

date

To: Diane Sugimura, Department of Planning and Development

From: Seattle Planning Commission

Re: Commission comments on review of Seattle 2035, Draft #4

Dear Ms. Sugimura,

As the steward of the Comprehensive Plan, the Seattle Planning Commission is focusing much of our work on tracking and contributing advice to the development of Seattle 2035, the major update to the Comprehensive Plan. The Commission has completed its review of Draft #4. This letter provides our comments and recommendations thus far.

Create an accessible and aspirational Plan that focuses on Equity

The Growth Management Act (GMA) is the foundation for the Comprehensive Plan and the Commission challenges the City to go beyond compliance. The Comprehensive Plan should provide a bold vision for the future of our city, with the four core values driving the goals and policies. The focus in the 2004 Update on sustainability led to pioneering programmatic changes which will have an enduring impact.

The current Major Update provides a vital opportunity for the city to address race and social disparities and its drafters should place a priority focus on more fully incorporating the core value “Racial Equity and Social Justice” in the Plan’s goals and policies. In late 2014 the Commission participated in crafting equity statements for each Comprehensive Plan Element. The process allowed subject matter experts and race and social justice leaders in the City to work together to provide a more equitable vision for each element. The content and the context of these statements are valuable to highlight an equitable vision and we urge the drafters of the current Update to integrate this work in a meaningful way.

The Commission appreciates your personal leadership on the issue of equity, and your role as co-lead on the Equitable Development Initiative. The Commission looks forward to continuing our partnership with the Department of Planning & Development to build a Plan to achieve equity.

The Commission challenges the DPD to be more aspirational in Plan language. The Commission recommends bold policy and vision moving forward. In order to achieve this bold vision, parts of the Plan may need to be adopted before projects to study potential code changes have been finalized. Using terms such as “encourage” and “explore” in Plan policies will enable the City to articulate bold policy changes in a manner that complies with GMA¹.

The Commission will be sending a separate letter to the Mayor urging the dedication of adequate resources to make the Plan graphically and digitally accessible to all Seattleites.

¹ The City of Bellevue’s Comprehensive Plan is a good example of this strategy in practice.

Include key aspects of the Equity Appendix in the Introduction to the Comprehensive Plan and the associated Environmental Impact Statement

The Commission supports the work of the DPD and Office of Civil Rights in completing the Equity Appendix (to the Draft Environmental Impact Statement) that will identify mitigation strategies. The Commission believes that our city benefits from a rich diversity of residents and that vulnerable populations can be displaced by growth. The Commission looks forward to the final release of the Equity Appendix and the opportunity to review the mitigation strategies.

Establish a single “Growth Estimate” for all Urban Centers and Villages

The Commission supports the Urban Village strategy to direct growth within the city. The Commission supports the DPD staff’s proposal to stop using the term growth “targets” as we believe that this change is important for facilitating and clarifying this strategy. Changing the term to “growth estimates” should help clarify the meaning of these assignments and the role they play in planning for the future. The City is required to accommodate growth and assign growth estimates to urban centers. Use of the term estimate will more accurately convey the intent of these numbers rather than incorrectly imply they are limits.

In addition, the Commission supports eliminating growth estimates for individual Urban Villages. The Growth Strategy in Draft# 4 envisions most growth continuing to occur within Urban Villages. The estimates themselves do not manage or limit growth. After zoning is set, the market decides where housing units will be built. Therefore, the Commission recommends that the final adopted Plan not include growth estimates by Village. The current Plan targets are, however, connected with legislation that triggers environmental review. The Commission recommends using this year to plan for how using estimates rather than targets and eliminating estimates by individual Urban Village will impact this adopted legislation.

Provide one Future Land Use Map category for areas within Urban Centers and Villages.

The Commission supports DPD staff’s proposal to change the Future Land Use Map to highlight Urban Villages as “areas of change.” The Comprehensive Plan’s growth strategy focuses growth in Urban Villages. The Future Land Use map should reflect and support the growth strategy².

Change the Single Family land use category in the Future Land Use Map to support a diversity of low density housing options in these areas.

The Commission recommends renaming the Single Family Land Use Category shown on the Future Land Use Map and further detailed in the Land Use Element in order to more accurately describe the allowed uses and residents (including accessory dwelling units and unrelated people sharing a house) and provide greater flexibility in these areas for low density housing options. The term “Single Family Residential” predetermines

² An example of this approach can be found in “Blue Print Denver” a Comprehensive Plan for the City of Denver. *“The majority of new development will be directed to areas of change; areas that will benefit from, and thrive on, an infusion of population, economic activity and investment.”* (City of Denver, “Blue Print Denver”)

allowable uses. The Commission has long supported flexibility in the single family areas through its work on “Backyard Cottages,” “Seattle Transit Communities,” and “Family-Sized Housing”. The Commission suggests looking at other cities to help guide this process³.

Renaming the Single Family Land Use category is a good first step. The Commission also recommends redefining allowable uses within the new residential use beyond the detached single family housing type. Single family zoned areas currently hold nearly 65% of buildable lands within the city. As we work to preserve a place where new and current residents can thrive and age in the city, the Commission supports more housing choices within single family areas. Several suggestions have been proposed through the Commission’s previous work and are currently being discussed by the Mayor’s Housing Affordability and Livability Advisory Committee. The Commission recommends that the City include new policies in the Comprehensive Plan to:

- Explore duplexes and stacked flats within the Single Family Land Use category⁴; and
- Encourage more production of accessible dwelling units and allow cottage housing within the Land Use Element⁵.

Align the boundaries of Urban Villages using the Transit Communities walkshed approach in accordance with the existing Comprehensive Plan

In 2012, “Transit Communities” policies were adopted into the Comprehensive Plan as a data driven “walkshed” approach to establishing Urban Village boundaries. The Commission is concerned with the removal of “Transit Communities” from the current Draft #4 and recommends maintaining the currently adopted LU273-279 in the Major Update. These policies help to define how new Urban Village boundaries will be drawn and allow for tailored application in existing Urban Villages through a public planning process. The Commission recommends maintaining this data driven policy direction.

Mitigate inequities in areas outside of Urban Villages

The Commission recommends making race and social equity the first priority in distributing public investments within the city. Draft#4, like the current Comprehensive Plan, prioritizes Urban Villages for public resources. However, as we know through the City’s Race and Social Justice Initiative, many areas of the city both inside and outside of urban villages have been under invested in or disinvested over generations. This historical context should be considered and equity should be the primary lens for allocating public investments. The efficiencies that can be gained when investments are concentrated in Urban Centers and Villages should continue to be a consideration, but race and social equity considerations should be the first consideration.

The Commission is concerned with the Plan’s lack of vision for how growth is accommodated in areas outside of Urban Villages. The Commission is particularly concerned about residential corridors that are located on major auto-focused arterials. These corridors are often uncomfortable places with unsafe

³ Examples of terms from other cities include “Urban Neighborhood” (Minneapolis), “Residential” (San Francisco), and “Low-Density Residential” (Raleigh).

⁴ Denver provides a good example of how to integrate duplexes with size and scale and Los Angeles provides a good example of how duplexes can equitably serve a market for middle income homeownership.

⁵ Portland provides a good example of removing barriers for accessory dwelling units.

pedestrian environments. In the public draft of the Plan, the Commission will be looking for goals and policies that address this inequity. While corridors serve a function for movement of goods and people, corridors also serve as home for many households, especially those with low to moderate incomes. It is essential for these households to have safe and meaningful access to places and services that improve their outcomes.

Provide additional information about protections and growth estimates for Industrial Lands

The Commission recognizes the role of Industrial Lands as an economic driver and force of stability for the City and the region. The Commission supports preservation of an industrial base and the lands to support it within the city limits. The Commission has been tracking the conversations in Ballard, Interbay, Georgetown and the proposed arena; as well as the new partnership between the Port of Seattle and Port of Tacoma. The Commission needs clarity on the goals and policies for each of the industrial zones, how goals and policies may change between Draft#4 and the public draft in response to public outreach conducted this spring and how the City intends to support this important economic driver.

In closing, the Commission notes appreciation for the work of the DPD and in particular Tom Hauger and Patrice Carroll. The Commission would not have been able to do as thorough a review of Draft #4 without their willingness to attend many meetings and present regularly on their work. The Commission looks forward to the public draft and the public discussion to follow.

Thank you for your consideration of our recommendations thus far and please do not hesitate to contact me or our Executive Director, Vanessa Murdock, at 733-9271 should you have any questions.