



City Neighborhood Council

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

November 19, 2015

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

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

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

VIA EMAIL

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

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

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

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

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

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

Sincerely,

Irene Wall | Cindi Barker
CNC NPLUC Co-Chairs

Laine Ross | Catherine Weatbrook
CNC Co-Chairs

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

This matter was discussed at CNC's September/October 2015 General Meetings

The attached final draft of comments was prepared at the CNC's NPLU November 17 Committee meeting

The CNC has not yet taken any formal action on the CNC NPLUC Committee Draft Comments due to meeting cycle incompatibility

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

The New Seattle Comprehensive Plan

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

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

Major Goal and Policy Issues

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

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

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

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

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

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

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

We do not support the FLUM change at this time.

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

We want to see policies to enforce metrics.

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

Create a new Community Involvement Element.

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

Neighborhood Planning.

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

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

We need policies to better manage development capacity citywide including:

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

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

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

Strengthen the discussion of and policies to achieve concurrency.

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

Use of surplus property (within the City limits).

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

Preservation of housing stock.

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

Sweeping zone-wide changes should no longer be allowed.

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

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

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

Priority use of street.

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

Setbacks and Green Space.

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

Parking for Private Vehicles.

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

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

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

No policy guidance for “The Grand Bargain”

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

Keep current goals and metrics for providing open space.

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

Only count open space that the city can control.

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

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

- We recommend a two tier organization that recognized the following elements as establishing umbrella policies which take precedence when resolving conflicts with the more functional elements of the plan
- **GUIDING POLICIES**
 1. Growth Strategy
 2. Community Well-being
 3. Neighborhood Planning
 4. Environment
 5. Community Involvement (new)
- **FUNCTIONAL ELEMENTS**
 - Land Use
 - Transportation
 - Housing
 - Capital Facilities
 - Utilities
 - Economic Development
 - Parks and Open Space
 - Arts and Culture
 - Container Port
 - Shoreline Management

Appendices for

Growth Strategies

Housing

Capital Facilities

Environment

Land Use

Transportation

Parks and Open Space

Community Well-being

These Elements were not reviewed by our committee:

Economic Development

Utilities

Arts and Culture

Growth Strategy

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We want to see policies to enforce metrics.

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

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Comments

Urban Village Strategy, Discussion p 23

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

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

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

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

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

- Add “and which result in equitable regional growth”

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

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

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

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

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

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

GS2.2 – “Encourage investments and activities in urban centers and urban villages that will enable those areas to flourish as compact mixed-use neighborhoods designed to accommodate the majority of the city’s new jobs and housing, provide services and employment close to housing, and promote efficient use of public services, including transit, with housing options for a variety of households and a range of incomes.”

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

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

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

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

- This really doesn’t make sense, please make English.
- The old wording UVG3 also referenced Transportation Demand Management (TDM), and that should be added back as a strategic concept. “...walking, biking, public transportation and other TDM strategies”

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

- Suggested minor edits shown above.

GS2.10 – “Establish Urban Centers and Urban Villages using the criteria described in Growth Strategy Figure 1.”

In replacing UV3 with this new policy and Figure 1, several important concepts have been left out which need to be restored:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Growth Strategy Figure 2
Estimated Urban Center Growth 2015-2035

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

Growth Strategy Figure 3
Estimated Urban Village Growth Rates

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

* Growth above 2014 actual housing units or jobs

** Frequent transit means a light rail station or two or more bus lines serving multiple destinations

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

- Unless people are working from home or virtually, you can’t reduce commutes. Clarify by saying “...to reduce the length of work commutes.”

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

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

- Citywide targets for housing and job growth adopted in the Countywide Planning Policies
 - The role of the center in regional growth management planning
 - Access to transit
 - Existing zoning, including capacity for additional commercial and residential development
 - Existing densities
 - Current development conditions, recent development trends and plans for private or public development, such as by major institutions
 - Plans for infrastructure, public amenities and services that could attract or support additional growth
 - Potential benefits and burdens for the city’s marginalized populations”
- Add new bullet point “Local circumstances and community preferences as expressed in Urban Center and MIC neighborhood plans”
 - If growth estimates are restored for the Hub Urban and Residential Villages, this policy should be expanded accordingly.

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

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

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

- Change evergreen to urban.

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

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

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

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

GS4.11 Design streets with distinctive identities that are compatible with a citywide system that defines differences between types of streets.

GS4.12 Preserve, strengthen, and, as opportunities permit, reconnect Seattle's street grid as a means to knit together neighborhoods and to connect areas of the city..

GS4.13 Develop street designs that reflect each street's function, right-of-way width, adjoining uses and opportunities to provide open space and green infrastructure.

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

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

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

- Add “...active uses that flank but do not obstruct the sidewalk”.

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

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

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

- Taller than what? Existing zoning? This would be a place where “as noted in neighborhood plans” would be a good addition!

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

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

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

- The area has access, or can easily be connected, to areas already served by the City
- The City can readily provide services to the area
- The boundary changes or interjurisdictional agreements will result in an equitable distribution of revenues and costs related to asset transfer and to the development, maintenance and operation of facilities “
- It won't help the City in the long run to accept annexation areas if they are not evaluated within these Growth Strategy goals and policies. Consider adding a 4th bullet that says areas must have some capacity to become an Urban Center, Hub or Residential Village.

New and Retained Goals and Policies for Growth Strategies Element

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

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

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

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

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

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

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

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

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

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

Retain Metrics for Growth Performance:

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

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

- industrial centers at least every 3 years. Include in these reports factors such as: progress on implementing neighborhood plan approval and adoption matrices; changes in the numbers of jobs and housing units; housing costs, including net loss or gain of low-income and very low-income housing units; housing types; crime rates; transportation systems and their use; business types; public facilities; services; and open space, to the extent information is practically available. Collect and report on similar data for typical areas outside villages for comparison. Broadly communicate the results of monitoring efforts. Provide a Briefing to City Council by July of the year following the review in order to be used for consideration in the annual Budget cycle. Provide the results directly to the Neighborhood Plan Stewards on record with the Department of Neighborhoods. Work with community members to identify appropriate responses to significant growth, lack of growth or changes, including: community-led activities; additional planning for, or re-prioritization of, City Programs or infrastructure improvements; partially or entirely updating a neighborhood plan; or working with other public agencies to address community goals.
2. Review situations where the rate of growth is significantly faster or slower than anticipated in the growth targets contained in Appendix UV-A or where other measures indicate significant changes in the center or village over an extended period of time. Evaluate the significance of the changes or the significance of lack of change with center or village residents, business owners, and other community stakeholders in light of the expectations underlying the neighborhood plan for the area, the actual level of growth, progress toward neighborhood plan implementation, and the relative maturity (level of mixed-use development, the pedestrian environment, infrastructure, and public facilities) of the area as an urban center or village
 3. To ensure compliance with [the two new polices suggested above], the Council shall receive and consider a report, compiled by DPD and DON, that documents the impacts of growth in each Urban Village when approving capital and operating budget for all departments. These growth impact reports shall be available for public review prior to the start of the annual Council budget cycle.
 4. When housing or job growth exceeds 100% of targets in any urban village or center, the city shall make all affirmative efforts to re-direct job and housing growth to designated growth areas that have not yet reached their targets.

Community Well-being

Major Goal and Policy Issues

None noted

Comments

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

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

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

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

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

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

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

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

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

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

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

Suggest that CW4.1, 4.3 and 4.4 be rewritten for better grouping of topics and adding reference to both facilities and programming, as follows:

CW4.1 Coordinate with other agencies to plan that facilities and programs exist in order to create equitable access to high quality early learning and K-12 services.

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

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

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

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

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

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

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

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

Retain the following policies:

HD34 – “Work with the state and King County to focus criminal justice efforts on preventing the most seriously threatening and predatory crimes and violent drug-related crimes.”

- Provides specific guidance on major issues.

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

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

Other Detailed Concerns noted

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

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

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

- This needs clarification. What is the subject?

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

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

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

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

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

- Modify as suggested above

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

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

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

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

Neighborhood Planning

Major Goal and Policy Issues

Neighborhood Planning.

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

Comments

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

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

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

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

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

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

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

As a possible solution, we suggest a new policy that DPD maintain a matrix of all planning work considered relevant for a neighborhood during the life of this Comprehensive Plan and that matrix is the reference point for all departmental work which is, by policy, directed to review neighborhood plans for input.

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

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

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

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

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

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

Other Detailed Concerns noted

NPG1 – “Help fulfill this Plan’s values, vision, and goals by maintaining plans for neighborhoods where the City wants or expects growth to occur and by including growth strategies in those plans that are appropriate to each neighborhood.”

The use of the phrase “growth strategies” is new and is not a term that will be found in neighborhood plans until the concept gets put into newer plans now being written. Suggest that this goal be modified to reflect what those strategies would be in context of the older plans. For example, would those be just the land use or housing items in a neighborhood plan? Or is it really every policy in a neighborhood plan. Help provide continuity to the users.

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

Environment

Major Goal and Policy Issues

We want to see policies to enforce metrics.

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

Major Comments

Landslides are a common, complex and growing problem in Seattle. There is substantial evidence that landslide losses are growing as more property is developed in landslide prone areas. (Source: Seattle Office of Emergency Management, Seattle Hazard Identification and Vulnerability Analysis)

We suggest stronger policies addressing the loosening of restrictions in Environmentally Critical Areas and in risk areas such as mapped liquefaction zones and steep slopes. This was cited as a concern in the DEIS in the Earth and Water Quality Chapter. While the DEIS says that many areas with those conditions are already “built up”, if additional density and additional land uses in Single Family zones are created, then the problem will continue to expand. This has to be addressed in the context of determining environmental significance and land use changes. Reference DEIS p 3.1-7, 3.1-8. If the policies are more appropriately reflected in the Land Use Element, make it so.

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

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

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

Other Detailed Concerns noted

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

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

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

E1.4 – “Increase the amount of permeable surface by reducing hardscape surfaces where possible and maximizing the use of permeable paving elsewhere.”

This could be written better, maybe replace elsewhere with “where paving is required in both commercial and residential construction”.

Also, vegetative cover should not have been removed (see old policy E10). If E1.4 policy wants to deal with just paving, an additional policy should be added to encourage the increase of green cover.

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

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

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

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

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

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

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

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

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

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

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

Proposed New Element for Comp Plan 2035 Community Involvement

Major Goal and Policy Issues

Create a new Public Engagement Element.

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

Comments

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

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

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

Suggested goal topics:

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

Policies should be created to address:

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

Land Use

Major Goal and Policy Issues

We do not support the FLUM change at this time.

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

Sweeping zone-wide changes should no longer be allowed.

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

Setbacks and Green Space.

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

Parking for private vehicles.

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

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

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

No policy guidance for “The Grand Bargain”

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

Comments

New LUG1 seems to open all kinds of development to all areas, not just within Urban Villages.

Allowing “infill development compatible with the established context in areas outside centers and villages” risks allowing undesirable types and scale of development where there is no clear established context to guide it.

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

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

Retain LU11 keep this policy which references the “character of Seattle’s neighborhoods and retaining existing affordable housing, discourage demolition and displacement...”

Retain LU11	In order to maintain the character of Seattle’s neighborhoods and retain existing affordable housing, discourage the demolition of residences and displacement of residents, while supporting redevelopment that enhances its community and furthers the goals of this Plan.
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New LUG2 eliminates reference to neighborhoods and current residents. Retain current policy instead.

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

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

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

<p>Retain LU102 – Reject LUG7</p>	<p>LU102 includes a policy of using zoning incentives and other development related tools to provide for or preserve public benefits including “housing affordable to low- and moderate-income households...” That objective is proposed to be replaced by LUG7 which just increases density with no reference to affordability.</p>
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<p>Modify LU6.3</p>	<p>LU6.3 Within Urban Centers rely on market forces to determine the amount of parking provided in new development, in areas of the city that are well served by transit such as urban centers and those In urban villages that contain frequent transit service without requiring a minimum parking requirement in these areas to be provided by new public commercial and multi-family residential development that may cause parking spill-over to residential areas outside the village. Outside urban villages require parking for new development consistent with the size of the development and existing availability of parking in the area. Require the provision of sufficient electric vehicle recharging stations in new multi-family residential development.</p>
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New LU5.1 – remove reference to “new development”

<p>Modify LU5.1</p>	<p>Allow for flexibility in development standards so existing structures can be maintained and improved and new development can better respond to site specific conditions.</p>
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Keep reference to regional transit stations. New LUG9 eliminates the direct linkage to access to “regional transit stations.”

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

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

<p>Clarify LU1.7</p>	<p>Require Future Land Use Map amendments only when needed to achieve a significant change to the intended function of a <i>large area</i>.</p>
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E1.5 New policy no longer focuses on tree preservation and is vague. Restore existing LU 40 and 41 which encourages the preservation or planting of street trees.

<p>Restore This LU41</p>	<p>Because of the many benefits that street trees provide to both property owners and the general public, encourage the preservation or planting of street trees as development occurs, except in locations where it is not possible to meet City standards intended to preserve public safety and utility networks.</p>
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<p>Restore Tree Protection Focus LU40</p>	<p>Use the following tools to protect trees, appropriate to the size, importance and location of a tree:</p> <ul style="list-style-type: none"> • Providing flexibility in development standards • Promoting tree retention through the design review process • Promoting site planning and horticultural practices that are consistent with the reasonable use of property • Educating the public and development community concerning the value of retaining trees • Restricting the removal of trees on undeveloped land prior to review of a specific development proposal
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LU5.11 Signage policy is too vague. Policy allows too much flexibility for size and height of signs under vague concept of “creating visual harmony.” Need clearer guidelines.

<p>Clarify LU5.11</p>	<p>Allow for flexibility in signs’ height or overall area on existing or new buildings when there is a comprehensive design that creates visual harmony between the sign, the building and the site where it is located.</p>
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LU5.16 on views. Revised language refers to “zoning” which is too crude a tool for view protection. Consider private views when rezoning. See addition below.

<p>Modify LU5.16</p>	<p>Address view protection through:</p> <ul style="list-style-type: none"> • Zoning <u>Land use regulations</u> that takes into accounts views, with special emphasis on protection of shoreline views • Development standards that help to reduce impacts on views, including height, bulk, scale, and view corridor provisions, as well as design review guidelines • Environmental policies that protect specified public views, including views of mountains, major bodies of water, designated landmarks and the downtown skyline, during reviews of development projects <p><u>Protection of private view should be considered when permitting or denying a conditional use, rezone, or other departure from the land use regulations.”</u></p>
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Parking Minimums. Restore language in LU50 that reads “Parking requirements should account for local conditions and include language that parking requirements for new development should consider the impacts on street parking supply needed by local small businesses.

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

<p>Modify LU6.2</p>	<p>Establish parking regulations that recognize differences in the likely auto use and ownership of intended occupants of new developments, such as low-income, elderly, or disabled residents. <u>Consider visitor parking demand when establishing parking requirements.</u></p>
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<p>Modify LU6.8</p>	<p>Allow shared and off-site parking facilities to create more efficient use of parking and to provide the flexibility to develop parking on a separate site. Ensure that such parking is compatible with the existing or desired character of the area <u>and also ensure that such parking is available for the development relying on the shared parking.</u></p>
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Retain reference to single-family structures. Retain LU 57 because the substitute LU8.1 changes the concepts away from SF homes to a less reliable standard of “consistent residential character of low height, bulk and scale over several blocks.” This suggests possibility of allowing non SF structures in the SF zone under vague criteria. Policy needs to clarify how many blocks are “several.”

<p>Retain LU57</p>	<p>Designate as single-family residential areas, those areas that are predominantly developed with single-family structures and are large enough to maintain a low-density development pattern.</p>
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<p>Do not Include LU8.1</p>	<p>Designate as single-family residential areas those portions of the city that are predominantly developed with single-family houses and that are large enough to maintain a consistent residential character of low height, bulk and scale over several blocks.</p>
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<p>Modify LU8.2</p>	<p>Use a range of single-family zones to:</p> <ul style="list-style-type: none"> • <u>Maintain the current density and character of existing single-family areas</u> • Maintain the current low height and bulk character of designated single-family areas • Protect designated single-family areas intensity that are predominantly in single-family residential use, or that have environmental or infrastructure constraints; Respond to neighborhood plans calling for redevelopment or infill development that maintains the single-family character of the area but also allows for a greater range of housing types.
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Retain deleted policies (LU59 & LU 60) for neighborhood planning in upzones.

<p>LU59</p>	<p>Permit upzones of land designated single-family and meeting single-family rezone criteria, only when all of the following conditions are met:</p> <ul style="list-style-type: none"> • The land is within an urban center or urban village boundary. • The rezone is provided for in an adopted neighborhood plan. • The rezone is to a low-scale single-family, multifamily or mixed-use zone, compatible with single-family areas. • The rezone procedures are followed.
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LU60	<p>Apply small lot single-family zones to single-family property meeting single-family rezone criteria only when all of the following conditions are met:</p> <ul style="list-style-type: none"> • The land is within an urban center or urban village boundary. • The rezone is provided for in an adopted neighborhood plan. • The rezone procedures are followed.
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Retain policy with clear intent about ADUs. New LU8.4 and LU 8.5 creates uncertainty and appears to be aimed at removing the requirement for owner occupancy of either the principal or accessory dwelling unit. Current policies requiring homeowner residency should be retained because loosening this standard essentially upzones SF areas to multi-family zones without broad-based agreement.

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

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

Clarify LU8.9	Allow exceptions to minimum lot size requirements to recognize building sites created under earlier regulations and historic platting patterns, to allow the consolidation of very small lots into larger lots, to adjust lot lines to permit more orderly development patterns, and to provide more housing opportunities by creating additional buildable sites that integrate well with surrounding lots and do not result in the demolition of existing housing.
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Retain current criteria references in LU 69. New LU8.8 shifts the metrics of character in SF areas including reference to setbacks toward more generic “use of min. lot sizes” which open up potential of creating new zones with even smaller lot sizes that current 5,000 SF. Creating small lot sizes is an increase in density outside urban villages which is not consistent with the Growth Strategy to focus development into urban villages.

Clarify LU8.8	Use minimum lot size requirements to maintain the character of single-family residential areas, while reflecting differences in development conditions and densities in various single-family areas throughout the city.
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Retain LU69	Reflect the character of existing low-density development through the regulation of scale, siting, structure orientation, and setbacks.
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Unlimited Height allowance. Retain original policy. LU 5.4 provides for “unlimited height” in some zones. Bad idea and contrary to other policy about view protection.

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

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

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

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

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

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

Clarify LU9.11	Use midrise multifamily zones to provide additional housing opportunities in urban villages and urban centers.
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Density or Affordability? New LU67 is clumsy policy that does not include specific reference to using developer incentives to produce low income housing only to provide increased in density!

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

Other Detailed Concerns noted

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

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

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

Transportation

Major Goal and Policy Issues

Priority use of street.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Need to better define “sufficient” when used in policy below.

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

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

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

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

T3.1	Develop and maintain high-quality, affordable and connected bicycle, pedestrian, and transit facilities.
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T2.3 On street parking is actually beneficial providing a buffer between moving cars and pedestrians on the sidewalk. The meaning of “non-mobility” is unclear. Bullet 5 - Implementation of parking demand management could promote PRZs everywhere. Policy should preserve street parking

wherever possible given the needs and benefits for local businesses in most urban villages. Conclusion is to eliminate bullet 4 and 5.

Bullet #4 highlights another paradox within the policies. Here we are encouraging “off-street parking” while most other policies discourage the provision of parking. The city should encourage off-street parking in new development where there is not a demonstrated capacity to absorb additional parking demand created by new residential and commercial development.

T.2.3	Employ the following tactics to resolve potential conflicts for space in the right-of-way: <ol style="list-style-type: none"> 1. Allocate needed functions across a corridor comprised of several streets or alleys, if all functions cannot fit in a single street 2. Share space between modes and uses 3. Prioritize assignment of space to shared and shorter duration uses 4. Encourage off-street accommodation for non-mobility uses, including parking and transit layover 5. Implement transportation and parking demand management strategies to encourage more efficient use of the existing right of way.
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T2.4, T2.5, T2.6, and T2.7 all suffer from too much jargon. This section needs a definition of “Transition Zone.” What is “network connectivity” and “activation?” If the intent is to say don’t take away pedestrian space in order to make lanes wider, we generally agree however there is no sense of cost effectiveness.

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

Recommend retaining current policy T40 and T41.

T2.6	Assign functions in the transition zone to support nearby land uses provide support for modal plan priorities and to accommodate multiple functions.
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Do not use this: Transportation Figure 3

Priorities for Right-of-Way “Transition Zone by Predominant Use of Area

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

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

Other Detailed Concerns noted

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

<p>T2.9</p>	<p>Identify different types of streets with standards that are consistent with street classifications and that reflect the objectives of adopted modal and land use plans.</p> <p>T2.10 Designate the following classifications of arterials:</p> <ul style="list-style-type: none"> • Principal Arterials: roadways that are intended to serve as the primary routes for moving traffic through the city connecting urban centers and urban villages to one another, or to the regional transportation network. • Minor Arterials: roadways that distribute traffic from principal arterials to collector arterials and access streets. • Collector Arterials: roadways that collect and distribute traffic from principal and minor arterials to local access streets or provide direct access to destinations.
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<p>Retain this policy T7</p>	<p>Designate, in the Transportation Strategic Plan, a traffic network that defines Interstate Freeways, Regional, Principal, Minor and Collector Arterial streets, Commercial and Residential Access streets and Alleys as follows:</p> <p>Interstate Freeways: roadways that provide the highest capacity and least impeded traffic flow for longer vehicle trips.</p> <p>Regional Arterials: roadways that provide for intra-regional travel and carry traffic through the city or serve important traffic generators, such as regional shopping centers, a major university, or sports stadia.</p> <p>Principal Arterials: roadways that are intended to serve as the primary routes for moving traffic through the city connecting urban centers and urban villages to one another, or to the regional transportation network.</p> <p>Minor Arterials: roadways that distribute traffic from principal arterials to collector arterials and access streets.</p> <p>Collector Arterials: roadways that collect and distribute traffic from principal and minor arterials to local access streets or provide direct access to destinations.</p> <p>Commercial Access Streets: roadways that directly serve commercial and industrial land uses and provide localized traffic circulation.</p> <p>Residential Access Streets: roadways that provide access to neighborhood land uses and access to higher level traffic streets.</p> <p>Alleys: travelways that provide access to the rear of residences and businesses that are not intended for the movement of through trips. Where a continuous alley network exists, it is the preferred corridor for utility facilities.</p>
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T2.11 Alleys – support this policy but it needs companion language discouraging current practice of vacating alleys for large developments.

<p>T2.11</p>	<p>Maintain, preserve and enhance the City’s alleys as a valuable network for public spaces and access, loading and unloading for freight, and utility operations.</p>
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T1.2 – Safety Policies all tend to talk about investing in urban villages which appears to ignore areas outside of urban village even though many accidents and needs occur. Also children’s safety does not appear directly in any of these policies.

<p>T1.2</p>	<p>Design transportation infrastructure in urban centers and villages to support compact, accessible, and walkable neighborhoods for all ages and abilities.</p>
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T1.5 See addition underlined. This policy suffers when KC Metro moves bus stops.

<p>Modify T1.5</p>	<p>Improve transportation connections to urban centers and villages from all Seattle neighborhoods, particularly by providing a variety of affordable travel options (pedestrian, transit, and bicycle facilities) and by being attentive to the needs of vulnerable and</p>
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	historically marginalized populations including children, seniors and the mobility impaired.
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T5.9 Access to business districts. Support this but removal of street parking conflicts with this policy.

T5.9	Improve access to urban villages and other neighborhood business districts for customers and delivery of goods.
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T7.5. Should support job growth outside Seattle as a means of reducing VMT. Why not have a policy that supports job development in Kitsap County where housing is more affordable rather than support additional commuting to Seattle?

T7.5	Support a strong regional ferry system that maximizes the movement of people, freight and goods.
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TG 9 - Level of Service Standards. Seattle should develop transit LOS standards that do not rely on crush capacity boarding and leaving people behind at stops. Arterial level of service standards needs to acknowledge the lack of E-W corridors in Seattle and should also include intersection delay “traditional” LOS measures at key locations in the city.

TG9	Use level of service standards, as required by the Growth Management Act, as a gauge to assess the performance of the arterial and transit system.
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Restore T32	Recognize that stairways located within Seattle’s public rights-of-way serve as a unique and valuable pedestrian resource in some areas of the City. Discourage the vacation of public rights-of-way occupied by stairways, and protect publicly-owned stairways from private encroachment.
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Action Items versus Policies. Modify or remove statements like T2.8, T3.6 and T 3.11 which are action items, not policy statements. T5.2 develop a freight network in the Freight Mobility Master Plan. Is there not already a Freight Mobility Plan? Remove?

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

Glossary

Add a definition to the glossary for “Green Infrastructure.”

Housing

Major Goal and Policy Issues

Preservation of housing stock.

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

Use of surplus property (within the City limits).

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

We want to see policies to enforce metrics.

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

Major Comments

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

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

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

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

Additional support for strong preservation policies comes from the statement in the Draft EIS, section 3.6.3 Mitigation Strategies (for Housing)

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

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

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

Creating an environment where the community retains the conditions that afford it good opportunities while providing for stability and economic mobility for people vulnerable to displacement;

Expanding choices in areas that are currently unaffordable for lower income people who may want to live or operate a business there; and

Stabilizing areas that are transitioning to higher levels of desirability due to amenities such as light rail service.

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

H3.5 Consider allowing additional housing types that respect existing neighborhood character in single-family areas, particularly within or near urban centers and urban villages.

H4.7 Adopt development standards and design guidelines that help achieve a variety of quality housing types and respond flexibly to unique neighborhood contexts.

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

Other Detailed Concerns noted

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

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

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

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

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

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

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

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

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

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

Capital Facilities

Major Goal and Policy Issues

Use of surplus property (within the City limits).

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

Setbacks and Green Space

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

Restore community engagement to this Element

Comments

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

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

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

The second paragraph of the introduction makes the claim that “the City’s network of capital facilities is generally sufficient to accommodate forecasted housing and job growth through 2035.”

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

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

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

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

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

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

Other Detailed Concerns noted

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

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

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

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

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

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

Draft

Parks and Open Space

Major Goal and Policy Issues

Keep current goals and metrics for providing open space.

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

Only count open space that the city can control.

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

Use of surplus property (within the City limits).

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

Comments

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

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

<p>Eliminate P1.2</p>	<p>Identify goals for the City future open space system that are realistic about the quantity of land that could be acquired, consider land management by other agencies, and that drive improvements in the quality and usability of those spaces.</p>
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New policy needed that sets priority for use of Parks District funding to meet growth-induced needs for parks and open space.

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

Retain UV50	Establish, through the combined systems of urban trails, green streets and designated boulevards, a network among the city’s varied open space features and urban villages and urban centers as well as connections with recreational and natural areas within the Puget Sound region.
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Do not use P1.3 Provide urban trails, green streets, and boulevards in public rights-of-way as recreation and transportation options and as ways to connect open spaces and parks to each other, to urban centers and villages, and to the regional open space system.

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

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

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

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

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

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

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

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

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