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June 27, 2016

The Honorable Rob Johnson  
Seattle City Council  
600 4th Avenue  
Seattle, Washington 98124  
*Sent via email to: amy.gore@seattle.gov*

**RE: Comments on Seattle 2035 Mayor's Recommended Comprehensive Plan (May 2016)**

Dear Councilmembers:

Thank you for the opportunity to comment on the *Seattle 2035 Mayor's Recommended Comprehensive Plan*. Working with City of Seattle staff over the past several years, we appreciate the tremendous amount of effort, time, and thoughtfulness that has gone into the draft.

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

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

The *Seattle 2035 Mayor's Recommended Comprehensive Plan* is consistent with the Washington State Growth Management Act and Vision 2040, our regional growth strategy, and will bring significant benefits to the city, its residents, and its businesses. Both the Growth Management Act and Vision 2040 focus growth in Seattle. The Comprehensive Plan will work to gracefully accommodate that growth in a way that protects people and the environment, creates benefits for existing and new residents and businesses, and saves taxpayers and ratepayers money.

## ***Summary of Key Recommendations***

Futurewise supports the Comprehensive Plan update and concurs with many of the goals and policies of the Plan.

We support the “Potential Urban Village Expansions” shown on the Future Land Use Map in the Land Use Chapter. Expanding the urban villages in these areas will capitalize on the region’s investments in high capacity transit, provide for additional housing opportunities, and, by applying the Housing Affordability and Livability Agenda (HALA) recommendations to the increased density in these areas, increase opportunities for affordable housing.

Our key recommendations for the Seattle 2035 Comprehensive Plan include the following:

- Improve the tracking of affordable housing in each urban village, including the number of affordable units created, preserved, and demolished by income category. See Page 3 of this letter for more detail.
- When considering policy changes and rezones for multifamily and commercial zones, promote increased housing supply, mix, and affordability. See Pages 3 and 6 of this letter for more detail.
- Strengthen policies calling for environmental stewardship, low impact measures to reduce and filter stormwater, and best practices including increased landslide protections for people and property. See Pages 4, 6, 7, 9, 13, 14, and 15 of this letter for more detail.
- Better address the threats of sea level rise. Please see Page 8 of this letter for more detail.
- Improve the Comprehensive Plan’s fair housing policies. Please see Page 10 of this letter for more detail.
- Better track tree canopy in the city and add goals to equitably distribute tree canopy throughout the city. Please see Pages 13 and 14 of this letter for more detail.
- Add community-centered preparedness strategies to adapt to climate change and its adverse effects on people, property, and the environment. Please see Pages 14 and 15 of this letter for more detail.
- Incorporate the appropriate parts of the City’s Equity and Environment Agenda into the Comprehensive Plan. Please see Page 15 of this letter for more detail.
- Retain the existing level of service goals for parks and open space until new standards are adopted into the Comprehensive Plan. Please see Page 16 of this letter for more detail.

## *Specific Comments*

Our specific comments related to each element of the Mayor’s Recommended Comprehensive Plan are as follows:

### **Growth Strategy Element**

#### *Goals and policies supported*

- We support the continuation of the urban village strategy which has been successful in efficiently accommodating a significant portion of Seattle’s growth over the past 20 years. We support the creation of urban villages which use dense land use in conjunction with complete multimodal transportation networks to create compact neighborhoods that support healthy active transportation choices, reduce the environmental impacts of growth, and enhance community connectivity.
- We support the City’s efforts to engage underrepresented communities in public participation programs in addition to providing for broad public participation. We also support goal **GS G1** and its associated policies.
- We support policy **GS 2.7** and encourage the City to specify “safe walking, biking, and public transportation” in accordance with the adopted Vision Zero policy.
- We support **GS 2.13**’s call for affordable rent levels in urban centers and villages. All centers and villages need to include affordable housing to meet the City’s affordable housing goals.
- We support goal **GS G5** and policies **GS 5.1** through **GS 5.4**. Annexing the unincorporated areas south of the city will benefit those areas and King County. King County is not equipped to provide urban public facilities and services to these areas long-term, so including these areas in the city will benefit the county. Residents and property owners will benefit from better public facilities and services. The city will benefit because these areas will have better public facilities and services.

#### *Policies and/or Enhancements Recommended*

- ***Track affordable units.*** As the plan states, monitoring is important to the successful implementation of any plan. We support the monitoring policies **GS 1.4** through **GS 1.6**. However, because the majority of our growth will go in urban villages, it is critical that villages accommodate our goals for affordable housing. Therefore, the number of affordable units created, preserved, and demolished in each village should be tracked as part of policy **GS 1.5** and **GS 1.6**. This will enable the City to refine policies, programs, and investments as needed to ensure that there are affordable units in each village.
- ***Strengthen promotion of increased housing supply, mix, and affordability.*** We support policy **GS 2.19**, which calls for limited multifamily, commercial, and industrial uses outside of urban villages. Because increasing land supply for multifamily housing is a critical component of addressing our affordable housing crisis, we recommend that “promote housing supply, mix, and

affordability” be included as a condition for land use changes under this policy for multi-family and commercial development. So we recommend that policy **GS 2.19** be modified to read as follows, with our additions underlined: “**GS 2.19** Allow limited multifamily, commercial, and industrial uses outside of urban villages to support the surrounding area or to maintain the existing character. Policy changes authorized by this policy for multifamily and commercial uses shall promote increased housing supply, mix, and affordability.”

- ***Include archaeological and cultural factors.*** We support the urban design goals and policies. Native Americans have a long association with Seattle and its natural and built environments. The Washington State Department of Archaeology & Historic Preservation’s Predictive Model shows the entire city is associated with Native American culture, prehistory, and history.<sup>1</sup> So policy **GS 4.8** should call for preserving characteristics of archaeological and cultural resources too. We recommend this policy be modified to read as follows, with our additions underlined: “**GS 4.8** Preserve characteristics that contribute to communities’ general identity, such as block and lot patterns and areas of archaeological, cultural, historic, architectural, or social significance.”
- ***Include environmental best practices.*** Previous policy supporting environmental stewardship (“**UV 51:** Promote sustainable management of public and private open spaces and landscaping including preserving or planting native and naturalized vegetation as appropriate to the landscape, removing invasive plants, protecting and enhancing wildlife habitat, and using an integrated pest management approach which favors natural over chemical pest management.”) has been removed and partially replaced with a policy (**P 3.3**) which relates to public parks only. Given the importance of the natural environment to Seattle’s residents and our obligation to help restore threatened and endangered species, we recommend that this policy be reinstated in this Plan under “Natural Environment.”
- We support goals and policies throughout the Plan which aim to end racial disparities and create a diverse city where all people are able to achieve their full potential regardless of race or means, and we recommend that the Comprehensive Plan directly reference the Equitable Development Implementation Plan and commit to future investment in equitable development strategies.

## Land Use Element

### *Policies Supported*

- We support the “Potential Urban Village Expansions” shown on the Future Land Use Map. Expanding the urban villages in these areas will capitalize on the region’s investments in high capacity transit, provide for additional housing opportunities, and, by applying the Housing Affordability and Livability Agenda (HALA) recommendations to the increased density in these areas, increase opportunities for affordable housing.

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<sup>1</sup> See the Wisaard online database accessed on June 15, 2016 at: <http://www.dahp.wa.gov/learn-and-research/find-a-historic-place>

- We support the policies which recognize disproportionate adverse impacts of land use regulations on marginalized populations or other groups and aim to minimize and mitigate inequitable outcomes such as proposed policy **LU 2.8**.
- We support policy **LU 5.16**, which recognizes that higher-density development should offset its impacts through incentives for landmark preservation, open space amenities, and affordable housing.
- We also support policy **LU 5.17**, which calls on the City to continue its transfer of development rights program that provides for additional development capacity in return for protecting farmland in the region. This program is an excellent example of regional cooperation and the City's leadership in protecting the environment and encouraging the long-term production of safe and healthy local food. The City should be proud of this successful program.
- We support the policies which recognize the impact of land use on health and well-being, and that promote healthy residents and communities through noise control (**LU 5.12**), air quality (**LU 5.13**), recreation space (**LU 5.5**), as well as policies which encourage safe and convenient active transportation modes (**LU 6.5**).
- We support goal **LU G8** and its policies, which set forth a vision of multifamily zones that include a variety of housing types and densities, mixed-incomes, and promote walking and transit use.
- We support **LU 9.1**, the prioritization of existing commercial/mixed use areas over the creation of new business districts, particularly in areas with established districts with locally-owned and neighborhood supporting businesses.
- We support the use of land use regulations that protect and encourage locally-owned, neighborhood serving businesses, such as **LU 9.7** and **LU 9.23**. These policies are particularly important in those areas identified as high displacement risk in the Equity and Growth Analysis where businesses that serve persons of color, immigrant and refugees, and persons with limited English proficiency and other needs may be under significant displacement pressure due to rising rents or displacement of their customer base.
- We support the use of land use policies which improve the safety, accessibility and comfort of people walking, people on bikes, and people taking transit (**LU 9.7, LU 9.9, LU 9.11, LU 9.13, LU 9.16, LU 9.18, LU 9.19**).
- We support the protection and expansion of safe industrial land uses that support equitable employment opportunity in Seattle (**LU 10.1, LU 10.2, LU 10.4, LU 10.5, LU 10.6, LU 10.8, LU 10.9, LU 10.10**).
- We support the promotion of flexibility for special districts (**LU G12, LU 12.1**), as the new waterfront district will have the opportunity to provide significant recreational and economic benefits for Seattle residents.
- We support policy **LU 14.8**, which calls on the city to identify, preserve, and protect archaeological resources.

- We support policy **LU 15.14**, which seeks a “net gain in wetland function by enhancing and restoring wetland function across the city.” Wetlands have many functions that benefit the community such as flood storage, stormwater filtration, and shoreline stabilization. This policy wisely encourages a net gain in these important functions.

### ***Goals, Policies and/or Enhancements Recommended***

- ***Strengthen housing supply goal.*** We suggest that Goal **LU G2** include “providing adequate housing supply to meet demand and growth targets” in the goals of the City’s zoning and land use regulations.
- ***Strengthen stormwater/environmental protection related to impervious surfaces.*** Prior policy related to impervious surfaces (**LU 37**: Explore setting limits on impervious surfaces or encouraging the use of other tools to increase stormwater infiltration in appropriate areas) has been edited to remove limits on impervious surfaces. While there are additional tools that can be used to manage stormwater, impervious surface coverage is a key factor in reduction of the ability of the landscape to absorb stormwater. We recommend that **LU 5.8** be modified as follows to reincorporate limitations on impervious surface explicitly as a tool, with our additions underlined: “**LU 5.8** Use landscaping requirements, impervious surface limitations, and other tools to limit impacts on the natural environment, including increasing stormwater infiltration where appropriate.”
- ***Add more consistency in housing type descriptions.*** We support goals and policies which allow additional compatible housing types in single family neighborhoods (**LU G7**, **LU 7.2**, **LU 7.5**). We suggest that neighborhood character be promoted through consistent and compatible design standards like height, scale, and bulk, but discourage the use of “single family” as a descriptor of character, such as in **LU 7.2**, because it is inconsistent with other policies. We support the inclusion of housing choice as a consideration in changing the development standards in single-family areas (**LU 7.12**).
- ***Promote housing affordability.*** We recommend modifying proposed policy **LU 8.4** to include “promote housing affordability” as a condition for land use changes under this policy. As the HALA recommendations provide, increases in allowed density provide an opportunity to share those gains in land value with the community through providing affordable housing. Our recommended deletion is struck through and our recommended addition is underlined: “**LU 8.4** Establish evaluation criteria for rezoning land to multifamily designations that support the urban village strategy, create desirable multifamily residential neighborhoods, maintain compatible scale, respect views, enhance the streetscape and pedestrian environment, ~~and~~ achieve an efficient use of the land without major impact on the natural environment, and promote housing affordability.”
- ***Mitigate tree canopy and vegetation loss.*** Tree canopy and vegetation coverage are critical for both creating livable communities and helping reduce adverse stormwater impacts. While it is acknowledged that Seattle should promote large mixed-use development which may remove trees and vegetation, we suggest including “minimizing or mitigating loss of tree canopy and vegetation” as a need to be considered in midrise and highrise areas in **LU 9.14**.

- ***Include minimum industrial environmental requirements.*** While it is reasonable not to impede industrial land uses with unnecessary landscaping and streetscaping regulations for aesthetic purposes (**LU 10.11**), there should be minimum utilitarian requirements which will support a healthy environment through stormwater management and vegetation to improve air quality, reduce stormwater runoff, and mitigate the heat impacts of climate change.
  
- ***Promote historic preservation.*** We support the use of historic and landmark designation to protect those sites, buildings, and districts which contribute to the character of our city and provide a visible link to the shared history of our city, our neighborhoods, and our people. (**LU G14**) We support the following suggestions from Historic Seattle to be addressed in the Comprehensive Plan:
  - Foster stewardship of neighborhood, place, and landscape as contributors to the city’s viability and vitality;
  - Celebrate the diverse physical form and fabric of the city;
  - Promote the city’s historic and cultural resources as an economic asset;
  - Promote the environmental benefits and opportunities of preserving and adaptively reusing historic buildings;
  - Encourage rehabilitation and adaptive use of buildings to conserve resources, reduce waste, and demonstrate stewardship of the built environment;
  - Promote seismic and energy efficiency retrofits of historic buildings to reduce carbon emissions, save money, and improve public safety;
  - Identify and establish alternative means to protect the historic character of neighborhoods selected as urban centers and villages; and
  - Encourage adaptive use of historic community structures, such as meeting halls, schools, and religious buildings, for uses that continue their role as neighborhood anchors.

We also recommend that a more direct policy be included under this goal to promote increased designation of structures as landmarks.

- ***Strengthen landslide-prone area development restrictions.*** While we support the improved environmentally critical areas goal and policies, we continue to be concerned that Policy **LU 15.9** may be read as implying that construction on landslide-prone slopes is safe if properly engineered. The science shows this is not the case. For example, the United States Geological Survey (USGS) report *Shallow-Landslide Hazard Map of Seattle, Washington* states:

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

length would provide a degree of protection for the runout areas of most of the existing slopes of concern.<sup>2</sup>

So we recommend that policy LU 15.9 be modified to read as follows, with our additions underlined and deletions struck through: “LU 15.9 Avoid development on landslide-prone areas, landslide runout areas, and their buffers. Where scientific and engineering analysis shows construction may be safely allowed, ~~r~~Require engineering solutions for development in landslide-prone areas to provide complete stabilization of the developed area.”

- **Add consideration of sea level rise.** We suggest adding language to LU 15.25 to consider the risk of sea level rise, regulate development in areas vulnerable to future sea level rise, and require solutions to make development in these areas resilient to future inundation. We recommend that LU 15.25 be improved with our additions underlined: “LU 15.25 Regulate development in flood-prone areas in order to protect public health and safety, and aquatic habitat, and to prevent damage to private property caused by hazardous flooding conditions. New lots shall be designed and located so that the buildable area is outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands will likely migrate during that time. Where lots are large enough, new structures and buildings shall be located so that they are outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands will likely migrate during that time.”

## Transportation Element

### *Policies Supported*

- We support the goal to ensure transportation decisions, strategies, and investments support the City’s overall growth strategy and are coordinated with this Plan’s land use goals (TG 1). Full integration between the transportation and land use elements is necessary to achieve the goals set forth in the land use element.
- To achieve integration of land use and transportation elements we support policies that will create dense, walkable, accessible neighborhoods that also furthers Seattle’s mode share goals (T 1.3, T 1.5).
- We support goal TG 2, which allocates space on Seattle’s streets to safely and efficiently connect and move people and goods to their destinations while creating inviting spaces within the rights-of-way. This means the prioritization of policy T 2.2 that ensures that the street network accommodates multiple travel modes, including transit, freight movement, pedestrians, bicycles, general purpose traffic, and shared transportation options.
- We support the goal to promote healthy communities by providing a transportation system that protects and improves Seattle’s environmental quality (TG 4).

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<sup>2</sup> Edwin L. Harp, John A. Michael, and William T. Laprade, *Shallow-Landslide Hazard Map of Seattle, Washington* p. 17 (U.S. Geological Survey Open-File Report 2006–1139: 2006) accessed on June 16, 2016 at: <http://pubs.usgs.gov/of/2006/1139/>



- We support **TG 6**, which will provide and maintain a safe transportation system that protects all travelers, particularly the most vulnerable users.
- We support defining arterial and transit level of service (LOS) to be the share of drive-alone trips made during the late-afternoon peak period. Defining LOS by the reduction of single occupancy vehicles will allow for better safety and the most efficient use of roadway by moving the greatest number of people on our limited rights-of-way (**TG 9, T 9.1**). We also support **TG 3**, which will further allow the City to meet people’s mobility needs by providing equitable access to, and encouraging use of, multiple transportation options to meet the new LOS.

***Goals, Policies and/or Enhancements Recommended***

- ***Increase focus on safety.*** With the proposed change in LOS, the plan should do more to focus on expanding multiple transportation options throughout the city, with a focus on safety. This means greater emphasis on efficient movement of people and goods and prioritizing active transportation modes, such as walking and biking, with safety in mind.
- ***Update parking policies to reflect off-street parking availability.*** In neighborhoods with underused off-street parking availability Seattle should prioritize street allocation for non-parking uses to achieve goal **T G2**.
- ***Create better transit outcomes by strengthening transit dedicated lanes.*** Under policy **T 3.7**, we recommend that providing exclusive transit lanes should be prioritized and not just considered, as it currently states.
- ***Strengthen safety in freight corridors.*** We support ensuring the efficient movement of truck traffic in freight corridors (**T 5.3**), and recommend that “while maintaining the safety of all users” be added as a consideration in the design, maintenance, and operation of freight corridors. While freight corridors are important, it is necessary ensure that the prioritization of freight doesn’t negatively impact the safety of cyclists, pedestrians, or transit users where there is overlap with other corridor uses.
- ***Increase stormwater and environmental protections in transportation projects.*** Prior policy supporting stormwater protection (“**T 55** Coordinate with other city, county, regional, state, and federal agencies to pursue opportunities for air and water quality improvement, street and stormwater runoff prevention, reduction in vehicle miles traveled, and noise reduction.”) has been removed. Given the importance of paved surfaces and roadways as pathways for stormwater pollution, we recommend that the stormwater aspects of this policy be reinstated in this Plan. The other policies under goal **TG 4** do not directly promote stormwater protection.
- ***Evaluate climate change impacts.*** We support the goal of ensuring the long-term viability, cost-effectiveness, and safety of the City’s transportation assets (**TG 8**) and recommend the inclusion of a policy under this goal that recognizes the need to evaluate potential climate change impacts to transportation infrastructure and operations, including critical needs for emergency response, goods and services movement, and community access, and identify and prioritize strategies for enhancing resilience.

# Housing Element

## *Policies Supported*

- We support goals and policies to address inequities in access to housing which have led to disproportionate housing cost burden for lower-income households and household of color in Seattle (**HG 1, HG 2, HG 3, HG 5, H 5.13**).
- We support **HG 1** and its policies which commit to helping all people have fair and equal access to housing in Seattle. In particular, **H 1.4**, which recognizes that removing barriers that prevent lower-income households from using rental assistance throughout Seattle, particularly in high opportunity areas, is imperative if we are to achieve fair and equal access to housing.
- We support the goal to help meet the current and projected regional housing needs of all economic and demographic groups by increasing Seattle’s housing supply, and to add or preserve fifty thousand housing units by 2025, including twenty thousand rent/income-restricted housing units (**H G2**).

## *Goals, Policies and/or Enhancements Recommended*

- **Clarify fair housing policies.** We recommend breaking **H 1.3** into two different policies to include implementation of an enforcement policy. As it is currently written, the City is encouraging enforcement of fair housing policies instead of enforcing them fully. We recommend the following modifications, with our additions underlined and deletions struck through:
  - “**H 1.3(a)** Encourage actions, such as affirmative marketing and fair-housing education ~~and enforcement~~, to overcome historical patterns of segregation, promote fair-housing choices, and foster inclusive communities that are free from discrimination.”
  - “**H 1.3(b)** Increase enforcement of fair-housing policies including testing and monitoring of fair-housing compliance for all protected classes in the City of Seattle to identify those groups which are still experiencing discrimination.”
- **Require replacement of housing.** We believe that policy **H 2.5** should be modified from “encourage” to “require the replacement of housing that is demolished or converted to nonresidential or higher-cost residential use.”
- **Reinstate community engagement.** **H 2.6** of the previous draft stated: “Engage local communities, particularly in neighborhoods with marginalized populations, to identify and jointly address unique housing and community amenity or service needs.” We recommend that this policy be reinstated to ensure that programmatic and policy solutions are addressing the specific needs of marginalized communities.
- **Allow modest changes within a half-mile walkshed around high-capacity transit.** While we support **H 3.5**, we recommend that this policy be modified to allow additional housing types

in areas that are currently zoned single-family development inside urban villages in addition to areas within a half-mile walkshed around high-capacity transit.

- ***Develop a comprehensive anti-displacement plan.*** While we support policies which acknowledge the need to reduce displacement from Seattle neighborhoods or the city as a whole (H 5.3, H 5.6, H 5.9, H 5.10), we recommend that the City develop a comprehensive anti-displacement plan to protect communities at risk of displacement.

## Capital Facilities Element

### *Policies Supported*

- We support the City’s commitment to using the development and management of capital facilities in an equitable way which incorporates the environmental, economic, social, and health benefits of capital facilities (CF G1), in particular the structuring of user fees to mitigate cost burdens for low-income households (CF 1.7), supporting job creation and training (CF 1.8), and encouraging accessibility of capital facilities for people of all abilities, socioeconomic backgrounds, ages, and cultures (CF 4.1).
- We support the inclusion of capital facilities as a part of the City’s strategies in restoring the natural environment and preparing for the impacts of climate change through a commitment to resilient capital facilities (CF 1.6), improved resource conservation (CF 2.2, CF 2.3) and in the design and construction of new capital facilities (CFG 4).

### *Goals, Policies and/or Enhancements Recommended*

- ***Prioritize investments in underrepresented communities.*** We support the policy that encourages locating new capital facilities to support equitable distribution of services for underrepresented communities (CF 3.2), and recommend that this policy be strengthened to include prioritizing investment in underrepresented communities to make up for historical investment gaps.
- ***Consider multiple functions of facilities.*** In addition to considering climate conditions (such as flooding, sea level rise) during facilities siting (CF 3.6), we recommend that the City also take into consideration the need for capital facilities to provide a multiple-purpose resource (such as cooling centers, or temporary shelters) for communities experiencing the adverse impacts of climate change as part of siting, design, and construction of facilities.
- ***Monitor equity.*** We recommend that the City include a policy which states that it will develop specific goals and metrics to monitor the progress towards the equitable distribution of capital facilities through the Race and Social Justice Initiative.
- ***Include asset management.*** We recommend that the City include a policy within this section, similar to policy U 1.8, supporting asset management programs for the renewal and replacement of capital facilities.

## Utilities Element

### *Policies Supported*

- We support the commitment to using the utilities services to further environmental stewardship, race and social equity, economic opportunity, and the protection of public health (**UG 1**).
- We support embedding equitable access into decision-making criteria (**U 1**). We support the policy to discourage siting and design alternatives that may increase negative impacts, particularly on communities which already bear a disproportionate amount of these impacts (**U 3.2**).
- We support the incorporation of climate change considerations in the development of a resilient utility system (**U1.3**) and the commitment to further race and social equity in prioritizing projects (**U3.7**).

### *Goals, Policies and/or Enhancements Recommended*

- **Add Service Delivery policies.** We recommend including two new Service Delivery policies: a policy that encourages the investigation and application of innovative financial mechanisms such as Pay for Success or Environmental Impact Bonds that incentivize low-impact and green infrastructure solutions; and a policy that supports investment in job training and workforce development for the skill sets required to maintain green infrastructure such as invasive species removal and micro-level vegetation management and replacement.
- **Promote reduction of climate change drivers.** We recommend inclusion of more direct language which recognizes that the City's utility system will not only be responding to climate change, but can play an important role in reducing climate change drivers, particularly through the conservation of resources (**U 2, U 2.2**).
- **Reduce impacts of construction.** We support coordinating construction to limit cost and public inconvenience (**U 4.2**), and recommend that this policy include reducing the disruption impacts on locally-owned small businesses, particularly in commercial areas that serve disadvantaged or marginalized populations.

## Economic Development Element

### *Policies Supported*

- We support the policy to strengthen neighborhood districts (**ED 1.2**), particularly those neighborhood business districts identified as areas with high displacement risk in the *Growth and Equity Analysis*.
- We support the prioritization of assistance to commercial districts in areas of lower economic opportunity (**ED 1.3**) and encourage that assistance be community-driven and culturally-competent.

### ***Goals, Policies and/or Enhancements Recommended***

- ***Integrate street trees and vegetation.*** We support enriching the vibrancy of neighborhood business districts (**ED 1.4**), and recommend that this policy include the integration of street trees and vegetation.
- ***Tailor spaces for small businesses.*** We encourage the support for independently owned and operated retail and restaurants (**ED 1.5**), and the pursuing of community development strategies (**ED 1.6**), and recommend that these policies include reference to tailoring the sizes of new retail space to the needs of small business that are at risk of displacement.
- ***Increase education for business owners to reduce employment barriers.*** We support the policy to increase job training, internship, and placement to overcome high barriers to employment and achieve greater racial and social inclusion in the workforce (**ED 4.2**). This policy should also include programs to educate and work with businesses to understand how they can improve their hiring and retention of more diverse employees, women, and other groups which face higher barriers to employment.

***Increase support for diverse business owners.*** We support the goal of strengthening the entrepreneurial environment for start-ups and small businesses (**ED G5**) and encourage the inclusion of a policy which recognizes the particular need for entrepreneurial support for businesses owned by persons of color, immigrants, and non-native English speakers.

## **Environment Element**

### ***Policies Supported***

We support the City's strong focus on goals and policies to reduce future greenhouse gas emissions and its commitment to address environmental justice burdens and disproportionate access to benefits.

### ***Goals, Policies and/or Enhancements Recommended***

- Incorporate Climate Action Plan strategies.*** The Plan's Environment Element should include policies and goals which are consistent with and support the strategies and outcomes outlined in the Seattle Climate Action Plan, particularly under **EN G3**.
- ***Include drought tolerance.*** We support the goal of achieving a thriving and sustainable urban forest (**EN 1.1**), and recommend that the city include drought tolerance as a criteria in its approved street tree species list, given projected climate change impacts such as drier, hotter summers.
  - ***Track tree canopy.*** Tree canopy is important for Seattle's identity, for human well-being, and for environmental benefits related to air and water quality. Similar to other metrics in the Comprehensive Plan, tree canopy should be tracked. Prior policy related to tracking tree canopy ("E 24 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.”) has been removed. We recommend that this policy be reinstated in the adopted Comprehensive Plan.

- **Add equity goals for tree canopy.** Policy **EN 1.2** establishes canopy goals for the city as a whole. Our *City of Seattle Health and Equity Assessment* found that tree canopy decreased in the city from 2000 to 2010, with the largest rate of decrease (8%) occurring in the lowest income, most diverse areas of the city. We recommend including a policy which prioritizes increasing tree canopy in areas populated by marginalized groups at a rate that is faster than the city as a whole in order to reverse this inequity.

**Strengthen pollution prevention.** Reducing or eliminating pollutants at their source is the most cost-effective way to address pollution in water and air. We recommend that policy **EN 2.1** be modified to read as follows, with our additions underlined and our deletions struck through: “**EN 2.1** Protect and improve water and sediment quality by reducing pollution at sources ~~controlling pollution sources~~ and treating stormwater through best management practices.”

**Reduce use of pesticides.** Prior policies (including **E 12.5**) explicitly listed pesticides and manufactured fertilizers as problems to reduce. While new policy, **EN 2.4**, is in theory inclusive of these, we recommend that the language be reincorporated for clarity. We recommend that policy **EN 2.4** be modified to read as follows, with our additions underlines: “**EN 2.4** Limit the use of chemicals, including pesticides, herbicides, and manufactured fertilizers, that have negative impacts on aquatic or human health, especially on City-owned property or rights-of-way.”

**Increase access to subsistence and cultural fishing.** We support the goal of fostering healthy aquatic systems and protecting and improving fish and wildlife habitat in Seattle’s waterways (**EN G2**), and recommend that this goal include a policy to increase access to culturally appropriate fishing alternatives for the Lower Duwamish communities through partnerships with local, regional, and federal agencies.

**Include strategies to encourage uptake of energy efficient technologies.** We support encouraging energy efficiency and low-carbon energy sources (**EN 3.4**), and we recommend the inclusion of methods to enable uptake of these technologies and energy sources in low-income areas.

- **Add community-centered preparedness strategies.** We support the goal of preparing for the impacts of climate change (**EN G4**), and recommend the inclusion of the following policies under this goal:

**EN 4.3** Prioritize strategies that are driven by the communities most likely to be disproportionately impacted by climate change as well as the City’s adaptation and mitigation measures, particularly low-income households, persons of color, transit-dependent households, recent immigrants or non-English speaking residents, the elderly, and persons living in more vulnerable neighborhoods.

**EN 4.4** Partner with communities, particularly those mostly likely to be impacted by climate change, to identify local community assets, including infrastructure, City programs, cultural institutions, community centers, and social networks, that can be supported and leveraged in adaptation planning and implementation efforts.

**EN 4.5** Encourage City departments to share information and work together to increase climate change preparedness. Develop programs to facilitate cross-departmental communication and to provide information about the projected impacts of climate change to City departments for consideration in decision-making.

- ***Study potential climate impacts on communities.*** While we support the prioritization of actions that reduce risk and enhance resilience in populations mostly likely to be impacted by climate change (**EN 4.2**), the City should study the potential disparate impacts in order to develop responsive, equitable mitigation and adaptation actions and ensure that resources are sufficiently allocated.
- ***Consider co-benefits of resilience actions.*** We recommend that consideration of an action's co-benefits to the community, for example through creating local jobs or improving current health outcomes, be included in criteria for prioritizing preparedness and resilience actions (**EN 4.2**).
- ***Incorporate the Equity and Environment Agenda.*** We support policies to ensure that environmental benefits are equitably distributed and environmental burdens are minimized and equitably shared by all Seattleites (**EN G5**), and we recommend including reference to the City's Equity and Environment Agenda and related goals and strategies for increasing environmental equity, including:
  - Develop an environmental equity assessment to actively understand and begin to address multiple issues at the same time such as polluted soil, indoor and outdoor air quality, lead and diesel exhaust exposure as well as other identified hazards in Equity and Environment Initiative focus areas, including residential areas near industry.
  - Create opportunities and support structures for people of color to participate and lead in environmental policy and program work through positions in government and partnerships with community organizations, businesses, and environmental groups.
  - Institutionalize structures for community decision-making, transparency, leadership, and influence on design of environmental programs and policies.
  - Design City environmental policies and programs to simultaneously address multiple community issues and include economic and cultural benefits for communities of color, immigrants and refugees, people with low incomes, and limited English-proficiency individuals.
  - Create opportunities for young people to participate in environmental programs and develop skills through engagement activities and decision-making opportunities.
  - Connect environmental programs to cultural anchors in ways that enhance those anchors, increase community capacity, and deliver environmental, social and economic benefits.

## Parks and Open Space Element

### *Policies Supported*

- We support the emphasis on serving marginalized and traditionally underserved populations in the City’s expansion of park holdings and open space opportunities (**P 1.1**).
- We support policies **P 1.11** and **P 1.12**, which aim to reduce health disparities through investments that provide access to open space and recreational activities, particularly for marginalized communities. Research shows a positive association between accessible parks and greenspace and the physical and mental health of urban residents. Accessible greenspace, including large and small parks, green streets, and tree canopy, can help promote physical activity;<sup>3</sup> reduce air pollution, noise, and ambient temperature;<sup>4</sup> lower psychophysiological stress levels;<sup>5</sup> and encourage social connections that are linked with positive health outcomes for people of all ages.<sup>6</sup> Therefore, investments in park facilities and culturally competent programs are a critical component of reducing health disparities among Seattle residents.
- We support innovative strategies to better expand public and green space in the right-of-way, private development, shorelines, smaller acquisitions and uses, and schools or other public agencies (**P 1.3, P 1.5, P 1.6, P 1.7, P 1.8, P 1.10**).
- We support the policies under **P G2** which address provision of culturally appropriate facilities and activities that meet the needs of all residents of Seattle, in particular the emphasis on parks and recreation to support healthy living for diverse populations and age groups, persons with disabilities, and families.

### *Goals, Policies and/or Enhancements Recommended*

- **Retain strong parks and open space goals.** While we support the proposal to adopt new level of service and access standards for parks, recreational facilities, and open space, the existing level of service goals should be retained until the new standards are adopted as part of the Comprehensive Plan. As the population of the city grows, there is an *increased* need for parks, open spaces, and recreational facilities. We support the development of new level of service and access standards and recommend they be as specific as the current Urban Village Appendix. Seattle was able to increase access to facilities through the recent parks levies and through innovative approaches, including creation of pocket parks and plazas. The new standards should continue this work. The new standards should be quantifiable and address total open space, open space per person, and resident proximity. This is necessary to ensure that we prioritize

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<sup>3</sup> Kathleen L. Wolf, “Active Living - A Literature Review,” in Green Cities: Good Health, (University of Washington, College of the Environment, 2010), [www.greenhealth.washington.edu](http://www.greenhealth.washington.edu).

<sup>4</sup> Vardoulakis, Sotiris, Keith Dear, and Paul Wilkinson. "Challenges and Opportunities for Urban Environmental Health and Sustainability: the HEALTHY-POLIS Initiative." *Environmental Health* 15, no. 1 (2016): 1.

<sup>5</sup> Kathleen L. Wolf, S. Krueger, and M.A. Rozance, "Stress, Wellness & Physiology – A Literature Review,” in Green Cities: Good Health, (University of Washington, College of the Environment, 2015), [www.greenhealth.washington.edu](http://www.greenhealth.washington.edu).

<sup>6</sup> Kathleen L. Wolf, and M.A. Rozance, “Social Strengths – A Literature Review,” in Green Cities: Good Health, (University of Washington, College of the Environment, 2013), [www.greenhealth.washington.edu](http://www.greenhealth.washington.edu)



expanding greenspace and open space, which is a critical component of health and livability in the city.

- ***Consider a broader range of accessibility strategies.*** We suggest adding more ways to increase access to parks and greenspace beyond acquisition. In addition to considering multimodal access (**P 1.15**), access can be improved through better maintenance of existing facilities, improved safety and neighborhood connectivity, and facilities or programs which are culturally or age-appropriate to reflect the surrounding community.
- ***Aim to reduce language barriers.*** Policy **P 2.12** should include a specific reference to non-English speaking populations because language isolation is a significant contributor to mental and emotional stress and is a significant barrier to accessibility of parks and recreational facilities for many residents. We suggest the inclusion of a policy similar to **CF 1.7** regarding the structuring of user fees to mitigate cost burdens for low-income households.

## Community Well-Being Element

### *Policies Supported*

- We support policies **CW 2.3**, **CW 2.4**, and **CW 2.5**, which recognize the need to provide access to healthy, affordable, and culturally appropriate food for all people in Seattle, and policies **CW 2.6** and **CW 2.7**, which encourage the expansion of local food production, processing, and distribution to increase access to healthy foods and improve food security.
- We support the commitment to reducing health inequities and increasing equitable access to health care, in particular reducing health risks that lead to serious diseases and health conditions that disproportionately affect certain populations (**CW 3.2**), and collaborating with community organizations and health providers to improve the quality and equity of access to health care services (**CW 3.4**).

### *Goals, Policies and/or Enhancements Recommended*

- ***Support partnerships with community organizations.*** We support the goal of encouraging participation of all residents in family, community, and neighborhood life (**CW G1**), and recommend the inclusion of a policy under this goal that emphasizes partnering with community-based organizations and institutions to involve people of all backgrounds in planning and decision-making that impacts their communities and personal well-being.
- ***Assess and plan for climate change impacts.*** We support the goal of creating a healthy environment for community members of all ages, stages of life, and life circumstances (**CW G3**), and recommend the inclusion of a policy to assess and plan for the impacts of climate change on public health, including disproportionate impacts on lower income, recent immigrant, older, and very young residents, who are at greater risk of health impacts from climate change.
- ***Articulate barriers to health care.*** Many populations have specific barriers to health care, including limited physical access, fear of government institutions, language isolation and cultural taboos surrounding mental health and addiction. Policy **CW 3.3** should include language that

articulates these barriers and recognizes that targeted, culturally competent strategies will need to be employed to achieve equitable health outcomes.

- ***Include support for families and parents of English language learners.*** We support **CW G4** and its policies which support an education system and opportunities for lifelong learning for all Seattleites. We recommend that policy **CW 4.8** include language which indicates special support for families of English language learners that empower parental involvement.
- ***Emphasize coordination with transit agencies.*** We support the goal of reducing violence and the incidence of crimes and increasing the sense of security throughout the city (**CW G5**) and the emphasis on coordination across City departments and other agencies to address safety issues (**CW 5.1**). We recommend the inclusion of a policy that specifically acknowledges the need to coordinate with SDOT, Metro, and other transit agencies to address crime and ensure the personal safety of transit riders.
- ***Monitor opportunity and access.*** We support the commitment to providing equitable opportunity and access to services for all Seattleites (**CW G6**), and recommend the inclusion of a policy which indicates a commitment to measuring and monitoring equitable opportunity and access through a variety of metrics that can be used to guide programs and investments to create more equitable outcomes.

## Neighborhood Planning

### ***Goals, Policies and/or Enhancements Recommended***

- In 2012, the Rainier Beach Neighborhood Plan Update was completed to guide the culturally and ethnically diverse Rainier Beach community's vision for an enjoyable, affordable, and prosperous neighborhood. The Neighborhood Plan Update has not yet been approved by City Council and therefore is not included in this draft of the Comprehensive Plan. We recommend that the City Council approve the Rainier Beach Neighborhood Plan Update and adopt it as part of *Seattle 2035*.

## Shorelines Areas

### ***Policies Supported***

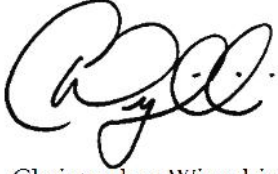
- Sea level is rising and floods and erosion are increasing. In 2012, the National Research Council concluded that global sea level had risen by about seven inches in the 20th Century and would likely rise by 24.3 inches in Seattle by 2100.<sup>7</sup> More recent estimates indicate that this estimate is low for likely sea level rise. So we support policy **SA G14** which directs the city to “[a]ddress and minimize the impacts of sea-level rise on the shoreline environment” and to “[p]rotect wetlands and in water vegetation to protect against storm surges and sea level rise.”

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<sup>7</sup> National Research Council, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* p. 23, p. 96, p. 102, p. 156 (2012) accessed on June 16, 2016 at: [http://www.nap.edu/catalog.php?record\\_id=13389](http://www.nap.edu/catalog.php?record_id=13389)

Thank you for consideration of our comments. If you require more information please contact me at 206-343-0681 Ext. 122.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Wierzbicki', with a stylized flourish at the end.

Christopher Wierzbicki, PE  
Interim Executive Director

Enclosure