



FRIENDS OF RAVENNA-COWEN

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One Seattle Plan Zoning Update Seattle
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The Friends of Ravenna–Cowen submit our comments on the proposed One Seattle Comprehensive Plan. On May 4, 2024, FORC submitted detailed comments on the original proposed plan which are attached (Attachment 1). The concerns and comments raised at length in Attachment 1 have never been addressed by OPCD. And the latest proposed changes to Comprehensive Plan raise entirely new issues, basically an entirely new plan, without ever addressing the comments regarding the first draft. This creates a procedural conundrum in how to deal with this latest draft; nevertheless, we have highlighted our significant concerns in this letter.

Background: The Friends of Ravenna–Cowen (FORC) is a 501(c)(3) 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 in 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.

Key Areas of Concern:

1. ***Plan Ignores Historic Resources*** (with the exception of the protection of designated Landmark buildings)

Proposed Zoning Changes Will Destroy the Ravenna-Cowen Historic District and It Should be Exempted from The Proposed Zoning Changes The “Zoning Update” maps for D4 ignore the Federal and State Ravenna-Cowen National Historic District (RCN NHD) designated in 2018 to



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reflect the historical significance of the homes and history of the area. Please see the attached map of the RCN NHD (Attachment 2).

The Ravenna-Cowen North NHD was specifically exempted from MHA upzones by a unanimous vote of the City Council due to the unique and architecturally intact nature of the area. (See additional discussion below.)

However, the proposed upzones do affect the NHD. Specifically, you will note that the addition of LR3 and NC along east side of NE 15th Ave and south side of NE 65th are within the RCN NHD. Further, the proposed LR3 zoning south east of 20th Avenue NE all the way south to NE 63rd Street is within the RCN NHD. These proposed zoning changes will cause loss of the historical integrity of approximately 1/3 of the RCN NHD. This proposed upzone area directly impacts (49) homes that are designated as historically contributing resources in the RCN NHD. Loss of these homes due to upzoning will cause the area to become ineligible to retain its state and national designation. Exceptional homes will be lost or compromised if the proposed zoning proceeds. Our website, <https://www.friendsofravennacowen.org/>, has details on the history and significance of every home in the NHD.

Further, we note that the Plan suggests future zoning changes in the Ravenna and Roosevelt neighborhoods – we urge the City to consider the RCN NHD in its future proposals. In the scramble for higher density, the City is ignoring its own history and the investment of homeowners in maintaining these historic homes. In the MHA upzoning process, the City Council considered a petition in support of exempting the RCN NHD from MHA upzoning. The petition was signed by 600+ individuals, including not only those who reside in the NHD, but many others who appreciate that this is a unique City asset. Based on this petition and additional compelling evidence that is in the record, the City Council unanimously approved exempting the NHD from upzoning. The current administration now seeks to overturn the Council's former decision without ever considering, or even mentioning, the City Council's action, or the overwhelming evidence why this NHD should be retained intact in its entirety.

Support for the NHD is also shown through popular tours that FORC has hosted. Since 2022, there continues to be wide-spread community interest in learning more about the history and natural environment of the neighborhood. Over 200 people attended these tours in 2023 and 2024. The City should rethink the current approach, review the past City Council record, account for the historical significance of these homes, and exempt the RCN NHD from the proposed upzones.



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2. *The Updated Neighborhood Residential Report* (issued October 2024) is *Severely Inadequate in its Design Standards and Lack of Design Review Procedures*

This document suggests that “**Compatibility**” is a key factor in residential design proposals. For instance, on page 4, note that HB 1110 defines and **requires** that middle housing be “buildings that are **compatible in scale, form, and character** with single-family houses and contains two or more attached, stacked, or clustered homes including duplexes, triplexes, fourplexes, five-plexes, six-plexes, townhouses, stacked flats, courtyard apartments, and cottage housing.” **However, we do not see any information regarding the process for determining compatibility, scale and form with a neighborhood, or for neighborhood review and comment on proposals.**

Further, in our review of the standards, photos & diagrams in the document, we are not seeing “compatibility” at all. **Proposed prescriptive “design standards” are outlined on page 14 but there is no mention of existing historic/cultural neighborhood character.** A modern 5-story multifamily building adjacent to a historic single-family home is not “compatible”.

3. *Plan Will Not Protect Trees and Vegetation and Will Create Heat Domes Throughout the City*

The plan as proposed will undermine Seattle’s climate resilience and lead to increased environmental inequity. The proposed changes significantly reduce space for trees both on private properties and streets, impacting two-thirds of Seattle’s existing tree canopy. This plan places Seattle on a path to fewer trees, less shade and higher temperatures. Seattle’s urban trees are critical to cooling our neighborhoods, improving air quality, and supporting biodiversity. New zoning codes should be revised to protect Seattle’s trees and ensure a livable, climate-resilient city for all.

Seattle’s 2013 Urban Forest Stewardship Plan recognized the importance of having an intact urban forest; it called for the modest goal of a 30% tree canopy by 2037. To put this into perspective, Atlanta and Tampa have already attained 36% tree canopy levels. Portland, the original “Stumptown,” has a goal of 33% and New York City has a 39% canopy. Seattle was making progress toward meeting its canopy goal for the first few years, reaching 28%. This plan backtracks and jeopardizes our city’s goal.

Seattle’s Urban Forest Stewardship Plan speaks directly to the strategic importance of retaining its large trees – especially evergreen trees: “Preserve existing trees because it takes decades for most trees to reach their ultimate size, trees already growing in Seattle generally provide immediate and ongoing benefits that cannot be matched by small, young replacement trees. Focus especially on evergreen trees because they maintain their canopy



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during the rainy season and are active year-around, evergreens can better attenuate rainfall, absorb carbon dioxide, and reduce air pollutants.” As author George Monbiot famously said: ***“There is a magic machine that sucks carbon out of the air, costs very little, and builds itself. It’s called a tree.”***

In light of the significance of our trees, **we agree with the comments provided by Tree Action and that the following should be eliminated from the plan:**

- **Setback Reductions** that limit essential space for both street and private-property trees.
- **Increased Hardscape Allowances** that prioritize pavement over greenspace.
- **Reduced Tree Requirements** on new developments, which are crucial for maintaining canopy as neighborhoods densify.

[Portland's tree code](#) can provide insight on how to build housing while retaining and planting large, climate resilient trees.

In closing, we bring your attention to The Updated Neighborhood Residential Report on p. 13 which has a picture of a tree in the narrow setback “canyon” between two residential structures as a “good” example of the proposed codes; this is outrageous! The tree could not even survive with the paved area shown and is a pathetic look at our future city.

As requested in our comment letter of May 4, 2024, we request a response to our comments.

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

Attachment 1: FORC comment letter submitted May 4, 2024 on the One Seattle Plan and the DEIS

Attachment 2: Map of Ravenna Cowen North National Historic District (RCN NHD).