HISTORIC SEATTLE
Educate Advocate Preserve

May 6, 2024

Via Email to: OneSeattleCompPlan@seattle.gov

City of Seattle
Office of Planning and Community Development

Re: Historic Seattle Comments on *One Seattle Plan*

Dear OPCD:

Thank you for the opportunity to review and provide comments on the City of Seattle's draft Comprehensive Plan update. *One Seattle Plan* provides a vision and roadmap for accommodating Seattle's growth over the next 20+ years.

Established in 1973, Historic Seattle is the only citywide nonprofit and public development authority dedicated to saving meaningful places to foster lively communities. We focus on the reuse and reimagining of historic properties for new purposes. Through our efforts to *educate*, *advocate*, and *preserve*, we are creating a more livable environment for future generations.

Historic Seattle has significant interest in the future development of the city and how historic preservation is considered within all four key "moves" identified in the Comprehensive Plan. Historic places are important to our societal memory, community diversity and character, economic vitality, and environmental stewardship.

Following are our comments as related to the Plan's four key moves (headings are taken from the Plan):

Housing and Affordability: Expand housing opportunities across the city.

The Comprehensive Plan focuses on expanding housing (both the number and type) through new construction. **We would like to see more emphasis on preserving existing housing.** We believe the prevention of the demolition of existing affordable housing (often in older historic buildings that provide naturally occurring affordable units and contribute to the history and character of a neighborhood) is just as important, particularly to help counter displacement. Historic Seattle has seen far too many older residential buildings (whether landmarked or not, they are still significant) that already contribute to a dense urban neighborhood demolished by developers who seek maximum return on their investment. The replacement project is more often than not, unaffordable and displaces tenants from the older existing building and their neighborhood. Developers should be required to build low-income and/or affordable housing rather than pay into a pot of funds if they are to profit and benefit from the rezoning of the entire city.

OUR PROPERTIES

Good Shepherd Center
Built: 1906 | Operated by Historic Seattle since 1975

Mutual Life Building
Built: 1890-1916 | Operated by Historic Seattle since 1983

Belmont/Boylston Houses
Built: 1893-1903 | Operated by Historic Seattle since 1989

Phillips House
Built: 1902 | Operated by Historic Seattle since 1992

Victorian Row
Built: 1891 | Operated by Historic Seattle since 1993

Dearborn House
Historic Seattle Headquarters
Built: 1907 | Operated by Historic Seattle since 1997

Egan House
Built: 1958 | Operated by Historic Seattle since 1998

Cadillac Hotel
Built: 1898 | Operated by Historic Seattle since 2001

Washington Hall
Built: 1908 | Operated by Historic Seattle since 2009

Garden House
Built: 1886 | Operated by Historic Seattle since 2021

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Equity and Opportunity: Promote a more equitable Seattle as we grow.

Historic Seattle acknowledges this city's past racist and discriminatory housing practices and support efforts to address inequity. **We believe preservation contributes to social equity.** Investment in the rehabilitation of older historic buildings is often made in low or lower income neighborhoods. Neighborhoods with a smaller-scaled mix of old and new buildings host a significantly higher proportion of women and minority-owned businesses. Reusing our historic building stock – whether an old warehouse, school, or former church – provides much-needed, creative spaces for housing, arts, offices, and community centers. Historic preservation does and can help alleviate displacement because older buildings often provide more affordable rents (residential and commercial) and opportunities for BIPOC ownership.

Community and Neighborhoods: Focus growth and investment in complete, walkable communities.

Preservation enhances community vibrancy and cultural identity. Historic buildings in older neighborhoods help define the sense of place or personality of a community, playing a vital role in contributing to livability and the health of local economies. Additionally, older neighborhoods with a mix of buildings have much higher Walk Score and Transit Score ratings.

Investing in historic buildings sparks economic revitalization and acts as a linchpin in neighborhood development. Older buildings draw a higher percentage of non-chain shops, restaurants, and retailers than new neighborhoods. Unfortunately, the trend in Seattle seems to favor demolishing older buildings and replacing them with out-of-scale, non-descript, mixed-use buildings with ground floor retail spaces that often remain vacant for years or provide generic businesses that do not enhance a community.

Climate and Sustainability: Meet the challenges of climate change for a resilient future.

Historic preservation conserves resources and supports environmental stewardship. Rehabilitation of existing structures reduces waste and saves energy. Approximately 25% of the material in landfills is demolition and construction waste. Building reuse almost always offers environmental savings over demolition and new construction. The Comprehensive Plan does not take into consideration the environmental impact of preservation vs. demolition of existing building stock. The life-cycle environmental impacts of new construction (in terms of energy, carbon, water, materials, toxicity, etc.) shows that it takes decades for the greenest new building to pay back these up-front costs. Historic buildings contain significant embodied energy – the amount of energy associated with extracting, processing, manufacturing, transporting, and assembling building materials.

The overwhelming emphasis by the City is on creating high-performance new buildings, with little emphasis on encouraging high-performing existing buildings. We would like to see the City develop policies that leverage the value of existing buildings toward achieving sustainability goals.

Specific Comments on the Historic Preservation and Cultural Resources Section of the Land Use Element:

Historic Seattle supports the goals and policies in the "Historic Preservation and Cultural Resources" section of the Land Use Element, particularly those that focus on supporting efforts in preserving resources in communities that have not traditionally benefited from historic preservation. However, it is unclear how the City will support these goals and policies.

One policy stands out as really needing City funding and staff support: *LU 16.1 Maintain and update a comprehensive survey and inventory of Seattle's historic and cultural resources. Update the survey and inventory when developing a new area plan or updating an existing plan, as appropriate.* Historic Seattle suggests deleting the second sentence because the survey and inventory is so old that what we are in desperate need of a new comprehensive city-wide survey—period. And it should prioritize BIPOC and underrepresented communities because they have often been left out of previous work. In addition, we believe that new historic context statements are necessary to support a citywide survey, particularly ones that help tell the full story of our diverse communities.

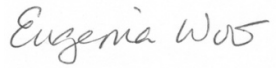
Regarding LU 16.7: *Seek to protect the scale and character of the established development pattern in historic districts, while encouraging compatible and context-sensitive infill development.* We fully support this policy, but in practice, we rarely see this implemented because property owners often propose a project that is out-of-scale but within the height limit allowed. We realize a comp plan update is not the place to hash this out, but if this policy is included, then how it is implemented is important.

Final Thoughts (for now)

Over the next 20+ years Seattle will continue to face growth and development challenges, as well as opportunities. The One Seattle Plan should lay out a development path that respects context, preserves historic and cultural resources in achieving healthy, complete communities. Historic preservation is often viewed as an outlier in land use planning. Some believe it's an obstruction to other goals and policies and pit preservation against these other goals and policies. Let's make clear this is not what the City intends.

Thank you for the opportunity to comment on this important process for Seattle's future.

Sincerely,



Eugenia Woo
Director of Preservation Services

Cc: Rico Quirindongo, Director, OPCD
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Kji Kelly, Executive Director, Historic Seattle
Sarah Sodt, City Historic Preservation Officer