

(Date)

City Councilmember Rob Johnson
Chair of the Planning, Land Use, and Zoning Committee
City Hall
via email

Subject: Seattle 2035 Comprehensive Plan – Mayor’s Recommended Plan

Dear Councilmember Johnson,

As stewards of our City’s Comprehensive Plan, the Seattle Planning Commission has closely reviewed the Mayor’s Recommended Plan of Seattle 2035: Managing Growth to Become an Equitable City. The Commission would like to commend the hard work of the Office of Planning and Community Development (OPCD) over the past few years to update the Comprehensive Plan. In 2015, the Planning Commission submitted comments on an earlier working draft of the Plan, provided an independent review of the Seattle 2035 Equity Analysis, and submitted detailed recommendations and comments on the public draft to the Mayor’s office. We are pleased to see that many of our major themes and recommendations have been incorporated into the Mayor’s Recommended Plan. We reiterate our support for these important themes and add some specific comments on the individual elements of the Mayor’s Recommended Plan below.

Urban Village Designations and Boundaries in the Future Land Use Map

The Planning Commission has consistently supported the urban center/urban village strategy which guides most future households and jobs into designated growth areas. We are supportive of the recommended changes to the Future Land Use Map (FLUM) in the Mayor’s Recommended Plan to further encourage and facilitate creation of mixed-use environments in urban centers and villages. This recommended change will provide for a range of multi-family residential, commercial, and mixed use projects permitted in all the centers and villages, as well as streamline the process for future rezones for areas inside the centers and villages. The FLUM is intended to provide a generalized view of how land in a particular area is intended to be used. Using a single color for each category of center or village (urban center, hub urban village, or residential urban village) will eliminate the need for an amendment to the FLUM to rezone areas inside urban villages. Requests for rezones would be evaluated using the rezone criteria in the Land Use Code.

The Planning Commission supports a data-driven approach to the establishment and/or modification of urban center and urban village boundaries. We have consistently advocated for concentrating growth within 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. open space, sidewalks, etc.). The Commission suggests going beyond the addition of dashed lines to designate proposed expansions of urban village boundaries. We recommend adopting the

expanded urban village boundaries on the FLUM that reflect a ten minute walk of frequent and reliable transit service—either a light rail station or a Rapid Ride bus stop that intersects with another frequent bus route. We strongly encourage the City to further adjust the boundaries based on walkshed calculations and other relevant data. We are eager to engage in community planning processes where the boundaries are addressed.

A more explicit vision for an equitable Seattle

The Mayor's Recommended Plan establishes a clear and powerful vision for how the city will grow over the next 20 years as it welcomes 120,000 new residents and adds 115,000 new jobs.

The Planning Commission supports the Plan's proactive strategies for managing growth.

We particularly applaud the elevation of race and social equity as a core value throughout the document. Race and social equity principles have been integrated consistently across the plan elements with introductory narrative clearly describing the role each element plays in advancing equity. These additions represent a significant new emphasis on using an equity lens to influence the City's vision for how to manage growth and development.

In order to address the inequities and displacement that can be consequences of rapid growth, the Mayor's Recommended Plan proposes defining and monitoring the City's progress toward making the city a more equitable place. **The Planning Commission strongly supports this commitment to track and monitor equity outcomes.** We look forward to working with OPCD in establishing a process through which the City will measure and report on the City's progress toward achieving racial and social equity in Seattle. We will also assist in determining specific equity indicators that are necessary to monitor this progress and identify whether policies need to be strengthened or implementation strategies changed.

A single land use designation for each urban center/urban village on the Future Land Use Map

The Planning Commission has consistently supported the urban center/urban village strategy which guides most future households and jobs into designated growth areas. To further encourage and facilitate creation of mixed-use environments in all the centers and villages, **we are supportive of the recommend changes to the Future Land Use Map (FLUM) in the Mayor's Recommended Plan.** The FLUM is intended to provide a generalized view of how land in a particular area is intended to be used. Using a single color for each category of center or village (urban center, hub or residential urban village) will eliminate the need for an amendment to the FLUM to rezone areas inside urban villages. Requests for rezones would be evaluated using the rezone criteria in the Land Use Code. **This recommend change will provide for a range multi-family residential, commercial, and mixed use projects permitted in all the centers and villages, as well as streamline the process for future rezones for areas inside the centers and villages.**

The Planning Commission **supports a data-driven approach to the establishment and/or modification of urban center and urban village boundaries.** We have consistently advocated for concentrating growth within 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.). The Commission is **supportive of the addition of dashed lines to the boundaries of urban villages on the FLUM that are within a ten minute walk of very good transit service**—either a light rail station or a Rapid Ride bus stop that intersects with another frequent bus route.

A Plan that is more relevant and accessible to community members

It is especially important to ensure that the Seattle 2035 Comprehensive Plan communicates its relevance and importance by clearly showing how it manages anticipated growth, guides the regulation of development, and prioritizes community services and infrastructure. The Plan is a long and complicated document that the public may see as bearing little connection to their day-to-day lives. We **commend the Mayor and OPCD for making the Plan more accessible and easy to understand for all audiences and populations**. The content and format have both been revised to be more relevant and readable to a broader audience. The Plan's goals and policies have been simplified to remove redundancies and to make the language more clear. New graphics and illustrative data points help to break up the text and present complex information in an appealing and interactive style. The addition of a glossary is very useful to define planning terminology and other technical concepts.

The format of the Mayor's Recommended Plan is accessible to a wider range of readers by making it more usable online and on mobile devices. While the Plan enables web-based readers to make connections within the document by providing links to other chapters, **we reiterate our ~~2015 previous~~ recommendation to reference and/or hyperlink (where possible) hyperlink references to other planning documents**, such as the Climate Action Plan and SDOT's modal plans ~~the Planning Commission encourages~~.

Summary of element-specific comments

The Planning Commission reviewed and provided extensive comments on the Growth Strategy, Land Use, Transportation, Housing, and Community Well-Being elements of the July 2015 public draft. Following the release of the Mayor's Recommended Plan, we have reviewed each of these elements again in light of our previous comments. We are grateful for the responsiveness to many of them. In addition to those elements reviewed in 2015, we have recently reviewed the Neighborhood Planning and Parks and Open Space elements. Following are our specific recommendations on the Mayor's Recommended Plan.

Growth Strategy

1. Expand this goal for community engagement to include prioritization of City investments.

GS G1 Continue to have meaningful opportunities for all people in Seattle to contribute their thoughts and aspirations to City processes that develop growth plans and related regulations, and prioritize city investments.

2. Elevate equity by adding it to this policy on using data to guide planning and City investments.

GS 1.5 Use information collected about growth, along with other information, to make decisions for further planning or for making investments that will equitably meet the needs of residents and businesses.

3. We support these inclusion of policies GS 1.7 – 1.10, which were added in response to our request to more strongly limit displacement of marginalized populations and expand community participation.

~~GS 1.7 Develop and implement strategies that can limit displacement of marginalized populations.~~

~~GS 1.8 Engage local communities, particularly in neighborhoods with marginalized populations, to identify and jointly address unique housing and community amenity or service needs.~~

~~GS 1.9 Use relevant, respectful, and innovative ways to encourage broad participation in neighborhood and community activities and events.~~

~~GS 1.10 Partner with other governments, schools, institutions, and community-based organizations to involve people of all backgrounds meaningfully in planning and decision-making that impact their communities.~~

4. Add a new policies policy to address growth along arterials and outside of urban centers and villages. ~~These were~~ A policy limiting the possibility of scattered growth along arterials was in the 2015 draft but ~~were~~ was removed. Although HALA will address ~~them~~ this, the process may take some time and we find it unaccountable to leave a gap in the City's Comprehensive Plan until then.

~~NEW Enhance connections along frequent transit corridors where ...~~

~~NEW Acknowledge that residential growth occurs along transit corridors and ensure adequate access for those residents to urban villages and centers and the essential components of livability present in those villages and centers. Allow for some residential and employment growth along transit corridors to support broader access via frequent, reliable transit to the essential components of livability provided in urban villages and centers.~~

5. Add clarity by providing an example of a "planning tool."

GS 2.8 Use zoning and other planning tools, such as the ~~equitable development implementation plan~~ *Equitable Development Implementation Plan*, to shape the amount and pace of growth in ways that will limit displacement of marginalized populations, community services, and culturally relevant institutions and businesses.

~~6.—(see also LU 11.22 further below in this document) Retain this policy which protects industrial lands. While the SPC supports the convening of a task force on industrial lands, we do not see this as a reason to eliminate policies in the interim. This would leave industrial lands at risk pending a process that could prove to be lengthy.~~

~~**GS 2.20** Retain land in manufacturing/industrial centers for industrial uses and develop criteria for evaluating request to remove land from a M/IC, recognizing the important economic resource the land in these centers represents.~~

Land Use

1. Provide clearer language on limiting automobile parking in City parks.

~~**LU 6.13** Limit parking in City parks to discourage auto use and to limit the use of parkland for parking private cars; where there is a demonstrated need for parking is needed, design parking facilities in ways that preserve open space, green space, and trees and other mature vegetation.~~

2. Align the language used in goals and policies on single family zones with those for the multi-family zones to express that all housing zones should provide opportunities for a wide range of households and income levels.

~~**LU G7** Provide opportunities for detached single-family and other compatible housing options for a wide range of households and income levels, including opportunities for both homeownership and renting, that have low height, bulk, and scale in order to maintain an intensity of development that is appropriate for areas with limited access to services, infrastructure constraints, fragile environmental conditions, or that are otherwise not conducive to more intensive development.~~

~~**LU G8** Allow a variety of housing types and densities that is suitable for a wide range of households and income levels, including opportunities for both homeownership and renting, and that promotes walking and transit use near employment concentrations, residential services, and amenities.~~

~~**LU 7.5** Encourage accessory dwelling units and other housing types that are attractive and affordable to a broad range of households and incomes and that are compatible with the development pattern and building scale in single family areas.~~

LU 8.9 Establish lowrise multifamily zones to accommodate various housing choices that are attractive and affordable to a broad range of households and incomes in the low- to moderate-density range, including walk-up apartments, town houses, row houses, duplexes, triplexes, and cottage housing.

3. ~~Remove language protecting single family zones and providing that protection to single family areas not zoned single family. Clarify language to maintain the character of single-family zoned areas and limit increased development in these zones to be consistent with goal LU G7. Remove language protecting single family uses in areas that are not zoned for single family residential uses.~~ Such policies are not in keeping with the vision of the Comprehensive Plan or Seattle's housing crisis.

LU 7.2 Use a range of single-family zones to:

- maintain the current low-height and low-bulk character of designated single-family zoned areas;
 - ~~protect designated~~ limit increased development in single-family zoned areas ~~that are predominantly in single family residential use or that have environmental or infrastructure constraints;~~
 - ~~allow different densities that reflect historical development patterns; and~~
 - ~~respond to neighborhood plans calling for redevelopment or infill development that maintains the single-family character of the area but also allows for a greater range of housing types.~~
4. Revert to the language from the 2015 draft that would allow for exploring a wider range of housing types in single family areas near urban centers, not just in ~~them~~ urban centers.

LU 7.3 Consider allowing redevelopment or infill development of single-family areas inside-near urban centers and villages, where new development would maintain the low height and bulk that characterize the single-family area, while allowing a wider range of housing types.

5. Update language from "ethnically" to "culturally."

LU 9.7 Provide opportunities for small local businesses to locate, especially in ~~ethnically~~ culturally relevant business districts throughout the City.

6. Restore language from policies GS 2.20 in the July 2015 draft and the 4th internal draft (reviewed by the Planning Commission in April 2015) that protects industrial areas from other non-industrial uses except for when certain criteria are met. While the Planning Commission supports the convening of a task force on industrial lands, we

do not see this as a reason to eliminate policies in the interim. This would leave industrial lands at risk pending a process that could prove to be lengthy.

LU 11.22 / GS 2.20 NEW *Retain land in manufacturing/industrial centers for industrial uses, recognizing the important economic resource the land in these centers represents. 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

Transportation

1. In the Transportation Effects section provide a hyperlink to the Climate Action Plan.
2. Clarify and strengthen language supporting non-motorized modes of travel.

T 9.2 *Provide a menu of transportation-demand management tools for future development to meet non-drive-alone mode share targets, such as carpooling, transit, walking, and biking.*

T 9.3 *Pursue strategies to reduce drive-alone trips in order to increase the ability of the city's transportation network to carry people and goods.*

T 9.4 *Assess the mode share LOS standards over time regularly and adjust as necessary needed, based on review of other City transportation measures.*

Housing

1. We suggest explaining how the Housing Element is related to the Growth Strategy and Land Use elements, similar to the description of the relationship between the various elements in the Growth Strategy introduction on page 21. Alternatively, this explanation could go in overall introduction to the Plan. Hyperlinks between the sections would also be helpful.

Community Well-Being

1. Include references to frequent transit service.

***CW 7.5** Consider related issues, such as transportation, access to frequent transit, and the need for dependent care, when planning for health, human services, employment, education, and recreation programs.*

***CW 7.7** Site new human service facilities in or near urban centers and villages, considering access to frequent transit, and use good-neighbor guidelines that consider the needs of consumers and the community.*

2. In CW 1.1 provide a hyperlink to the Community Engagement section of the Growth Strategy element.
3. Move the Multi-Cultural City section to the beginning of the Community Well Being element. This is an important section consistent with the race and social equity theme of the Plan. Provide a hyperlink in this section to the Growth Strategy policy 1.9 (encouraging broad community engagement).

Neighborhood Planning

1. In the introduction, provide a definition for Neighborhood Plan.
2. Delete the third paragraph on page 159 referencing the Planning Commission's review of the neighborhood plans. Given the life span of this document, tThe description "a few years ago" is vague and misleading. The Planning Commission's Reality Check review was in 2009-2010.

Parks and Open Space

1. Add wording in the Access to Open Space policies to clarify the aim of increasing parks holdings to keep pace with increasing demands. Also add a policy to link these increases with the overarching Growth Strategy and monitoring of progress of Seattle 2035.

P 1.1 *Continue to expand the City's park holdings and open space opportunities, with to meet the needs of an increasing population. Place special emphasis on serving urban centers, and urban villages, areas that are home to marginalized populations, and areas that have been traditionally underserved.*

NEW Link parks development planning with the Comprehensive Plan's Growth Strategy. Include parks and open space in the process of developing indicators and monitoring progress of the Comprehensive Plan.

2. ~~Remove wording that refers to parks "level of service," which appears to be an outdated term.~~

~~P 1.2~~ *Provide a variety of parks and open space to serve the city's growing population consistent with the priorities and level of service standards identified in the City's Park Development Plan.*

~~3.2.~~ In the Appendix, Capital Facilities – Parks – Forecast of Future Needs section on page 529, either remove the two existing goals of funding park acquisitions or add a third goal related to equity.

NEW *providing-Provide access to open space and recreation activities for marginalized populations and in areas that have been traditionally underserved.*

~~4.3.~~ In the Appendix, Capital Facilities – Parks – Forecast of Future needs section on page 529, remove wording that conflicts with the Parks and Open Space policies.

~~*Park acquisitions are opportunity driven. Additions to the park facilities would enhance the City's quality of life. However, such additions are not necessary to accommodate new households in urban centers, urban villages, or citywide.*~~

~~5.4.~~ Policies P 1.4 and P 1.12 are almost identical other than the population that they are intended to benefit. We suggest deleting P 1.4 and keeping P 1.12 to focus on all residents, but include marginalized populations, seniors, and children.

~~P 1.4~~ *Reduce health disparities by making investments that provide access to open space and recreation activities for marginalized communities.*

P 1.12 *Use investments in park facilities and programs to reduce health disparities by providing access to open space and recreational activities for all Seattle residents, especially marginalized populations, seniors, and children.*

~~6.5.~~ Add a new policy, possibly after P 1.2, to encourage development of parks and buildings that recognize and promote diverse cultures, similar to policies P 2.4, 2.5, and 2.12.

~~P 1~~**NEW** *Engage with community leaders to design and develop parks and facilities based on the specific needs and cultures of each community they serve.*

~~7.6.~~ Add an Access to Open Space policy that addresses the need for "new strategies" to create parks.

~~P 1~~**NEW** *Create innovative opportunities to utilize existing land, especially in the right of way, for open space and recreation, including street plazas, pavement to parks, parklets, and community gardens.*

~~8.7.~~ Ensure that public access is provided to open spaces associated with private development; delete language about providing recreation for building tenants, as this does not constitute public access.

P 1.8 *Encourage or require private developers to incorporate on-site publicly accessible open space ~~or to provide appropriate recreation opportunities for building tenants within new developments.~~*

~~9.8.~~ Include other funding strategies than impact fees.

P 1.9 *Consider the use of open space impact fees and other financing mechanisms to help fund open space system improvements that will serve the expected growth.*

~~10.9.~~ Replace “consider” with “ensure.”

P 1.15 *Ensure ~~Consider~~ access by transit, bicycle, and foot when acquiring new park facilities or improving existing ones.*

~~11.10.~~ Include other funding strategies than impact fees.

P 2.1 *Consider the use of open space impact ~~fees~~ and other financing mechanisms ~~fees~~ to help fund recreational facility system improvements that will serve the expected growth.*

~~12.11.~~ Include other habitats in addition to forests.

P 3.4 *Enhance wildlife habitat by restoring forests, shoreline areas, wetlands, and creeks and expanding the tree canopy on City owned land.*

~~13.12.~~ This policy should be included in the Access to Open Space section.

P 3.6 *Increase access to public land by assessing, managing, and cleaning up contaminated sites.*

Glossary

1. The glossary contains a definition for “frequent transit.” The document uses several other, slightly different terms for frequent transit service, including “very good bus service” (p. 13 and p. 27), “frequent bus route” (p. 28), “high frequency bus routes” (p. 30), and “very good transit service” (p. 28 and p. 30). We suggest consistent terminology be used throughout the document.
2. Add definitions for “Level of service” and “Transportation demand management.”

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

DRAFT