

Dear Mayor Durkan, Seattle City Council members and Director Quirindongo

The Seattle Planning Commission looks forward to supporting the next major update of Seattle's Comprehensive Plan. As stewards of the Plan, the Commission believes that this update provides a vital opportunity to assess our policies, while sharing decision making power with communities to advance a vision of a strong, sustainable, and racially equitable city. The dramatic changes in economic, demographic, and environmental conditions over the past 25 years demand new ideas and bold policies to address ongoing racial inequities, our crippling housing affordability crisis, and the growing existential threat of climate change, while enhancing the quality of life for all residents. In response, we are offering recommendations on topics and policy work to be included within the scope of the update. These recommendations adopt and advance the findings from our recent papers, *Neighborhoods for All*, *Evolving Seattle's Growth Strategy*, and *A Racially Equitable and Resilient Recovery*.

Those documents focus on critical issues facing the city and offer solutions that fall into three central themes - **racial equity, resilience, and a sustainable quality of life for all** - that we recommend guide the update effort. While racial equity is a long-held value of the City of Seattle, this update should strengthen the City's commitment by explicitly naming anti-racist practices to guide the update process and developing anti-racist outcomes throughout the Plan's goals and policies. Likewise, resilience is essential for responding to current and pending impacts of the climate crisis and any response must address vulnerabilities caused by current and past racial inequities. Lastly, this is an opportunity to craft Comprehensive Plan policies to increase access to the essential resources and services that make neighborhoods healthy, livable and walkable. In sum, we propose that this major Comprehensive Plan update advance a sustainable quality of life for current and future generations of Seattle residents.

Meaningful, effective and adequately resourced community engagement is essential in shaping both the process and the resulting content of this major update. We anticipate sharing a separate set of recommendations in response to the City's draft community engagement plan, expected later this year. However, we'd like to briefly touch on the necessity of adequately resourcing communities to lead engagement efforts that meet each community's unique circumstance. Seattle's Equity & Environment Initiative outreach process is an example of a successful model of engagement, where a steering committee of diverse community members was provided with grants to conduct outreach in their communities across the city.

While this letter focuses on the Commission's high-level recommendations, we will be sharing more detailed advice in a set of issue specific (Plan element) papers later. Below is a summary of these high-level recommendations, followed by additional explanation on the following pages.

Recommendation summary:

- Use racial equity, resilience, and quality of life as central themes to guide the update of the Plan
- Provide for reparations for inequities caused by racist policies (in land use, housing transportation, etc.) and identify racial equity outcomes
- Reevaluate the entirety of the existing Growth Strategy, while developing and evaluating bold alternatives such as the 15-minute city framework that meet the challenges of the housing affordability and climate crises. At a minimum consider the following:
 - Creating new and expanding existing Urban Villages
 - Updating Urban Village designations to include more uses and housing types
 - Encouraging a greater quantity and variety of housing types in what are now single-family zoned areas citywide
 - Include anti-displacement strategies with changes to the existing Growth Strategy
- Further increase accessibility in the built environment through consultation with the disability community
- Explore goals for land use code changes that equitably promote public health, and reduce racial inequities in health outcomes, such as open and green spaces in and around buildings that can provide shelter from heat and improve air quality
- Seek guidance from and consult Tribes in the region on indigenous land management, engagement, and deliberation practices
- Expand transit, and establish a hierarchy for modal plans that prioritizes more efficient and equitable transportation choices to reduce reliance on automobiles driving to improve safety and reduce carbon emissions
- Explore and leverage opportunities to repurpose the public right-of-way as an urban open space
- Embed climate actions, drawn from the Environmental Justice Steering Committee, and Seattle for a Green New Deal resolution (res. 31895)
- Invest in graphic design that increases the accessibility and utility of the Plan

Detailed Recommendations**1. Use racial equity, resilience, and quality of life as themes to guide the update of the Plan**

The dramatic changes in economic, demographic, and environmental conditions over the past 25 years demand new ideas that address the magnitude of our housing and climate crises, while increasing the quality of life for all residents. Building on the racial equity considerations of the current Comprehensive Plan, establishing anti-racist practices that create racially equitable outcomes will support the City in addressing our biggest challenges. Fortunately, there are existing models for enhancing racial equity, sustainability and livability that can be expanded in this Plan update. Some of the City's ongoing programs have exemplified the racially equitable approach that should also

guide the Comprehensive Plan update. These include the Equity and Environment Initiative, Outside Citywide, and the Equitable Development Initiative.

2. Provide for reparations & racial equity outcomes

To start, the City should make further efforts to identify how policies, programs and practices originating in the Comprehensive Plan have directly caused or exacerbated racial inequities. The City should work with the impacted communities to co-create reparative measures as part of this update to the Comprehensive Plan. The Commission recognizes the complexity and sensitivity required for such an undertaking, and we are aware of substantive critiques of recently developed municipal reparations policies. We, nonetheless, support the City's efforts to pursue reparations and suggest making tangible benefits to impacted communities a central focus of any policy or program.

3. Fully reevaluate the Growth Strategy & and revise land use policies

Our twenty-five-year-old Urban Village Growth Strategy supported transit ridership prior to the pandemic. Yet, the City's most recent housing needs and supply analysis identified a 21,000-unit gap of needed housing for households making 80% or less of area median income. The Urban Village Growth Strategy is creating two cities - one for those wealthy enough to own a detached, single-family home in close proximity to parks and open spaces, and the other for virtually everyone else to live in apartment buildings often on arterial streets with little access to open space and little hope of attaining homeownership. What is needed are more missing middle housing types - plexes, townhouses, courtyard housing and small apartment buildings that expand access to neighborhoods and homeownership, especially for BIPOC households, throughout the city. We must do more to reduce our carbon footprint, and existing single-family neighborhoods have a key role to play. Auto emissions are the city's largest source of carbon emissions and low density, single-use, single-family neighborhoods promote car ownership and usage. In order for robust transit access to extend beyond urban village boundaries, a greater quantity and variety of housing types must extend beyond them as well.

The existing Growth Strategy has contributed to this tale of two cities – it has not produced racially equitable or sustainable outcomes and has likely exacerbated previous racial inequities. In response, the City should consider alternative frameworks such as the 15-minute city or substantially revise the existing strategy to realign with the City's racial equity and environmental goals. Failing to do so leads Seattle to become an increasingly exclusive city, where only the wealthy can afford to stay, middle- to low-income residents are displaced and climate goals are unmet.

Adjustments to the growth strategy should include expanding existing Urban Villages to better reflect transit walksheds, establishing additional and new types of Urban Villages, updating the Urban Village designations to include a greater diversity flexibility and mix of uses and allowing a variety of missing middle housing types in what are now single-family zones citywide. Action could include neighborhood compatible commercial spaces, light manufacturing, live-work units, and other appropriate uses that foster complete, walkable and resilient neighborhoods. By allowing a

greater variety of uses, neighborhoods can increase the number of local jobs, reduce commutes and enhance walkability. Such policy updates should be careful to avoid encouraging auto-oriented uses such as retail warehouses and big box stores by prohibiting surface parking lots, effectively managing parking supply at a district level, and establishing parking maximums.

Paired with anti-displacement strategies, all residential areas including existing single-family zoned parcels, can become more sustainable, walkable, and diverse by increasing the share of housing they welcome. We recommend developing a vision for connected, complete neighborhoods, with a greater quantity and variety of housing, frequent transit service, and diversity of uses beyond the boundaries of existing citywide. Future residents should be welcomed across the entire city, contributing to the community life of every neighborhood. At the parcel scale, the reduction or elimination of required setbacks and minimum lot sizes, increasing allowable lot coverage, floor area ratio, building heights, units per parcel and incentives for affordability could provide for a greater quantity and variety of housing types while expanding opportunities for affordable homeownership.

Increasing housing opportunity in what are now single-family zones may be a politically contentious issue, however the costs of bold action are dwarfed by the human, economic and environmental impacts of not doing so. Housing scarcity results in more Seattleites experiencing homelessness, the displacement of low income and BIPOC communities, and higher carbon emissions. Seattle is a majority renter city and we should set up land use patterns that support a spectrum of quality housing in every neighborhood in response. Several other cities have recently taken the bold step of re-envisioning their single-family neighborhoods to make them more equitable and sustainable, including Minneapolis, Portland OR and Berkeley CA. Seattle should learn from these efforts and improve upon them.

More than ever before, Seattle must do what other cities have done and pursue bold and meaningful actions that address the scale of our current and anticipated housing crises. The scope of these changes requires significant revision to the existing Comprehensive Plan, which contains vague and often harmful language protecting “neighborhood character” and identifying the detached, single-family dwelling as the preferred housing type. This rhetoric is counter to the City’s race and social equity goals and should be removed or revised as needed. The entire Plan should be systematically reviewed to remove language inconsistent with the housing diversity objectives needed to meet this moment. Examples of Comprehensive Plan goals and policies in need of revision include LU G7, LU 7.2, LU 7.6 and GS 1.23 as well as language in the neighborhood plans that are appended in the Comprehensive Plan.

Strong anti-displacement practices and policies should be a key focus for every zoning and land use policy change made in support of addressing the affordable housing crisis. Existing tools such as the placement and expansion of affordable housing are vital. Additional strategies should include City acquisition of property for housing, and promoting land trusts, shared equity or limited equity cooperatives, and other community ownership models. This should be in support of building wealth

in Black, Indigenous, and other people of color (BIPOC) communities when land values are increased through changes to development standards and zoning regulations to allow the development of more housing types and community owned spaces.

4. Further increase accessibility in the built environment through consultation with the Disability Community

While seeking improvements to the built environment, increased attention should be given to serving community members living with disabilities. The City is discussing many exciting projects to improve public spaces and transportation, including car-free zones and bike-only areas. If the City can make such investments in a way that ensures they robustly support access for people with a range of disabilities, the overall quality of those spaces will be improved. Such a forward-looking approach to strengthening the City's commitment to accessibility will also support the older adults in our communities, who are a growing percent of the population. In the same way that racial equity is woven throughout the Comprehensive Plan's elements, early engagement with and guidance from the Disability Community should be an elevated feature across all sections of the Plan. Seattle's Disability Commission is a key resource to start the engagement and consultation process.

5. Study code changes to equitably improve public health

As the Commission previously advocated in our [Racially Equitable and Resilient Recovery paper](#), private and shared outdoor spaces with landscape features should be incentivized and promoted through the code. While this will provide an opportunity to improve public health through redevelopment, it is essential that additional efforts be made to improve the built environment's public health outcomes when redevelopment is absent. Investments in built environment improvements should take place equitably, where they are most needed.

Creating more open and green spaces can reduce heat island effects, improve air quality, manage stormwater, sequester carbon, and support urban wildlife and biodiversity. This will help prepare the city for future public health crises and mitigate climate change impacts. Additionally, this update should examine outcomes associated with existing codes that allow housing near freeways or other air quality concerns and evaluate the health impacts of concentrating multi-family buildings on or near busy arterials.

6. Explore alternative planning frameworks and practices

As stated previously in our Racially Equitable and Resilience Recovery paper, as part of a paradigm shift, the Planning Commission encourages the City to adopt more practices based on Indigenous principles that create self-determination for BIPOC communities, emphasizing holistic wellbeing and authentic relationships. Seattle's planning process should reflect the findings of consultation with local Tribes (federally recognized or not), their traditions and practices, co-creating methods of placekeeping. Placekeeping and place-serving practices are those that ensure that policies, plans, and investments will serve and create value for those already living there, even while others are

welcomed, and investments are made. Placekeeping celebrates a community's cultures and histories while preventing displacement. As an example, the [Indigenous Design Collaborative](#) at Arizona State University, has developed an Indigenous Placekeeping Framework to assist with Indigenizing campus planning in partnership with local Tribes. We recommend the City take inspiration from this and similar efforts to update the Racial Equity Toolkit in support of meaningfully including Indigenous practices in project and policy development. Peer cities such as [Vancouver](#) may provide useful strategies for moving this work forward, as well.

7. Expand transit, & prioritize modes other than single-occupancy vehicles and set mode shift targets

As the Commission has stated previously, Seattle will not mitigate its contribution to climate change without a radical reduction in motor vehicle emissions, as nearly two-thirds of local carbon emissions are from transportation. Reducing private vehicle trips requires transit and active transportation networks and alternatives to be prioritized, allocating resources such as money, road space, parking spaces and priority in traffic. An emphasis on expanding public transit access supports climate, compact development and mobility goals while providing equitable transportation options.

The Planning Commission also sees great value in committing to a hierarchy of transportation modes that favors higher value trips and lower cost modes priority over lower value, higher cost trips. Many modal sub-plans are developed in response to the Comprehensive Plan's goals, and City investments should strategically prioritize the modes that advance those goals. While Seattle has made great strides in reducing and eliminating the minimum requirements for off-street parking, the next step in discouraging driving and supporting transit would be the establishment of modal targets and a comprehensive parking management strategy that institutes maximum parking allowances, especially within light rail transit walksheds, as is currently the case at the Capitol Hill light rail station. The expanded application of this policy and the establishment of modal targets citywide and at a district level, should be studied as part of the update. Establishing a robust travel demand management strategy, centered on parking reform, with mode shift targets as the foundation of an equitable, sustainable and efficient transportation system should be a key component of the Plan.

8. Methods to repurpose the right-of-way

Our right of ways are more than just for transportation and infrastructure. They are also our single largest public open space, are key for quality of life, and should be considered for their potential for economic and recreational uses.

In response to COVID-19's physical distancing requirements many restaurants have been permitted to repurpose curbside parking spaces into outdoor dining areas. At the same time, many residents have needed to walk in the street to avoid close contact with neighbors on sidewalks. The Commission applauds the City's efforts to evolve the use of the right-of-way to better support businesses, create more public open and green space. Such evolutions should be expanded and made

long-term during this major update. The current approach of reserving nearly the entire width of public rights-of-way for the movement and storage of cars should be reconsidered in many cases. In a collaborative process with community, the City can act during this update to identify locations where the right-of-way can be repurposed and implement alternate uses. This work should also emphasize the importance of the urban design of the right-of-way, acknowledging its significant role in the quality of life of those living near and moving through it.

Special attention should be given to the pros and cons of changes to transportation infrastructure that aim to serve autonomous vehicles, and private electric vehicles. In their current conception both mobility options are short-sighted, profit driven, and will ultimately exacerbate congestion. They do not address the ways that single-occupancy vehicles diminish the pedestrian experience, reduce pedestrian and bicycle safety, eliminate opportunities to re-purpose the public right-of-way, increase housing and infrastructure costs, (for AV, accelerating the climate crisis) and thwart a sustainable quality of life for current and future generations.

9. Embed climate actions

Review and incorporate existing climate objectives, as well as actions identified in [resolution 31895](#) (a Green New Deal for Seattle). These actions should be reflected in the goals and policies of all elements of the Plan, with special attention to the Land Use, Housing, Environment, Transportation, Utilities and Capital Facilities Elements. This Comprehensive Plan update needs to anticipate climate change impacts and understand how infrastructure investments can support resilient communities. Principles from the Climate Justice Alliance's Just Transition framework could also support the framing of the Comprehensive Plan. In particular:

- Equitably distributing resources and power
- Promoting self-determination for those most impacted by the climate crisis
- Creating meaningful work and developing human potential in a regenerative economy
- Retaining culture and tradition (in Seattle's context, this includes anti-displacement work)
- Embodying solidarity from a local to a national scale

10. Invest in graphic design that increases the accessibility and utility of the Plan

Although the Comprehensive Plan is separated into distinct topic-elements per the directions of the Growth Management Act, the topics are thoroughly connected in practice. The opportunity to make progress on Seattle's most challenging issues with this major update means that the use of the Plan should be a high priority. While this may feel like an administratively focused recommendation, the graphic design and structure of the Plan has significant impacts on its use and approachability. Features such as graphics detailing the connections between elements, hyperlinks throughout the document to cross reference related policies in the elements, and callouts that highlight content most relevant to all community members can all strengthen the Plan's accessibility. Data disaggregated by race, framing of findings, especially any disparities within the context of structural

racism, and using narrative to explain any cultural variation in how data is interpreted will ensure the Comprehensive Plan leads with equity.

The City's One Center City Plan was a great start in increasing accessibility of planning materials. Additional references could include Auckland, NZ's [Comprehensive Plan](#), [Boston's Comprehensive Plan](#), [Minneapolis 2040](#) and the ArcGIS [Story Map summaries](#) of Denver's 2040 Comprehensive Plan.

Conclusion

The dramatic changes in economic, demographic, and environmental conditions over the past 25 years demand new ideas and priorities that address the magnitude of our housing and climate crises, while increasing the quality of life for all residents. This update to Seattle's Comprehensive Plan is an unprecedented opportunity to do so. The Planning Commission is looking forward to working closely with other City Boards and Commissions that focus their work on elements of the Comprehensive Plan that are outside the Planning Commission's typical focus. These include Arts & Culture, Economic Development, and Utilities. We anticipate developing additional recommendations on these elements during the major update

The Planning Commission looks forward to supporting the important work of the major update over the coming years. Please reach out with any questions you may have, or to discuss any of this letter's contents further.