FRIENDS OF RAVENNA-COWEN

May 4 2024

To: OneSeattleCompPlan@seattle.gov
To: PCD_CompPlan_EIS@seattle.gov
cc: Bruce.Harrell@seattle.gov , maritza.rivera@seattle.gov

The Friends of Ravenna–Cowen submit our comments below on the One Seattle Plan and the DEIS for the One Seattle Plan.

The Friends of Ravenna–Cowen (FORC) is a not-for-profit neighborhood group established to *"preserve and protect the history and natural environment of the Ravenna-Cowen neighborhood as a shared community resource for all, and to support other like-minded neighborhood and not-for-profit groups."* With this mission in mind, we are providing our comments, focusing primarily on historical/cultural resources, land use/housing, and plants/animals. We acknowledge the need for affordable housing and increased density is some areas of the City, but this must be done in concert with protection of our natural and historical resources. While many of our comments may reference specific issues for the Ravenna-Cowen area, these also generally apply to many areas within Seattle.

Background:

FORC was organized in 2016 to celebrate and raise awareness of the neighborhood to the north and west of Ravenna and Cowen parks. This area includes many examples of historically significant architecture, numerous heritage trees, and the incomparable public resources of Ravenna and Cowen Parks.

In 2018, thanks to thousands of hours of volunteer work, the Ravenna-Cowen North Historic District was listed in the National Historic Register of Historic Places, as well as the Washington State Register of Historic Places, where it joins other districts which contribute to the rich cultural heritage of Washington State. Our neighborhood is architecturally intact and represents a fascinating period in the development of the City of Seattle. Ravenna's architectural resources highlight a period of rapid growth in the early 20th century, encompassing the history of Ravenna and Cowen Parks; the Olmsted legacy; the streetcar era; development of the University of Washington's environs (along with the 1909 Alaska Yukon Pacific Exposition); and the rise of a "bungalow" style that provided homes for working families and university staff. Following the NHD designation, FORC has been organizing various public events, including several different walking tours that focus on the history, architectural elements, and natural environment of the NHD; these have been very well received and have had a positive effect. Many people from various parts of our city come to the RCN NHD to learn more about our city and to walk in an interesting historic neighborhood.

The proposed One Seattle Plan Land Use Goal LU G16 (page 59) identifies three important reasons to preserve, maintain, and celebrate historical and cultural resources. The RCN NHD fulfills all of these.

The RCN NHD will be adversely affected by all alternatives detailed in the One Seattle Plan unless sufficient, meaningful mitigation is developed, as detailed below.

1. **Historic/Cultural Resources**.

The proposed changes to the Neighborhood Residential Zone create an impetus for redevelopment of historic homes within the RCN NHD that is incompatible with the historical architectural context and reduce the number of contributing resources to a point that the NHD will completely lose its significance and status as a nationally-recognized historic district. This will be an irreversible loss and no protection nor special review of the NHD is provided. [This was a shortcoming of E2SHB 1110.] This adverse impact affects historical/cultural resources (known and unknown) and historic districts throughout Seattle. Meaningful, and adequate mitigation must be provided for ***all*** NHDs within Seattle or these resources will be lost.

While the DEIS acknowledges these losses as "significant unavoidable adverse impacts" for all alternatives, this is reprehensible because Preservation of historical/cultural resources is promoted as a goal (Goal LU G16) and stronger mitigation must be developed and implemented if this goal is to be taken seriously. Specifically:

- Policy LU 16.1 talks about maintaining a comprehensive survey and inventory of Seattle's historic and cultural resources, but this inventory is very incomplete and still needs significant development! This inadequacy must be addressed or resources will be lost due to lack of knowledge/recognition. This is where "advance planning" can actually work (see DEIS page 3.9-121, last paragraph) because it would help *avoid* adverse impacts on historic/cultural resources.

- Policy LU 16.3 talks about supporting designation of areas as historic, cultural, and special review districts, but NHDs are not recognized as special review districts or exemptions. Recognition of NHDs must be added here! Recognition and protection for NHDs must be part of mitigation or these will be lost due to redevelopment related to upzoning and the One Seattle Plan.

- Policy LU 16.4 talks about tailoring development standards for a special review district, but this policy needs to include NHDs or they will be degraded and lose their historical/cultural integrity and ability to interpret Seattle's history

- Policy LU 16.5 talks about encouraging adaptive reuse of designated landmark structures by allowing uses in these structures that might not otherwise be allowed under the applicable zoning. This policy should also be applied for structures in historic districts and NHDs in cases where this approach could help the district retain its architectural integrity.

- Policy LU 16.6 talks about incentives to restore or reuse designated landmark structures and specified structures within designated districts. While this policy is fairly narrow, it should be *broadened to include additional incentives for restoration and reuse of historic structures* and *should also apply to NHDs* but fails to include them. These incentives should also apply to NHDs and/or contributing structures within NHDs to avoid or mitigate adverse impacts and to prevent loss of the NHD's integrity.

- Policy LU 16.7 talks about protecting the scale and character of the established development pattern in historic districts, while encouraging compatible and context-sensitive infill development. This is a very important policy! However, it fails to include NHDs. These incentives should also apply to NHDs to avoid or mitigate adverse impacts.

The DEIS provides a list of "Potential Mitigation Measures (see pages 3.9-119 and 3.9-120). While many of these can be helpful and/or are already required under other regulations, mitigation for historic/cultural resources and NHDs needs to incorporate these measures more substantially.

Also, please consider that mature trees and landscape are elements of RCN NHD, as well as many other historic/cultural districts. Protection of these not only provides part of the context for NHD, but recognition of the NHD reciprocally can help protect these elements of the environment.

2. Land Use/Housing.

For Regional Centers, GS 3.2, p. 22 has the language "Recognize and plan for the unique role and character of different neighborhoods within large regional centers." ***We request that the same language apply, and that the same language be added for Urban Centers (GS 4, p. 24 and 25) and Neighborhood Centers.*** The Roosevelt Urban Center (p. 25) is a mix of commercial, high rise and "craftsman."

3. ***With regard to GS 4 and related LU policies:***

LU 2.9 (p.38) states: *Encourage the preservation of characteristics and features that contribute to communities' multiple identities, including in areas of historic, architectural, cultural, or social significant."* This is a very important policy and it needs to be taken seriously.
To help facilitate this, LU Policies should be added to recognize and plan for the unique role and character of different neighborhoods:

- Note that the definition of middle housing in E2SHB 1110, p. 5, para (21) (lines 32- 35), "means buildings that are compatible in scale, form, and character with single-family houses ... ["single family" is defined at p.7, para.32, lines 32-34.])

  Add a new LU _ that states the same language as above – *Middle housing means buildings that are compatible in scale, form, and character with single-family houses.*

- Add the italicized language to LU 4.1 (p.40). Allow for flexibility in development standards so existing structures, *trees and green space* can be maintained and improved and new development can respond to site-specific conditions. As an example, this link shows how a DADU was built to preserve the tree:
  https://nwgreenhometour.org/ghtoursite/matthews-beach-cottage-2024/

- LU 4.18 (p.48), second bullet, add italicized language – responds to the surrounding neighborhood, *character,* and context, including historic resources. Thus, for the RCN NHD and any other NHD, the type of housing built should preserve the character of the NHD.

With regard to housing/displacement:

The proposed upzoning will increase the tax base for properties in the RCN NHD that will continue to displace owners from our neighborhood (this has been happening since the last rezone) as property taxes have become unaffordable for homeowners. This trend shifts ownership of these historic homes and many historic properties to developers and lessors, thus consolidating the trend of land ownership. This applies to any other NHD or historic district, and LU policies to prevent this are inadequate.

Another type of housing that exists in our neighborhood and the RCN NHD, which is located close to the University of Washington, is the group home, usually a historic home that has been rented to a group of unrelated people who often are college students and/or people with jobs in Seattle. This type of housing offers an often more affordable alternative for housing groups of people, as well as for people who prefer older buildings and garden areas.

This type of housing will be displaced by redevelopment. As discussed under Natural Environment below, many existing Seattle homes can be subdivided or use a "community" model with four bedrooms with the other spaces for the shared use within the structure. Adding policies to further protect this type of use increases housing flexibility and can help protect historic housing.

Still of concern is that while the One Seattle Plan would create additional housing units per the directive of E2SHB 1110, increasing the number of units will not bring affordability; the "trickle-down effect/Reaganomics notion" does not work. Thus, the proposed impacts on displacement and historic preservation caused by the proposed upzoning would occur without bringing enough benefit to justify the losses. This was largely the basis behind the recent Los Angeles County Superior Court ruling that overturned CA Senate Bill 9, which had overturned single-family housing in five California cities. See: https://www.latimes.com/homeless-housing/story/2024-04-29/law-that-ended-single-family-zoning-is-struck-down-for-five-southern-california-cities .

3. Plants and Animals/Natural Environment.

A stated goal of the Comprehensive Plan is to "protect and enhance" the natural environment (p.36). This document includes some positive goals and policies but falls short in several areas.

Furthermore, the DEIS falls short:

The DEIS, 3.1.3, states that "*Projects that entail vegetation clearing would likely reduce the diversity and/or abundance of plants and animals on and near the affected parcels. These impacts would be expected to diminish over time as vegetation regrows in temporarily disturbed areas."* Most projects that are moving forward are maximizing lot coverage, with little setbacks or vegetative areas around them. This general statement is misleading and implies a no problem exists when developments occur. Mitigation must address this issue.

The DEIS, p. 3.3-7, states, *"In 2023,... the city's tree ordinance was updated. It is anticipated that these updates will decrease the rate of canopy loss associated with residential and commercial development."* Many urban forest practitioners, including Seattle's Urban Forestry Commission, do not share the expectation that the new tree protection ordinance will decrease the rate of canopy loss associated with residential and commercial development, especially on Multifamily, Commercial, and Seattle Mixed Zones. The combination of high hardscape allowances, rigid delineation method for tree protection areas, and reduced authority by departments to request alternate designs to accommodate tree preservation make it likely that any sizeable, regulated tree on these lots would be permitted for removal.

The DEIS conclusions are hypothetical, not fact-based:

The DEIS concludes, "Action alternatives would tend to increase regional tree canopy by focusing growth in urban areas and preventing sprawl." "[D]evelopment within the urban environment of Seattle could indirectly benefit the tree canopy pressure in less-developed areas outside the city." (Emphasis added.) The DEIS does not identify any data supporting an indirect benefit that regional tree canopy would increase, not even the acreage currently remaining that is less developed. Sprawl continues, with suburban areas with lawns that do not provide needed habitat for birds and other wildlife. Nor does the DEIS identify the reasons people seek housing outside Seattle. And, apparently, no one at OPCD has bothered to traverse the "region." King County is rapidly becoming one big sprawl as people search for more affordable housing options outside of Seattle. Moreover, state law (E2SHB 1110) now requires most municipalities to increase density, which could mean more tree cutting region-wide. The DEIS conclusions are fictitious, unsupported hypotheses and pure fantasy.

The reality is that if real mitigation to preserve Seattle's tree canopy is not implemented immediately, Seattle will be a polluted, heated environment impacting its residents, other animals and native flora. One only has to look at the Roosevelt Urban Village, parts of which transformed within four years to a heat island.

With regard to the tree canopy:

On p. 150, Goal CE G12 refers to the tree canopy goals and lists several related policies. The following goals/policies should be added:

- Strengthen and enforce tree protections throughout the City to ensure Seattle's current canopy tree policies and goals continue. The Seattle One Plan would inexplicably reduce that policy's goals.

The 2035 Seattle Comprehensive Plan includes Policy EN 1.2 (p. 133) which states, "Seek to achieve citywide tree canopy coverage to **30 percent by 2037, and 40 percent eventually,** which maximizes the environmental, economic, social, and climate-related benefits of trees." This is **current Seattle policy**. Current Seattle Policy also includes Policy EN 1.7 which states, "Promote the care and retention of trees and groups of trees that enhance Seattle's historical, cultural, recreational, environmental, and aesthetic character*."* ***Both policies should be retained.***

However, for unexplained reasons, without discussing the adverse implications of this major reduction in tree canopy, the Seattle One Plan changes **current policy to a *goal* of 30 percent with no increase over time.** Moreover, the goal, CE G12 (p.151) *makes a false statement of fact.* The actual current tree canopy is 28 percent due to a loss of 235 acres, the size of Green

Lake. CE 12 maintains "Seattle has a healthy urban forest with a tree canopy that covers at least 30% of the land [FALSE]…

It is critical that the Seattle One Plan maintain the 2035 Comp Plan Policies EN 1.2 and EN 1.7, for multiple reasons:

- The more trees, the better. Trees absorb and mitigate water run-off. Trees absorb pollution. Trees reduce carbon. Trees reduce heat, which is why Seattle is trying desperately to plant more trees in underserved communities to prevent residents from dying. Currently, due to recent development in Neighborhood Residential areas, 19%, or more, tree canopy was lost. Seattle One Plan, Ex. 3.3-7. Neighborhood Residential has the highest percentage of trees in the city. The Ravenna-Cowen NHD is a green oasis with plentiful trees and green cover where Roosevelt residents now come to escape from their heat island high-rise homes. The NHD represents a historic era and embodies the reasons current Policy EN 1.7 should remain in effect.

- Trees also contribute to a personal sense of well-being and reduce crime. https://www.motherjones.com/environment/2019/04/trees-crime-cincinnati-philadelphia-ida-b-wells-chicago/.

- Adequate tree canopy is essential for birds and other wildlife. Among the 120+ birds tabulated city-wide by the annual Seattle Audubon Christmas Bird Count, tree-dependent species include: Pileated, Hairy, Downy, Northern Flicker and Red-breasted Sapsucker Woodpeckers; Barred, Western Screech, Great Horned and Saw-whet Owls; Cooper's, Sharp-shinned, and Red-tailed Hawks; Black-throated Gray and Townsend's Warblers, Pacific Wren, Brown Creeper, Red-breasted Nuthatch, and Varied and Swainson's Thrush. These birds require a dense forest canopy in which to hunt, feed, nest and take cover. These birds become scarce when tree canopy cover falls below 20%. There is a direct relationship between bird abundance and tree canopy. Some might say, just develop everything except the designated parks and green spaces***. As all major wildlife and bird organizations and conservation scientists will tell you, however, these "postage stamp" preserves are not viable unless green corridors connect them. The tree canopy in Seattle is critical to ensure these green corridors.***

  The Ravenna-Cowen/Roosevelt community is keenly aware of the impact from tree reduction. Our naturalist conducted a bird count. From Ravenna Park north, the bird species decreased dramatically as the trees diminished. Due to development in Roosevelt, where high-rise apartment buildings developers bulldozed all the trees, within a few years that area became a heat island with few birds and few species.

- Need for Additional Policies and Goals Due to Climate Change Impact on Tree Canopy. The Seattle One Plan contains two policies that address tree canopy and climate change, CE 12.2 and CE 12.3 (p. 150). Additional policies are need to address this existential issue. Tree death from heat is acknowledged in the discussion, but the policies are vague. Communities around the world are emphasizing the use of native flora in landscapes and researching the use of species that would adapt readily to warmer climate. See: https://www.discovermagazine.com/environment/cities-are-rethinking-what-kinds-of-trees-theyre-planting If Seattle is to retain a healthy tree canopy, the Seattle One Plan must address this issue with more specificity, with specific goals, policies and time-tables. This issue requires research, knowledgeable staff, and funding.

With regard to the natural environment and urban wildlife:

- The Climate and Environment Section beginning on p. 137, should include **more specific goals and policies regarding the significance of biodiversity and urban wildlife.**

  This idea is reinforced by Professor John Marzluff, University of Washington Ornithology, who points out in his book Welcome to Subirdia, "When natural land cover measured across areas the size of neighborhoods, metropolitan areas or counties drops to less than one-third of its historical extent, its ability to sustain native biodiversity crumbles." Marzluff warned that "…not considering the amount and arrangement of green spaces that connect urban people with nature is inefficient and dangerous." He added, ***"To remember what biodiversity is, and why it is important, we must conserve nature close to where we live and work."***

  Neither the Seattle One Plan nor the Seattle Plan DEIS provide any base-line data as to the current bird count (by number and species) for indigenous and migratory birds and the impact of the Plan.

  Specific policies regarding natural environment and urban wildlife should include the following:
  - First, determine status and trends of biodiversity within Seattle;
  - Recognize and support Indigenous-led conservation and environmental stewardship;
  - Seek new financing mechanisms and incentives for conservation, natural space management, urban forestry, etc.;
  - Protect and enhance habitat quality within natural areas, parks, and open spaces

- Reduce urban hazards to biodiversity, including pesticides; reflective glass; plastic and other pollution; and negative impacts from certain human-associated and introduced species, such as outdoor cats and unleashed dogs.
- Encourage residents and visitors to learn about, celebrate, study, and conserve urban biodiversity.
- Maintain current trees and green cover on Neighborhood Residential and Multifamily lots.

With regard to Mitigation:

The DEIS mitigation options are incomplete and fail to consider substantive steps and regulations that would reduce loss of trees/wildlife habitat. The mitigation measures below will help preserve trees and green cover on Neighborhood Residential lots

- *Amend the Seattle Tree Ordinance as recommended by the Urban Forestry Commission.*

- *Retain current Neighborhood Residential setback requirements.* This will reduce the likelihood that tree canopy and green cover will be reduced.

- *Require developers to design projects that preserve trees, with oversight by professionals who know how to accomplish this.* While the DEIS sets out "green" alternatives, such as permeable driveways, solar panels, wood construction, limiting fossil fuels, it inadequately addresses the most valuable of our green resources, trees. There is technical knowledge on how to build and protect trees. Groups of architects now design buildings focusing on tree preservation. See, for example, Matthews Beach Cottage – NW Green Home Tour. To accomplish retention of as many trees and green space on Neighborhood Residential lots, the DEIS is deficient because it did not address solutions, such as requiring developers to identify the location of trees and species at the onset of the permitting process; requiring the developer to design the project to retain the maximum number of trees, with oversight by arborists and other professionals who understand how to accomplish tree retention.

- *Encourage, Provide Incentives for, and Assistance with the Repurposing of Existing Neighborhood Residential Housing, or Mandate Repurposing of Existing Structures and Building, and Mandate That New Construction Be Limited to the Original Footprint of the House.* These steps will help preserve existing trees, reduce tree loss and tree damage. While the DEIS mentions retrofitting, it does not apply or study the applicability and impact of retrofitting to Neighborhood Residential houses. Many

Neighborhood Residential houses can be retrofitted for four or more units (or three units plus a DADU), or converted to shared community housing (now authorized by state legislation), meaning residents have separate bedrooms but share other spaces. Examples include fraternities and sororities, multi-generation households, and group homes in high-density cities (e.g., New York City and others) where shared living is common and each tenants pays rent.

With regard to Access to Public Open Space, p. 157:
This section speaks to "Public Space" and uses this term to imply parks and natural areas. Public Space can be unfortunately be interpreted by some as a concrete plaza. This term should either be deleted or defined as a space that include a majority of natural landscaping similar to the definition of the "Open Space" (which is defined as containing elements of the natural environment). Courtyards and the like should be incentivized by the City for new developments, but again these must include natural landscaping.

If you need further information or would like to meet with the FORC Board, you can reach Larry Johnson at 206-406-8488 or lejohnson@friendsofravennacowen.org.

Thank you for your consideration.

Larry E. Johnson, AIA, President, Friends of Ravenna-Cowen

Lori Cohen, Vice President and Secretary, Friends of Ravenna-Cowen
Judith Bendich, Secretary, Friends of Ravenna-Cowen
Lani Johnson, Boardmember, Friends of Ravenna-Cowen
Jackie Lum, Boardmember, Friends of Ravenna-Cowen
Francesca Renouard, Boardmember, Friends of Ravenna-Cowen
Darnell Samuelson, Boardmember, Friends of Ravenna-Cowen