

**THE PROPOSED 2015 COMPREHENSIVE PLAN “UPDATE” IS, IN EFFECT, A REVOLUTIONARY NEW PLAN THAT REMOVES MANY CURRENT PROTECTIONS FOR SUSTAINABILITY AND LIVABILITY**

Mayor Murray and his Department of Planning and Development have proposed an “update” of Seattle’s Comprehensive Plan which is in reality a revolutionary new plan that would unleash devastating new construction upon the 30+ neighborhoods that the Comprehensive Plan since 1994 has designated as urban centers or villages [See list in box below]. It would do so by adding major new growth expectations for these neighborhoods while removing protections that currently seek to ensure them some semblance of village-like livability.

**Urban Centers:** Downtown, Northgate, South Lake Union, University.

**Hub Urban Villages:** Lake City, North Rainier, Bitter Lake Village, Ballard, West Seattle Junction, and Fremont.

**Residential Urban Villages:** Crown Hill; 23rd Avenue S @ S Jackson – Union; Madison-Miller; Wallingford; Eastlake; MLK@Holly Street; South Park; Upper Queen Anne; Roosevelt; Aurora-Licton; Green Lake; Rainier Beach; Morgan Junction; Admiral; North Beacon Hill; Greenwood/Phinney Ridge; Columbia City; Westwood/Highland Park

The Mayor is proposing that Seattle and particularly its urban villages take far more growth than County targets currently require. And the current targets already have Seattle accepting as its share of growth more new construction per acre and per capita than any other city in the state. Further increasing these already unsustainable growth targets is a decision that would have huge consequences for Seattle’s size and livability, and it must not be made without full public awareness and involvement.

Officially terming these neighborhoods as “urban villages,” as the Comprehensive Plan has done since 1994, embodied a promise to them that while growth would come, it would be no more than is consistent with the intimacy and charm of a village. The commitment was that growth would only be such that the qualities of a village would be maintained; that it would be accompanied by public investments in amenities like parks, sidewalks, and other public facilities; and that the growth expectations for urban villages would be scaled back if livability would otherwise be sacrificed.

Since its adoption in 1994, the Comprehensive Plan has committed the City to balancing growth with livability. With the revolutionary “update” now proposed, the Comprehensive Plan would be transformed into an engine of growth at any cost that would likely leave Seattle unrecognizable as the city of neighborhoods it has been for more than a century.

In the proposed “update,” many if not most items in the current Comprehensive Plan that protect sustainability, livability, and public participation are either weakened or entirely deleted.

Emblematic of the loss of balance in this “update” is that the plan would no longer even be titled “Toward a Sustainable Seattle,” as it has been since being adopted in 1994.

This reversal in priorities can also be seen in how the term “urban village” is used in the proposed new Comprehensive Plan. It no longer connotes a balance between growth and livability, but simply a means to push more growth into the urban villages. In an Orwellian reversal of meaning, the “updated” Comprehensive Plan’s notion of “urban village strategy” (newly envisaged as huge growth increases in those neighborhoods) would now trump the balancing protections that urban villages now enjoy in the current Plan--rendering absurd the claim of village-like qualities in the result. The “urban village strategy” thus would become an all-purpose excuse for density without limits, in contrast to the urban village strategy being originally defined in the Comprehensive Plan as balancing growth with livability.

To see Seattle’s current Comprehensive plan, click [here](#); for the proposed “update,” click [here](#) or search on the web for Seattle 2035; on that site you can see both the current Comprehensive Plan and the proposed new plan. But until recently you were on your own in trying to discern the vast differences between the two documents. After receiving months of criticism for this omission, the Department of Planning and Development responded in August with a “crosswalk” document (available on the Seattle 2035 documents page or by clicking [here](#)) that begins to identify the many parts of the current plan that would be lost. The goals and policies in the crosswalk’s left column are the current Plan’s, and those in the right column are those of the “Update.” Unfortunately, the crosswalk document is only a listing of changes, without any grouping of the changes and without any analysis of what the changes mean.

Following is a summary of the differences that the “crosswalk” document reveals between the current Comprehensive Plan and the proposed “update.” Note that the preparer of the current document has not had a chance to double-check the changes identified in the crosswalk document by comparing each important goal and policy in the current plan that is listed below to confirm what its fate is in the proposed “update.” The crosswalk document may have missed some goals or policies that are proposed to be deleted, and it may also incorrectly state that some are proposed to be deleted. The “update” document, not the crosswalk, is what the City Council would adopt, and so further confirmation of the changes is needed. It is hoped that readers of the current document will help with this double-checking process.

In the summary below, a goal (those with a G) or a policy (those without a G) is deemed deleted if no similar language survives. If readers find any errors or divergences between what is stated below and how the proposed 2015 Comprehensive Plan “update” would make changes from the current Comprehensive Plan, or can suggest improvements in this analysis, please send them to Chris Leman, cleman@oo.net, or call (206) 322-5463. Following is a grouping of the changes into the following four categories:

Growth is no longer to be balanced with livability

Open space and trees and their benefits are greatly de-emphasized

Participation by the public and consideration of its wishes are greatly diminished  
Parking is no longer recognized as of value but now is cast as a problem

## **GROWTH IS NO LONGER TO BE BALANCED WITH LIVABILITY**

*Deletes* LU11: “In order to maintain the character of Seattle’s neighborhoods and retain existing affordable housing, discourage the demolition of residences and displacement of residents, while supporting redevelopment that enhances its community and furthers the goals of the Plan.”

*Substantially deletes* LU48: “Seek to preserve views through: (1) land use regulations that address view impacts with height, bulk, scale, view corridor, and design review provisions; (2) zoning policy that considers the effect of zone designations on views, with special emphasis on protection of views related to shoreline areas; and (3) application of adopted environmental policy to protect public views, including views of mountains, major bodies of water, designated landmarks and the downtown skyline, in review of development projects.” [The replacement language is as only as follows: Address view protection through (1) Zoning that takes into account views, with special emphasis on protection of shoreline views; (2) Development standards that help to reduce impacts on views, including height, bulk, scale and view corridor provisions, as well as design review guidelines; (3) Environmental policies that protect specific public views, including views of mountains, major bodies of water, designated landmarks and the downtown skyline, during review of development projects.]

*Deletes* LU80: “Provide for predictability about the allowed intensity of development with appropriate development standards and density limits for each zone to accommodate a range of housing types and achieve development that meets the policy intent for each zone.”

*Deletes* LU81: “Limit building heights to establish maximum heights, maintain scale relationships with adjacent buildings, and limit view block age. Allow for a variety of roof forms, and allow additional height to encourage pitched roofs, where appropriate.”

*Deletes* LU82: “Determine the appropriate height for an area according to the policy intent for each multifamily classification.”

*Deletes* LU94: “In order to maintain a consistent and appealing character in low-density multifamily areas, adopt development standards that help ensure new development and converted structures contribute positively to the character of multifamily neighborhoods and are compatible with abutting single-family zoned areas in terms of scale, open space and setbacks, siting, and unit orientation.”

*Deletes* UV14: “Encourage development of ground-related housing, which is attractive to many residents including families with children, including townhouses, duplexes, triplexes, ground-related apartments, small cottages, accessory units, and single-family homes.”

*Adds* LU9.11 “Use midrise multifamily zones to provide additional housing opportunities in urban villages and centers.”

*Deletes* UV30: Balance objectives for accommodating growth supporting transit use and walking maintaining compatibility with existing development conditions, maintaining affordable housing, and responding to market preferences for certain types of housing, through the density and scale of development permitted.

*Deletes* UVG33: “Plan for a distribution of growth to each urban village that accomplishes the goals of the urban village strategy, and recognizes local circumstances, community preferences as expressed in neighborhood plans, and the need for an equitable distribution of growth across the city.” [Various new policies or goals would force most growth into urban villages regardless of the impacts and regardless of the capacity for growth to be accommodated outside urban villages. For example, an addition is GSG2: “Accommodate most of the city’s housing and employment growth in designated urban centers and urban villages in ways that will lead to equitable outcomes for all of the city’s residents.” Another addition is GS2.8: “Direct the majority of future development to centers and urban villages, and limit the possibility of scattered growth along arterials and other areas not conducive to walking, transit use, and cohesive community development.”]

*Deletes* UVG35 “Achieve development within urban villages at a pace appropriate to current conditions in the area.”

*Deletes* CF8 (concurrency): “Explore tools that encourage sufficient capital facilities and amenities to meet baseline goals for neighborhoods and to address needs resulting from growth.”

*Substantially deletes* H37 (good neighborhood guidelines): “Require sponsors of City-funded subsidized rental housing projects and encourage sponsors of non-City-funded subsidized rental housing projects to use the City’s good neighbor guidelines. This should encourage cooperative problem solving as early as possible in the process of developing subsidized rental housing, in order to identify, and where appropriate, respond to neighborhood concerns.” [The replacement language is as only as follows: “Require neighborhood notification when agencies apply for City funding for rental housing preservation and projection projects and provide guidelines for effective communication between housing owners and neighbors.”]

*Adds* GS2.9/2.10: Use zoning and other planning tools in urban centers and urban villages to address displacement of low-income, special needs residents, and immigrant and refugee populations, along with community services and institutions.” [Note: this is an ironic addition,

given that upzoning and the overdevelopment that it promotes have caused much of the recent displacement by causing demolition of the older buildings in which many low-income, special needs, and immigrant and refugee populations were living.]

## **OPEN SPACE AND TREES AND THEIR BENEFITS ARE GREATLY DE-EMPHASIZED**

*Deletes* LU-34: “Limit the maximum amount of lot area covered by a structure to maintain compatibility with the scale and character of an area, to provide an adequate proportion of open area on a site relative to the area occupied by structures, and to provide occupants with sufficient access to light and air, as appropriate to the intended character and use of an area.” [The replacement language, LU5.3, is only as follows: “Control the massing of structures to make them compatible with the area’s planned scale, provide a reasonable ration of open to occupied space on a site, and allow the building to receive adequate natural light. ”

*Deletes* LU36: “Outside of Urban Centers, use requirements for onsite open space or required yards to help ensure that new development maintains existing patterns of landscaped front yards, to encourage permeable surfaces and vegetation, and to mitigate the cumulative effects of development.”

*Deletes* LU39: “Preserve and enhance the City’s physical and aesthetic character and environment by (1) Preventing untimely and indiscriminate removal or destruction of trees; (2) Providing incentives to property owners for tree retention; (3) Providing protection to large trees; (4) Providing special protection to exceptional trees that, because of the unique historical, ecological, or aesthetic value, constitute an important community resource.

*Deletes* UVG37: [“Provide safe and welcoming places for the people of Seattle to play, learn, contemplate, and build community. Provide healthy spaces for children and their families to play; for more passive activities such as strolling, sitting, viewing, picnicking, public gatherings, and enjoying the natural environment; and for active uses such as community gardening, competitive sports, and running.”]

*Deletes* UV39: [“Enhance the urban village strategy through the provision of: 1. Amenities in more densely populated areas; 2. Recreational opportunities for daytime populations in urban centers; 3. Mitigation of the impacts of large scale development; 4. Increased opportunities to walk regularly to open spaces by providing them close by; 5. Connections linking urban centers and villages, through a system of parks, boulevards, community gardens, urban trails, and natural areas; 6. A network of connections to the regional open space system; 7. Protected environmentally critical areas; 8. Enhanced tree canopy and understory throughout the city.”]

*Deletes* UV53: Direct efforts to expand the open space network according to the following considerations: (1)Locations for new facilities: a. Urban centers and villages targeted for largest

share of residential growth; especially those existing high density residential areas presently not served according to the population-based or distribution goals for urban village open space; b. Other urban village locations where an adopted subarea plan or recognized neighborhood plan includes open space recommendations consistent with these policies; and c. Specific locations enumerated in the Parks functional plan outside urban centers or villages. (2) types of open space acquisitions and facility development: a. Village open space sites, urban center indoor recreation facilities, village commons sites, and community gardens; b. Critical open space linkages, connectors, and corridors that are highly accessible for active use within or directly serving urban villages, high density and/or high pedestrian, bicycle, or transit use areas; c. Open space linkages, connectors, and corridors that are highly accessible for active use serving other high pedestrian, bicycle, or transit use areas; and d. Other types of open space within or adjacent to urban villages that is accessible from adjacent urban village. [The replacement language, P1.1, is only as follows: "Continue to expand the City's park holdings, with special emphasis on serving urban centers and urban villages and areas that have been traditionally under-served."]

*Deletes UV55:* "Seek to provide public open space in conjunction with major public projects such as utility and transportation projects, with the amount of open space based on the size of the project, open space needs of the adjacent areas, and the opportunities provided by the particular project."

#### **PARTICIPATION BY THE PUBLIC AND CONSIDERATION OF ITS WISHES ARE GREATLY DIMINISHED**

*Deletes LU5:* ["Consider, through neighborhood planning processes, recommendations for the revision of zoning to better reflect community preferences for the development of an area, provided that consistency between the zoning and this Plan is maintained. Consider relevant goals and policies in adopted neighborhood plans when evaluating a rezone proposal."]

*Deletes UVG10:* "Collaborate with the community in planning for the future."

*Deletes LU5:* "Consider, through neighborhood planning processes, recommendations for the revision of zoning to better reflect community preferences for the development of an area, provided that consistency between the zoning and this Plan is maintained. Consider relevant goals and policies in adopted neighborhood plans when evaluating a rezone proposal."

*Deletes LU75:* "Limit the multifamily zones to areas that do not meet the single-family zone criteria, except in circumstances where an adopted neighborhood plan indicates that a different zone is more appropriate."

*Deletes LU164:* "Require conditional use review for certain uses to ensure compatibility with uses located in abutting, less intensive zones, to ensure consistency with adopted neighborhood plans, or to evaluate certain uses that could have significant impacts on other nearby uses."

## **PARKING IS NO LONGER RECOGNIZED AS OF VALUE BUT NOW IS CAST AS A PROBLEM**

*Deletes* LUG4: “Establish off-street parking requirements for new development to provide parking for the occupants of the structure. Set off-street parking requirements to reduce reliance on automobiles, promote economic development, and reduce housing costs.”

*Substantially deletes* LU49: “Seek to further this Plan’s goals of encouraging the use of public transit, carpools, walking, and bicycles as alternatives to the use of single-occupancy vehicles when setting parking requirements for both single-occupant vehicles and their alternatives. When setting new requirements for off-street parking balance the goals of accommodating the parking demand generated by new development and avoiding on-street congestion of parked cars with the goals of lowering construction costs and discouraging single-occupant vehicles.”

*Deletes* LU20: “Allow small institutions and public facilities to not satisfy all parking demands they generate, if they demonstrate how they will reduce traffic impacts. Do not permit the creation of a serious safety problem or blighting influence on the surrounding neighborhood.”

*Deletes* LU50: In urban centers and urban villages, consider removing minimum parking requirements and setting parking maximums in recognition of the increased pedestrian, bicycle and transit accessibility these areas already provide or have planned. Parking requirements for urban centers and villages should account for local conditions and planning objectives. “

*Adds* LU63: “Rely on market forces to determine the amount of parking provided in areas of the city that are well-served by transit, such as urban centers and those urban villages that contain frequent transit service, without requiring a minimum parking requirement in these areas.”

*Deletes* T-39: “Restrict on-street parking when necessary to address safety, operational, or mobility problems. In urban centers and urban villages where such restriction is being considered, the pedestrian environment and transit operations are of primary concern, but decisions should also balance the use of the street by high-occupancy vehicles, bicycles and motor vehicles, access to local businesses; control of parking spillover into residential areas; and truck access and loading.”

*Deletes* T-40: “in commercial districts prioritize curb space in following order: 1. transit stops and layover; 2. passenger and commercial vehicle loading; 3. short term parking (time limit signs and paid parking); 4. parking for shared vehicles; and 5. vehicular capacity.

*Adds* T2.6: “Assign functions in the transition zone to support nearby land uses, provide support for modal plan priorities, and to accommodate multiple functions.

Transportation Figure 3--Priorities for Right of Way Transition Zone” by Predominant Use of Area

Commercial/mixed use areas: 1. Access for commerce; 2. Access for people; 3. Activation; 4. Greening; 5. Storage.

Industrial areas: 1. Access for commerce; 2. Access for people; 3. Storage; 4. Activation; 5. Greening

Residential areas: 1. Access for people; 2. Access for commerce; 3. Greening; 4. Storage.”

*Deletes T-46: Coordinate Seattle’s parking policies with regional parking policies to preserve Seattle’s competitive position in the region.”*

*Deletes TG17: “Manage parking supply to achieve vitality of urban centers and urban villages, auto trip reduction, and improved air quality.”*

**Opportunity for public comment.** It is urgent for members of the public to comment on the proposed Comprehensive Plan “update.” The public comment period is open until Nov. 20, but early comments will make more of a difference. Please e-mail your views to 2035@seattle.gov or send them by U.S. mail to the Seattle Department of Planning and Development, Attn: Seattle 2035, 700 5th Avenue, Suite 2000, P.O. Box 34019, Seattle WA 98124-4019. Mayor Ed Murray does not accept comments from the public by e-mail, requiring electronic communication via a web site, <http://www.seattle.gov/mayor/get-involved/contact-the-mayor>. You can also reach Mayor Murray by letter at 600 Fourth Avenue, 7th floor, P.O. Box 94749, Seattle, WA 98124-4749, or by fax at 206-684-5360.

You should also send your views to the nine City Councilmembers, who will make the final decision. Be sure to communicate with them individually, rather than by a group e-mail or letter (which is far less likely to be heeded). The City Council e-mail addresses are as follows:

sally.bagshaw@seattle.gov, tim.burgess@seattle.gov, jean.godden@seattle.gov, bruce.harrell@seattle.gov, nick.licata@seattle.gov, mike.obrien@seattle.gov, john.okamoto@seattle.gov, tom.rasmussen@seattle.gov and kshama.sawant@seattle.gov (some of these names will change in January). You can also reach the City Councilmembers by letter at 600 Fourth Avenue, 2nd floor, P.O. Box 34025, Seattle, WA 98124-4025, or by fax at 206-684-8587.

*The above analysis was prepared by Chris Leman (cleman@oo.net, 206-322-5463) who bears sole responsibility for its content. Readers are encouraged to contact him if they find any errors or divergences between what is stated below and how the proposed 2015 Comprehensive Plan “update” would make changes from the current Comprehensive Plan, or if they can suggest other improvements or additions for this analysis.*