-style-type: none"> <li>Expands housing choices in all neighborhoods</li> <li>Increases production of homeownership options</li> <li>Addresses exclusionary nature of current zoning</li> <li>Allows more housing options near existing large parks and other neighborhood amenities</li> </ul>	<ul style="list-style-type: none"> <li>Similar level of jobs as No Action Alternative</li> <li>Slight increase in at-home and retail businesses due to a larger number of people living in Seattle</li> <li>Additional retail jobs likely spread throughout Seattle</li> </ul>
<b>Alternative 4: Corridor</b> 	<ul style="list-style-type: none"> <li>Allows a wider range of low-scale housing options only in <b>corridors</b> near frequent transit and amenities</li> </ul>	<ul style="list-style-type: none"> <li>Expands housing choices in areas near frequent transit and amenities</li> <li>Increases production of homeownership options with some additional rental options</li> </ul>	<ul style="list-style-type: none"> <li>Similar level of jobs as No Action Alternative</li> <li>Slight increase in at-home and retail businesses due to a larger number of people living in Seattle</li> <li>Additional retail jobs likely spread throughout Seattle, but with focus near transit and amenities</li> </ul>
<b>Alternative 5: Combined</b> 	<ul style="list-style-type: none"> <li>Assumes more housing growth over 20 years to better meet demand.</li> <li>Distribution of housing would combine other alternatives, resulting in more areas identified as appropriate for more housing and mixed uses</li> </ul>	<ul style="list-style-type: none"> <li>Promotes abundant housing in neighborhoods across the city</li> <li>Promotes greater range of rental &amp; ownership housing</li> <li>Addresses past underproduction of housing and rising housing costs</li> <li>Supports complete neighborhoods across more of the city</li> </ul>	<ul style="list-style-type: none"> <li>Similar level of jobs as No Action Alternative</li> <li>More increase in at-home and retail businesses due to a larger number of people living in Seattle</li> <li>Distribution of jobs would be combination of alternatives 2, 3, and 4</li> </ul>

For more information [seattle.gov/opcd/one-seattle-plan](https://seattle.gov/opcd/one-seattle-plan)

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:34 AM  
**To:** Staley, Brennon  
**Subject:** FW: Don't forget about the trees!

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**From:** Penrose and Muerdter <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 10:29 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Don't forget about the trees!

**CAUTION: External Email**

I submit these comments regarding the updating of Seattle's Comprehensive Plan. While upzoning is important to increase housing and housing density in our city, any changes must not come at the cost of losing tree canopy. Increasing and maintaining urban trees and forests are critical to an equitable and healthy Emerald City. Trees are important for reducing heat island impacts and stormwater runoff, our mental and physical health, animal and plant habitats, reducing air and water pollution, and for noise and stress reduction.

We need to both support increased housing **AND** protect and enhance the city's urban forest at the same time. We need to plan for growth and build communities across the city that are healthy, equitable and livable for everyone.

Sincerely yours,

Nancy L. Penrose, [REDACTED] Seattle 98122

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:07 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comprehensive Plan should guarantee space for large trees

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**From:** Ann Prezyna [REDACTED] >  
**Sent:** Monday, August 22, 2022 10:53 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comprehensive Plan should guarantee space for large trees

**CAUTION: External Email**

Large trees provide the most benefits to offset the effects of climate change, reduce air pollution, and provide habitat. No current plan addresses the issue of requiring sufficient space to save and grow old trees. Impermeable lot coverage must be reduced, and open space coverage increased. If not, there will be insufficient space for the roots and canopies of large trees.

Townhouses, in theory, could allow more space for trees. In Eastlake where I live, townhouses are rapidly replacing single family homes. Currently they fill nearly the entire lot to maximize profit, leaving no space for large trees. These townhomes, at least where I live, are not affordable for many people, which I had understood was one of the reasons developers are being allowed to replace single family homes with these developments. Many single family homes currently have large trees in their yards. There has been a significant loss of large trees in my neighborhood, and a lack of proper care and protection for "saved or spared" trees. I urge you to reverse this trend.

Thank you for your consideration.

Ann Prezyna  
District 4  
Resident since 1986

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:34 AM  
**To:** Staley, Brennon  
**Subject:** FW: Upcoming Planning Meeting

-----Original Message-----

From: Hubner, Michael <Michael.Hubner@seattle.gov>  
Sent: Sunday, August 21, 2022 8:01 AM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Subject: FW: Upcoming Planning Meeting

-----Original Message-----

From: Susan Reimers [REDACTED]  
Sent: Friday, August 19, 2022 10:29 AM  
To: Hubner, Michael <Michael.Hubner@seattle.gov>  
Subject: Upcoming Planning Meeting

CAUTION: External Email

Hello,

I will not be able to make it to the upcoming planning meeting, but I want to make sure my voice is heard. I've read through the documents posted, and the plan is exciting in a lot of ways. Unfortunately, I don't think it goes far enough toward opening the city to large apartment/condo buildings and providing affordable housing. As a blind person, I struggle with finding good-paying employment and mobility. Affordable housing in dense, walkable neighborhoods and robust transit aren't just a luxury for me, they're a necessity. I'm not alone in that regard. And the city's huge homeless population and outrageous home prices prove that. It's a hard pill to swallow for a lot of people but Seattle has to engage in infill and grow upward. It's the only real solution. And urban villages, while nice, aren't going to cut it. Please pass this message on to the commission. We need to open up the entire city to large-scale apartments and condos, we need to eliminate parking requirements (if present). We need to continue to improve and promote transit and walkability/bikability. It's the only way to move into the future.

Susan Reimers, JD/LCSW

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:11 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comprehensive Plan Comments

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**From:** Moani Russell <[REDACTED]>  
**Sent:** Monday, August 22, 2022 4:22 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comprehensive Plan Comments

**CAUTION: External Email**

Please consider these comments when updating Seattle's Comprehensive Plan:

- Evaluate in all options the impacts on trees and urban forest canopy cover in the ability of Seattle to reach 30% tree canopy in Comprehensive Plan while also increasing density to meet housing needs. We need both more housing and trees to keep Seattle livable.
- Evaluate the changing ratios of park and open space acres per 1000 residents as population and housing increases under the different proposals
- Evaluate tree canopy impacts on neighborhoods near freeways and other major transit corridors, including SeaTac Airport and Port of Seattle that exist and how each proposal would address pollution and urban forests
- Evaluate projected increase in urban heat domes and heat island impacts as building density and lot coverage increases and tree canopy decreases
- Evaluate options to add trees to existing parking lots and other built areas
- Evaluate loss of climate resiliency as trees are removed for denser building across the city
- Evaluate possible new building guidelines and lot coverage that could increase retaining more trees during development.
- Evaluate requiring setbacks on multifamily lots to require more trees and shrubs along sidewalks and roads to reduce heat impacts.
- Calculate the ability to create more parks, including pocket parks in each scenario to provide more greenspace, tree covered areas and playgrounds for residents and families
- Calculate the ecosystem services and natural capital currently provided to the city and the change that would occur under each different proposals
- Calculate the potential loss or gain of habitat and biodiversity of plants and animals under the different proposals
- Calculate potential economic, social, environmental and health impacts on BIPOC and other racial and ethnic minority communities under the proposals
- Look at ways to increase street trees under the different proposals, including making street trees mandatory on all proposals in all zones and planting large trees where there is no overhead power lines.
- Look at additional building alternatives and zoning that create space for residents to have trees and open green space on building sites.

- Consider eliminating residential small lots and allowing multiplexes on the existing lots if they set aside a portion of the lot for a designated tree protection area. This could increase protection for larger form trees like exceptional trees or a tree grove.
- Address how each plan would work to increase tree equity and environmental justice across the city

Thank you -  
Moani Russell

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**From:** Daphne Schneider <[REDACTED]>  
**Sent:** Monday, August 22, 2022 2:41 PM  
**To:** Staley, Brennon  
**Cc:** [REDACTED] 'Dick Burkhart'; Patrick Taylor; 'Lisa Nitze'  
**Subject:** Proposed Changes to Comprehensive Plan

CAUTION: External Email

Good afternoon,

I have been a resident of South Seattle's Othello neighborhood for over 15 years, and have been active in the Othello Station Community Action Team, On-Board Othello and other neighborhood groups interested in development in this area.

After reviewing the five alternatives listed for approaching this review, I would be most supportive of #5 (though all but #1 would move us forward in a relatively positive fashion).

**Alternative 5** seems to promote more housing of various kinds with mixes uses, which we certainly need. We are currently very limited by the existing zoning in single family neighborhoods, and we need to look at creative ways to expand housing in those neighborhoods without destroying them. It will also be important to look at how we expand that housing and whom we involve.

To that end, I would like to see an emphasis on public/private/non-profit partnerships (to include businesses in the area as well as churches, schools and others who don't traditionally engage in housing conversations) to bring stakeholders together to creatively develop the broadest possible range of alternatives to address our many needs.

Thank you – I look forward to the next steps.

Daphne Schneider  
[REDACTED]  
Seattle, WA 98118

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:37 AM  
**To:** Staley, Brennon  
**Subject:** FW: Planning for growth

-----Original Message-----

From: Anita Shelton <[REDACTED]>  
Sent: Monday, August 22, 2022 8:33 AM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Subject: Planning for growth

CAUTION: External Email

Seattle needs to be planning for growth, climate change, and the heat island effect. The best way to combat the heat island effect is to pass the Tree Ordinance to protect mature trees in the city. Protection of the existing canopy is the most important thing we can do to protect the city from the heat island effect and climate change.

Street trees need to be planted in front of all residential homes, with priority going to the South End of the city where there is less of an urban forest. Fruit trees should be encouraged for the City's Trees for Neighbors program. Food is getting more and more expensive and with worsening drought these problems are going continue. The City needs to provide more community garden spaces for residents to grow their own food and have a lottery system to allocate the popular garden spaces more fairly.

New construction should be required to have a "green" (living) roof, a white roof, or solar panels. There should be size limits on the construction of single family homes. The City should find a way to limit foreign investment in real estate because it is limiting home buying opportunities for US citizens and residents.

New construction should be required to include open space for trees and flowering plants. We need to provide food for endangered pollinators. New construction should also require grey water systems for watering yards and

The City needs to allow curb installation of Electric Vehicle (EV) charging stations to make room for more ADU's and DADU's. Currently EV's must be charged at an off street parking spot. This requirement prevents many residents from switching to an EV, and prevents current EV owners from converting their off street parking spots to much needed housing in the form of ADU's or DADU's.

Sincerely,

Anita Shelton  
[REDACTED]  
Seattle 98103

Sent from my iPhone

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:35 AM  
**To:** Staley, Brennon  
**Subject:** FW: Trees

-----Original Message-----

From: Nancy Simsons <[REDACTED]>  
Sent: Sunday, August 21, 2022 12:51 PM  
To: PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
Subject: Trees

CAUTION: External Email

Please save our trees. We need to be able to breathe. We have lost birds because their habitats have been taken from them. The quality of life is more important than housing.

More trees need to be planted! Don't do away with the trees we have!!!!!!

Nancy Simsons

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:34 AM  
**To:** Staley, Brennon  
**Subject:** FW:

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**From:** Joan and Ed Singler <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 9:17 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:**

**CAUTION: External Email**

Am sending this email to voice my support for adding as many trees to Seattle and surrounding areas as possible. I understand the need for new housing but I believe we can have both. If climate change is not address immediately this planet will not be livable for future generations. Trees contribute a great deal to reducing our carbon footprint.

Joan and Ed Singler

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**From:** Rachel Smith <rachels@mail.seattlechamber.com>  
**Sent:** Monday, August 22, 2022 4:08 PM  
**To:** Staley, Brennon  
**Cc:** Alicia Teel; Lars Erickson  
**Subject:** SMCC One Seattle EIS Scoping Comments  
**Attachments:** Final SMCC - One Seattle Plan Comments.pdf

**CAUTION: External Email**

Dear Mr. Staley,

Attached, please find comments from the Seattle Metropolitan Chamber of Commerce on the scope of the environmental impact statement for the One Seattle Plan Comprehensive Plan update.

Thank you,

Rachel

**Rachel Smith**

*President and CEO*

[Seattle Metropolitan Chamber of Commerce](#)



August 22, 2022

Brennon Staley  
Office of Planning and Community Development  
P.O. Box 94788  
Seattle, WA 98124-7088

Dear Mr. Staley,

On behalf of the Seattle Metropolitan Chamber of Commerce and our 2,500 members, I encourage you and City leaders to take an approach to the One Seattle Plan that strongly embraces the policy tools the City has to increase housing and affordability.

Housing that is affordable across the income spectrum is a top issue for our region's employers as they work to recruit and retain workers – both workers already in the area, and those moving from other regions and beyond. Especially as employees can increasingly work from anywhere, housing affordability is vital to an equitable, inclusive metropolitan region with a high quality of life: one with dynamic communities, thriving neighborhood businesses, and strong arts and culture.

One only needs to look at the headlines to see rents and home prices rapidly escalating throughout our region. Zoning standards that only allow detached units – essentially banning new duplexes and triplexes in much of our residential areas – drive up the cost of land, making housing more unaffordable and inaccessible. Further, the evidence is clear that at its core, homelessness is a housing problem. In a city facing the twin challenges of a homelessness crisis and a lack of housing affordability, increasing density, promoting housing affordability, and eliminating exclusionary zoning are essential. Seattle needs more housing—all types of housing.

Housing leaders – non-profits, government agencies, and the private sector – have all worked within current system constraints to build more housing. From 2010-2020, Seattle [added](#) roughly 60,000 units of housing, a 19% increase. This rate of growth was the third-highest among U.S. cities, just behind Austin and Denver. However, we're still not adding housing to keep up with the pace of population and job growth – over that same period, Seattle added 129,000 people, a 21% increase in population

As we look to the future and update the Seattle Comprehensive Plan, we need housing growth targets that flex to meet job and population growth. Simply planning to meet the bare minimum of housing growth targets is not enough to get us out of the current housing crisis. We must learn from past mistakes and look at a wide variety of housing types to address this gap. This should include rowhouses, townhouses, duplexes, triplexes, and other diversified housing types to address our middle housing needs.

Aligning with state policy should be a top priority. While the current Alternative 3 looks at legalizing up to four-plexes in current Neighborhood Residential Zones, OPCD should look to proposals from the state legislature last session and study the impacts of legalizing up to six-plexes in current neighborhood residential areas.

Finally, the One Seattle Plan must incorporate how the City will address the historic and ongoing harmful impacts of exclusionary zoning, including a plan to avoid and mitigate displacement without limiting overall housing and growth opportunities. This should include exploring denser housing options in areas at low risk for displacement. We also encourage OPCD to look at options to maximize housing opportunities around current and future light rail stations while avoiding and mitigating the displacement of critical industrial businesses in our region.

We need a bold approach to address housing affordability; the time for half measures is over. And we know our community supports it – the most recent Index poll of 700 Seattle voters said 66% support the building of new housing in their neighborhood and 82% support policies that make it easier to build new housing in transit and commercial areas.

Thank you, and we look forward to continuing to engage with the City during this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Smith". The signature is fluid and cursive, with the first name "Rachel" being more prominent than the last name "Smith".

Rachel Smith  
President & CEO

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**From:** Susan Starbuck <[REDACTED]>  
**Sent:** Monday, August 22, 2022 1:04 PM  
**To:** Staley, Brennon  
**Subject:** Community Response to "One Seattle Plan"  
**Attachments:** Letter to Seattle City Planning 8.22.22.docx

**CAUTION: External Email**

*My Email Schedule: Monday through Friday 10 - 1 PM; Usually available by telephone. I am often slow to respond; please re-send if you don't get a response.*

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Dear Mr. Brennon Staley,

Attached you will find my response to the "One Seattle Plan".

Briefly, I recommend avoiding uniformity and affirming diversity. Seattle, when I moved here in 1970, was known for the diverse character of its neighborhoods. Each had a history, its own small businesses, its population, and its flair. Of course in 1970, the city was racially divided, my children bussed to Martin Luther King School, Washington Middle School, and Garfield Highschool, and had positive learning experiences in each one.

Today, my neighborhood is more diverse than it was in 1977, when I moved into my present location. but it still retains many families and lots of older folks, a few of whom have lived here longer than I have. Please stick to the plan of establishing transition zones, for example, along 15th Ave NE and not permitting additional dwellings on one existing lot. We need to attract families, and we have quite enough boarding houses and multi-family dwellings already. In the past year, just a couple of houses from me, there are three new DADU's and lots of renovation. Absentee property owners are shaping my life by putting any number of people in each dwelling and on each lot. I and other family owners will lose the great privilege of knowing the people on my block and inviting them to share in the produce of my vegetable garden. Already, we have an air bnb a couple houses away.

What am I to do? Move to Edmonds? Move to an adult family home? How I love this neighborhood, this house, these people. I love living around students and near the university, as do all of us here. I used to love doing all my shopping on the Ave on foot. Thank you for your consideration.

Sincerely,  
Susan Starbuck

Mr. Brennon Staley  
Office of Planning & Community Development  
P.O. Box 94788, Seattle, WA 98124  
brennon.staley@seattle.gov

Dear Mr. Brennon Staley (OPCD):

We reside in the University Park Neighborhood, which is nestled in the NE corner of the University District. Though small in actual area, it is surrounded by the recently up-zoned Urban Center of the U District. At the time of the up-zone, a buffer layer, called the Transition Zone, was inserted to protect our community's integrity as a single-family neighborhood. Now that protection has been all but erased, as the City eliminated the 'single-family' designation in preparation for this latest update of the Comprehensive Plan, or the "One Seattle Plan".

Unfortunately, the City doesn't appreciate the fact that Seattle is not "one", in that its many districts and neighborhoods have unique heritages, cultures, and issues. Any city-wide, "one-size-fits-all" approach will fail to address the particular needs and pressures facing each community. Thus, we would like to submit these concerns and feedback into the permanent record:

- ◆ In drafting the Comprehensive Plan, city officials should acknowledge, respect, and protect the uniqueness of individual neighborhoods, including their personalities. This mandates that city regulations be flexible enough to anticipate, in advance, any of the many negative pressures and impacts that might result from new legislation. The regulations must also incorporate real-time reassessments in order to address any unexpected challenges before they become unmanageable.
- ◆ Seattle should reactivate the concept of Conservation District, but only in a broader, less restrictive format. In order to preserve the identities of neighborhoods, while encouraging the construction of new affordable housing, these districts should be established, with specific guidelines as to design standards. This would discourage the creation of out-of-scale development, such as large LEGO-boxy houses and townhouses, with gardens replaced by cement walls and walks, and hidden entrances that are not inviting and engaged with the streetscape and the passersby. These improvements should be promoted by a City that declares itself to be 'pedestrian-friendly'.
- ◆ Any new construction, including DADUs and ADUs should require advance notification of the neighborhood, including street signage. Currently, by the time we become aware of the new development, it is too late for us to formally submit our concerns and other feedback. Developers should also be asked to contact the neighborhood groups and offer to discuss their plans.
- ◆ If Seattle is to welcome displaced families into our neighborhoods, they must be prepared to provide the support needed, including infrastructure, such as schools, parking access, open green space, etc.
- ◆ Seattle must finally address the fact that affordable family homes disappear when such properties are snatched up by corporations—a growing trend that is now being discussed in Congress.
- ◆ Seattle must use code to encourage housing for families, not simply be satisfied with a numerical increase in housing units, especially if they are mainly apartments or efficiency and studio apartments.
- ◆ Seattle must acknowledge the new post covid19 lifestyle—people working from, studying from, and living at home. Many families are now eagerly seeking homes that have private yards, where they will not be restricted by future shutdowns and where their children can gather safely and have fun. Construction of multi-unit housing projects fail to provide these amenities.

Thank you for allowing to share our concerns and other feedback. Please keep us informed as to future opportunities to help develop a blueprint that will shape the growth and expansion of Seattle through the next twenty (20) years. We appreciate your dedicated service to our city.

Sincerely,

Susan Starbuck

Seattle, WA 98105

**45-year owner of this home.**

**Family of 5, 3 daughters.**

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**From:** Peggy Sturdivant <[REDACTED]>  
**Sent:** Monday, August 22, 2022 12:49 PM  
**To:** Staley, Brennon  
**Subject:** 2024 Seattle Comprehensive Plan

**CAUTION: External Email**

As a resident involved in neighborhood planning through the defunct councils (Ballard District Council) and as former journalist on the topic and member of Seattle Green Spaces Coalition I would like to comment.

In using the Equity and Climate Analysis Framework it is crucial that all comments be examined to determine if they speak to the greater good, applicable to all six components or simply of benefit to a biased group (such as Master Builders, and those already with power). The most successful areas of the city are those that have balanced growth, transit, affordability, etc. while considering the environment first. The Tree Ordinance needs to be applied and updated. Loss of tree canopy dooms any future plan. It is disingenuous to claim that affordable housing is incompatible with retaining trees.

I would support Option 5 only if opening current SFR zones was for affordable housing, not single family residences that are oversized, and reduce tree canopy. Plus all districts deserve to be part of their own planning to balance the historic nature, provide access to parks and green spaces, transportation, and walkability. There needs to be planning that looks to the future, not just lot-to-lot. Approach it the way islands must, balancing all elements and including the community.

Help create neighborhoods again.

Peggy Sturdivant  
[REDACTED]  
Seattle, WA 98107

*Remote Writing and Tutoring for all ages via Skype, Facetime and Zoom*  
[peggysturdivant.com](http://peggysturdivant.com)

***What I'm Reading Now: Hell of a Book by Jason Mott***

"Instead of writing what you know, find out what you know by writing." Hilma Wolitzer

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:35 AM  
**To:** Staley, Brennon  
**Subject:** FW: Comprehensive Plan Comments

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**From:** Dennis & Martha <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 3:31 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Comprehensive Plan Comments

**CAUTION: External Email**

I am writing to express support for maintaining and enhancing Seattle's urban tree canopy as part of the Comprehensive Plan.

We need to retain trees. The great value of an urban forest needs to be part of all zoning decisions. Many people are facing a housing crisis in housing availability and affordability. At the same time, we are facing a climate crisis that we need to respond to and a glaring inequality in our urban natural environment. All these issues need to be addressed in the Comprehensive Plan.

Our trees and urban forest are a critical element in the neighborhoods of Seattle. They are important for reducing heat island impacts, our mental and physical health, reducing storm water runoff, animal and plant habitats, reducing air and water pollution, and noise and stress reduction. Less affluent neighborhoods are especially vulnerable to heat and air pollution due to less urban forest cover. We need to support increased housing, and protect and enhance the city's urban forest at the same time. We need to plan for growth and build communities across the city that are healthy, equitable and livable for everyone. We have to plan on affordable housing AND tree canopy, no matter which alternative is adopted. "Complete neighborhoods" should be defined to include tree protection for the health of all living things. Any reference to "amenities" should include green space and trees. We need budgets to include plantings and maintenance of large trees. These concepts need to be incorporated into the zoning regulations themselves, and not left up to some unspecified future part of the planning process.

Martha Taylor, Seattle

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**From:** Dennis & Martha <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 3:29 PM  
**To:** Staley, Brennon  
**Subject:** One Seattle Plan Environmental Impact Statement

**CAUTION: External Email**

Mr. Staley:

I am writing to express support for maintaining and enhancing Seattle's urban tree canopy as part of the Comprehensive Plan.

We need to retain trees. The great value of an urban forest needs to be part of all zoning decisions. Many people are facing a housing crisis in housing availability and affordability. At the same time, we are facing a climate crisis that we need to respond to and a glaring inequality in our urban natural environment. All these issues need to be addressed in the Comprehensive Plan.

Our trees and urban forest are a critical element in the neighborhoods of Seattle. They are important for reducing heat island impacts, our mental and physical health, reducing storm water runoff, animal and plant habitats, reducing air and water pollution, and noise and stress reduction. Less affluent neighborhoods are especially vulnerable to heat and air pollution due to less urban forest cover. We need to support increased housing, and protect and enhance the city's urban forest at the same time. We need to plan for growth and build communities across the city that are healthy, equitable and livable for everyone. We have to plan on affordable housing AND tree canopy, no matter which alternative is adopted. "Complete neighborhoods" should be defined to include tree protection for the health of all living things. Any reference to "amenities" should include green space and trees. We need budgets to include plantings and maintenance of large trees. These concepts need to be incorporated into the zoning regulations themselves, and not left up to some unspecified future part of the planning process.

Sincerely,

Martha Taylor, Seattle

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**From:** Tolon, Marsha <TolonM@wsdot.wa.gov>  
**Sent:** Monday, August 22, 2022 8:26 AM  
**To:** Staley, Brennon  
**Cc:** Bartoy, Kevin; Sowers, David; Storrar, Jeff; Vezina, John  
**Subject:** Seattle Comp Plan EIS Scoping - WSDOT Comments

**CAUTION: External Email**

Submit via email to ([brennon.staley@seattle.gov](mailto:brennon.staley@seattle.gov))

August 22, 2022

City of Seattle  
Office of Planning & Community Development  
600 4<sup>th</sup> Avenue  
Seattle, WA 98104  
RE: Comments on Scoping for the *One Seattle Comprehensive Plan*

Dear Mr. Brennon Staley,

Thank you for the opportunity to comment on the scope of the Environmental Impact Statement (EIS) for the upcoming *One Seattle Comprehensive Plan*. We recognize the City of Seattle and WSDOT's shared interest in promoting and expanding a safe and efficient multimodal transportation system, both in the city and throughout the Puget Sound region. We also commend the city for its efforts as part of its plan update to explore new ideas for how Seattle can grow to be more equitable, affordable, and climate resilient.

After review of the EIS scoping materials, WSDOT submits the following comments for consideration:

#### Aligning Plans

Consistency between the City of Seattle and WSDOT's planning efforts is critical to helping meet the goals of both agencies. Alignment with the actions, objectives, and goals of WSDOT's Washington State Ferries (WSF) 2040 Long Range Plan and the 2021-2023 Sustainability Action Plan is particularly important during the city's current plan update. For example, several of the EIS alternatives laid out in the scoping documents suggest advancing land use concepts that are conducive to less single-occupancy vehicle travel. The Washington State Ferries 2040 Long Range Plan promotes mode shift and helping our customers have travel choices beyond driving a vehicle onto a vessel. WSF welcomes future coordination towards assisting the city in making the alignment of these plans feasible.

#### Alternatives

WSDOT supports the City of Seattle's efforts to develop compact urban forms that promote greater transit and active transportation mode shares, as well as a jobs/housing balance. We also recognize a need to preserve the functionality of State facilities that provide regional connectivity. We recognize that land use changes considered under different alternatives can have implications for both WSP's Seattle Terminal and the Fautleroy Terminal. A multi-year construction project to rebuild the Seattle Terminal at

Colman Dock is nearing completion, and a similar project to rebuild the Fauntleroy terminal in West Seattle, is in the early planning stages. The goals defined for urban villages and corridors would appear to have the most potential impact to these two WSF terminals. It is important to acknowledge that in the zones where land transit meets water transit, zoning and land use should be compatible with regional as well as local transportation modes and the types of infrastructure they require to maintain efficient operations without conflict to community environs.

The aim of developing "15-minute neighborhoods" near the two terminals, as part of any of the proposed alternatives, would need some flexibility in its implementation to allow ferry routes to continue to operate as community and regional lifelines. The terminal vicinity needs to allow for vehicle-freight-bicycle-pedestrian staging and emergency services planning. WSF knows that releasing that type of traffic to pulse through a neighborhood can affect it. The scale of a 15-minute neighborhood in those environs would likely set up points of conflict between transportation modes without informed foresight.

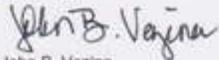
The sections of the EIS where it would be appropriate to analyze and discuss these implications would be air quality and GHG emissions, transportation, land use patterns and urban form. We would also recommend there be discussion of the relationship to plans, policies, and regulations, and to energy and natural resources.

Additional Considerations & Resources

WSF is initiating an updated demographic, and Origin and Destination studies. If the timing of the WSF studies meets with the *One Seattle Comprehensive Plan* schedule, these studies could serve as a useful resource to inform the alternatives analysis, particularly for identifying plan actions and goals in the Seattle and Fauntleroy terminal locations.

Thank you again for the opportunity to comment. We look forward to continuing the collaborative relationship that our agencies have shared for a considerable amount of time. Please reach out to Kevin Bartoy, WSF's Chief Sustainability Officer, [bartovks@wsdot.wa.gov](mailto:bartovks@wsdot.wa.gov), or by phone at (206) 515-3856, with any questions or future correspondence.

Sincerely,



John B. Vezina  
Director, Planning, Customer and Government Relations  
Washington State Ferries

CC: Kevin Bartoy, WSF Chief Sustainability Officer  
David Sowers, WSF Terminal Engineering Director  
Jeff Storrar, WSDOT Regional Planning and Policy Manager

Thank you,  
**Marsha Tolon, PLA, ENV SP**  
Environmental and Permitting Lead  
[Office of Sustainability and Environmental Services](#)  
[Washington State Ferries \(WSF\)](#)  
2901 3<sup>rd</sup> Avenue, Suite 500  
Seattle, Washington 98121  
206.515.3876 (office)  
206.359.0864 (cell)





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**From:** Blake Trask <[REDACTED]>  
**Sent:** Monday, August 22, 2022 4:59 PM  
**To:** Staley, Brennon  
**Subject:** Seattle Comprehensive Plan EIS scoping comments

CAUTION: External Email

Dear Brennon-

I wanted to send some comments as the City considers what to scope in its EIS. My points focus on (1) the matrix of conceptual alternatives and (2) the 130th and 145th St Station areas.

On the first topic, I would ask that the city explore alternatives that concentrate both retail and residential density off of arterials (and in addition to arterial-related growth) to create housing and activity generation that is not adjacent to some of our busiest and most dangerous streets. Concentrating the majority of the Seattle's density along its busiest, noisiest and most polluted right of ways is not fair or equitable. Instead, Seattle's Comprehensive Plan scope should include options that allow and promote density along and off of those busy arterials and across the fabric of our neighborhoods.

Of the conceptual alternatives presented for comment in this scoping period, alternatives 3 and 5 align most with this vision . Alternative 5 is the closest, but I am not clear that it goes far enough. My ask is for an alternative to be developed that allows a wider range of housing and retail choices in all Neighborhood Residential zones across the city with an explicit expansion that allows for business districts, corner stores and other community amenities interspersed in and across our Neighborhood Residential. Finally, it would explicitly allow for more density across Neighborhood Residential (urban village/center levels), as well.

On the second point - station area planning, I would request that OPCD staff and the scoping for upcoming station area zoning changes contemplate innovative ways to add significant density in all quadrants around these two stations, including Jackson Park Golf Course. Sound Transit is investing close to half a billion dollars to build these two stations. Seattle reciprocate this level of investment by zoning as intensively as some other cities are to meet the scale of this impressive regional investment. Please upzone the 1/2 mile radius of both stations to urban center levels.

Thank you and best regards,

Blake Trask  
Greenwood resident

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**From:** Janis Traven <[REDACTED]>  
**Sent:** Monday, August 22, 2022 11:38 AM  
**To:** Staley, Brennon  
**Subject:** One Seattle Comp plan

CAUTION: External Email

In order for growth to be effective, please take an approach that is appropriate for each neighborhood, taking into account limits and/or benefits of topography, current and realistic future connectivity including infrastructure, tree canopy preservation and expansion, and whether the city is dedicated to building affordable housing itself. It will not happen on its own - has subdividing lots added to the affordable housing supply? My preference is to maintain NR zoning as an option.

One logical approach to include in the One Seattle Comp Plan is to upzone along frequent transit corridors - and add frequent transit to expand where those corridors are. Similarly, Urban Villages that include affordable housing should be part of the plan.

But the city needs to do more than change zoning and hope that developers will build affordable housing, or that increased supply will result in lower rents and housing prices. The city must build housing itself, or not let developers get away with paying a fee in lieu of building.

I know that my feedback isn't as detailed or technical as many that have been submitted. I'm a longtime Seattle resident who encourages smart growth that includes more affordable options. The successes that Seattle has seen have taken neighborhoods into account in the process. One size does not fit all.

Thank you.

Janis Traven  
[REDACTED]

Sent from my iPad

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**From:** Doug Trumm <doug@theurbanist.org>  
**Sent:** Monday, August 22, 2022 11:15 PM  
**To:** Staley, Brennon  
**Cc:** editor; Welch, Nicolas; board@theurbanist.org  
**Subject:** Comprehensive Plan Update Scoping - Urbanist Comment

**CAUTION: External Email**

Hi Brennon,

The Urbanist wanted to underscore and expand upon a few points from our letter with the HDC coalition.

- Alternative 2 should create new urban villages and the study must allow UVs in key spots where they are most lacking, such as Laurelhurst, Magnolia, Montlake, Madison, Wedgwood, West Woodland -- neighborhoods we largely [identified in 2015 comments](#). This would allow greater access to high opportunity, low displacement risk neighborhoods while also helping raise them to 15-minute neighborhood standards for walkability and access. The Focused Growth Alternative should also study UV expansions, particularly in the most gerrymandered UVs, such as Phinney-Greenwood, Fremont, Wallingford, Queen Anne, Admiral District, Morgan District, Aurora-Licton Springs, and Crown Hill.
- Alternative 3 should include sixplexes at the very least in order to tip the scales away from single family teardowns and toward middle class housing. An eightplex bonus for including affordable housing on-site would be a further boost. We want to encourage housing creation not just have density on paper, very difficult to build in reality.
- Alternative 4 must ensure the majority of new dense multifamily housing is going on quieter, shadier, safer streets not just noisy polluted wide arterials. This is an approach consistent with undoing racist transportation policy of the past and promoting environmental justice.
- Alternative 5 should include all the aforementioned improvements from each of the three alternatives. The study should seek to quantify the impact to affordability and increasing the mix of incomes in the most exclusively wealthy enclaves.
- Alternative 6 should seek to maximize sustainable development by allowing simple massings that perform at high energy efficiency Passive House standards. Permitting five-story buildings everywhere and height and density bonuses for mass timber could further incentive green building and lower the carbon footprint of the building sector.
- All alternatives should maximize housing opportunities near planned light rail stations. With the 130th Street Station opening in 2026, the City should establish an urban village around the station. Likewise, Graham Street, North Delridge, Avalon, the Junction, Ballard, and Uptown could use new or expanded urban villages to complement their planned light rail stations.
- The City's greenhouse gas analysis must consider the regional benefits of preventing sprawl and adding dense, climate-friendly housing in the existing urban core. What is the climate impact at a regional level? Measuring Seattle in a vacuum ignores that people will move to carbon-intensive car-oriented suburbs instead if Seattle doesn't add housing.

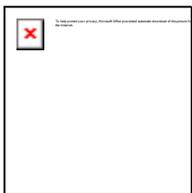
Here is a [link to the full letter](#) for reference.

Thanks for your consideration,

**Douglas Trumm**, *Executive Director*

Pronouns: *he, him*

[The Urbanist](#) | 320.237.4771





## HDC Coalition Comment - Expanding Scope for Affordable and Abundant Homes

42 5

We, the undersigned organizations, represent a coalition committed to advancing housing affordability and addressing climate change through Seattle's Comprehensive Plan update, including affordable housing developers and operators, environmental advocates, climate activists, and grassroots housing organizers. It is essential that the City analyzes a full range of growth alternatives in the EIS. We urge you to expand the scope of analysis of each of the alternative growth strategies and to advance a new transformative Alternative 6, to provide as much flexibility to build as many homes as possible.

This Comprehensive Plan update is a once-in-a-decade opportunity for

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efforts inextricably on housing and climate action.

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Posted by

[Jesse Simpson](#) on August 12, 2022

Current status

[Housing](#)
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English

We have an exacerbated housing crisis; far too many of our neighbors sleep unsheltered, struggle to afford rent, or have been displaced from their communities, all because of how expensive homes in our city are. Simply put, we have a shortage of homes, and we need to build more of them. We need more affordable homes, more sustainable homes, more homes to rent and to own, and more middle homes, apartments, and corner stores throughout our city.

We also face a climate crisis, driven overwhelmingly by transportation, accounting for a whopping two-thirds. Car-dependent sprawl is not consistent with our climate goals or a sustainable future. As the center city of this region, Seattle must lead in welcoming sustainable land use patterns. Per capita emissions are lower in Seattle due to better access to transit, jobs, and walkable neighborhoods. By not welcoming housing growth in its borders, Seattle forces it to the suburban fringe, where residents are locked into car dependency and growth jeopardizes forests and farms.

Of the options currently drafted, **Alternative 5** is the only alternative to make a major positive impact on Seattle's housing costs by allowing for more housing growth to meet demand. Per the City's analysis, by

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walkable, transition communities near jobs and amenities, and could help create transit-supporting densities throughout Neighborhood Residential zones. And finally, it goes furthest among the five drafted

English

alternatives to correct the racial inequities of historically exclusionary zoning policies.

In addition to advancing Alternative 5, it is essential that all the growth strategies studied include as much flexibility to increase housing supply, diversity, and affordability as possible. A **new Alternative 6**, should expand on the Combined Growth Strategy with policies to create abundant, affordable housing throughout the entirety of Seattle.

- **Alternative 2**, the Focused Growth Strategy, should create or expand new urban villages and maximize housing development capacity in neighborhoods with high access to opportunity and low risk of displacement. The Focused Growth Strategy should ensure that urban villages encompass the entire 15-minute walkshed around frequent transit. Finally, the Focused Growth Strategy should incorporate analysis of high-rise and mid-rise zoning. These housing types maximize density around light rail stations and regional centers, would generate more Mandatory Housing Affordability contributions to expand the city's affordable housing stock, and could encourage sustainable mass timber construction.

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should also include mixed-use development on corner lots, with an

English

emphasis on allowing uses that meet residents' essential daily needs.

- **Alternative 4**, the Corridor Growth Strategy, should incorporate significant upzones in the 15-minute walkshed around transit stations, not just a narrow band directly on arterials. Mid-rise and mixed-use zoning should anchor the 5-minute walksheds around transit stations, with wide swaths of low-rise apartments and missing middle homes permitted throughout the rest of the 15-minute transit walksheds.
- **Alternative 5**, the Combined Growth Strategy, should incorporate the additional flexibility for housing production from each of the growth strategies enumerated above.
- **A new alternative, Alternative 6**, should expand on the Combined Growth Strategy and be explicitly designed as the anti-displacement alternative requested by the Comprehensive Plan Racial Equity Analysis: it should “end the prevalence of single-family zoning” with a “racially inclusive approach.” This includes anti-displacement overlays in areas of high displacement risk and allowing maximum growth of the most affordable housing types in areas of high

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requirements for green buildings, to encourage mass timber and passive house techniques.

English

Beyond specific growth strategies, we recommend that all the alternatives be improved in the following ways:

- All of the growth alternatives OPCD advances for analysis should plan for—at a minimum—a continued rate of population growth similar to what Seattle has seen over the last 10 years.
- The City’s greenhouse gas analysis should consider the regional benefits of preventing sprawl and adding dense, climate-friendly housing in the existing urban core.
- All of the growth alternatives should analyze altering the transportation network concurrently with the land use strategy, to expand the area of Seattle covered by frequent transit service.
- Broadly, all of the alternatives should develop strategies to expand the “15-minute city” concept effectively in residential zones to ensure complete, walkable communities with a mix of housing types with jobs, commercial spaces, schools, health clinics, and parks.
- For all alternatives, locate new nodes of housing and business density in areas that currently have low access to frequent transit service and/or low access to businesses and amenities that provide

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- All alternatives should maximize housing opportunities near planned light rail stations. With the 130th Street Station opening in 2026, the City should establish an urban village around the station. Likewise,

English

Graham Street, North Delridge, Avalon, the Junction, Ballard, and Uptown could use new or expanded urban villages to complement their planned light rail stations.

- All of the alternatives should analyze the impact of various growth strategies and housing production rates on the total homes affordable by area median income (AMI) band, with attention paid to residents making less than 30% of AMI, 30-50% of AMI, and 50-80% of AMI.
- All of the alternatives should evaluate production rates of rental and ownership housing and incorporate land use strategies to create new homeownership and rental options across the city.

The undersigned organizations look forward to working with OPCD throughout the Comprehensive Plan Update process. We are committed to shaping our city’s land use to allow more homes to be built and to create a more equitable, affordable, and green city.



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English

## Comments (2)

Most recent ▾

 Commenting is not possible because this project is currently not active.



[Michael Gillenwater](#) 2 months ago

I support and echo these comments. Seattle is becoming a laggard on the issue of housing abundance.

 3 • [Reply](#)



[Scott Alspach](#) 2 months ago

I strongly support these comments and am grateful to the signed organizations for putting them together.

 2 • [Reply](#)

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English

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**From:** Liz Underwood-Bultmann <LUnderwood-Bultmann@psrc.org>  
**Sent:** Monday, August 22, 2022 12:59 PM  
**To:** Staley, Brennon  
**Cc:** Paul Inghram; Hubner, Michael  
**Subject:** PSRC Comments on SEPA Scoping for Seattle Comprehensive Plan  
**Attachments:** PSRC Comment Ltr Seattle Comp Plan Scoping.pdf

**CAUTION: External Email**

Hi Brennon,

Thanks for the opportunity to comment on SEPA scoping for Seattle's 2024 comprehensive plan. Please find comments from the Puget Sound Regional Council attached. We look forward to working with you throughout this process, and please feel free to contact us with any questions on our comments.

Best regards,

Liz

**Liz Underwood-Bultmann, AICP (she/her) | Principal Planner | Puget Sound Regional Council**

1011 Western Ave Ste 500 | Seattle, WA 98104

206.464.6174 office | [LUnderwood-Bultmann@psrc.org](mailto:LUnderwood-Bultmann@psrc.org)

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# Puget Sound Regional Council

1011 WESTERN AVENUE, SUITE 500 \\\ SEATTLE, WA 98104-1035 \\\ psrc.org \\\ 206-464-7090

August 22, 2022

Brennon Staley  
Office of Planning and Community Development  
P.O. Box 94788  
Seattle, WA 98124-7088

Subject: Comments on One Seattle Plan Environmental Impact Statement Scoping

Dear Mr. Staley,

Thank you for the opportunity to comment on scoping for environmental review for Seattle's 2024 comprehensive plan update. The Puget Sound Regional Council (PSRC) appreciates the work the city has done to engage residents, businesses, public agencies, and other interested parties in planning for the city's future. The comprehensive plan is critical in mapping out the city's future, and PSRC has a role in ensuring consistency with regional and state policy in this work.

Adopting a plan consistent with and that advances VISION 2050 policies will aid certification of the updated Seattle plan, which in turn qualifies the city for regionally allocated federal transportation funds. VISION 2050 emphasizes the important role that Seattle plays in accommodating growth and serving as a civic, cultural, and economic center for the region.

Seattle has seen significant growth since the 2015 plan update and is undertaking a robust comprehensive plan update to prepare for the future. In 2021, the King County Growth Management Planning Council adopted 2019-2044 targets for Seattle of 112,000 housing units and 169,500 jobs. It is reasonable for the analysis to consider different distributions of growth and understand the implications if actual future growth will continue to exceed forecasts.

VISION 2050 includes a policy and action for Metropolitan Cities to expand middle density housing capacity in the face of rapid employment growth and/or displacement (MPP-RGS-7, RGS-Action-8). PSRC's Regional Housing Strategy encourages local actions to increase housing choices in single family zones, provide greater opportunities for middle housing, and to provide transit-supportive housing options near transit stations. The evaluation of the plan alternatives should assess how well they support and implement these policies and strategies.

VISION 2050 and PSRC's plan certification program emphasize substantial consistency between the comprehensive plan and adopted countywide growth targets. PSRC recognizes that land use

capacity for housing and jobs should exceed the 20-year growth targets to ensure the appropriate location, types, and timing for actual development. In reviewing capacity and distribution for growth, the city should consider the new requirements of HB 1220 and whether the city has sufficient capacity at each income band to accommodate future growth, while recognizing the importance of county and regional coordination. If the city anticipates overall growth that is significantly more than the adopted target it should seek to adjust the target through the Growth Management Planning Council.

Additionally, PSRC will look for consistency between the comprehensive plan and Seattle Transportation Plan. Based on discussions with city staff, some components of the 20-year Seattle Transportation Plan will inform the Transportation element and appendix of the comprehensive plan. Certification will require demonstrating consistency in the analysis and development of both long-range plans.

Thank you for providing this opportunity to comment on SEPA scoping for the comprehensive plan, and we look forward to continuing to be involved with this important work. Please don't hesitate to reach out if we can provide any support or provide any additional information about VISION 2050 and comprehensive plan certification.

A handwritten signature in black ink, appearing to read 'Paul Inghram', with a long horizontal stroke extending to the right.

Paul Inghram, FAICP  
Director of Growth Management Planning  
Puget Sound Regional Council

---

**From:** PCD\_OneSeattleCompPlan  
**Sent:** Monday, August 22, 2022 10:34 AM  
**To:** Staley, Brennon  
**Subject:** FW: trees

---

**From:** wwaldmanmd <[REDACTED]>  
**Sent:** Sunday, August 21, 2022 10:55 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** trees

**CAUTION: External Email**

whatever growth plan is adopted, none will be viable for long if the city living and the city itself are not viable. saving the remaining trees and a vigorous effort to plant new trees wiol make the city a much more friendly, comfortable, civil place to live for years and years. developers do not live inneighborhoods without trees.

---

**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:13 AM  
**To:** Staley, Brennon  
**Subject:** FW: Public Comment on Seattle Comprehensive Plan

---

**From:** Janet Way <[REDACTED]>  
**Sent:** Monday, August 22, 2022 6:37 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Public Comment on Seattle Comprehensive Plan

**CAUTION: External Email**

Dear Seattle Planners,

Your proposed Comprehensive Plan is essentially flawed if you sacrifice everything here for the sake of Density for Developers.

1. My essential question is how on earth can we have "Community Well Being" without protecting our magnificent historic Tree Canopy?
2. How can we prevent Climate Change in Seattle if the Tree Canopy is so fragmented and disconnected, that the Heat Island Effect will continue to kill and sicken the people and the wildlife, including the threatened Salmondids that Chief Seattle's people counted on as do the Orca Whales in Puget Sound?
3. How can our diverse population of BIPOC residents survive and thrive if their air is dirty because most of the large trees have been cut down?
4. How can you expect families in Seattle to thrive if their children are forced to breath dirty air and when thy go to a beach the waters are polluted, because the trees that prevent this pollution are mostly gone.
5. How can their be any well being in this community when people in the most diverse communities have the fewest trees?
6. When you plan a City, it must be for the people who live and work here. Their well-being depends on being safe from pollution such as the toxics that are underlying communities like, Rainier Valley, Southpark and of course Downtown. How can these communities be safe when the Big Trees are being sacrificed? Every single day!
7. How can Seattle thrive when so much of its historic character and tree canopy is being sacrificed and yet the "affordability used as an excuse" is non existent?
8. How can the their be "Community Well Being when the only "nature left" is a few pocket parks full of disconnected strands of green where there was once an ecosystem that sustained salmon? We can do better.
9. How can Seattle thrive when it's parks are being neglected and abandoned to the mountains of trash and the beautiful natural areas are being left to rot?

These are questions about how the Comp Plan should provide a Sustainable Future. Not one where the future is only sustainable for developers who probably don't even live here.

Please create a Comp Plan that includes a truly effective plan to protect the tree canopy and the Critical Areas that depend on them. For an equitable Seattle, we need our large trees along with the development. Find a way to do it. It's not impossible.

Sincerely,

Janet Way  
98155

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**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 6:13 AM  
**To:** Staley, Brennon  
**Subject:** FW: Trees, affordable housing, climate crisis, homelessness

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**From:** lassiewebster [REDACTED]  
**Sent:** Monday, August 22, 2022 11:53 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Trees, affordable housing, climate crisis, homelessness

**CAUTION: External Email**

I am writing to express my views regarding the One Seattle Plan. My priorities for Seattle include:

- Maintaining and growing a healthy tree canopy,
- Create low income and affordable housing that does the least damage to the environment and allows residents to enjoy a healthy outdoor environment.
- Restricting tree removal to preserve healthy habitats and canopies

I support a 6th alternative that will address the environment, climate crisis, and equity. Higher density housing is important, but we have to maintain a healthy environment.

Thank you,  
Lassie Webster

---

**From:** PCD\_OneSeattleCompPlan  
**Sent:** Tuesday, August 23, 2022 5:51 AM  
**To:** Staley, Brennon  
**Subject:** FW: Save Our Urban Forest!

---

**From:** Steven Wells <[REDACTED]>  
**Sent:** Monday, August 22, 2022 10:09 AM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Subject:** Save Our Urban Forest!

**CAUTION: External Email**

- Hello -
- 
- 
- I'm writing today to express my concern for the viability of the trees in Seattle. We must have stronger protections for the trees we already have and also for the ones we need to plant in the future. We need the One Seattle Comprehensive Plan that is being put forward today by advocates for the trees. It will help us maintain our tree cover and increase it to 30% or more. Trees provide way more than just trunks and leaves. They give us clean air and cool shady streets, streets that have been shown to have less crime than areas with fewer trees. Trees moderate the devastating heat island effect that is so prominent in big cities like ours as well as the drastic effects of climate change. They can promote equity in the city by placing more trees in chronically under served areas where there are few trees. They provide so many benefits it's just common sense to include them in a prominent place in the Comprehensive Plan.
- 
- 
- There are too many situations where builders cut down big old trees so they can plant big houses instead. We desperately need more affordable homes. (tho these big homes are rarely affordable!) But we need these trees just as much! Big old trees take generations to grow again. We'll never see them and neither will our children or even their children. It takes that long. But the builders rarely replace the trees they cut with comparable trees that will grow to be big and old again. That's because they don't leave enough land on the properties to have large trees anymore. It used to be that you could only cover 30% of a property with buildings, leaving the rest for plantings. Now it seems like you can cover 80% of the property with buildings and leave almost nothing for trees and other plants. That's nuts! Another problem is that the builders often plant smaller growing deciduous trees to replant the conifers. The conifers sequester much more carbon than deciduous trees so it's imperative that more conifers are planted.
- 
- 
- I want to reiterate how important it is to have more trees. They will give us so many good things for generations to come. Please pass strong tree protections now.
- 
- Thank you, Steven Wells
- 
- [REDACTED] Seattle 98117 (Greenwood!)
- 
- [stevenjwells@earthlink.net](mailto:stevenjwells@earthlink.net)

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**From:** Hubner, Michael  
**Sent:** Monday, August 22, 2022 4:44 PM  
**To:** Staley, Brennon  
**Subject:** FW: Seattle Green Spaces Coalition comments for 2024 Comp Plan EIS  
**Attachments:** OPCD-SGSC comment\_2024 Comp Plan EIS Scoping\_08-19-2022.docx

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**From:** Martin Westerman <info@thesgsc.org>  
**Sent:** Monday, August 22, 2022 7:30 AM  
**To:** Quirindongo, Rico <Rico.Quirindongo@seattle.gov>; Hubner, Michael <Michael.Hubner@seattle.gov>  
**Cc:** Elaine Ike <elaineike@hotmail.com>; MICHAEL OXMAN <michaeloxman@comcast.net>; Mary Fleck <maryfleckws@gmail.com>; John McNulty <johnm4502@gmail.com>; Peggy Sturdivant <peggysturdivant@gmail.com>  
**Subject:** Seattle Green Spaces Coalition comments for 2024 Comp Plan EIS

**CAUTION: External Email**

Dear Acting Director Quirindongo,

The Seattle Green Spaces Coalition offers this summary of comments and recommendations for the 2024 Comprehensive Plan EIS Scoping process and analysis:

1. Support the Urban Forestry Commission call to consider impacts on urban forests in all recommended analyses of urban growth strategies, specifically,
2. Incorporate ecosystem services monetary values and accounting into all analyses
3. Study how EcoDistrict planning can support low-carbon, climate-adapted growth and economic development goals,
  - a. Support Seattle City Council Resolution 32059 prioritizing resilience
  - b. Consider more diverse housing types than apartment blocks and rowhouses
4. Address the erosion of Seattle's natural capital
5. Require that all City departments and agencies use the Urban Forest Management Plan to inform decisions on development
6. Increase setbacks from property lines, and make more spaces for urban flora
7. View the environment on an equal footing with equity and commercial concerns.

Please find our detailed concerns in the attached letter.

All the best,

Martin Westerman, for the Board of  
The Seattle Green Spaces Coalition  
<https://seattlegreenspaces.org> / [info@thesgsc.org](mailto:info@thesgsc.org)



## Seattle Green Spaces Coalition

The City of Seattle owns more than 200 acres of non-park lands — forest, wetland green spaces — that it considers “excess” or “surplus” to its needs, and ripe for sale to developers. These properties powerfully benefit our neighborhoods and our city, and SGSC says let’s

keep them in public hands for public benefit. They can be transformed into pocket parks, P-Patches, play fields ...

[seattlegreenspaces.org](http://seattlegreenspaces.org)

SEATTLE GREEN SPACES COALITION  
[www.seattlegreenspacescoalition.org](http://www.seattlegreenspacescoalition.org)

Rico Quirindongo, Acting Director  
Michael Hubner, Long Range Planning Manager  
Office of Planning and Community Development  
City of Seattle,  
Seattle, Washington

August 18, 2022

Re: 2024 Comprehensive Plan EIS Scoping process and analysis

Dear Acting Director Quirindongo:

The Seattle Green Spaces Coalition offers this summary of comments and recommendations for the 2024 Comprehensive Plan EIS Scoping process and analysis:

1. Support the Urban Forestry Commission call to consider impacts on urban forests in all recommended analyses of urban growth strategies, specifically,
2. Incorporate ecosystem services monetary values and accounting into all analyses
3. Study how EcoDistrict planning can support low-carbon, climate-adapted growth and economic development goals,
  1. Support Seattle City Council Resolution 32059 prioritizing resilience
  2. Consider more diverse housing types than apartment blocks and rowhouses
4. Address the erosion of Seattle's natural capital
5. Require that all City departments and agencies use the Urban Forest Management Plan to accurately and wisely inform decisions on development
6. Increase setbacks from property lines, and make more spaces for urban flora
7. View the environment on an equal footing with equity and commercial concerns.

The Coalition's specific comments include the following;

1. **Support the Urban Forestry Commission's call to consider impacts on urban forests** in all recommended analyses of urban growth strategies, specifically,
  1. Support for Seattle City Council Resolution 32059 prioritizing resilience
  2. Direct City staff to study and develop new and revised science-based goals, policies and strategies that foster holistic management and conservation of Seattle's urban biodiversity,
  3. Identify trends in and projected climate impacts to Seattle's biodiversity, within city limits and within the natural areas and watersheds managed by the city that provide drinking water and utilities.
  4. Assess tree canopy and trends in tree canopy cover across land use types and development patterns.

2. **Incorporate ecosystem services monetary values and accounting into all analyses.**

Trees and green spaces do not exist in isolation; they are integral elements in ecosystems.

  - a. Include the following statement in the document to guide analyses:
    1. “Whereas, Seattle’s open and green spaces are a tangible asset essential to public health, urban resilience, equity and sustainability, with a monetary value in excess of \$3 billion per year, Therefore the City of Seattle will integrate development within this context, to meet the needs of communities, neighborhoods, and the entire city.”
    2. Invite experts in ecosystem service valuation and accounting, alternative land use and urban forest planning, and other relevant areas to consult with the City
    3. Seattle’s “green infrastructure” – land and water areas within its 142 square mile area, provides more than \$3 billion worth of benefits and savings to this city each year. These include erosion control, stormwater management, habitats and pollinator corridors; public health, oxygen output and carbon sink; pocket parks, tree and land banks; property value enhancement; fisheries support and urban agriculture space (for P-Patches and community gardens), etc.
    4. Stormwater management reference: <https://arbodayblog.org/treecare/how-trees-can-retain-stormwater-run-off/#:~:~%20%20;text=How%20do%20trees%20help%20with%20storm-water%20management%3F%201,eventu%20%20ally%20be%20re-leased%20into%20the%20atmosphere%20by%20transpiration>
3. **Study how EcoDistrict planning can support low-carbon, climate-adapted growth and economic development goals.**
  - a. consider a greater diversity of housing types than apartment blocks and row-houses in development planning, including social housing, co-ops, and low- and middle-income /”affordable” homes
  - b. Support Seattle City Council Resolution 32059 prioritizing resilience
  - c. Include land use for industrial and major institutions in analyses.
  - d. Consider a greater diversity of transportation options that minimize neighborhood footprints, dislocations of residential, commercial and green spaces, minimize pollution and carbon footprint, and provide high-capacity transit, such as aerial gondola systems. Aerial transit reference: <https://www.westseattleskylink.org>
4. **Address the erosion of Seattle's natural capital.** In design reviews and permit approvals, City departments must actively restore and increase that capital, and contribute to the City of Seattle's goals for mitigating climate change.
  - a. Create incentives for residential property owners to build a healthy environment. Seattle’s original Comprehensive Plan required a 1% increase in forest canopy cover each year to reach 30% by 2037. The 2035 Comprehensive Plan contains no such requirement or metrics.
  - b. Using the original plan as a guide, SDCI and other departments must use their authority to help balance development with forest ecosystem health and integrity. That would include, but not be limited to:

- i. Creating an aggressive plan for developers and remodelers to preserve and expand the city’s existing tree stock, and residential property owners to help the city meet its forest canopy & climate change goals.
  - ii. Enforcing rules (e.g., SMC 25.11.090) that protect exceptional and significant trees and tree groves, levying penalties for violations, and requiring in kind tree replacements.
  - iii. Creating financial incentives (e.g., reducing taxes and/or fees, etc.) for residential property owners that protect exceptional and significant trees and tree groves;
  - iv. Prioritizing enhancement of contiguous wildlife and pollinator corridors through arrangements of neighborhood groves, that benefits all city residents, regardless of locale or economic status
  
- 5. **Require that all City departments and agencies (SDCI, SDOT, SPU, SCL, FAS, SPR, OSE, and others) use the Urban Forest Management Plan** to accurately and wisely inform decisions on development
  - a. Require departments and agencies to work with other land- owning entities (colleges, universities, county, state and federal governments and agencies, the Port of Seattle, etc.) to retain and expand green space and forest canopy
  - b. Establish a baseline tree count that shows locations, sizes and health of trees, drawn from pairing aerial (LiDAR) surveys with on-the-ground surveys.
  - c. Create public-private partnerships wherever possible to preserve and increase tree coverage in Seattle’s urban-suburban core.
  
- 6. **Increase setbacks from property lines, and make more spaces for urban flora:**
  - a. SDCI is approving urban multi-family and commercial buildings with sidewalks as narrow as 40 inches, and equally narrow planting strips (does Seattle expect trees to grow no wider than utility poles?)
  - b. These designs do not support Seattle’s goals for carbon footprint reduction, tree canopy expansion or environmental health.
  
- 7. **View the environment on an equal footing with equity and commercial concerns.**
  - a. Seattle’s urban health depends on its environment’s health. City development decisions must be made within an ecosystem context.
  - b. Create a statement that supports the resources it is charged with protecting, and use it to guide its decisions. That statement in the Comp Plan that reads:
    - i. Whereas, Seattle’s open, green and water spaces are tangible assets essential to public health, urban resilience, equity and sustainability, therefore the Seattle’s Department of Construction and Inspections will integrate development within this context, to meet the needs of communities, neighborhoods, and the entire city.”

Thank you for inviting public input on the 2024 Comprehensive Plan EIS Scoping.

Sincerely,

Martin Westerman. Mary Fleck Elaine Ike

John McNulty Michael Oxman Peggy Sturdivant  
Board Members / Seattle Green Spaces Coalition / [www.seattlegreenspacescoalition.org](http://www.seattlegreenspacescoalition.org)

---

**From:** Eugenia Woo <eugeniaw@historicseattle.org>  
**Sent:** Monday, August 22, 2022 7:17 PM  
**To:** Staley, Brennon  
**Cc:** Quirindongo, Rico; Kji Kelly  
**Subject:** EIS Scoping Comments - One Seattle Comprehensive Plan from Historic Seattle  
**Attachments:** historic\_seattle\_comments\_eis\_scoping\_one\_seattle\_comp\_plan\_082222.pdf

**CAUTION: External Email**

Hi Brennon,

On behalf of Historic Seattle, please see our attached comment letter on EIS Scoping for the One Seattle Comprehensive Plan.

Thanks,  
Eugenia

Eugenia Woo  
Director of Preservation Services  
Historic Seattle  
1117 Minor Ave | Seattle, WA 98101  
t: 206.622.6952 ext 245  
[eugeniaw@historicseattle.org](mailto:eugeniaw@historicseattle.org) | [www.historicseattle.org](http://www.historicseattle.org)





August 22, 2022

Via E-mail

Brennon Staley  
Office of Planning and Community Development  
P.O. Box 94788  
Seattle, WA 98124-7088

Re: EIS Scoping Comments – One Seattle Comprehensive Plan

**OUR PROPERTIES**

**GOOD SHEPHERD CENTER**  
Built: 1906 | Operated by  
Historic Seattle since 1975

**MUTUAL LIFE BUILDING**  
Built: 1890-1916 | Operated by  
Historic Seattle since 1983

**BELMONT/BOYLSTON HOUSES**  
Built: 1893-1903 | Operated by  
Historic Seattle since 1989

**PHILLIPS HOUSE**  
Built: 1902 | Operated by  
Historic Seattle since 1992

**VICTORIAN ROW**  
Built: 1891 | Operated by  
Historic Seattle since 1993

**DEARBORN HOUSE**  
Historic Seattle Headquarters  
Built: 1907 | Operated by  
Historic Seattle since 1997

**EGAN HOUSE**  
Built: 1958 | Operated by  
Historic Seattle since 1998

**CADILLAC HOTEL**  
Built: 1898 | Operated by  
Historic Seattle since 2001

**WASHINGTON HALL**  
Built: 1908 | Operated by  
Historic Seattle since 2009

**GARDEN HOUSE**  
Built: 1886 | Operated by  
Historic Seattle since 2021

**1117 Minor Avenue  
Seattle, WA 98101**

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Dear Brennon:

On behalf of Historic Seattle I am submitting these comments on the EIS Scoping for the One Seattle Comprehensive Plan. Established in 1973, Historic Seattle is the only citywide nonprofit and public development authority dedicated to saving meaningful places to foster lively communities.

The four core values that inform the One Seattle Comprehensive Plan’s vision for how the city grows over the next 20 years are solid values that we believe all Seattleites support. Our comments are provided through the lens of historic preservation (our area of expertise). Historic and cultural resources are interconnected with all four core values guiding the Plan and are vital to livable communities.

We understand the five alternative concepts proposed are in draft form and will be developed further as the EIS process moves ahead. However, in reviewing the five alternative concepts, it does not appear that any of them would address the prevention of the demolition of existing affordable housing (often in older historic buildings that provide naturally occurring affordable units and contribute to the history and character of a neighborhood). Historic Seattle has seen far too many historic apartment buildings (whether landmarked or not, they are still significant) that already contribute to a dense urban neighborhood demolished by developers who seek maximum return on their investment. The replacement project is more often than not, unaffordable and displaces tenants from the older existing building.

None of the proposed alternative concepts seems to address how actual low-income housing and affordable housing throughout Seattle would be provided. We need more than to say, “expand housing choices.” Sloganeering does not result in true low-income housing (rental and homeownership). If more housing types are to be expanded throughout Seattle, then require low-income and affordable housing to be built in communities throughout the city to prevent or at least minimize displacement. Developers should be required to build low-income and/or affordable housing rather than pay into a pot of funds if they are to profit and benefit from the rezoning of the entire city.

Historic Seattle has observed many buildings (again, older structures that once provided naturally occurring affordable units) of different sizes demolished and replaced by skinny, multi-story townhouses that sell for well over \$1.0M or new apartment buildings that have rents that long-time neighborhood residents cannot afford. Where's the equity in that? Who benefits? We do not wish to see the One Seattle Comprehensive Plan be another giveaway to developers.

We support Councilmember Alex Pedersen's August 20, 2022 comment letter to OPCD Acting Director Rico Quirindongo and Friends of Ravenna Cowen's email comments dated August 21, 2022. Both make excellent points with which we mostly concur.

For the Draft EIS we expect the section on Historic and Cultural Resources to recognize that significant resources exist in communities throughout Seattle beyond formal local designation and/or National Register listing (individual or district). For all the alternative concepts, we would like to see the City commit funding to a city-wide survey of historic and cultural resources and preparation of local landmark and historic district nominations. Rezoning the city may have adverse impacts on individual and neighborhood-level historic and cultural resources. There is no mitigation for demolition. Once a resource is gone, it's gone.

Historic preservation often gets overlooked or minimized in comp plan updates. In an ideal world, Historic Seattle would like to see a Historic Preservation Element in the One Seattle Comprehensive Plan. Preservation elements exist in comp plans for cities throughout the country. They guide the long-range planning for the protection, revitalization, and preservation of a city's historic assets.

Historic preservation is integral to community. Historic Seattle sees this firsthand every day, particularly through our own rehabilitated properties such as the Good Shepherd Center in Wallingford, Washington Hall in the Central District, the Garden House in Beacon Hill, the Cadillac Hotel and Good Arts Building in Pioneer Square, and our three low-income housing projects (First Hill and Little Saigon).

Historic preservation is inherently environmentally sustainable—"The greenest building is the one that is already built." (Carle Elefante, architect)

Historic preservation supports economic stability and opportunity for small businesses, heritage tourism, cultural space, and affordable housing.

Historic preservation does and can help alleviate displacement because older buildings often provide more affordable rents (residential and commercial) and opportunities for ownership.

Thank you for the opportunity to comment on this important process for Seattle's future.

Sincerely,



Eugenia Woo  
Director of Preservation Services

Cc: Rico Quirindongo, Acting Director, OPCD