



City of Seattle

October 27, 2023

Seattle
Freight
Advisory
Board

To: Mr. Greg Spotts, Director
Seattle Department of Transportation
via e-mail: Greg.Spotts@seattle.gov, STP@Seattle.gov

Dan Kelly (Chair)
Stanley Ryter (Co-Chair)

RE: Seattle Freight Advisory Board (SFAB) recommendations on the Draft Seattle Transportation Plan

Geri Poor

Dear Director Spotts:

Dan McKisson

Nigel Baron

Howard Agnew

Eric Wright

Dan Gatchet

Herb Krohn

Waylan Robert

The Seattle Freight Advisory Board (SFAB) has had the opportunity to review portions of the 720-page draft Seattle Transportation Plan (STP), and we spent the October 2023 SFAB meeting discussing members' points of view regarding the proposed 20-year vision. The discussion brought up several themes regarding its level of development as well as awareness of other groups' praise and concerns about the Draft STP.

In short, while the Draft STP speaks to the need for climate action and equity, it has not met the original stated goals. The SFAB recommends the Draft STP process be paused until after the Comprehensive Plan is finalized in 2024 and can be seen as an explicit guiding document rather than stating that the documents are being developed in coordination. This is a black-box process that is the opposite of SDOT's commitment to transparency.

To help frame the SFAB comments and recommendations, we went back to the STP launch information on the STP web page:

[Seattle Transportation Plan – Transportation | seattle.gov](#)

This page contains multiple pull-down menus to describe the plan's goals and inputs, and we will use those titles and text as a framework to comment on the Draft STP.

[Can you tell me more about the Seattle Transportation Plan \(STP\)?](#)

The STP is a vision for the future of transportation in Seattle. Community involvement is a crucial part of the development of the plan. The STP will establish goals, strategies, and recommendations for a transportation system that works for our city now and in the future. The plan will shape everything from future transportation funding to projects and programs that enhance the way we enjoy public space and move through the city.

We look forward to working with you and your neighbors to create a transportation system that meets your needs.

Too often, when government plans are developed, they exclude people - particularly those who are Black, Indigenous, or members of a community of color; people who are LGBTQIA+; people living in poverty; immigrant communities and people who do not speak English at home; young people; older adults; and people with disabilities. We believe everyone's voice should be heard so their needs can be met. We are partnering with community-based organizations, who have existing relationships with the communities they serve, to listen and ensure that the plan reflects the values and needs of everyone.

The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.

City Council Resolution
31243

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The bottom line? The Seattle Transportation Plan is our commitment to building a transportation system that:

- *Meets everyone's needs,*
- *Connects us all safely, efficiently, and affordably to places and opportunities, and*
- *Treats everyone - regardless of race, class, gender, sexuality, nationality, age, or ability - with dignity and equity.*

The STP was billed as a single, guiding transportation plan with community involvement. However, the communities polled did not include representative samples of the people working in industrial areas. In fact, there was only one public meeting noted on the Events and Meetings Map (*I-36, Draft STP*) that could be reasonably seen as focusing on Manufacturing & Industrial Center (MIC) input and a few presentations to the SFAB. We applaud the goal of community input, but the outcome leaves voiceless the tens of thousands of people in 'essential worker' living-wage jobs in our industrial centers.

The 2016 Seattle Freight Master Plan includes a great deal of discussion regarding freight access and its importance to economic vitality at the local, regional, and state level. These discussions are missing from the Draft STP which makes the document unresponsive to the stated goal of connecting all people '*safely, efficiently, and affordably to places and opportunities*' especially within the MICs and freight system.

Our recommendations are that SDOT provide a means for the people who work in industrial and commercial areas to be an active part of the Final STP's development. This mirrors the Seattle Planning Commission's recommendation (*pg.2, Seattle Planning Commission comments on the draft STP: attached*) that 'Encourage(s) ongoing community engagement'.

Additionally, we believe the document must include a goal for "Economic Vitality", the value to the city's economy of the transportation system, and both in the downtown (or urban centers/villages) and MIC-geographic sections. These proposed sections then can specifically address the unique aspects of these land uses and key benefits to Seattle. This mirrors, and the SFAB reinforces the Seattle Planning commission's recommendation (*pg.9, Seattle Planning Commission comments on the draft STP: attached*), that SDOT 'Include economic development as a goal and emphasize how the STP can help to build wealth and improve quality of life'.

[When will the plan be done?](#)

We expect to have a draft plan for public review in mid-2023.

The Draft STP is off its initial timeline, as can be expected of a document that is this aspirational. What is difficult to consider is that the timeline itself precedes its own guiding document, namely the Comprehensive Plan. Moreover, the Draft STP comment periods for public input to SDOT and to the Draft Environmental Impact Statement (DEIS) are both different to each other and amazingly short for a document of this size. Given that this is the first time the public has had a chance to see the draft document, it has been difficult to find the necessary time to focus on one modal element much less try to understand how the variety of modes interact with each other, as well as the Comprehensive Plan and environmental impact statements.

We recommend that SDOT adjust the timing of this review and finalization of the STP until after the Comprehensive Plan is finalized in 2024. This supports and parallels the recommendation in the SPC comment letter (*Seattle Planning Commission comments on the draft STP: attached*) which comments multiple times to align with the Comprehensive Plan.

[Why does Seattle need this plan now?](#)

Urgent and emerging challenges: *Together, we are facing transportation challenges that affect our transportation system. This includes:*

- The ongoing effects of the COVID-19 pandemic on communities' livelihoods and the way we travel,
- The climate emergency causing extreme weather conditions that affect our roads,
- and much more.

These demand urgent action. We must envision and create a new transportation system that responds to these challenges and helps everyone get around Seattle safely, efficiently, and affordably.

The development of a new transportation funding package: *Our current funding package, the Levy to Move Seattle, expires in 2024. The Levy to Move Seattle provides \$930 million over nine years (2016-2024) and provides about 30% of our transportation budget. We need to develop a new funding package that is grounded in your feedback. With your help to create the STP, we can develop the next funding package that will meet your needs.*

Alignment with the Seattle Comprehensive Plan Update: *The Seattle Comprehensive Plan Update (Comprehensive Plan) is a tool that City departments use when making big-picture decisions on how Seattle grows and evolves over the next twenty years. Among many other things, the Comprehensive Plan includes a transportation element. The Comprehensive Plan is being updated at the same time we are developing the Seattle Transportation Plan. This is important because the Seattle Transportation Plan will provide greater clarity to the community with more detail about how the Comprehensive Plan goals and policies will come to life in our transportation system.*

The freight and industrial communities know full-well the impacts the COVID-19 pandemic created. By and large, every person working in the goods-movement and freight industries were designated essential workers and continued to keep food and products on shelves at the risk of our own safety. Freight movement in the city of Seattle didn't "work from home" – the streets of the MICs were always active. In fact, many portions of the supply chain activity increased during COVID-19, including domestic (regional) imports/exports and package deliveries.

Also, Seattle's industrial and maritime work takes place on the lowest elevations and on land created on fill. The climate emergency will affect the roads and lands that we essential workers use much earlier than almost every other part of Seattle. It is difficult to understand why the response to climate change for the 12% of the city that is in harm's way doesn't involve projects to keep us from literally going underwater.

An explicit goal to develop a new funding package requires a functioning evaluation structure. However, there is no discussion of costs or prioritization of key moves, and the performance measures are "in development." Each element has a list of key moves that claim to support the plan's goals. There is no comprehensive evaluation or comparison of the relative weights of one move in one element to a similar move in another element. This makes any attempt to understand what SDOT prioritizes impossible. In fact, ANY project could be justified under the current draft plan so long as it meets a key move. As mentioned previously, this is the exact opposite of a transparent process, especially since the Comprehensive Plan will not be completed until after the STP's final due date.

We recommend that SDOT develop a plan for the industrial areas describing how SDOT will provide for the projected rise in sea level that stands to devastate the most vulnerable portions of the city. Planning and work now will save billions in the form of lost opportunities and jobs. The SFAB supports the SPC Climate Change/Resilience comments (pg. 8-9 *Seattle Planning Commission comments on the draft STP: attached*) and asks that the recommendation on pg. 9 for Climate Action Key Move CA2 be further amended to include and address sea level rise.

The members of the SFAB commented multiple times that there is no method to identify and prioritize projects or programs in the STP. The development of this framework was understood to be a key part of this plan, but it is nonexistent. As noted in the SPC document (pg. 5 *Seattle Planning Commission comments on*

the draft STP: attached), ‘The Planning Commission is concerned about pragmatic implementation of the STP over the life of the planning period. We would like to see a clear framework for prioritization and a decision tree for various criteria that centers equity.’ Those same essential workers whose voices are not heard are largely the BIPOC community we are concerned will not be prioritized.

Again, we recommend the STP be offered more time for development and to better align itself with the Comprehensive Plan schedule. This will help develop a true set of climate actions that can address sea level rise in the most vulnerable parts of the city.

What values are driving this plan?

The STP will reflect our values. The plan will also focus on our climate, equity, stewardship, and safety needs to help address our toughest challenges.

SDOT Values & Goals:

Equity: *We believe transportation must meet the needs of communities of color and those of all incomes, abilities, and ages. Our goal is to partner with communities to build a racially equitable and socially just transportation system.*

Safety: *We believe everyone should be able to move safely throughout the city. Our goal is to create safe transportation environments and eliminate serious and fatal crashes in Seattle.*

Mobility: *We believe transportation choices are critical to accessing opportunities. Our goal is to build, operate, and maintain an accessible transportation system that reliably connects people, places, and goods.*

Sustainability: *We believe environmental health should be improved for future generations through sustainable transportation. Our goal is to address the climate crisis through a sustainable, resilient transportation system.*

Livability: *We believe transportation is essential to supporting daily life. Our goal is to manage our streets and sidewalks in a way that enriches public life and improves community health.*

Excellence: *We believe in exceeding the expectations of the communities we serve. Our goal is to build a team committed to excellence and equipped with the skills to meet the challenges of today and tomorrow.*

These goals describe a city we aspire to be, and the SFAB members support them. Board members represent various sectors of the freight industry including shipping, trucking, marine, maritime, aviation, and rail. Our members have and continue to represent organized labor and businesses, and we seek to uplift the voices of the people who literally link rail cars and deliver to neighborhood stores all times of day, including the middle of the night.

The SFAB supports the SPC recommendations regarding Safety/Vision Zero (pg. 7-8 *Seattle Planning Commission comments on the draft STP: attached*) and recommends further that Vision Zero actions in MICs and industrial areas be actively informed by the people and stakeholders that understand the needs and limitations of large vehicles, and hazards of mixing transportation modes. This will help SDOT and the STP find ways to support the people who work to improve the city by improving their safety and daily work life.

Seattle already has many plans. Why do we need a new plan? What will it do differently?

Holistic planning: *The STP will address mobility, access, and public space needs in a single document as a unified system. The plan will update our existing pedestrian, bicycle, transit, and freight modal plans to meet our current and future needs. The STP will incorporate several city initiatives like Seattle's Vision Zero, the Race and Social Justice Initiative, our Climate Action Plan, Transportation Electrification Blueprint, and others. Additionally, it will reference plans created by other regional transportation agencies so we can see which strategies will best serve Seattle.*

Modal integration and efficiency: *The STP will help mobility options (like biking, walking, taking transit, and more) work together to support you in accessing opportunities, people, and places.*

Community engagement: *We are making transparent, inclusive engagement our priority for the STP. We will use new approaches to make it easier for you and your neighbors to participate.”*

The Draft STP does not meet the goal of a holistic planning document. The planning format and prioritization frameworks cannot be identified, the metrics are apparently all “in development,” and the modal elements do not cross-reference in a way that implies any type of unified system. The result is that each modal element for which a Master Plan was developed is an abbreviated version of the original plan. The Freight Master Plan was more comprehensive with explicit acknowledgement of other modes’ needs. As already mentioned, the community engagement in MICs, and for people working in essential living-wage jobs, was lacking.

We again recommend the STP develop an understandable prioritization framework and support comments regarding Freight Mobility in the SPC document, and that that document be released for public review and comment (pg. 10 Seattle Planning Commission comments on the draft STP: attached).

[How will the community be involved in the planning process?](#)

Guided by you: *The STP will be guided by you - our communities. Your voices will help shape the plan. We will listen and respond to your ideas as we work to address our greatest transportation challenges with a renewed vision for our city.*

Focus on people traditionally left out of the planning process: *We will connect with people across Seattle to shape our future transportation system, with a focus on people who are too often left out of the planning process. This includes those who are Black, Indigenous, or part of a community of color; people who are LGBTQIA+; people living in poverty; immigrant communities and people who do not speak English at home; young people; older adults; and people with disabilities.*

Building capacity of those closest to the community: *We are collaborating with community-based organizations and Seattle Department of Neighborhoods Community Liaisons to develop an engagement process that builds partnerships with our communities, makes it easier for everyone to participate, and builds on a foundation of racial equity.*

New engagement strategies: *With the STP engagement process, we are striving to make it easier for people to participate in a racially just and equitable way. We'll hear from more voices, ensure that communities often excluded are involved, and help people feel like their participation matters. We'll do so by using culturally-relevant, accessible, and inclusive strategies that prioritize public health during the ongoing COVID-19 pandemic.*

Your voices will be the most important part of this process, and we look forward to working with you and your neighbors to develop a plan that works for all of Seattle.

The STP engagement focused almost exclusively on residential neighborhoods and not commercial or industrial areas with high employment activity. Both the downtown core and our MIC’s appear geographically underrepresented when viewing the Events & Meetings Map (I-36, Draft STP). This challenges the declaration that the STP ‘connect(ed) with people across Seattle to shape our future transportation system with a focus on people who are too often left out of the planning process.’

The industrial and maritime sectors employ those same communities being sought out, but there seems to be no weight given to improving access to their opportunities. As SFAB members indicated, the Draft STP doesn’t define what their goals or strategies are in MICs, so it’s difficult to understand if projects to improve anything other than Major Truck Streets in industrial areas would even be considered. In fact, the Freight Element Metrics only speak to Major Truck Streets and leave out the rest of the freight network and the industrial areas, which together make up the system. Even the First & Last Mile Connectors make up some of the highest volumes of trucks in the city.

We recommend that the inclusion of the business, maritime, and manufacturing workers and employers be explicitly sought out, before drafting a Final STP, especially since the communication strategy focused on

understanding the needs of the working community. We also strongly recommend that the condition of entire freight network to be a metric of success instead of only one portion of the network (the Major Truck Streets).

[Does this plan have anything to do with Seattle Comprehensive Plan?](#)

*The Seattle Comprehensive Plan Update – the **One Seattle Plan**- is a tool that City departments use when making important decisions on how Seattle grows and develops over the next twenty years. It includes a transportation element to support our growth.*

The One Seattle Plan's transportation section outlines goals and policies for Seattle's future transportation system. The STP will provide more details about strategies and actions we will take to fulfill our collective transportation vision.

*We will work closely with the **Office of Planning and Community Development (OPCD)** to develop both plans at the same time. Each plan builds on the other to ensure the STP addresses future housing, jobs, and community investments. OPCD is also developing the One Seattle Plan through public engagement opportunities, shared advisory boards, and other events. Together, the STP and One Seattle Plan will provide an integrated transportation, land use, and growth strategy for Seattle's future.*

Visit OPCD's [One Seattle Plan website](#) to learn more and share your input to guide Seattle's big-picture future.

As mentioned previously, the Draft STP is misaligned with the Comprehensive Plan's release. Narratives that claim the STP is being aligned with the Comprehensive Plan, combined with a lack of project and prioritization framework and even what measures the STP will use, create a planning document that is impossible to evaluate functionally.

[What is the environmental review process for the Seattle Transportation Plan?](#)

DEIS public comment session, Tuesday, September 26, 2023 [Click here to join the meeting](#)

The STP will go through the State Environmental Policy Act (SEPA) review process. SEPA ensures environmental values are thoroughly considered during the planning and decision-making processes. Under SEPA, an Environmental Impact Statement (EIS) is a required study that provides the City, public, and other agencies with anticipated environmental outcomes of the Seattle Transportation Plan. You can review our [SEPA Fact Sheet](#), as well as other materials listed below, to learn more! The findings of the EIS will reinforce our commitment to transparency and contribute to informed decision-making. Your comments on the EIS are being incorporated in tandem with input shared through the larger community engagement for the STP.

Scoping Comment Period: June 16 – July 29, 2022

Thank you to everyone who shared comments with us during the comment period. Your input informed the Environmental Impact Statement.

Draft Environmental Impact Statement (DEIS) Release and 45-day Comment Period — August 31 through October 16, 2023: *The Draft EIS is available for review as of August 31, 2023. You are invited to share your comments. These comments are incorporated into the final EIS, along with responses.*

- [Draft Environmental Impact Statement](#) and [Appendices](#)

Late 2023 or early 2024: *The final EIS will be published and used to inform the decision-making process.*

The DEIS comment period has closed, but at approximately 400 pages, the document itself was daunting. Combined with the 700+ pages in the Draft STP, any meaningful comments require more time than the average person could devote. The SFAB was unable to provide DEIS comments, but among the challenges to any reviewer is the lack of--or conflicting--definitions and the separation of modes and goals that were supposed to be integrated.

The SFAB is concerned that any DEIS finding is meaningless given that the STP in its current form can be used to justify and prioritize any project depending on what goals are emphasized in the moment.

In conclusion, the SFAB supports the values listed, with the inclusion of Economic Vibrancy as a goal, and understands the need to combat climate change; we support the outcomes of reduced carbon emissions and fewer SOVs on the road. These goals need to be well thought out, and the steps be made explicit. As such, we strongly recommend the actions listed above in our letter and additional time for them to be developed, with input from the freight community, and integrated into the STP. After that, we request a longer review period to fully understand the structure and its cost and benefits to Seattle's residents and workers.

Thank you,

Dan Kelly
Seattle Freight Advisory Board Chair

A handwritten signature in black ink, appearing to read 'DK', is enclosed in a light gray rectangular box.

CC:

Mayor Bruce Harrell
Deputy Mayor Adiam Emery, Office of the Mayor
T. Krawczyk, J. Lewis, J. Valencia, R. Dacanay; SDOT
R. Quirindongo, L. Flemister, M. Hubner; Office of Planning & Community Development

Attach: Seattle Planning Commission comments on the draft Seattle Transportation Plan



City of Seattle

Seattle Planning Commission

October 13, 2023

Greg Spotts, Director
Seattle Department of Transportation
via e-mail

RE: Seattle Planning Commission comments on the draft Seattle Transportation Plan

Dear Director Spotts,

The Seattle Planning Commission appreciates the opportunity to provide our comments and recommendations on the draft Seattle Transportation Plan (STP). We offer our comments on this very important citywide transportation plan to ensure that the City is planning for a transportation system that provides everyone with access to safe, efficient, and affordable options to reach places and opportunities throughout Seattle and the region and responds to the imperatives of a changing climate. The STP is intended to guide the City toward meeting its goal of zero traffic deaths and serious injuries (Vision Zero), while also considering new mobility opportunities, people-oriented streets, use of the public right-of-way as shared spaces for public life, and emerging trends such as connected and autonomous vehicles. In addition, and perhaps most notably, the STP is intended to form the basis of the next multi-year transportation levy after the current nine-year levy expires in 2024. The projects identified in that levy will be of vital importance in the implementation of the STP. The Planning Commission has also provided comments on the STP Draft Environmental Impact Statement, which can be found [here](#).

Overarching Comments

- **Commend an unprecedented community engagement and outreach effort.**

The Planning Commission appreciates the following statement from the document: “The draft STP is a 20-year vision for the future of Seattle’s streets, sidewalks, and public spaces informed by thousands of people who live, work, and play in Seattle.” We commend the Seattle Department of Transportation (SDOT) for an unprecedented community engagement and outreach effort. The vision set forth by the Plan is clearly one built upon public input:

Commissioners

David Goldberg, *Co-Chair*
McCaela Daffern, *Co-Chair*
Xio Alvarez
Andrew Dannenberg
Matt Hutchins
Rick Mohler
Radhika Nair
Dhyana Quintanar
Julio Sanchez
Monika Sharma
Lauren Squires
Jamie Stroble
Kelabe Tewolde
Nicholas Whipple
Rose Lew Tsai-Le Whitson

Staff

Vanessa Murdock
Executive Director

Olivia Baker
Policy Analyst

John Hoey,
Senior Policy Analyst

Robin Magonegil
Administrative Analyst

*Seattle is an equitable, vibrant, and diverse city where moving around is safe, fair, and sustainable.
All people and businesses can access their daily needs and feel connected to their community.*

The draft Plan connects what SDOT heard to the Vision and Key Moves, providing an important throughline and feedback loop to the many stakeholders that engaged in the process.

- **Encourage ongoing community engagement.**

The Planning Commission appreciates that SDOT recognizes equity as a key value and explicitly states that the transportation system must meet the needs of communities of color and those of all incomes, abilities, and ages. The draft STP states "Our approach for updates will remain centered on community input in concert with our core values" (page I-88) and establishes SDOT's "Implementation Strategy Co-Creation" approach (page I-94). The Commission encourages SDOT in their ongoing community engagement to build a racially equitable and socially just transportation system. We would like to see explicit mention in the final Plan of continued partnership and clear accountability with community throughout the implementation phase.

- **Praise for goals and priorities that the Planning Commission can support.**

The Planning Commission recognizes the significant effort made in the draft STP to establish a very ambitious vision for a transportation system to serve the needs of our growing community. We also commend the general goal of ensuring this plan addresses all modes as part of the same effort, rather than in separate exercises. The draft STP generally considers the priorities the Commission has identified in our previous comments to SDOT, including but not limited to equity, safety, and climate change. Seattle needs an explicit paradigm shift and transformational change to deprioritize cars, reduce vehicle miles traveled (VMT), and meet the City's climate and Vision Zero goals. The draft Plan includes a significant amount of aspirational language that the Planning Commission can support. The Key Moves align with what the Commission has called for and indicate a big step forward for SDOT.

- **Draft STP appears to be a compilation of plans, rather than an integrated strategy.**

From our initial briefings on this project, the Planning Commission has understood that the STP will serve as an update to previous transportation master plans, as well as a replacement for the individual modal plans. Upon reviewing the draft, we are disappointed that the Plan does not articulate and demonstrate how the plans are integrated. While this Plan was intended to create a unified vision, the draft STP appears to be a compilation of modal plans into one document, rather than an integrated strategy with clarity of prioritization criteria for decision-making where modal plans still overlap. Inter-connections across modes are not easy to follow and it is not apparent how layering the various sections of the STP results in a comprehensive "One Seattle Transportation Strategy" with clarity of priority. The draft STP's network integration guidance process graphic (page II-15) is a useful first step. We will look for additional guidance in the final STP on how critical decisions are to be made with multiple demands on the right-of-way.

- **Include more explicit goals, performance measures, targets, and an implementation dashboard.**

The Planning Commission would like to see more explicit goals in the STP and a final plan that clearly states a prioritization framework and implementation strategy. Ambiguous goal language can hinder bold and ambitious policy development. For example, Part I, page 17 includes the following sentence: "...this plan includes an integration strategy to support consistent decisions that advance shared, long-term goals and objectives." What are those shared long-term goals and objectives? What is the baseline that those goals will be measured against? The Planning Commission would like to see some improvements to the performance measures, targets, and a dashboard to track implementation progress. Table 1 (page I-93) is a useful first step in establishing the baseline target for the City, but it lacks clarity of the methodology, assumptions, and cadence of updating these numbers and trends for this and all Performance Measures tables.

The Commission is disappointed that performance targets in the draft STP are listed as "TBD" and are concerned that the details to replace these TBDs will not be revealed until the final Plan. The Commission would encourage an explicit commitment to public updates on these performance measures, particularly for safety and VMT, as well as an appendix with the anticipated methodology for deriving the metrics. Specifically, the performance measure associated with "Percent of household income dedicated to transportation" provides a limited measure if this does not capture how transportation costs affect disadvantaged populations, which could be provided by characterizing income dedicated to transportation by income level or at least by those households at and below the Area Median Income.

- **Clarify the prioritization framework and implementation strategy.**

The Plan does not provide readers with a simple way to look at the existing and proposed miles of infrastructure improvements by type. One suggestion would be to define incremental change from baseline conditions to a target network in five years, ten years, and then full buildout in twenty years. For example, several separate graphics could show how SDOT proposes the multimodal network to be built out, as follows: Today (baseline map), 5 years (target incremental changes), 10 years (additional target incremental changes), and 20 years (full buildout). The Commission understands the Plan needs to be adaptable to changes we cannot anticipate now. However, the "Implementation Strategy Co-Creation" process described in the STP does not make it clear if the strategy will be developed before or after the final STP draft is published. The Planning Commission looks forward to seeing the prioritization framework and an implementation strategy, either as part of the final Plan or as a companion document.

Integration with the Comprehensive Plan

- **Coordinate transportation planning with the Comprehensive Plan.**

As stewards of the City's Comprehensive Plan, the Planning Commission is especially interested in seeing that development of the STP is closely aligned with the upcoming One Seattle Comprehensive

Plan. Transportation investments to serve future land use development patterns will depend on the selected growth strategy and housing and jobs projections in the Comprehensive Plan. The STP must consider coordination between transportation planning and the One Seattle Comprehensive Plan to support population and job growth, housing affordability, mobility access, and public facilities. Policy direction in the upcoming Comprehensive Plan should be driving much of what the STP proposes. A considerable amount of policy direction and programmatic strategies' language is established in Part I of the STP. To an extent, Part II attempted to outline the Plan's actions. The Commission recommends scrutiny in aligning terms and objectives in the Comprehensive Plan with the final STP. We encourage ongoing coordination between SDOT and the Office of Planning and Community Development (OPCD) in the development of these two plans.

- **Align STP with the final growth strategy selected for the Comprehensive Plan.**

The STP should be aligned with the final growth strategy selected for the Comprehensive Plan and the resulting Future Land Use Map. The STP implementation plan, at minimum, will need to align with the anticipated travel demand generated by the selected growth strategy and associated land use patterns. The delayed public release of the draft One Seattle Comprehensive Plan has created an unfortunate challenge; it is not known at this point which land use growth strategy alternative will be selected. It is difficult to fully evaluate the compatibility of the STP with future land use without the Comprehensive Plan major update draft available to the public. Since the timing of the two documents will not align, we recommend an update to the STP to match transportation investment strategies with the preferred growth strategy in the Comprehensive Plan, through the "Implementation Strategy Co-Creation" process described in the STP.

- **Integrate the STP with the Comprehensive Plan to help create great places.**

The STP will inform the Transportation element of the upcoming Comprehensive Plan. We will be looking to the Comprehensive Plan to support STP strategies to reduce vehicle miles traveled and traffic fatalities, new Vision Zero tools, and mode shift as an overall target. The STP should recognize that the pandemic fundamentally shifted our commuting patterns. It will be necessary to answer the question "Is our transportation network complete enough to support the future number of people in each neighborhood as we grow?" The Planning Commission would like to see how STP investments can help to create great walkable neighborhoods. Integration of the STP with the Comprehensive Plan growth strategy that shows how Vision Zero, transit, and zoning make places that are economically viable and very livable is essential. As housing and infrastructure develop, the City will need to take pressure off the arterials. The 15-minute city model and dense development will provide opportunities for transit-oriented development, multimodal infrastructure, transportation hubs, neighborhood bikeways, and charging infrastructure for electric vehicles.

- **Concern about conflicts between the Corridors alternative in the upcoming Comprehensive Plan and arterials in the STP.**

The Planning Commission is concerned about conflicts between the Corridors alternative in the upcoming Comprehensive Plan and use of high traffic volume arterials in the STP. The City has encouraged the placement of multifamily housing along major arterials like SR-99 and Rainier Avenue South for decades and appears poised to further invest in this strategy with the upcoming growth strategy. There are many unknowns about the Corridors concept prior to release of the draft Comprehensive Plan. We would like to see an explicit connection between the Corridors concept and the STP. The City will likely continue co-locating car traffic and freight with transit in ways that push out other modes. We encourage SDOT and OPCD to show how the Corridors concept uses other modes to support economic growth and future housing locations. See the Multilane Arterials section below for further discussion on creating an integrated strategy for arterials.

Prioritization Framework

- **Recommend an equity-based prioritization framework focusing on disproportionately impacted, vulnerable, and underserved communities.**

The Planning Commission is concerned about pragmatic implementation of the STP over the life of the planning period. We would like to understand how SDOT is intending to implement the STP vision in an incremental fashion and would like to see a clear framework for prioritization and a decision tree for various criteria that centers equity. Building a racially equitable and socially just transportation system includes a results-based decision-making process to ensure not just those with access to power are heard when tradeoffs are made. The draft STP provides an important context of the adverse impacts that major planning and transportation projects have had and continue to have on racial equity in Seattle. We hope this context continues to be highlighted during implementation of the Plan. The Commission recommends an equity-based prioritization framework focusing on disproportionately impacted, vulnerable, and underserved communities.

- **Support reprioritization of the right-of-way for active transportation and transit investments over private vehicles.**

The Planning Commission strongly supports reprioritization of the right-of-way for active transportation and transit investments over the movement of private vehicles. We appreciate that the Plan highlights the need to increase the mobility throughput of people and goods and decrease vehicle miles traveled. The Commission applauds SDOT for focusing on people and their use of the right-of-way in the STP rather than focusing on vehicle level of service as in the past. We recognize that many multimodal investments, transit-priority or combined freight/bus lanes, and green infrastructure will require reprioritization of general travel lanes. This may be considered by many to have an impact on drivers but should be seen as a benefit for more efficient means of travel. SDOT should acknowledge that some of the STP strategies will make travel time worse for vehicles but focus on the benefits from other modes. We encourage SDOT to continue to tell this story through additional data and modeling that shows how redistribution of the right-of-way will create a more reliable and convenient travel experience for all modes in the long run.

- **Address multi-modal transportation in underserved, low income, and BIPOC communities.**

The Planning Commission commends SDOT's commitment to implementation of projects related to the Plan in accordance with the department's existing Transportation Equity Program. The STP must address and facilitate multi-modal transportation in underserved, low income, and BIPOC communities. One of the key moves of the STP aims to "Provide reliable and affordable travel options that help people and goods get where they need to go" (page I-10). One of the goals in the Lead with Transportation Justice section is to "ensure everyone can afford to take the trips they need to make" (page I-9). The Commission wholly supports these goals and recommends incorporating affordability as a prioritization criterion for implementation of the STP.

Language in the Plan about "co-creating with community" should include vulnerable communities that are typically left out of decision-making. In places where transit, walking, and biking are not accessible, SDOT should prioritize those areas for new investments. For example, Table 6: Innovative Transit Streets in the Transit chapter (page T-49) recognizes potential streets that could shift to a different mode. The Planning Commission recommends layering in equity and environmental justice as an integrated approach to provide a clear picture of what areas are receiving investments. Every citywide map of transit networks should include the Racial and Social Equity (RSE) composite index as the background and include clear symbology between existing and proposed connections so we can see clearly where investments are proposed to be made relative to the RSE index.

Multilane Arterials

- **Articulate and illustrate a comprehensive, integrated strategy for multilane arterials.**

The Planning Commission strongly recommends that the STP articulate and illustrate a comprehensive strategy for multilane arterials to address integration of multiple modes. According to the draft Plan, multilane arterials are:

- Where most crashes occur, with a disproportionate number of people of color experiencing serious injuries or death. Crashes on arterials are more likely to be serious and fatal.
- The source of delay for high-frequency transit.
- The areas that have absorbed the most growth over the last 25 years.
- The corridors where not everything "fits", with the strongest implications for bike access and safety.

The Commission suggests that the overall strategy for multilane arterials should:

- Draw from each STP chapter to show how multilane arterials will be transformed.

- Show how modes will be integrated to increase transit speed and reliability; eliminate deaths and serious injuries; expand People Streets and Public Spaces (PSPS) for high-population areas; ensure a complete and safe bike network; and allow for safe passage of freight.
 - Describe how parking policies will change to allow these to occur.
 - Illustrate the integration with adjacent private land use and how the right-of-way supports nearby housing and economic activity.
 - Use maps to show and prioritize the “collision-prone locations” (according to the Transportation Equity Framework and safety ranking) and identify speed reduction strategies for individual corridors.
 - Identify and prioritize opportunities for PSPS, stormwater infrastructure, and increased vegetation that are critical for safety, equity, climate action, and livability in high-population areas with limited green space.
 - Show the modal integration moves for each corridor.
 - Accommodate electric vehicle charging if there is also parking.
 - Provide additional tree canopy.
 - Prioritize investments based on their ability to reduce negative health impacts.
- **Concerns about the negative environmental and health consequences of arterials.**

The Commission has raised concerns in the past about the negative environmental and health consequences of arterials, especially with regards to housing adjacent to busy arterial corridors. We recommend SDOT refer to research on the health implications of arterial roads, health equity considerations associated with arterials, and design characteristics of arterials that promote or hinder health (*Understanding and Improving Arterial Roads to Support Public Health and Transportation Goals*, American Journal of Public Health, June 2017, <https://pubmed.ncbi.nlm.nih.gov/28640685/>).

Safety/Vision Zero

- **Include priority projects to meet the urgency of the City’s Vision Zero goals.**

The Planning Commission strongly recommends that the STP establish clear accountability for the achievement of Vision Zero and the promotion of safe and comfortable transportation options. The City needs a very focused, resourced, accountability-driven Vision Zero program to increase safety for all transportation systems. The Commission has concerns about how aspirational safety goals will be translated into actual plans and projects. The STP should include priority projects to meet the urgency of the City’s Vision Zero goals. Prioritization focused on safety along with racial and social equity should drive implementation across all modes.

- **Recommend making Vision Zero a standalone chapter.**

The Planning Commission appreciates inclusion of Key Move S1: “Reduce vehicle speeds to increase safety” (page I-8). We recommend building on this policy direction by making Vision Zero a

standalone chapter with a comprehensive strategy, performance measures, and priority projects for getting to zero deaths by 2030 (or an updated target date with express moves to get there). This Vision Zero chapter should include specific program details to implement speed-reduction measures and track progress on investments in safety infrastructure including speed humps, curb bulbs, and speed limits; effectiveness of enforcement; elimination of slip lanes and high-speed turns; leading pedestrian intervals; no right on red signage; and other innovative tactics.

- **Address equity concerns related to safety in low-income and BIPOC communities.**

The STP must address equity concerns in its efforts to end traffic deaths and serious injuries in low-income and BIPOC communities. SDOT should explicitly acknowledge that the Transportation Equity Framework should be applied to repair past transportation planning decisions resulting in ongoing harm, including prioritizing safety and maintenance projects in underserved neighborhoods. We encourage SDOT to work with communities to identify opportunities for low-cost safety measures such as closing streets to cars and opening neighborhood streets to walking and cycling.

Climate Change/Resilience

- **Include programs and projects that address critical environmental sustainability issues.**

The Planning Commission recommends elevating and emphasizing the STP's strategies to address the ongoing climate crisis. We support the City coordinating with the region, other neighboring cities, and the Washington State Department of Transportation (WSDOT) to determine an appropriate planning framework for meeting the intent of House Bill 1181, requiring local governments to plan for climate change. The STP must include not only strategies but programs and projects that address critical environmental sustainability issues including air quality, emissions, heat island, sea level rise, tree canopy, and green infrastructure to address increasing stormwater flows and flooding.

- **Use an equity lens to focus on the most affected and vulnerable communities.**

The STP should use an equity lens to focus on communities that have been most affected and continue to be vulnerable to these issues. We recommend integrating capital project maps with the RSE index to identify priority investment areas for green infrastructure and street tree planting locations. SDOT can partner with Seattle Public Utilities to prioritize green infrastructure projects not only where development is already planned but in parts of the city that have been underserved and underinvested.

- **Identify policies and projects to mitigate extreme heat across all modes and systems.**

The draft STP's climate actions do not sufficiently address the impacts of extreme heat such as urban heat island effects caused by paved roads and rights-of-way. Extreme heat disproportionately affects vulnerable populations such as elderly residents seeking shade at transit stops. The STP should identify policies and projects to mitigate extreme heat across all transportation modes and systems.

Climate Action Key Move CA2 could be reworded to "...to better handle extreme heat and increased storm event intensity in a changing climate."

- **De-emphasize transition to electrification of the citywide transportation network.**

The Planning Commission looks forward to learning more about the development of a low-emissions neighborhoods pilot program to improve air quality, mobility, and community health. We recommend de-emphasizing Climate Action Key Move CA4 about transitioning to electric vehicles and instead emphasize CA5 about advancing mobility management strategies to encourage walking, biking, and transit trips. The concept of electrification of the citywide transportation network is intriguing but should not be prioritized. At the least, strategies for electrification of the transportation network should prioritize charging for underserved, low income, and BIPOC communities.

Access to Daily Essential Needs

- **Prioritize increasing access to daily essential needs, jobs, and recreational opportunities, including strategies for those without access to cars.**

The Planning Commission recommends the STP prioritize increasing access to daily essential needs, jobs, and recreational opportunities, including strategies for those without access to cars. SDOT can partner with OPCD in development and implementation of the 15-minute city concept in which most daily necessities and services, such as work, shopping, education, healthcare, and leisure can be accessed by relatively short non-vehicle trips. This approach aims to reduce car dependency, promote healthy and sustainable living, and improve wellbeing and quality of life by providing residents the opportunity to select alternative travel modes.

SDOT should expand use of strategies such as Seattle Transportation Access Programs that provide affordable, safe, and equitable access to public transportation by providing transit resources such as the youth ORCA and Metro Flex to diverse Seattle communities. SDOT should also increase coordination with private employers to expand the supply and availability of more sustainable transportation alternatives such as Microsoft's Connector commuter bus service.

The STP should add a section on emergency preparedness and response that describes the work needed to ensure that SDOT and regional transportation agencies are prepared to respond to a major natural disaster, especially a large-scale earthquake that could damage or destroy highway and rail infrastructure.

Economic Development

- **Include economic development as a goal and emphasize how the STP can help to build wealth and improve quality of life.**

The Planning Commission recommends that the STP include economic development as a goal. An integrated transportation system supports a thriving economy by providing access to opportunity, easy commutes for workers, and timely delivery of goods and services. Small businesses depend on

convenient transportation and will thrive if mobility choices are based on both efficiency and convenience. We would like to see an emphasis on how the STP can help to build wealth and improve quality of life for those who have been most marginalized and significantly impacted by the current transportation system. The draft STP mentions more than 80% of Black and Indigenous survey responders want to prioritize a transportation system that supports a strong economy. An economic development focus can assist SDOT in measuring performance and equitably directing transportation investments across all communities citywide.

Freight Mobility

- **Include strategies to integrate freight with other modes and address conflicts.**

Freight mobility is an issue of critical importance for successful economic development. The Planning Commission commented during the City's recent Industrial and Maritime Strategy that traffic volumes and travel times for both cars and freight are likely to increase due to anticipated growth within Seattle's industrial zones. As a result, the Planning Commission recommended a comprehensive review of transportation policies related to freight mobility and logistics. We will be paying attention to how freight mobility projects are advanced and prioritized, how to integrate other modes in industrial areas, and the City's focus on major maintenance. The STP must include strategies that integrate freight with other modes and address conflicts with pedestrians and bikes, especially in industrial areas and future light rail station areas in SODO, Interbay, and Ballard.

- **Prioritize corridors for combined freight and transit and include strategies that allow for innovation in urban freight mobility.**

The Planning Commission recommends that SDOT work with private industry stakeholders and organizations such as the University of Washington's Urban Freight Lab to address issues related to the proliferation of smaller delivery vehicles and the need for dedicated loading zones, curb space, and/or parking. The STP should prioritize corridors for combined freight and transit and include strategies that allow for innovation in urban freight mobility. Key Move PG2 aimed at curb space management should include integration with freight to reflect the increasing amount of urban goods delivery. The STP should consider encouraging freight companies to increase their use of electric cargo bikes for last mile delivery of small packages rather than delivery vans.

Repurposing the Right-of-Way

- **Prioritize repurposing of the right-of-way for people-oriented streets.**

The Planning Commission appreciates the STP recognizing our *Repurposing the Right-of-Way: Mobility Options and People-Oriented Streets in an Equitable City* issue brief (November 2022). The right-of-way as public space is an essential component of livability as Seattle continues to grow. An increasing population and future concentration of multi-family housing calls for active, lively, vibrant public spaces throughout the city. The STP should prioritize repurposing of the right-of-way for people-oriented streets and community spaces. The People Streets section of the draft STP does not reflect

the shift towards the desire for neighborhood walkability and Stay Healthy Streets that we experienced during the pandemic. As a first step in prioritizing repurposing rights-of-way for public use, the Commission would like to see inclusion of a map identifying “streets that should be closed to cars.”

- **Continue to explore the benefits of additional parking management strategies.**

While there is a lot of verbiage in the “curbside management” section of the draft STP about techniques for regulating parking, there does not appear to be similar policy guidance for parking in relation to other parts of the Plan. For example, parking is not addressed in the Transit chapter, although preserving on-street parking in the public right-of-way has consistently been noted by SDOT as a barrier to expanding access for other modes such as adding transit only lanes or bike lanes. We encourage SDOT to continue to explore the benefits of additional parking management strategies.

Anti-Displacement

- **Include proactive strategies to prevent and mitigate the impacts of displacement.**

The Planning Commission recommends that the STP include proactive strategies to prevent and mitigate the impacts of displacement from transportation investments. We are especially concerned with the increases in Seattle residents, including a high BIPOC percentage, who have been displaced to auto-dependent locations. Fast and reliable transit is a proven equity strategy for providing all citizens with a way to get to work and access their cultural community centers. However, we recognize that building out transit networks takes time and people will continue to need to drive in the meantime. The Commission will be looking for strategies in the STP to address both preventing displacement and managing the effects of displacement. SDOT should consider ways to prevent displacement through community-specific transportation investments and clarify how they will commit to partnering with other departments focusing on displacement.

Regional Coordination

- **Align with the Puget Sound Regional Council’s VISION 2050 and continue ongoing coordination with regional transit agencies.**

The STP must consider the regional nature of transportation networks, choices, and mobility, and encourage a regional approach to transportation planning. The Planning Commission would like more information on how the Plan will align the City’s transportation strategies with the Puget Sound Regional Council’s VISION 2050 planning framework and targets. Successful implementation of the STP will depend on consistent coordination and integration with both King County Metro and Sound Transit. Voters approved a Seattle Transportation Benefit District in 2014 to expand Metro service in Seattle. This successful ballot measure demonstrated that Seattle voters value fast and reliable transit. Unfortunately, ridership was significantly affected by the COVID-19 pandemic and Metro continues to struggle with driver shortages and maintenance issues that have led to service reductions on several

commuter routes. The Commission commends SDOT for ongoing coordination with our regional transit agencies and encourages this important coordination to continue throughout the STP planning and implementation process. The Commission suggests that SDOT consider increasing this coordination by designating a specific staff member as the interagency coordinator and that this person spend part of their time physically in each of the transit agencies on a regular basis.

Readability and User Experience

- **Improve readability with searchable formatting, intuitive maps, and representative photographs.**

The Planning Commission applauds SDOT's very significant achievement in publishing the draft STP. We offer the following minor comments to help improve the document's readability and the reader's experience navigating the document. We have found that digesting the information in this Plan is very challenging, as its length is daunting for the public, the file is not searchable, and the formatting does not contain hyperlinks. The STP should include a glossary for the overall document, not each individual chapter. There are many new and vague terms introduced in the document. The online maps should be more easily distinguishable, using additional line types, weights, and colors, and be tagged with data to help users understand how the plan might affect their block and when. Lastly, almost all the photographs included in the draft STP are of beautiful, sunny, dry days in Seattle. The Plan should include more representative photography that highlights the realities of our unique weather patterns, the existing problems of our transportation system, and what needs to change, especially on rainy, snowy, extreme heat, or smoky days.

The Planning Commission appreciates the opportunity to provide our comments on the draft STP. We look forward to hearing more as the final Plan is developed. With the final growth strategy for the Comprehensive Plan update unclear at this time, the City should pursue the most aggressive implementation of the STP to avoid the transportation plan becoming a limiting factor in the growth strategy selected for the Comprehensive Plan. Given the climate crisis we all face and the City's anticipated growth, a robust transportation plan is the only reasonable option to pursue. The Planning Commission understands that the STP is intended to serve as a policy document to guide future transportation investments. We look forward to any additional companion documents or analysis to determine the financial feasibility of those investments.

If you have any questions, please do not hesitate to contact Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

Two handwritten signatures in black ink. The signature on the left is a stylized, cursive 'M'. The signature on the right is a more complex, cursive signature, possibly 'D. Goldberg'.

McCaela Daffern and David Goldberg
Co-Chairs, Seattle Planning Commission

Cc: Mayor Bruce Harrell
Seattle City Councilmembers
Adiam Emery, Office of the Mayor
Radcliffe Dacanay, Tracy Krawczyk, Jonathan Lewis, Joanna Valencia; Seattle Department of
Transportation
Rico Quirindongo, Lauren Flemister, Michael Hubner; Office of Planning and Community
Development