



# City of Seattle

## Seattle Planning Commission

### Commissioners

David Cutler, Co-Chair  
Amalia Leighton, Co-Chair  
Catherine Benotto, Vice-Chair  
Luis Borrero  
Josh Brower  
Keely Brown  
Colie Hough-Beck  
Bradley Khouri  
Grace Kim  
Jeanne Krikawa  
Kevin McDonald  
Tim Parham  
Marj Press  
Matt Roewe  
Morgan Shook  
Maggie Wykowski

### Staff

Vanessa Murdock,  
Executive Director  
  
Jesseca Brand,  
Planning Analyst  
  
Diana Canzoneri,  
Demographer &  
Senior Policy Analyst  
  
Robin Magonegil,  
Administrative Staff

### MEMORANDUM

April 18, 2014

TO: Diane Sugimura, Director, Department of Planning & Development

FROM: Seattle Planning Commission

RE: **Comments on the Draft Alternatives to be studied in the Environmental Impact Study on the 2015 Major Update to the Comprehensive Plan**

CC: Mayor Ed Murray; Seattle City Councilmembers; Hyeok Kim, Andrea Riniker, Robert Feldstein, Kathy Nyland, Mayor's Office; Marshall Foster, Nathan Torgelson, Susan McLain, Tom Hauger, Patrice Carroll, DPD; Tracy Krawczyk, Kevin O'Neill, SDOT; Shannon Kelleher, SPU; Rebecca Herzfeld, Eric McConaghy, Lish Whitson, Council Central staff

Dear Ms. Sugimura,

The Seattle Planning Commission is pleased to provide its feedback as part of the scoping process regarding the Draft Alternatives to be studied in the Environmental Impact Statement (EIS) being prepared as part of the Department of Planning and Development's (DPD) State Environmental Policy Act (SEPA) review for the 2015 major update to the City of Seattle Comprehensive Plan. As stewards of the Comprehensive Plan, we are tracking this major update very closely and will be weighing in throughout the SEPA and update process. We appreciate DPD's staffs' efforts to date and their willingness to regularly keep us informed on the DPD's efforts to complete the major update.

The Plan as originally adopted in 1994 set out an innovative concept focused on the urban village strategy. In the last 20 years this strategy has been a tremendous

success and helped lay the necessary groundwork for how our city looks today. The urban village strategy also has given the City much needed direction in where to allocate limited resources. Our urban villages today are thriving communities with many of the necessary components of livability that make places great.

The Commission is looking forward to a robust city-wide dialogue on shaping the next 20 years for Seattle. Seattle has a thriving economy and a fantastic natural environment, the combination of which will continue to be a draw for many more people who are going to choose to live here. The EIS DPD is preparing as part of its SEPA review process is a critical planning tool in the current update. The Commission believes that the best plan forward will likely be a combination of the proposed alternatives outlined in the scoping process and thus the Commission urges DPD to study the broadest range of alternatives possible. If the City forgoes studying the broadest range of alternatives we would be missing an important opportunity that will likely not come again for another seven or more years.

***The Commission Recommends Expanding Alternative 3 to Encompass all Transit Communities, not just Light Rail.***

In 2012, the City Council adopted Land Use Element C-6 Transit Communities into the Comprehensive Plan outlining further refinement of the urban village strategy. The 2012 Transit Communities amendment was an important first step intended to strengthen and reinforce the City's urban village strategy. Transit Communities are based on a 10-minute walkshed ***from a node of frequent and reliable transit located within urban villages.*** At the time of adoption, the City acknowledged that more work needed to be done to fully realize the potential and transformative power of fully implementing Transit Communities policies in the Comprehensive Plan. Because of that, it was decided that urban villages that included Transit Communities but did not encompass the entire walkshed would need further analysis as part of the major update. The Comprehensive Plan states that before changes in boundaries could become formalized, a planning process that allows for community input is needed. The Commission understood—and continues to regard—the major update of the Comprehensive Plan as the logical opportunity to conduct the needed analysis and outreach.

While we appreciate the inclusion of light rail in Alternative 3, we believe that all Transit Communities—i.e., all with nodes of frequent and reliable transit (i.e., bus or street car) not just light rail—should be studied as part of that alternative. Failing to do this now will be a huge missed opportunity as we plan for the next 20 years. While we understand and appreciate that potential bus service cuts may seem daunting, that is no

excuse for failing to plan for the future. It is the task of City visionaries to set the planning course for Seattle and we should not be daunted nor deterred by outside organizations that have narrower missions than the City, yet serve a regional constituency. Instead, the City can meet this task by focusing on the Transit Communities policy adopted into the Comprehensive Plan and by looking at the [Transit Master Plan](#) as a key document for prioritization and planning. Together, these policies and documents should continue to form the basis for the City's long range planning efforts around Transit Communities.

***Transit Communities Comprehensive Plan amendment needs further study.***

As previously stated, when adopted in 2012, the Transit Communities policy required further work to be fully integrated into the urban village strategy as part of the Comprehensive Plan. Although much of the land within Transit Communities is already incorporated within urban villages there are several examples such as the 23<sup>rd</sup> Ave and E Madison, Greenwood/Phinney Ridge, Ballard, and West Seattle Junction villages, where the walkshed extends outside the urban village boundary and should be studied. While this would not change dramatically the outcomes of the EIS, it is an important policy shift to fully valuing the investments that transit make in a community.

Over the next 20 years the City will continue to make investments to support rail, street car and bus transit service while living in the city continues to be increasingly more expensive. By limiting the EIS to light rail, several communities reliant on frequent transit will not receive these planned investments in infrastructure despite experiencing continued growth in their community. We therefore urge the DPD to include the walksheds surrounding nodes of frequent and reliable bus service and street car service as part of Alternative 3, not just existing and possible future light rail stations.

***DPD should consider adjusting the Boundaries of Urban Villages using walkshed methodology.***

Since the adoption of urban villages in the 1994 comprehensive plan, the City has aligned growth with essential components of livability. Where there is growth in housing and jobs there also should be investments in open space, public facilities, sewer improvements, etc. This is an important piece of the Plan and we are delighted to hear that transit also will be seen as a key part of the growth puzzle. This will allow for compact and lively communities as was envisioned in the [Transit Communities Report](#) and formalized in the Transit Communities Comprehensive Plan policy.

As you know, understanding how people move around within an urban village, and to and from frequent transit, is vital to understanding a community's needs. This analysis will incorporate what we know today and how we plan for the future, ensuring that our city maintains its attractiveness to existing and future residents as well as to employers.

Providing for growth in Transit Communities offers myriad benefits to households, businesses, and to the community as a whole: more opportunities for household savings on transportation costs which, next to housing, tend to comprise their largest expense; increased abilities of employers to recruit workers; and an increased likelihood that Seattle will realize adopted climate action goals.

In selecting and shaping the alternatives for study in the EIS, it is vital to consider how the breadth of those alternatives limits or enhances the city's ability to grow in a way consistent with its social equity core value. Providing for greater residential growth in Transit Communities would provide opportunities to facilitate a wider variety of housing choices—including more affordable family-sized housing—in these areas.

***Alternative 1 and 2 continue in a strong tradition.***

The Commission also offers support for proposed growth alternatives 1 and 2. Alternative 1 – Urban Center Focus, is essential for understanding the impacts that may occur as a result of more focused growth in the urban centers. This alternative is a departure from the status quo and it will be helpful to see this Alternative in relationship with the other two to help guide future planning and implementation. Alternative 2 – Urban Village Focus, is best practice in EIS work as it carries forward growth patterns as have occurred in the last 20 years. The Commission believes that these alternatives with the addition of our recommendation on Transit Communities in Alternative 3 create the broadest range of alternatives for study. We urge DPD to incorporate our recommendations with the Draft Alternatives for study in the EIS, as this is the time to better understand any growth impacts and does not require adoption of any of these alternatives at this time.

In conclusion, we appreciate the hard work underway by DPD staff on the three draft alternatives. The plan for how we grow in the next 20 years is clearly being stewarded by a committed group of staff at DPD. We are hopeful that our suggested modification to Alternative 3 is seen as a positive outgrowth of years of shared vision and work.

If you have any further questions or would like to discuss our comments further please feel to reach out to either of us, or Commission Executive Director, Vanessa Murdock 206-733-9371.

Sincerely,



David Cutler  
Co-Chair



Amalia Leighton  
Co-Chair

**SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURES & RECUSALS:**

Commissioner Amalia Leighton disclosed that her firm, SvR Consulting is working on the EIS for the City of Seattle.