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Seattle Planning Commission

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November 18 2015

Honorable Mayor Edward B. Murray
Mayor of Seattle
City Hall
via email

RE: Seattle 2035 public draft – the major update of Seattle's Comprehensive Plan

Dear Mayor Murray,

As stewards of our City's Comprehensive Plan, the Seattle Planning Commission has closely reviewed the public draft of the Major Update to Seattle's Comprehensive Plan – Seattle 2035. The Commission would like to recognize the high quality work of the Department of Planning and Development (DPD). Per guidance provided by you and City Council in resolution 31577, race and social equity has been elevated as a core value in the Comprehensive Plan. In particular, the equity analysis conducted by DPD is an exceptional and important step that will help inform goals, policies and strategies to help Seattle become a more equitable city as it welcomes 120,000 new residents and 115,000 new jobs. While the draft plan has incorporated equity in many regards, we look forward to the Mayor's proposed Plan being even more explicit in establishing a clear and powerful vision for how the city will grow over the next 20 years as it welcomes new residents and jobs while sustaining and elevating the quality of life for those already living and working here.

Seattle's Comprehensive Plan, which is required through the State Growth Management Act, is the appropriate guiding document for establishing a "cohesive and focused approach to planning and development.[1]" The following recommendations address how the plan can articulate a **more explicit vision for an equitable Seattle**; make the plan more **accessible and relevant** to community members; provide direction for a process through which we **monitor our progress** to achieve racial and social equity in Seattle.

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[1] Executive Order 2015-04: Directing the Creation of a New Executive Office to Coordinate Planning and Implementation to Build Thriving and Equitable Communities

Articulate a more explicit vision for an equitable Seattle.

The plan should set an aspirational tone for the next 20 years and establish a pathway that will help achieve this vision. The existing draft Plan states: "We envision Seattle as a city where growth benefits and increases opportunities for all residents while offering ways to enhance and preserve our natural environment." This is a strong vision that should be echoed through all elements of the Plan. When the Plan was last updated in 2004, the focus on environmental sustainability led to pioneering programmatic changes which have had an enduring impact on the region. *This update should do the same for racial and social equity.*

The public draft incorporates race into the Plan's core value of social equity and many of the Plan elements make great strides in addressing this value. However, more could be done on this front. In late 2014, the Commission participated in crafting equity statements for each element of the Plan. These statements provide valuable models for articulating an equitable vision. We urge that components of these statements be integrated more consistently across the elements with introductory narrative clearly describing the role each element plays in advancing equity. **The introduction to the Community Well Being element;**
"The City of Seattle invests in people so that all families and individuals can meet their basic needs, share in our economic prosperity, and participate in building a safe, healthy, educated, just and caring community.'
is an excellent example of how equity should be discussed and addressed in the Plan.

Furthermore, the Commission supports the urban village strategy which guides most future households and jobs into designated growth areas. The Commission would also like to see the Plan acknowledge and address the inequities and displacement that can be consequences of the growth strategy.

The Commission supports a data-driven approach to the establishment and/or modification of Urban Village boundaries, taking into account ten minute walking access to existing and planned frequent and reliable transit as well as easy access to other essential components of livability (e.g. adequate open space, sidewalks, etc.) as articulated in our [Seattle Transit Communities](#) report.

Make the Plan more relevant and accessible to community members.

This update provides a renewed opportunity to establish policies for coordinating and prioritizing investments in infrastructure and services. By prioritizing equity considerations in these policies, this update sets the stage for Seattle's neighborhoods to become complete, compact, and connected communities where everyone can attain the resources, opportunities, and outcomes that improve their quality of life and enable them to reach their full potential.[2]

DPD is working hard to streamline the Plan and make the intent and impact of its policies on people and communities easier to understand. Yet, the Plan remains a long and complicated document that the public may see as bearing little connection to their day-to-day lives. This

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[2] From the definition of race and social equity in resolution 31577

challenge is inherent in setting forth a comprehensive set of long-range policies. The final Plan should communicate its relevance and importance by showing more clearly how it guides the regulation of development, and the prioritization and implementation of community services and infrastructure.

The public draft includes some helpful references to other planning documents, such as the Climate Action Plan and SDOT's modal plans. These are functional plans that describe and prioritize how we invest in our communities in alignment with Comprehensive Plan goals and policies. The Comprehensive Plan should communicate these connections more explicitly. Interactive graphics could also be included in individual elements to allow readers to quickly navigate from goals and policies in the Plan to projects that implement the vision.

Seattle is at the heart of a growing region that is grappling with equitable development challenges on a broader geographic scale. Framing equity within the context of our regional growth strategy can help remind readers that of this context. Resolution 31577, which called for the incorporation of race into the core value of social equity, also called for the [Principles of Equitable Development](#), ratified by the Puget Sound Regional Equity Network in 2012, to be included in the Plan. These Principles are currently not in the draft Plan and should also guide Seattle's Comprehensive Plan.

Earlier this year the Commission wrote in support of additional resources that would help ensure that Seattle's Comprehensive Plan is accessible to all residents. We hope that your recommended Plan will include an interactive version with additional graphics that explain complex concepts. The current version does include a diagram that illustrates how the Comprehensive Plan fits within the context of state and regional plans as well as the implementation plans, codes, and initiatives. This diagram should continue to be refined. Current technology allows for web-based and printable pdfs to be developed simultaneously. Because the entire content of the plan is being updated, this is an excellent opportunity to make use of this software. It is especially important to ensure that the Plan is readily accessible for people with disabilities.

Provide direction for a process through which the City will monitor our progress and highlight community-wide efforts to achieve racial and social equity in Seattle. [3]
A strong and sustainable monitoring process is essential for gauging the extent to which the City is making progress toward the vision, values, and goals set forth in the Plan. Monitoring is also necessary to identify whether policies need to be strengthened or implementation strategies changed.

While the Commission generally cautions against incorporating *specific metrics* within the Comprehensive Plan itself, we would like to work with your office and the new Office of Planning and Community Development to provide advice for establishing a process to measure and report

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[3] From Executive Order 2014-02: Race and Social Justice Initiative

on the City's progress and highlight community-wide efforts to achieve racial and social equity in Seattle.

Equity Measurements. Resolution 31577 also calls for the City to identify and measure over time "quantifiable city-wide community indicators of equitable growth." Reporting on these equity measures in concert with the broader monitoring process could help make the Plan relevant and accessible to more Seattleites.

Indicators will have to be developed with great attention to measurability and context. Many monitoring processes at city and broader levels have been cut back between major plan updates or have been dropped entirely. It will be crucial to develop a monitoring process that is feasible to sustain throughout the 20-year planning horizon.

Summary of element-specific comments

Following is a summary of key comments and recommendations for the specific elements we reviewed. We offer more detailed comments and suggestions by element in the second section of this letter following page 6.

Seattle's Growth Strategy

- Support added language regarding equity and access to opportunity
- Support revising urban village boundaries consistent with <u>Seattle Transit Communities</u> methodology and policies
- Ensure final equity analysis and mitigation strategies are addressed in the Plan
- Address growth that occurs outside of urban centers and villages - (particularly along frequent transit corridors)
- Clearly articulate how public investments will be equitably prioritized, not based solely on growth

Land Use

- Support proposed change to the Future Land Use Map
- Concerned that single family zoning continues to be designated as an area to be protected and removes these areas from our regional growth boundaries and limits diversity of housing types
- Allow more flexibility to support a diversity of low-density housing options
- Emphasize mitigation strategies that will minimize displacement, particularly for most vulnerable individuals, businesses, and communities
- Confirm which policies are consistent with HALA, revise as necessary those policies that are inconsistent with HALA
- Reiterate support for industrial uses in manufacturing and industrial centers

Transportation
- Support mode share goals that reflect the [Climate Action Plan]() and [Seattle Transit Communities]() policies.
- Support overall connection between this element and implementation as articulated in Seattle's modal plans and maps; the final version of the Plan should include links to these modal plans
- Support recognition of transit-dependent communities rather than just peak-hour commuters
- Support recognition of connections to all business districts in addition to the Port of Seattle
- Support Vision Zero

Housing
- Support extensive incorporation of race and social equity throughout element
- Support policies related to housing for families with children
- Reference Growth Strategy and Land Use element and how housing policies are related to them both
- Acknowledge regional nature of housing challenges
- Reiterate need for more access within single family areas to enable a broader variety of housing
- Appreciate incorporation of health; would like to see Environmental Justice addressed
- Add a policy about monitoring as required by Countywide Planning Policies; could also monitor HALA goals
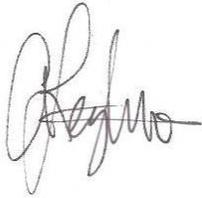
Community Well-Being
- Support how equity is referenced in this element; a great example of including equity in the Plan
- Explain and highlight role of element in the overall introduction – consider moving element to front of Plan
- Support the multiplicity of ways policies advance race and social equity, including promotion of civil rights
- Strengthen connections with Housing, Parks and Open Space and Environment elements; connections to the Growing Seattle and Land Use elements are good.
- Strengthen policies related to emergency preparedness
- Co-location of facilities are important and should be encouraged
- Acknowledge at-risk youth in policies who have already dropped out of school or gotten entangled in the criminal justice and need access to services and opportunities that promote rehabilitation

The Commission appreciates the work of the DPD and in particular Tom Hauger and Patrice Carroll. The Commission would not have been able to do as thorough a review of the public draft without their willingness to attend many meetings and present regularly on their work. The Commission looks forward to your recommended Comprehensive Plan.

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

Sincerely,

Amalia Leighton, Chair
Seattle Planning Commission

CC: Robert Feldstein, Mayor's Office; Seattle City Councilmembers; Diane Sugimura, Nathan Torgelson, Susan McLain, Tom Hauger, Patrice Carroll, Department of Planning and Development; Patricia Lally, Seattle Office for Civil Rights, Kevin O'Neill, Seattle Department of Transportation

Section	GS#	Goal/Policy/Text	Comments
overall			Support change of element name (previously Urban Village). Recommend clearly stating this is the growth strategy and as such is different from the other elements in the Plan.
Planning for Growth policies	1.5	Monitor urban centers and villages to track changes over time in the number of housing units and jobs, population and public investments and use this information to make decisions about…	Add an additional policy after GS 1.5 and before GS1.6 that says: public investments will be made using an equity lens. Acknowledge past inequities pulling language from the Equity Analysis.
Planning for Growth policies	1.6	Monitor development activity in areas with high potential for displacement of marginalized population…	Requires more specificity in regards to which strategies (Incentives, job to education, etc.) or it should specifically call out the Equity Analysis as the implementing document.
Urban Village Strategy discussion		Second to last paragraph of Discussion: Because urban centers and villages are the places where the City expects to concentrate public facilities.	Support.
Urban Village Strategy discussion		Final paragraph of Discussion: …On the whole, however, the urban village approach continues to direct most new development away from Seattle's single-family focused communities…	Strike this sentence entirely. It is single-family protectionist and doesn't allow access to opportunity that may be presented in single-family areas.
Urban Village Strategy policies	2.8	Direct the majority of future development to centers and urban villages, and limit the possibility of scattered growth along arterials…	Describe what growth along arterials is acceptable. Describe what growth outside of Urban Centers and Village should look like.
Urban Village Strategy policies	2.9	Use zoning and other planning tools in places where growth and development are expected to shape the amount and pace of growth in ways that will control displacement of marginalized populations, community services and institutions.	Support the intent of this policy but is this language consistent with Equity Analysis? Strike "Use zoning and other planning tools" zoning does not create equity and planning tools could be more specific (incentives, etc.)
missing graphics			Map of the urban villages
missing graphics			Graphic that shows what three ideal urban villages would look like if they were to be created. This will give a much needed visual for the reader.
Urban Village Strategy figure 1	F1	Characteristics of Urban Centers and Villages table	Remove Zoning and Land Use, it is confusing to the reader because this plan is above zones and zoning.
Urban Village Strategy figure 1	F1	Characteristics of Urban Centers and Villages table	Add policies about urban village boundaries to the table.
Urban Village Strategy policies	2.11	Permit varying sizes of urban villagese…	move to Figure 1

Section	GS#	Goal/Policy/Text	Comments
Urban Village Strategy policies	2.12	Reflect the area that is generally within a ten-minute walkshed…	move to Figure 1
Urban Village Strategy policies	2.15	Promote meaningful choice for marginalized populations to live and work in urban centers and urban villages throughout the city.	Add to 2.9 or discussion; vague and unnecessary on its own.
Urban Village Strategy policies	2.20	Retain land in manufacturing/industrial centers for industrial uses and develop criteria for evaluating request to remove land from a M/IC…	There has been extensive public process as well as two stakeholder groups to develop this criteria. What will become of this work? What more is there to be done to get to a resolution on this issue?
Distribution of Growth	3		This is EIS alternative 1; is following past trends acceptable for growth estimates? If the purpose is to dramatically change equitable outcomes should we not also change our thinking about growth allocation?
Distribution of Growth	3.4	Base 20 year growth estimates for each urban center and manufacturing/industrial center on:…	
Distribution of Growth	3.5	Encourage a distribution of growth that both fosters opportunity in low-income neighborhoods and provides access for marginalized populations…	
Urban Design			Public safety and crime prevention are covered in the Community Well-Being Element, but there are also opportunities to help prevent crime via design. We recommend the Urban Design, or the Built Environment section of the Growing Seattle Element include a policy on crime prevention through environmental design.

Section	LU#	Goal/Policy/Text	Comments
Introduction		Seattle has a long history as a maritime, manufacturing, and freight distribution center for the region. These activities are now largely located in industrial zones, and clustered primarily in two manufacturing/industrial centers…	Include stronger language regarding the importance of preserving Industrial lands in order to preserve living wage jobs and the transportation efficiencies to be gained through collocating industrial use.
Uses	2	…Allow for a variety of housing types to accommodate housing choices for households of all types and income levels. …Providing jobs for a diverse residential population.	Support. Good incorporation of equity.
Uses	2.8	Evaluate all new land use regulations to determine if there are potential adverse outcomes that may affect certain groups or individuals unfairly, and seek to avoid or mitigate such potential outcomes.	*that may affect certain groups* " – is this consistent language with the equity appendix? Who is being referenced by the phrase 'certain groups'? Be more specific on which programs we would likely use to "mitigate".
General Development Standards	5.17	Impose conditions on higher-density development to offset the impacts of increased densities, including consideration of incentives for Landmarks Preservation, additional open space amenities, and affordable housing, and encourage new development to contribute to affordable housing through incentives and code changes that are implemented as part of rezones.	*"Impose conditions"* should be removed. Instead insert language that is more positive. Suggest breking into two policies; one that deals with incentives and the other that deals with affordable housing - distinguish between incentives and mandatory inclusion (HALA).
Off-Street Parking	6.13	Limit parking overall in City parks to discourage auto use and to limit the conversion of park land for parking private cars, and where parking is needed, design parking facilities in ways that preserve open space, green space, trees and other mature vegetation.	Is this for all parks? Are there parks that are an automobile draw that are not easily accessible by transit? Would this policy be better suited in the Parks and Open Space Element? Consider removing "*Limit parking overall in City parks to discourage auto use and to limit the conversion of land for parking private cars*".

Section	LU#	Goal/Policy/Text	Comments
Incentives	7	Use development incentive programs to provide opportunities for increasing density…	Is this section consistent with HALA recommendations and the programs moving forward? Particularly in regards to incentives that would/should prioritize affordable housing. It is our understanding that these incentive programs would start to prioritize components other than affordable housing.
Single-family Residential Areas - introduction		discussion	Single-family discusion should be consistent with that of Multi-family in describing what we hope to see and why we value the land - what types of householdscan be found in these areas. In its current form it simply describes current use.
Single-family Residential Areas	8	Provide detached single-family and other compatible housing options…	Are there other models by which we can start to define our residential areas?
Single-family Residential Areas	8.2	Use a range of single-family zones to…	Strike policy, 8.3 is sufficient.
Single-family Residential Areas	8.4	Recognize detached single-family dwellings as the principle use in single-family residential areas…	Are there other models by which we can start to define our residential areas?
Single-family Residential Areas	8.12	Emphasize measures that can increase housing choices for low-income individuals and families when considering changes to development standards in single-family areas.	Move into the goal rather than being a separate policy.
Multifamily Residential Areas	9	Achieve a residential devleopment pattern consistent with the urban village strategy that includes increased availability of a vareity of housing types and densities…	Support. Good incorporation of equity.
Multifamily Residential Areas	9.9	Establish low-rise multifamily zones to accommodate various housing choices in low to moderate density ranges…	Remove all language about building type to maintain consistency with removal in single-family.
Commercial/Mixed Use Areas		The general commercial zones are considered to be auto-oriented and less suitable for housing…	Allowing housing in close proximity to auto-dependent uses creates a less desirable place to live and is less healthy.
Commercial/Mixed Use Areas	10.7	….Provide opportunities for small local businesses to locate, especially in ethnically relevant business districts throughout the City.	Change "*ethnically*" to culturally.

Section	LU#	Goal/Policy/Text	Comments
Industrial Areas	11.9	Avoid placing industrial zones within urban centers or urban villages. However, in locations where a center or village borders a manufacturing/industrial center, use of the industrial commercial zone within the center or village where it abuts the manufacturing/industrial center may provide an appropriate transition to help separate residential uses from heavier industrial activities.	Why Industrial Commercial and not Industrial Buffer?
Industrial Areas	11.22	Limit the future application of the IC zone inside the M/IC boundaries to prevent the expansion of offices and other non-industrial uses.	Support but with criteria from 4th internal draft (reviewed by SPC in April 2015) re: removing lands from MIC added back in – currently not in public draft Add: GS2.20 Allow land to be removed from a manufacturing/industrial center only when all of the following criteria are met: * A specific use for that land is proposed * There is insufficient appropriately-zoned land elsewhere in the city for the proposed use * The proposed use would not displace an existing industrial use; and * The proposed use would not adversely affect nearby industrial operations

Section	T#	Goal/Policy/Text	Comments
Integrating Land Use and Transportation	F1	Mode Chart Targets table	Support. Previous Commission discussion and recommendation to include income, age, and ability. Ensure consistency with Pedestrian Master Plan metrics.
Making the Best Use of the Street We Have	2.2	Consider safety concerns, modal master plans, and adjacent land uses when prioritizing functions in the pedestrian, travelway and transition zones of the right-of-way.	Support as a clear way to guide readers from Comp Plan to Implementation Plan.
Making the Best Use of the Street We Have	2.8	Develop a decision-making framework to direct future planning, design and optimization of street right-of-way.	Support in response to previous modal hierarchy discussions and as a smart way to be flexible and focused.
Making the Best Use of the Street We Have	2.9	Identify different types of streets with standards that are consistent with street classifications and that reflect the objectives of adopted modal and land sue plans.	Support. Previous Commission discussion and recommendation to include income, age, and ability. Ensure consistency with Pedestrian Master Plan metrics.
Transportation Options - discussion			This discussion tells the story well for the reader.
	3.3	Consider the income, age, ability, and vehicle ownership patterns of populations throughout the city in developing transportation systems and facilities so that all residents, especially those most in need, have access to a wide range of affordable travel options.	Support. Previous Commission discussion and recommendation to include income, age, and ability. Ensure consistency with Pedestrian Master Plan metrics.
	3.5	Prioritize transit investments on the basis of ridership demand, service to populations heavily reliant on transit, and opportunities to leverage funding.	Support prioritization of transit-dependent language as previously noted.
	F4-7	Maps of Priority Corridors for Transit Investments; Planned Frequent Transit Service Network; Recommended Bicycle Network; and Pedestrian Priority Investment Areas	Support the use of maps to illustrate priorities (note: scales, north arrows, etc. should be consistent in all maps and figures).
Environment discussion			Appreciate reference to Climate Action Plan; final version should include links to that site and implementation actions.

Section	T#	Goal/Policy/Text	Comments
Support a Vibrant Economy discussion		...In addition to goods movement, a well-designed transportation network supports a thriving economy by adding to the vibrancy of the city's urban centers and urban villages. It also allows people to access jobs, businesses, employment, school, and leisure destinations.	Support this as a change from talking only about the Port and Industry. Previous Commission support for broadening to include connections to Neighborhood Business Districts.
	5.2	Develop a freight network in the Freight Master Plan that enhances freight mobility, operational efficiencies, and promote the City's economic health.	Will this need to be revised when the network is developed?
Safety	6.1	Reduce collisions for all modes of transportation and work toward a transportation system that produces zero fatalities and serious injuries.	Support.
Measuring Level of Service	9.3	Consider establishing level-of-service standards that include non-motorized modes in order to advance this Plan's goals of encouraging use of travel options, reduce dependence on drive-alone automobile use and accommodate growth in urban centers and urban villages.	Support - Commission would like to continue to be part of this discussion.

Section	H#	Goal/Policy/Text	comments
Introduction			We **support** the combination of policies included to provide housing choice, improve access to locations of opportunity, and address the needs of communities most vulnerable to displacement. The narrative and policies in the draft element clearly attend to equity in addressing locational aspects. We suggest **acknowledging the** regional nature of housing challenges and Seattle's responsibility in this context. Piggyback on Plan Introduction to highlight King County Countywide Planning Policies, which provide guidance for accommodating housing growth and setting affordability goals. We suggest **explaining** how Housing Element is related to the Growth Strategy and Land Use elements. Alternatively, this explanation could go in overall introduction to the Plan. A diagram would be useful in either case.
Equal Access to Housing	1.2	**Promote diverse, inclusive communities** through housing programs that serve extremely low-income to low-income households.	Support incorporation of race and social equity.
Equal Access to Housing	1.4	Seek ways to promote use of tenant-based rental assistance **in compact, complete communities** in greater parts of Seattle.	Support incorporation of race and social equity.
Supply of Housing - introduction		…where housing should be located is being taken into consideration, since location can make a big difference in Seattleites' quality of life….	This section is a strong example of incorporating race and social equity. Suggest moving the referenced section of the introductionto this section (noted to the left) to the introduction of the Housing element.
Supply of Housing	2.3	Promote innovative strategies that increase the supply of housing that moderate- and middle-income households, including families with children, can afford.	Support policy direction to help meet the needs of families with children.

Section	H#	Goal/Policy/Text	comments
Diversity of Housing - discussion		...Seattle needs a broader variety of housing types and spectrum of affordability. Seattle's high housing costs are making it increasingly difficult for lower- and moderate-income households to live in the city. Even middle-income families are struggling, given the high prices for Seattle home sales in almost all areas of the city. The City may need to consider expanding the use of areas currently zoned as 'single family' beyond individual detached single-family houses to other compatible low-density housing types…	Suggest additional, direct language along the lines of - *It is important to increase access to single family areas by enabling a broader variety of compatible housing types in areas currently zoned single-family.*
Diversity of Housing	3.2	Explore ways to align development and design standards with strategies for extremely low-, very low-, and low-income housing, in order to encourage housing production and preservation **in urban centers and urban villages** in order to increase attractive and affordable housing options for households of varied sizes, types, and income levels, including families with children and mixed generation households.	Support incorporation of race and social equity.
Diversity of Housing	3.3	Allow and encourage housing for older adults and people with disabilities, including designs that allow for independent living, various degrees of assisted living, and skilled nursing care, **in or near urban centers and villages** with access to health care services.	Support incorporation of race and social equity.
Diversity of Housing	3.4	Encourage the development of housing with affordable family-sized units in urban centers and villages with access to parks, and other child-focused amenities and services.	Support policy direction to help meet the needs of families with children.
Diversity of Housing	3.5	Consider allowing additional housing types that respect existing neighborhood character in single-family areas, particularly within or near urban centers and villages.	Recommend striking the word *"Considering"* to **make the policy more direct**. Strengthen policy by highlighting the intent to increase access to the benefits that urban centers and urban villages provide.

Section	H#	Goal/Policy/Text	comments
Housing Construction and Design			Appreciate that health has been incorporated in this section. Address environmental justice issues in relation to housing location. Suggest the current draft Plan be screened to ensure that the Plan provides policy direction on this important equity issue.
Affordable Housing			Support incorporation of race and social equity. Recommend renaming the section to Housing Affordability.
Affordable Housing	5	Advance the opportunity for households of all income levels to live affordably in Seattle and reduce over time the unmet housing needs of extremely low-, very low- and low income households in Seattle.	Support. This goal encompasses **making our city more accessible** to a variety of income levels **as well as addressing unmet need for affordable housing among Seattle's low-income residents**. Both aspects are essential.
Affordable Housing	5.1	Recognize that the provision of housing affordable to lower income households can help increase access to education, employment, and social opportunities, support creation of a more inclusive city, and **reduce displacement from a neighborhood** or from the city.	Support incorporation of race and social equity.
Affordable Housing	5.5	**Increase housing choice** and opportunity by funding extremely low-, very low-, and low- income rental housing throughout Seattle, **especially in areas where less rent/income restricted housing is available, including in high-cost areas with high frequency transit, parks, quality public schools, and other amenities where greater subsidies may be needed.**	Support incorporation of race and social equity - wording of this policy is awkward and would benefit from additional editing. Define levels of income and provide a hyperlink to glossary in on line version. Strike "quality" from phrase 'quality public schools'
Affordable Housing	5.6	**Consider access to high frequency transit** and estimated housing and transportation costs when funding extremely low-, very low-, and low-income housing.	Support incorporation of race and social equity.

Section	H#	Goal/Policy/Text	comments
Affordable Housing	5.9	**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.	Support incorporation of race and social equity.
Affordable Housing	5.13	Ensure that City strategies for community revitalization help meet the needs of marginalized populations **in underserved areas or where people are at risk of displacement** due to increasing housing costs.	Support incorporation of race and social equity.
Affordable Housing	5.20	Encourage major employers to develop…	Support H.20, and suggest some rewording to convey a less narrow intent e.g. change employees to households
Affordable Housing	NEW		Add a policy to monitor the diversity and affordability of Seattle's housing supply and track Seattle's progress in reducing unmet housing needs. While the monitoring policy could include tracking progress toward the HALA production goals, it should also incorporate the broader aspects we describe above.

section	CW#	goal/policy/text	comments
Introduction			Intro is an excellent explanation of how this element complements other elements in the Plan. CW element is consistent with the Urban Village strategy in that the CW emphasizes locating services and programs in Urban Centers and Villages, and that such services to support community well-being are appropriately accommodated and encouraged in the LU element policies (e.g., GS2.2, LU10.6, LUG14, LUG3). At least one of the policies encouraging services for community wellbeing in urban centers and villages should also refer to the importance of proximity to frequent transit.
Supportive and Healthy Communities	1.2	Use relevant and respectful ways to encourage broad participation in neighborhood and community activities and events.	Incorporate use of innovative tools to encourage broad participation, and also communication with people with limited English proficiency.
Access to Food and Shelter			Strengthen **policies and achieve tighter consistency with related Housing element policies.**
Access to Food and Shelter	2.2	Contribute to efforts that help people meet their basic needs, **maintain their independence** as long as possible, and remain in their neighborhoods of choice.	**Replace "remain" with "live" so policy does not assume people's choice would always be the same neighborhood.** Revision will also work better with H3.3, which includes encouraging housing for older adults and people with disabilities "in or near urban centers and villages with access to health care services."
Access to Food and Shelter	2.3	Allow temporary shelter for those who are homeless and invest in services and programs that provide a pathway to permanent housing.	Support allowing temporary shelter and **investing in services and programs that provide a pathway to permanent housing**. However, consider revising policy to place additional emphasis on the latter for consistency with policy H5.4 and associated discussion in Housing Element.
Access to Food and Shelter	2.4	Develop an increased level of emergency preparedness among all segments of the population to help coordinate governmental response and recovery efforts that seek to minimize the adversity of a major emergency or disaster.	Support the policy - additional policies may be needed to provide appropriate level of policy direction on this multifaceted and important topic. In preparing for disasters, suggest focusing on those most adversely affected.

section	CW#	goal/policy/text	comments
Access to Food and Shelter	NEW		There is no direct mention of services and programs to help *prevent* homelessness in the CW element. Add CW element policy that complements related Housing Element policies (e.g., H5.4).
Healthy Growth, Aging, and Lifestyles			While policies in this section address environmental health on several fronts, they do not reflect the importance of outdoor environments free of pollution or the mental health benefts of open space and greenery. Incorporate these additional aspects of environmental health in the Community Wellbeing policies, or note the relationship of applicable policies in other elements (such as the Environmental Justice policies in the Environment Element) to goals in the Community Well-Being Element. Policies 3.5 to 3.9 all relate **to access to food** in one way or another and should be moved to the section titled "Access to Food and Shelter."
Healthy Growth, Aging, and Lifestyles		…Social and Social and environmental factors, as well as access to health care, all contribute to an individual's overall personal health…	Appreciate acknowledgment of environmental factors.
Healthy Growth, Aging, and Lifestyles	3.9	Consider using City land, including parks and surplus property, to expand the capacity to grow, process, distribute, and access local foods.	Support **policies to facilitate co-location and use of existing facilities for services and programs** to advance community wellbeing.
Lifelong Learning	4.6	Work with schools, higher education, libraries, community centers, arts and cultural agencies and organizations to link services into a seamless system that helps students stay in school, such as through co-location or services and joint use of facilities.	
Lifelong Learning	4.7	Support programs that help people who have dropped out of high school to achieve education, personal, and employment goals.	Rephrase to additionally support students who are "at risk" of dropping out.

section	CW#	goal/policy/text	comments
Public Safety			Public safety and crime prevention are covered in the Community Well-Being Element, but there are also opportunities to help prevent crime via design. Recommend that the Urban Design, or the Built Environment section of the Growth Strategy include a policy on **crime prevention through environmental design**.
Public Safety	5.9	Provide competent, professional, and efficient City criminal justice services that hold those who commit crimes accountable, reduce recidivism, and achieve a fair and just outcome.	Support Policy CW5.9, and suggest adding a **policy to help connect adjudicated youth and adult offenders with services and opportunities to promote rehabilitation.** Rehabilitation services are important for many facets of community well-being including reducing dropout rates among at-risk students. Policy HD35 in the *existing* Comprehensive Plan provides direction along these lines and could be refreshed and included in the update. That policy is to: "Work with the state, King County and community organizations to connect local detention facilities with the health and human services systems."
A Multi-Cultural City			Support the multiplicity of ways these policies advance race and social equity, including promotion of civil rights. This set of policies is a **great example of the inclusion of equity** in the Plan. Consider moving this section to the **front** of the element.

Incorporate use of innovative tools to encourage broad participation. |
| A Multi-Cultural City | 6.2 | Promote culturally responsive and relevant service delivery from City departments and other agencies. | Add language about interpretation and translation. |
| Coordination of Services | 7.8 | Encourage use of existing facilities and co-location of services, including joint use of schools and City and community facilities, to make services available in underserved areas and in urban village areas. | Support policies to facilitate co-location and use of existing facilities for services and programs to advance community wellbeing. |