To:
Rico Quirindongo
Director, Office of Planning and Community Development
City of Seattle

Dear Office of Planning and Community Development Team,

Seattle Parks Foundation has worked for 25 years to ensure thriving and equitable public spaces throughout the city. We believe that the future of Seattle depends on equitable public spaces, climate solutions that support neighborhoods, activated public spaces that promote healthy lifestyles, and strong well supported community engagement. We appreciate that much of this plan addresses these values and ensures that the future of Seattle will be healthy.

Our comments and suggestions for this current Comprehensive Plan update are made in the spirit of partnership. Our goal is to ensure that the goals are clear and direct enough to address the pressing issues we have as a city in the next 20 years.

General Feedback:
Parks, recreation, natural areas, and tree canopy need to be acknowledged *throughout the plan*, not just in their distinct sections. Public and green spaces are critical urban infrastructure for the health and wellness of our residents. They are destination locations that provide economic development, cultural entertainment, recreation activities, rejuvenation and connection to nature, community engagement, critical ecosystem services, and biodiversity.

High-level summary of SPF comments on the draft One Seattle Plan:
We appreciate and recommend maintaining these sections, goals, and policies specifically:

- Integration of climate mitigation, adaptation, and resilience throughout the plan
- Incorporation of landscaping techniques to improve environmental health throughout various public assets
- Inclusion of support for lids over our major freeways that divide communities
- Planning for green jobs and a sustainable economy
- Greater integration of tree canopy policies throughout the plan
- Addition of nature-based solutions and ecological restoration as important tools for addressing climate impacts and environmental hazards
- Addition of goals and policies for Tribal consultation and supporting Indigenous communities
- Consideration for wildlife and nature appreciation in parks and recreation planning

We recommend strengthening the draft One Seattle Plan by:

- Acknowledging that parks are part of our critical urban infrastructure for the health, wellness, and community support of all residents and the city should strive for a 5 – minute walk shed for all parks and green spaces.
- Recognize that new park like spaces will need to be created through private development and non-traditional public spaces such as schoolyards (transitioning hardscapes into greenscapes).
- Further defining “public spaces” by saying “public and green spaces” throughout the plan, not just in the public spaces section.
- Improve design language to expressly identify design solutions that can improve climate change mitigation
- Acknowledge the global extinction crisis and establish equitable biodiversity conservation as a goal

- Integrating and increasing ambition and specificity of goals and policies related to natural systems throughout the plan
- Expand the concept and expectations of sustainable operations and building design to include wildlife safety.

In the sections below – amendments and suggestions are in RED.

GROWTH STRATEGY COMMENTS:

GS 3.4: Allow a wide range of non-residential uses in Regional Centers including office, retail, parks and recreation, and entertainment uses. Regional Centers should contain most of Seattle's office development.

GS 4.4 Allow a wide range of non-residential uses including office, retail, parks and recreation, and entertainment uses in Urban Centers. Major office developments are appropriate in Urban Centers but should be encouraged primarily near light rail stations.

GS 4.5 Allow various sizes of Urban Centers based on local conditions, but generally include those areas within a 10-minute walk (half-mile) of a current or future light rail station or 8-minute walk (2,000 feet) of the central intersection if no light rail exists and within a 5-min walk of local greenspace, trail, or park facility.

GS 5.2 - Allow a diversity of housing, institutional, service, retail, parks and recreation, and entertainment uses in Neighborhood Centers. Focus non residential uses primarily in the core of the center. Generally, avoid allowing major office developments in these areas.

PARKS AND OPEN SPACE COMMENTS:
Add a policy that includes:

GS 9.5 Continue and expand shared use agreements with institutions which have or could create public spaces, such as schools, public agencies, and private developments to ensure expansion of public spaces towards a 5-minute walk goal.

GS 9.6 Address zoning within a 5-minute walk of current and/or future parks and open space to ensure diversification of housing and to reduce green gentrification.

ANNEXATION COMMENTS:
Add a policy that includes:

GS 11.7 Prioritize protection of greenspaces, ecosystems, trails and potential parks and recreation facility locations when annexing unincorporated areas of King County.

LAND USE - URBAN DESIGN

Natural Environment:
LU 2.1 should be revised to read: Encourage the protection, restoration, and celebration of Seattle's natural features and landforms such as bluffs, beaches, streams, and forests and trees.

Built Environment:

SPF Strongly supports the inclusion of LU 2.12: Preserve Seattle's existing street grid and seek opportunities for new pedestrian and bike connections to knit together neighborhoods. Support efforts to use lids and other connections over highways that separate neighborhoods, especially when such lids provide opportunities to reconnect neighborhoods and provide amenities such as affordable housing, open spaces, or pedestrian and bike connections to transit stations.
LU. 2.13 Design neighborhoods to be walkable and accessible by enhancing pedestrian connections, public open and green spaces, urban tree canopy, walking and biking infrastructure, and wayfinding, and by encouraging buildings with retail and active uses that flank the sidewalk.
LU 2. 14 Consider the value of designing buildings and public spaces that maximize use of natural light and provide protection from inclement weather, including extreme heat and smoke.
LU 2. 15 Encourage the use of land, rooftops, and other spaces for urban food production, gardens, and natural landscaping that improve the overall ecosystem services to the city.
LU 2.17 Use groupings of tall buildings, instead of lone towers, to enhance overall topography or to define districts. Ensure these developments do not create a heat canyon effect but rather improve airflow through neighborhoods.

Public Spaces:
General Comment: When using the term "public space" it is too vague and can often be interpreted as hardscape spaces. It is important as we address the long-term climate challenges of the city that we prioritize when public spaces are created we have natural landscaping, trees, and other greenspace infrastructure. Thus, we recommend adding:
LU 2.25 Design public spaces to prioritize natural landscaping to support biodiversity, trees which contribute to the city's 30% tree canopy goal, and greenspaces that allow for cooling infrastructure.

USES:
General comment: We are concerned about how public spaces can increase the affordability of housing in the city. It is important that zoning within a 5-minute walk of current and/or future parks and open space ensures diversification of housing to reduce green gentrification. The uses outlined here could allow for this to happen, however it is not explicitly stated.

PUBLIC FACILITIES AND SMALL INSTITUTIONS:
LU 6.4 Allow buildings no longer used as schools to be put to other uses not otherwise permitted in the applicable zone. Allow blacktop or hard scaped publicly accessible areas of these facilities to be converted to green spaces, public gardens, or similar natural infrastructure facilities.

TRANSPORTATION PLAN:
T 2.13 Preserve and enhance the boulevard network ~~both~~ for travel, ecosystem, and urban forest enhancement, and as a usable open- space system for active transportation modes.
T 2.16 Develop strategies that prioritize walking, biking, transit, natural landscaping, and public spaces on streets over parking.

MULTIFAMILY ZONES:
Development on multifamily zones takes a heavy toll on the trees that grow there. The 2021 Tree Canopy Assessment found that on average 50% of tree canopy was lost on multifamily lots that had undergone development. Multifamily zones also already tend to have less canopy cover and many of these zones are in Environmental Justice Priority Areas where tree canopy loss has been experienced disproportionately. The updated version of SMC 25.11 passed in 2023 allows developers to hardscape up to 85% of the developable lot area in multifamily zone, leaving little room for trees. Planning for tree preservation and planting in these zones is critical for meeting the city's climate resilience and environmental equity goals. To that end, the following policies should be adjusted to read:

LU 10.4 Design multifamily zones to be appealing residential communities with high-quality housing and development standards that promote livability and a sense of community, including equitable tree canopy, appropriately scaled landscaping, street amenities, and, in appropriate locations, limited commercial uses that serve the neighborhood's residents.

LU 10.6 Encourage child-friendly housing with unit sizes and layouts that work for larger households and public and green spaces with amenities that improve livability for families with children.

HISTORIC PRESERVATION AND CULTURAL RESOURCES

The wild things we share our city with are links to Seattle's past and important cultural resources. Yet the Historic Preservation and Cultural Resources section does not specifically identify natural heritage as a subject of preservation. We recommend revising the first sentence of the discussion on page 58 to read:

"Historic preservation recognizes and protects aspects of our shared cultural heritage—buildings, districts, designed landscapes, natural features, and areas long used by Indigenous communities—that link to Seattle's past."

ENVIRONMENTALLY CRITICAL AREAS

Regulations for environmentally critical areas should not just seek to protect ecological functions and values of wetlands and fish and wildlife conservation areas, they should also seek to enhance them. Our regulations should also protect the health and safety of both people and wildlife.

LU G17 Environmentally critical areas regulations seek to:

- protect and enhance the ecological functions and values of wetlands and
- fish and wildlife conservation areas;
- prevent erosion on steep slopes;
- protect public health, safety, and welfare in areas subject to landslides, liquefaction, floods, or peat settlement;
- inform the public by identifying seismic and volcanic hazard areas; and
- minimize harm to people, wildlife, property, public resources, or the environment

TRANSPORTATION

Streets Designed for Everyone

Changing how we design and use the public right of way is an exciting opportunity to achieve multiple benefits—increased tree canopy, greater urban food production, improved access between parks for people, and increased wildlife supporting capacity in the city to name a few.

T 2.16 Develop strategies that prioritize walking, biking, transit, street trees and public spaces on streets over parking.

T 2.17 Create vibrant public spaces in and near the right-of-way that foster social interaction, promote access to walking, bicycling, and transit options, support birds and other wildlife, and enhance the public realm.

T 2.19 Co-create and design with the community shared streets that prioritize people, public life, natural landscaping, and community functions, and that deemphasize vehicles.

T 2.20 Identify streets and other public rights-of-way that could potentially serve as corridors between parks and open spaces to prioritize vegetation and amenity enhancements to improve people's access to public space and to facilitate movement of wildlife.

T 3. 19 – we strongly support the inclusion of this element, particularly the creation of lids over highways that can expand green and open space.

T 4.10 – Enhance and protect tree canopy and landscaping in the street right-of-way

CAPITAL FACILITIES
Public School Facilities
We believe public schoolyards play an important role in the future of greenspaces and parks in the city. To that end, this policy should be adjusted:

CF 6.8 Encourage SPS to preserve, improve and transition hardscapes to open space, greenspace, and trees when redeveloping school sites.

ECONOMIC DEVELOPMENT
Build and Invest in the Green Economy

ED 7.1 Establish partnerships to build workforce capacity to advance completion of city-wide decarbonization and climate adaptation efforts, including through electrification, construction, conservation, urban forestry, and other new green technology programs.

ED 7.3 Support business partnerships and models which are centered on climate mitigation, climate adaptation, biodiversity conservation, and/or a shift toward sustainable operational models within established industries, including incubator and accelerator funding of new sustainable businesses.

CLIMATE AND ENVIRONMENT: HEALTHY RESILIENT COMMUNITIES AND ENVIRONMENT
Community-Based Climate Resilience
Seattle Parks Foundation has worked in partnership with community for over a decade in South Park and Georgetown. It is important for the city to recognize the Duwamish River Valley needs natural ecosystem solutions to King tides and sea level rise.
CE 8.2 Mitigate climate impacts by prioritizing green and natural systems infrastructure solutions that provide co-benefits to community, such as providing living wage jobs, increased parks and greenspaces and enhancing social connectedness.

Extreme Heat and Smoke Events
Seattle Parks foundation strongly supports long term and disproportional investment in this policy.
CE 9.3 Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events.

Sea Level Rise and Flooding
The language in the below policy needs to be strengthened and more directive.

CE 10.3 ~~Where feasible,~~ Prioritize use of open space, green infrastructure, and other nature-based solutions to buffer communities from flooding impacts.

Urban Forest and Tree Canopy

Trees are among the most important natural features in urban areas. But the urban forest is more than a tree canopy: it is a layered system including soil, understory plants, and the epiphytes that live on the trees themselves. Seattle's urban forest is amazingly diverse and in decline. Additional investment and attention will be needed to reverse losses and address inequities.

CE G12 Seattle has a healthy urban forest with a tree canopy that covers at least 30% of the land by 2037, and 40% over time, which meets the needs of people and wildlife, and maximizes the environmental, economic, social, and climate-related benefits of trees.

CE 12.1 Consider and prioritize the needs of frontline communities in all urban forestry actions.

CE 12.5 Reach out to, educate, and partner with the community to help care for, preserve, and celebrate Seattle's urban forest. ~~and preserve our tree canopy~~

Care and maintenance for most street trees is the responsibility of the adjacent property owner. Tree care can be expensive, which creates disincentives for tree planting and preservation. This has contributed to the current inequity in tree canopy cover we observe across the city. We therefore recommend adding a new policy:

CE 12.9 Explore opportunities through subsidies or other mechanisms to reduce inequities and disincentives associated with the cost of tree maintenance and preservation

We need measurable goals to ensure we are delivering on canopy and nature access equity goals. We ask you to consider the 3-30-300 rule (Browning et al. 2023). We recommend adding a new policy under CE G12

CE 12.10 : Strive to equitably distribute the benefits of trees by advancing measurable policies such as the 3-30-300 rule: three (3) significant trees (at least 20' wide crown) from their dwelling, have 30% tree canopy in their neighborhood, and live within 300 meters (3-4 blocks) of a high-quality green space.

Healthy Food System

Access to locally grown, organically produced and culturally relevant foods is critical to the future health of our community. The city needs to continue and expand investments in pea patches, community gardens and urban farms. In addition, localized composting solutions could significantly reduce the carbon impact of food systems in neighborhoods throughout the city.

CE 14.7 Strive to prevent food waste, rescue and redistribute surplus food for people who need it, and locally compost the rest with the least amount of carbon impact.

PARKS AND OPEN SPACES

Seattle Parks Foundation agrees with the general discussion around the context of our parks and public spaces in the city. There are refinements that are necessary to some of the policies.

SEATTLE PARKS FOUNDATION

P G1 Public spaces are expanded and enhanced as the city grows, and current inequities are addressed, so that everyone has access to the full range of recreational, social, cultural, natural, and health benefits that public spaces provide.

Access to Public Space

P 1.12 Provide areas to preserve or restore important natural or ecological features and allow people access to these spaces by building or expanding trail systems through greenbelts and other natural areas, while ensuring the protection of habitat and wildlife.

P 1.14 Provide sustainable public access to shorelines by improving shoreline street ends, applying shoreline regulations, ~~and~~ acquiring waterfront land, removing shoreline armoring, and restoring coastal habitat.

P 1.17 Maintain and expand cooperative agreements with Seattle Public Schools and other public or private agencies to provide or expand access to open spaces they control, ~~and~~ increase the tree canopy, transition hardscapes and grow the current green space they provide.

P 1.21 Design public spaces to provide multiple benefits, such as providing a variety of recreational uses and environmental functions, such as with stormwater capture and tree canopy for urban heat relief.

Partnering with Communities

It is important to recognize that for the community to participate in public space engagement, particularly in lower income communities, they need to be supported with community capacity building funding.

P 4.2 Establish partnerships with public and private organizations to supplement programming and support community capacity building that supports residents' needs and interests.

Seattle can learn a lot from Vancouver, BC in how they have transitioned oversight and management of public lands in partnership with the Coast Salish in BC. We have added more nuance to P 4.5.

P 4.5 Partner with and support Indigenous communities and individuals to incorporate Indigenous cultures, histories, values, and land management and stewardship practices in public spaces. Explore opportunities to return public land to Indigenous ownership or co-manage public lands with tribal partners.

Climate Resilient Open Space

As Goal P G5 is written, it is unclear to us what is meant by "healthy environment", why only shorelines are to be resilient, and how public spaces are meant to do the big job of mitigating the impacts of climate change.

P G5 should be modified to read: Public spaces meet community needs, maintain ecosystem functions, support healthy levels of biodiversity, and are resilient to and help ~~support a healthy environment and resilient shorelines and~~ mitigate the impacts of climate change.

We recommend adding two new policies to under Goal P G5:

P G6 Promote removal of shoreline armoring, coastal restoration, and managed retreat of structures away from areas at high risk of erosion, flooding, or submersion due to sea-level rise.

P G7 Assess vulnerability of Seattle parks—including park access, facilities, habitats, and wildlife—to climate change and develop proactive plans to manage for resilience.

ARTS AND CULTURE

We believe it is important to acknowledge those elements in the natural environment that have cultural significance, particularly culturally significant trees and historic indigenous locations (such as the "little crossing over place" beach at Pier 48). Natural locations should be included as historically important cultural spaces.

AC 1.1 Maintain an inventory of ~~both~~ public, ~~and~~ private, and nature based, cultural spaces that includes information about the cultural communities reflected in these spaces.