

June 11, 2015

Re: Comments on the Seattle 2035 Equity Analysis, a companion document to the Environmental Impact Statement on the four growth alternatives

Dear Director Sugimura:

The Seattle Planning Commission is an independent and objective volunteer body that advises City officials on broad goals, policies, and plans for the physical development of the city. The Commission also serves as stewards of the Comprehensive Plan; in that capacity we have reviewed the Seattle 2035 Equity Analysis, a companion document to the Environmental Impact Statement (EIS), and offer the following comments.

The Commission commends the good work of the Department of Planning and Development and the Office of Civil Rights for the development of Equity Analysis. The Equity Analysis does several important things:

- it provides a solid analytical framework and definitions for key concepts which are essential for a shared understanding of what drives the equity work in the context of race and social justice;
- it looks at differences in access to opportunity and describes tools for advancing access to opportunity in tandem with reducing displacement risks and,
- it analyzes the types of displacement pressures within the city and outlines potential mitigation strategies to help address the issue of displacement;
- it focuses decision makers on what is possible through equitable planning.

The Commission urges decision makers to fully incorporate the mitigation strategies introduced in the Equity Analysis into the Seattle 2035 goals and policies. There are displacement risks associated with all growth alternatives and as such the major update to the Comprehensive Plan should include the mitigation strategies outlined in the Equity Analysis. If such mitigation strategies are not fully incorporated, it should be acknowledged that marginalized populations will likely continue to be displaced.

The Commission would like to hear about the outreach strategy with marginalized populations. The Commission would like to see the engagement identify what will help marginalized populations stay in Seattle and have increased access to opportunities. This outreach will ensure that updated Comprehensive Plan goals and policies have the desired outcomes of limiting displacement and increasing access to opportunities. The public draft of the Comprehensive Plan is scheduled to be released in July. The planned public engagement should highlight the Equity Analysis

as an essential tool to review the goals and policies. The Commission continues to be concerned that the Equity Analysis and associated materials are currently available only in English. At a minimum, these documents should be made available in multiple languages.

The Equity Analysis is a good model for how data can play a role in defining and addressing equity issues. **The Commission recommends further discussion on how a data driven approach may benefit key decisions beyond the Comprehensive Plan, i.e., in the development of functional and implementing plans and prioritization of public investments.** The Commission is pleased to participate in any discussions as the DPD works to formalize this data set.

Thank you for the work of producing the Equity Analysis and please do not hesitate to contact me or our Executive Director, Vanessa Murdock, at 733-9271 should you have any questions.

Staff draft for review