

November 20, 2015

City of Seattle
Department of Planning & Development
700 5th Avenue, Suite 1900
PO Box 34019
Seattle, WA 98124
Sent via email to 2035@seattle.gov

RE: Comments on Seattle 2035 Comprehensive Plan Draft

To Whom It May Concern:

Thank you for the opportunity to comment on the Seattle 2035 Comprehensive Plan Draft. Working with City staff over the past several years, it is obvious that a tremendous amount of work and thoughtfulness has gone into the draft.

Futurewise is a non-profit organization that works throughout Washington State to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of life for present and future generations. We work with communities to implement effective land use planning and policies that prevent waste and stop sprawl, provide efficient transportation choices, create affordable housing and strong local businesses, and ensure healthy natural systems. We have supporters across Washington State, including the City of Seattle, and together we are creating a better quality of life in Washington State.

In 2014 and 2015, Futurewise and its partners conducted an extensive community engagement program throughout the city to ensure that the voices of Seattle residents are heard in the Comprehensive Planning process. The engagement included "SpeakOuts", surveys, workshops and focus groups for persons of color, residents with limited English proficiency, youth and other groups not normally reached through traditional outreach methods. The results of this engagement have been summarized and highlighted in the *City of Seattle Health and Equity Assessment* found at www.futurewise.org and were shared with City staff.

We would like to offer comments on the policies and goals related to eight priorities:

- (1) Modify the growth strategy and associated land use to provide greater flexibility, more affordability and less displacement.** How we plan to grow is one of the most important questions answered by the Comprehensive Plan. The Urban Village strategy set forth in 1994 has been largely successful in directing new residential units and jobs into villages and has allowed the City to target public investment efficiently. We support this strategy as a way to combine more intense land uses with transit and other amenities into compact, multimodal communities. However, the urban village strategy needs to be modified to provide an increased, more flexible supply of land for development which will produce a greater variety of housing types, increase affordability in the city and reduce the risk of displacement for low-income residents and businesses.
- (2) Support housing affordability through aggressive, bold action.** Housing affordability is a critical issue facing Seattle. We believe that a lack of affordable housing is increasingly becoming a threat to the economic vitality and environmental sustainability of our city and that all possible policies and resources should be used to address housing affordability. We support those goals and policies which are needed to implement the Housing Affordability and Livability Agenda (HALA) recommendations through increasing the number of

affordable and market-rate units, providing more resources for affordable housing, offering more support for communities and using innovation to meet our goals.

- (3) Implement increased environmental protection, climate change adaptation and mitigation.** The Pacific Northwest's extraordinary natural environment is one of its most important assets. We have an obligation to protect natural systems for ourselves and future generations. A key part of this is the reduction of greenhouse gas emissions as well as support for our communities to be resilient in the face of climate change impacts. To continue to reduce our impacts on air, water and natural habitats as we add 120,000 new residents and 115,000 new jobs, we will need to plan carefully, increase our public engagement (with the entire community), and implement innovative solutions in transportation, building codes and regulations, industry, utilities and community development.
- (4) Employ land use, transportation and other city policies and investments to support health and well-being.** Cities can improve health and well-being through access to opportunity, jobs, healthcare, social connections, healthy food access, positive attachment to place. However, cities can also negatively impact health due to air quality problems from transportation and industrial uses, threats to bodily safety from traffic collisions, and mental and emotional stress from noisier, more intrusive environments. Therefore, the City must use its policies and investments to mitigate these negative impacts by ensuring affordable, healthy food access, safe and efficient transportation, personal safety and protection from violence and crime, and by ensuring healthcare and healthy environments are affordable and accessible regardless of income, race, English proficiency, age, gender identity, sexual orientation or religion.
- (5) Focus on equity and opportunity throughout the Plan.** The City of Seattle has significant disparities by race, ethnicity, income and geography in many critical determinants of opportunity, including health, incomes, education, housing cost burden, homeownership and many other critical measures. The policies in the Plan can and should be focused on reducing these disparities in accordance with the City's Race and Social Justice Initiative (RSJI). Furthermore, the City should set specific, measurable goals for reducing disparities that can be tracked for progress on an annual basis.
- (6) Articulate neighborhood livability and support.** Neighborhoods, whether they are a dense urban village or single family areas, are the primary way that Seattle residents experience the city. Neighborhoods are extraordinarily important to people and they have a fierce sense of ownership and are protective of the characteristics which drew them there in the first place, whether it is affordability, cultural diversity, historic character, valued assets, natural amenities or connections to neighbors, businesses and institutions. We believe that the City can support neighborhood growth and change while protecting these elements of neighborhood livability by working with residents to identify their priorities, planning for change and using policies and investment to guide growth responsively and responsibly.
- (7) Increase meaningful community engagement and partnership.** The City has committed to broader participation by under-represented communities throughout this planning process. Holding open houses in multiple neighborhoods and at different times of day is an improvement on traditional engagement methods which can be exclusionary. We encourage the City to continue to expand their engagement activities which allow in-depth discussions about policies in accessible, relatable language in comfortable community spaces. Using community leaders and community-based organizations as trusted intermediaries should be utilized more fully and there should be more resources dedicated to translation and interpretation for non-English speakers. Clearly demonstrating how city decisions have been responsive to the engagement process is critical to building trust and demonstrating the value of engagement for stakeholders. These methods should not be limited to only the Comprehensive Plan, but broadly in all planning initiatives taken by the City.

(8) Emphasize quantifiable goals and commit resources to tracking progress towards these goals. The Plan sets forth a vision for a Seattle that is equitable, affordable and sustainable. However, without specific, actionable and quantifiable goals, we will be unable to determine if we are fulfilling this vision or not and we will be unable to change our programs and investments to better fulfill this vision. Where possible, the City should set specific goals and develop a process for tracking and reporting on progress in a timely and transparent manner.

These eight priorities are influenced by goals and policies found throughout the Plan. For simplicity and clarity, we have organized our comments by element to reflect the order of the Plan:

Growth Strategy Element

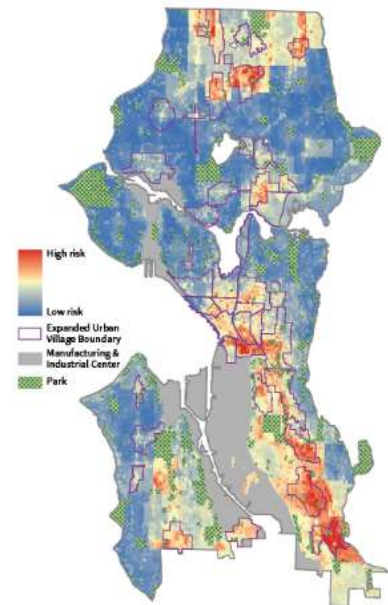
We support the continuation of the Urban Village strategy which has been successful in efficiently accommodating a significant portion of Seattle's growth in the past 20 years. We support the creation of urban villages which use dense land use in conjunction with complete multimodal transportation networks to create compact neighborhoods which support healthy active transportation choices, reduce the environmental impacts of growth and enhance community connectivity.

- Because the majority of our growth will go in urban villages, it is critical that villages accommodate our goals for affordable housing. Therefore, the number of affordable units created and demolished in each village should be tracked as part of policy **GS1.5** and **GS1.6**. This will enable the City to refine policies, programs and investments as needed to ensure that there are affordable units in each village.
- The Plan's policies should go further in explicitly stating the need for affordable housing in urban villages. This could occur in policies **GS2.6** (in addition to or rather than "broad cross-section") and **GS2.15** (which currently states "promote meaningful choice for marginalized populations to live and work in urban centers...") and **GS3.5**.
- We support policy **GS2.7** and encourage the City to specify "safe walking, biking, and public transportation" in accordance with the adopted Vision Zero policy.
- We support policy **GS2.12** which will expand urban village boundaries and recommend that "a ten-minute walk of frequent light rail stations" be changed to "a ten-minute walk of frequent transit service" to be more flexible with regard to mode and more consistent with the HALA recommendations.
- We support policy **GS2.22**, which will allow limited multifamily commercial, and industrial uses outside of urban villages. Because increasing land supply for multifamily housing is a critical component of addressing our affordable housing crisis, we recommend that "promote housing supply, mix and affordability" be included as a condition for land use changes under this policy.
- We support goal **GSG5** and its associated policies identifying potential annexation areas and annexation policies. Annexing these areas would provide efficiencies in service delivery, improve level of service for residents and businesses, and lead to more cohesive land use and transportation integration with the adjacent city.

- While we support directing growth to urban villages, many of the existing urban villages are in areas with high displacement risk for marginalized populations, as noted in the City's *Growth and Equity Analysis*. This may result in a disproportionate burden of accommodating growth and redevelopment on those people who are most vulnerable to displacement and who would most benefit from remaining in urban villages which have superior transit service, culturally appropriate institutions and other supportive amenities.

For this reason, we support directing a larger proportion of growth into existing urban villages in "high opportunity/low displacement risk" areas as well as the creation of new urban villages in areas identified as "high opportunity/low displacement risk". Additionally, we support policies which protect both residents and businesses from displacement to mitigate this risk equitably and fairly, as noted in policy **GS2.9**.

Displacement Risk Index



Land Use Element

- We suggest that **LUG2** include "providing adequate supply to meet demand and growth targets" in the goals of the City's zoning and land use regulations.
- We support the policies which recognize disproportionate adverse impacts and aim to minimize and mitigate inequitable outcomes (**LU2.8**).
- We strongly support policy **LU5.17**, which recognizes that higher-density development will require additional conditions related to preservation, open space and affordable housing.
- We support policy **LU9.4**, which establish evaluation criteria for rezoning land to multifamily and recommend that "promote housing affordability" be included as a condition for land use changes under this policy.
- We support the policies which recognize the impact of land use on health and well-being, and that promote healthy residents and communities through noise control (**LU5.12** and **LU5.13**), air quality (**LU5.14**), food access (**LU5.18**), recreation space (**LU5.5**), as well as policies which encourage safe and convenient active transportation modes (**LU6.5**, **LU6.6** and **LU6.7**).
- We support policies which use land use regulations to protect the natural environment and support climate change mitigation and adaptation (**LU5.8**).
- While off-street parking can reduce the need for on-street parking which allows for mobility uses in the City's limited Right of Way (ROW), off-street parking reduces site capacity and increases the cost of construction, leading to more expensive housing and commercial costs. Currently, the Plan has goals and policies which both encourage off-street parking (**T2.3**) and ones which aim to minimize off-street parking (**LUG6** and related policies). The Plan should have better consistency related to parking, ideally focusing on the goal of reducing overall parking demand rather than accommodating parking demand at the expense of either mobility or affordability through policies such as **LU6.5**, **LU6.8**, **LU6.10** and **LU6.13**.
- We strongly support the use of development incentives to increase density and, in particular, provide housing options not met by the market (**LUG7**). We suggest that some examples of housing market deficiencies where

these incentives could be used be included in the Plan, particularly “affordable housing” and “family-sized housing”.

- We strongly support policies which allow additional compatible housing types in single family neighborhoods (**LUG8, LU8.3, LU8.5, LU8.11** and **LU8.12**). We suggest that neighborhood character be promoted through consistent and compatible design standards like height, scale and bulk, but discourage the use of “single family” as a descriptor of character, such as in **LU8.2**, because it is inconsistent with other policies. We support the inclusion of housing choice as a consideration in changing the development standards in single-family areas (**LU8.12**).
- We support goal **LUG9**, and its policies, which sets forth a vision of multifamily zones which includes a variety of housing types and densities, mixed-incomes, and promotes walking and transit use.
- We suggest the inclusion of “minimizing or mitigating loss of tree canopy and vegetation” as a need to be considered in midrise and highrise areas in **LU9.14**.
- We support **LU10.1**, the prioritization of existing commercial/mixed use areas over the creation of new business districts, particularly in areas with established districts with locally-owned and neighborhood supporting businesses.
- We support the use of land use regulations that protect and encourage locally-owned, neighborhood serving businesses, such as **LU10.7** and **LU10.22**. These policies are particularly important in those areas identified as high displacement risk in the *Equity and Growth Analysis* where businesses that serve persons of color, immigrant and refugees, persons with limited English proficiency and other needs may be under significant displacement pressure due to rising rents or displacement of their customer base.
- We support the use of land use policies which improve the safety, accessibility and comfort of people walking, people on bikes and people taking transit (**LU10.7, LU10.9, LU10.11, LU10.16, LU10.18** and **LU10.20**).
- We support the protection and expansion of safe industrial land uses that support equitable employment opportunity in Seattle (**LU11.2, LU11.4, LU11.5, LU11.6, LU11.10**).
- While it is reasonable not to impede industrial land uses with unnecessary landscaping and streetscaping regulations for aesthetic purposes (**LU11.11**), there should be minimum utilitarian requirements which will support a healthy environment through stormwater management and vegetation to improve air quality and mitigate heat impacts of climate change.
- We support the use of overlay districts to achieve support transit communities and large master planned communities where appropriate (**LU13.2, LU13.3** and **LU13.4**).
- While recognizing the benefits of an expanded, mixed-use Stadium District, we have serious concerns about the impact this might have on the surrounding industrial lands and related businesses and jobs. Therefore, we recommend that **LU15.2** be modified from “minimize negative impacts on nearby activities” to “avoid negative impacts...” or “without impacting” and that the Plan include additional language about potential conflicts and a framework for prioritizing business-supporting industrial lands when conflicts arise.
- We support the use of historic and landmark designation to protect those sites, buildings and districts which contribute to the character of our city and provide a visible link to the shared history of our city, our neighborhoods and our people. (**LUG16**) We support the following comments from Historic Seattle:

- *Foster stewardship of neighborhood, place, and landscape as contributors to the city's viability and vitality*
 - *Celebrate the diverse physical form and fabric of the city*
 - *Promote the city's historic and cultural resources as an economic asset*
 - *Promote the environmental benefits and opportunities of preserving and adaptively reusing historic buildings*
 - *Encourage rehabilitation and adaptive use of buildings to conserve resources, reduce waste, and demonstrate stewardship of the built environment*
 - *Promote seismic and energy efficiency retrofits of historic buildings to reduce carbon emissions, save money, and improve public safety*
 - *Identify and establish alternative means to protect the historic character of neighborhoods selected as urban centers and villages*
 - *Encourage adaptive use of historic community structures, such as meeting halls, schools, and religious buildings, for uses that continue their role as neighborhood anchors*
- While we appreciate that Goal **LUG17** includes the correct standard of protecting the functions and values of critical areas,ⁱ we encourage the expansion of the land use policies designed to protect the ecological functions and values of our environmentally critical areas. The development of wetlands and fish and wildlife habitat conservation areas will result in their destruction. We urge more specific language in **LU17.3** to reflect that "reasonable development" in environmentally critical areas may not only be destructive to the environment, but also may endanger human health and safety. So we recommend that **LU17.3** be modified to read as following, with our additions underlined and our deletions struck through: **LUG17** Protect the ~~ecological~~ecological functions and values of environmentally critical areas, including wetlands and fish and wildlife conservation areas; prevent erosion caused by development on steep slopes; and protect public health, safety and welfare in hazard-prone areas, including areas subject to landslides, liquefaction or floods, while allowing ~~permitting~~ development in areas subject to erosion, liquefaction, or floods where the safety of occupants can be assured that is reasonable in light of these constraints.
 - Policy **LU17.1** does not address conservation of wetlands which are often, but not always, fish and wildlife habitats. So we recommend addition a new bullet "Conserve wetlands" to Policy LU17.
 - Policy **LU17.3** should reflect the standard of no net loss of functions and values for critical areas.ⁱⁱ So we recommend that Policy LU17.3 reads as follows: "Allow adjustments of development standards in environmentally critical areas to ~~help~~ protect those places and their functions and values while enabling reasonable development."
 - While we support Policy **LU17.5**, instability has many causes beyond development, including precipitation, ground water, geology, and slope.ⁱⁱⁱ So we recommend that Policy LU17.5 should be modified to consider instability due to causes other than development. Natural slope failure can be as damaging, or even as deadly, as development induced slope failure. In addition, both relative and absolute risk should be considered. So we that Policy LU17.5 be modified to read as follows: "Identify landslide-prone areas by examining the geologic, hydrologic and topographic factors that contribute to landslides and regulate development to protect against future damage due to instability, including instability that might be created or exacerbated by development, including potential damage to public facilities. Consider the ~~relative~~ risk to life or property when reviewing development proposals for landslide-prone areas."
 - We are concerned that Policy **LU17.6** maybe read as implying that construction on landslide-prone slopes is safe if properly engineered. The science shows this is not the case. For example, the USGS report *Shallow-Landslide Hazard Map of Seattle, Washington* states:

Although most of the source areas for debris flows are located near the tops of slopes in the Seattle area, debris-flow sources are scattered among lower parts of the slopes as well. There are enough of these that a runout zone established below susceptible cells based on the mean or maximum runout length from this data set would cover most of the existing slopes. For this reason, we conclude that the runout data indicate that all areas of steep slopes forming bluffs of Puget Sound and along other bluffs in the Seattle area should be considered hazardous. Furthermore, where flat-lying areas exist in Seattle below steep slopes that are above water and can be occupied, a runout zone based on the mean (60.2 m) or maximum (235 m) runout length would provide a degree of protection for the runout areas of most of the existing slopes of concern.^{iv}

So we recommend that Policy LU17.6 be modified to read as follows; “LU17.6 Avoid development on landslide-prone areas, landslide runout areas, and their buffers. Where scientific and engineering analysis shows construction may be safely allowed, require engineering solutions for development on landslide-prone sites in order to prevent slides during high-stress periods and if there has been poor maintenance of the hillside.”

- We strongly support policy **LU17.11** which seeks a “net gain in wetland function by enhancing and restoring wetland function across the city.” Wetlands have many functions that benefit the community such as flood storage. This policy wisely encourages a net gain in these important functions.

Transportation Element

- We support **TG.1** and its policies, which recognize that transportation investments supporting land use policies are critical to the success of the Urban Village strategy and are needed to create compact, accessible and walkable neighborhoods while reducing dependence on personal automobiles. We support policy **T1.5** which recognizes that vulnerable and historically marginalized populations may have special transportation needs to be considered.
- We support accommodating multiple travel modes and placemaking functions in public right of way (**TG2**). This section should also acknowledge the need to use right-of-way to house landscaping and incorporate other design standards which support critical environmental and natural systems.
- We support the development of a decision-making framework (**T2.8**), which should include safety, mobility, access, greening and environmental uses, placemaking and activation as well as community and personal health.
- We support **TG3** and its policies which expand transportation options for those most in need (**T3.3**) and focuses on the expansion of interconnected, accessible bicycle, pedestrian and transit facilities.
- We support **TG4** and its policies which incorporate the recommendations from the Climate Action Plan and will help the City achieve its environmental and greenhouse gas reduction goals.
- Goal **TG6**, which addresses system safety, should acknowledge the need to improve personal safety around transit facilities (like light rail and bus stops) so that people are safe while waiting for or using transit, through methods like better design or through coordination with public safety departments.
- We support policy **T9.3**, which would establish an alternative, multimodal approach for Level of Service (LOS) standards which will be more useful in meeting the City’s GHG emissions reduction targets.

Housing Element

- The City's housing element should include housing policies and goals which are consistent with and supportive of the Housing Affordability and Livability Agenda (HALA) strategies, particularly **H2.1, H2.3, H2.5, H2.7, H3.1, H3.5** and **HG5** and its policies.
- The policies under **HG1** should include testing, monitoring and enforcement of fair housing compliance for all protected classes in the City of Seattle to identify those groups which are still experiencing discrimination. It should also include coordinating with non-profit groups and quasi-governmental agencies to achieve fair housing goals through coordinated education and protection programs.
- We agree with policy **H2.6**, in which local communities should be part of the affordable housing conversation to ensure that programmatic and policy solutions are addressing their specific needs.
- We support the goal **HG3** and policies related to expanding the mix of housing found in Seattle through design standards, zoning, and land use policies to better meet the diverse needs of Seattle households.
- We suggest that goal **HG4** include a policy which considers providing assistance to low-income homeowners, landlords or building owners/managers for renovations and upgrades to improve energy efficiency of housing units. We suggest the City explore innovative financing techniques and improved incentives to encourage and support the use of innovative, sustainable building methods.

Capital Facilities Element

- We appreciate the commitment to using the development and management of capital facilities in an equitable way which incorporates the environmental, economic, social and health benefits of capital facilities (**CFG1**), in particular the structuring of user fees to mitigate cost burdens for low-income households (**CF1.7**), supporting job creation and training (**CF1.8**), locating new capital facilities to support equitable distribution of services for underrepresented communities (**CF3.2**) and encouraging accessibility of capital facilities for people of all abilities, socioeconomic backgrounds, ages and cultures. (**CF4.1**)
- We support the inclusion of capital facilities as a part of the City's strategies in restoring the natural environment and preparing for the impacts of climate change through a commitment to resilient capital facilities (**CF1.6**), improved resource conservation (**CF2.2, CF2.3**) and in the design and construction of new capital facilities (**CFG4**) .
- In addition to considering climate conditions (such as flooding) during facilities siting, we recommend that the City also take into consideration the need for capital facilities to provide a resource for communities during adverse impacts (**CF3.6**) as part of siting, design and construction of facilities.
- We recommend that the City include a policy which states that it will develop specific goals and metrics to monitor the progress towards the equitable distribution of capital facilities through the Race and Social Justice Initiative.

Utilities Element

- We support the commitment to using the utilities services to further environmental stewardship, race and social equity, economic opportunity and the protection of public health (**UG1**).
- We support embedding equitable access into decision making criteria (**U1.1**). We support the policy to discourage siting and design alternatives that may increase negative impacts, particularly on communities which already bear a disproportionate amount of these impacts (**U3.2**).
- We support the incorporation of climate change considerations in the development of a resilient utility system (**U1.3**). We encourage the inclusion of a policy which recognizes that the City's utility system will not only be responding to climate change, but can play an important role in the achievement of the City's climate change mitigation through policies, particularly related to conservation as included under goal **UG2**.

Economic Development Element

- We support the policy to strengthen neighborhood districts (**ED1.2**), particularly those neighborhood business districts identified as areas with high displacement risk in the *Equity and Growth Analysis*.
- We support the prioritization of assistance to commercial districts in areas of lower economic opportunity (**ED1.3**) and encourage that assistance to be community-driven and culturally-competent.
- We support the policy to increase job training, internship and placement to overcome high barriers to employment and achieve greater racial and social inclusion in the workforce (**ED4.2**). This policy should also include programs to educate and work with businesses to understand how they can improve their hiring and retention of more diverse employees, women, and other groups which face higher barriers to employment.
- We support the goal of strengthening the entrepreneurial environment for start-ups and small businesses (**EDG5**) and encourage the inclusion of a policy which recognizes the particular need for entrepreneurial support for businesses owned by persons of color, immigrants and non-native English speakers.

Environment Element

- The Plan's Environment Element should include policies and goals which are consistent with and supportive of the strategies and outcomes outlined in the Seattle Climate Action Plan, particularly **EG3, and policies E3.1 through E3.7**. Climate change, as well as the city's adaptation and mitigation measures, will have disparate impacts on certain populations, particularly low-income households, persons of color, transit-dependent households, recent immigrants or non-English speaking residents, the elderly and persons living in more vulnerable neighborhoods. The City should study and address these disparate impact with responsive, equitable mitigation actions.
- We support the goal of fostering healthy trees, vegetation and soils to promote both environmental and human health (**EG1**) and suggest including a policy recognizing that there will need to be diverse strategies to achieve these goals which are responsive to different land use patterns and that our high density areas can and should support this goal.
- The need to protect waterways and healthy fish and wildlife should include a policy of respecting the needs of subsistence and cultural fishing within the City.

- Pedestrian-friendly neighborhoods as outlined in **E3.2** to reduce emissions are critical to Seattle's emissions reduction strategy, and therefore the Comprehensive Plan should change the language from "aspire" to "will."
- We strongly support the goal in **E3.3** to implement these policies "while employing strategies which mitigate impacts on low income residents," though we would advise broadening to "low income residents and other impacted communities."
- Sea level is rising and floods and erosion are increasing. In 2012 the National Research Council concluded that global sea level had risen by about seven inches in the 20th Century and would likely rise by 24.3 inches in Seattle by 2100.^v The general extent of the two feet of sea level rise currently projected for coast can be seen on the NOAA Coastal Services Center Sea Level Rise and Coastal Flooding Impacts Viewer available at: <http://coast.noaa.gov/digitalcoast/tools/slr/>

The Washington State Department of Ecology (Ecology) writes that "[s]ea level rise and storm surge[s] will increase the frequency and severity of flooding, erosion, and seawater intrusion—thus increasing risks to vulnerable communities, infrastructure, and coastal ecosystems."^{vi} Not only our marine shorelines will be impacted, as Ecology writes "[m]ore frequent extreme storms are likely to cause river and coastal flooding, leading to increased injuries and loss of life."^{vii}

A recent peer reviewed scientific study ranked Washington State 14th in terms of the number of people living on land less than one meter above local Mean High Water compared to the 23 contiguous coastal states and the District of Columbia.^{viii} This amounted to an estimated 18,269 people in 2010.^{ix} One meter, 3.28 feet, is well within the projected sea level rise estimates of three to four feet or more for the end of this century.^x

Sea level rise will have an impact beyond rising seas, floods, and storm surges. The National Research Council wrote that:

Rising sea levels and increasing wave heights will exacerbate coastal erosion and shoreline retreat in all geomorphic environments along the west coast. Projections of future cliff and bluff retreat are limited by sparse data in Oregon and Washington and by a high degree of geomorphic variability along the coast. Projections using only historic rates of cliff erosion predict 10–30 meters [33 to 98 feet] or more of retreat along the west coast by 2100. An increase in the rate of sea-level rise combined with larger waves could significantly increase these rates. Future retreat of beaches will depend on the rate of sea-level rise and, to a lesser extent, the amount of sediment input and loss.^{xi}

A recent paper estimated that "[a]nalysis with a simple bluff erosion model suggests that predicted rates of sea-level rise have the potential to increase bluff erosion rates by up to 0.1 m/yr [meter a year] by the year 2050."^{xii} This translates to four additional inches of bluff erosion a year.

Homes built today are likely to be in use 2100. And new lots created today will be in use in 2100. This is why the Washington State Department of Ecology recommends "[l]imiting new development in highly vulnerable areas."^{xiii} So we recommend that new lots and new buildings be located outside the area of likely sea level rise. So we recommend that the following new policies be added to page 127:

E4.3 New lots shall be designated and located so that the buildable area is outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands will likely migrate during that time.

- E4.4** Where lots are large enough, new structures and buildings shall be located so that they are outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands will likely migrate during that time.

Parks and Open Space Element

- We support innovative strategies to better expand public and green space in right of way, private development, shorelines, smaller acquisitions and uses, and schools or other public agencies (**PG1**). However, we believe that keeping a quantifiable goal for parks and open space, defined as total open space, open space per person, or resident proximity, is necessary to ensure that we prioritize expanding greenspace and openspace, which is a critical component of health and livability in the city.
- We suggest adding more ways to increase access to parks and greenspace beyond acquisition. In addition to considering multimodal access (**P1.12**), access can be improved through better maintenance of existing facilities, improved safety and neighborhood connectivity, and facilities or programs which are culturally or age-appropriate to reflect the surrounding community.
- We support and appreciate the thoughtful consideration of the needs of many users reflected in the policies under goal **PG2**, in particular the emphasis on parks and recreation to support healthy living for diverse populations, various age groups, persons with disabilities and families.
- Policy **P2.9** should include a specific reference to non-English speaking populations because language isolation is a significant contributor to mental and emotional stress and is a significant barrier to accessibility of parks and recreational facilities for many residents. We suggest the inclusion of a policy similar to **CF1.7** regarding the structuring of user fees to mitigate cost burdens for low-income households.

Community Well-Being Element

- We support the Plan's emphasis on encouraging broad participation in neighborhood and community activities and events(**CW.1**).
- We strongly support partnering with community organizations and institutions to involve people of all backgrounds in planning and decision making (**CW1.4**).
- Many populations have specific barriers to health care, including limited physical access, fear of government institutions, language isolation and cultural taboos surrounding mental health and addiction. Policy **CW3.3** should include language that articulates these barriers and recognizes that targeted, culturally competent strategies will need to be employed to achieve equitable health outcomes.
- We support policy **CW3.5** and **CW3.6**, which recognizes that healthy food needs to be accessible, affordable and culturally appropriate.
- We support Goal **CWG4** and its policies. Policy **CW4.8** should include language which indicates special support for families of English language learners that empower parental involvement.

- We support CWG5 and the public safety policies. We suggest an additional policy which reads:

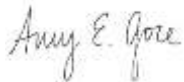
CW5.15 Coordinate with SDOT, Metro and other transit agencies to address crime and personal safety for transit riders.
- We support Goal **CWG6** and its policies to provide equitable opportunity and access to services for all Seattle residents. The City should include a policy which indicates a commitment to measuring and tracking equitable opportunity and access through a variety of metrics that can be used to guide programs and investments to create more equitable outcomes.

Neighborhood Planning

- As the city grows and changes, neighborhood planning will be critical. Neighborhood planning can be resource intensive and we support the approach to prioritization in **NP1.1** and through broader, more meaningful engagement with under-represented groups, as discussed in **NP1.2**.

Again, we appreciate the opportunity to provide comment on the Plan. We look forward to the release of the Mayor's Recommended Plan in 2016.

Sincerely,



Amy Gore
Sustainable Communities Director

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- ⁱ *Whidbey Envtl. Action Network v. Island Cty.*, 122 Wn. App. 156, 174 – 75, 93 P.3d 885, 894 (2004) “the GMA requires that the regulations for critical areas must protect the ‘functions and values’ of those designated areas. This means all functions and values.” Footnotes omitted.
- ⁱⁱ *Whidbey Envtl. Action Network v. Island Cty.*, 122 Wn. App. 156, 174 – 75, 93 P.3d 885, 894 (2004).
- ⁱⁱⁱ Dianne L. Brien and Mark E. Reid, *Modeling 3-D Slope Stability of Coastal Bluffs, Using 3-D Ground-Water Flow, Southwestern Seattle, Washington* p. 6, pp. 39 – 46 (U.S. Geological Survey Scientific Investigations Report 2007-5092: 2007) accessed on Nov. 19, 2015 at: <http://pubs.usgs.gov/sir/2007/5092/>
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