June 18, 2015

Re: Comments on the Seattle 2035 Equity Analysis, a companion document to the Environmental Impact Statement on the four growth alternatives

Dear Director Sugimura:

As an independent and objective volunteer body, the Seattle Planning Commission advises City officials on broad goals, policies, and plans for the physical development of the city. The Commission also serves as stewards of the Comprehensive Plan; in that capacity we have reviewed the Seattle 2035 Equity Analysis, a companion document to the Environmental Impact Statement (EIS), and offer the following comments.

The Commission commends the good work of the Department of Planning and Development and the Office of Civil Rights for the development of the Equity Analysis. **The Equity Analysis should directly inform the goals and policies in the major update to the Comprehensive Plan, Seattle 2035, as the Equity Analysis does several important things:**

* it provides a solid analytical framework and definitions for key concepts which are essential for a shared understanding of race and social justice;
* it looks at differences in access to opportunityand describes tools for advancing access to opportunity in tandem with reducing displacement risks,
* it analyzes the types of displacement pressures within the city and outlines potential mitigation strategies to help address the issue of displacement; and
* it focuses decision makers on what is possible through equitable planning.

**The Commission believes the Equity Analysis is an excellent tool to engage all communities in Seattle in a meaningful dialog about what will help marginalized populations stay in Seattle and have increased access to opportunities**. This outreach will ensure that updated Comprehensive Plan goals and policies have the desired outcomes of limiting displacement and increasing access to opportunities. This outreach willalso help verify that the strategies identified in the Equity Analysis for retaining marginalized populations and providing better access to opportunities for these populations will achieve their intended result. The Commission continues to be concerned that the Equity Analysis and associated materials are currently available only in English. At a minimum, these documents should be made available in multiple languages. We look forward to hearing about the outreach efforts.

**After community review and discussion, the Commission urges decision makers to fully incorporate these vetted strategies into the major Comprehensive Plan Update.** There are displacement risks associated with all growth alternatives. Given this, it is essential that the goals and policies in the major update to the Comprehensive Plan include effective strategies for retaining marginalized populations and providing access to opportunities for these populations. If such strategies are not fully incorporated, it should be acknowledged that the marginalized populations outlined in the Equity Analysis will continue to face substantial risks of displacement.

The Equity Analysis is a good model for how data can play a role in defining and addressing equity issues. **The Commission recommends further discussion on how a data driven approach will benefit key decisions beyond the Comprehensive Plan, i.e., in the development of functional plans, implementing plans and the prioritization of public investments.** The Commission is pleased to participate in any discussions as the DPD and other departments work to further incorporate data sets and tools into their decision making.

Thank you for the work of producing the Equity Analysis and please do not hesitate to contact me or our Executive Director, Vanessa Murdock, at 733-9271 should you have any questions.