



October 30, 2015

Diane Sugimura  
Director  
City of Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 2000  
P.O. Box 34019  
Seattle, WA 98124-4019  
Via e-mail

**PRESERVATION DEVELOPMENT  
AUTHORITY COUNCIL**

**Re:** Recommendations on Proposed Comprehensive Plan Amendments

MICHAEL HERSCHENSOHN  
*Chair*

Dear Ms Sugimura,

CARA BERTRON  
SHARON COLEMAN  
JAMES FEARN  
JAPHET KOTEEN  
KATE KRAFFT  
MARY MCCUMBER  
PETE MILLS  
RICK SEVER  
MARCIA WAGONER

Thank you for the opportunity to comment on the **Seattle 2035** Comprehensive Plan Draft, specifically the proposed Arts & Culture Element where the Historic Preservation component now resides. Historic Seattle is the only citywide nonprofit dedicated to protecting Seattle’s unique character through our efforts to *educate, advocate, and preserve*.

KJI KELLY  
*Executive Director*

The intent of the Comprehensive Plan is to meet the requirements of Washington Growth Management Act and set forth a 20-year vision for the city’s growth. It should provide a bold vision that aligns with the plan’s four core values – race and social equity, environmental stewardship, economic opportunity, and community – and guides the development of goals and policies. Historic Seattle has strong concerns that historic preservation is not prominently featured throughout the Draft Plan. The re-use and rehabilitation of historic buildings is a key component of each of the Plan’s four core values.

**FOUNDATION BOARD OF  
DIRECTORS**

In our current economic boom, we are witnessing the demolition of our historic buildings at an alarming rate. Each time a historic building is demolished, Seattle loses an irreplaceable piece of its unique character. The Draft Plan highlights critical core values vital to our city yet does not acknowledge the role historic buildings play in these values. These core values cannot be achieved without the preservation of Seattle’s historic buildings.

JAMES FEARN  
*President*  
VERNON ABELSEN  
GARY GAFFNER  
KJI KELLY  
RICK SEVER

**Why does historic preservation matter?**

MICHAEL HERSCHENSOHN  
*Ex Officio*

- **Our older buildings play a vital role in defining Seattle’s sense of place and the character of its neighborhoods.** Since the city adopted its landmark preservation ordinance in 1973, it has established 8 historic districts and designated more than 450 individual sites, buildings, structures, and objects. The city’s Historic Resources Survey, last updated in 2000, includes over 5,000 properties. These places contribute to Seattle’s identity and quality of life, create a distinctive sense of place, and serve as tangible reminders of where we came from. If we continue to tear down old buildings, the city will lose its authenticity and what makes it a great city. It will become anonymous, without its historic compass.
- **Reinvesting in historic properties sparks economic revitalization.** Preservation and adaptive use projects provide important economic benefits to the community by stimulating neighborhood revitalization, creating local jobs, and attracting local businesses.

**1117 Minor Avenue  
Seattle, WA 98101**

(206) 622-6952  
INFO@HISTORICSEATTLE.ORG  
WWW.HISTORICSEATTLE.ORG

- **Historic preservation is sustainable development.** Reusing and rehabilitating a historic building is more socially, economically, and environmentally sustainable than demolition and new construction. Building reuse almost always offers environmental savings over demolition and new construction. The city should demonstrate its leadership role and embrace the adage, “The greenest building is one that is already built.” Historic buildings enhance community character and preserve affordable housing. The Preservation Green Lab’s *Older, Smaller, Better* report demonstrates that neighborhoods with a “fine-grained mix of old and new buildings” were more economically, socially, and culturally vital than areas with mostly newer, larger buildings. Additionally, these neighborhoods already have density between 30 and 100 residential units per acre.

Historic preservation goals and policies do not exist in a vacuum. Preservation encompasses all of the plan’s core values and should be balanced with other goals and policies. The 159-page draft plan references the term “historic preservation” in various sections (LU5.17, LU7.2, LU14.15, LU15.5, H4.9, and ED1.4) and “Historic District and Landmarks” are referenced on page 67 under the Land Use Element (LUG16, LU16.1-LU16.4). However, historic preservation is not treated as an important and broad priority shaping a sustainable and livable city.

One of the biggest challenges will be finding strategies to accommodate anticipated growth, while also preserving historic buildings and respecting neighborhood character. Areas slated for high-density development must strike a balance between historic preservation goals and other policy objectives. Tools must be developed to manage this change.

What is proposed is a weak Historic Preservation component (ACG5) within the new Arts & Culture Element having little relevance to the rest of the plan’s goals and policies. The proposed policies do not convey a robust historic preservation program.

#### **What are the specifics of Historic Seattle’s position?**

The attached memo provides our comments and recommendations to better integrate historic preservation into the new Comp Plan by:

- *Expanding the Historic Preservation goals*
- *Strengthening the Historic Preservation policies*
- *Strengthening and expanding the proposed survey/inventory policy*
- *Connecting the Historic Preservation component with other Comp Plan elements*

The city’s most vibrant urban neighborhoods are those with a high concentration of historic buildings and mixed-scale development. The city needs to invest in its future by balancing new growth with the existing building fabric. The Comp Plan should value stewardship of historic properties as an important priority along with clean water, natural resources, open space, environmental stewardship, and social equity.

As we continue to grow, the city will face design and development challenges, as well as opportunities. Seattle 2035 should lay out a path that leverages our historic and cultural resources in achieving healthy, complete communities. If historic preservation continues to be marginalized within the Draft Plan, Historic Seattle fears that our city will lose all the qualities that make it a desirable place to live, work and play.

Thank you for your consideration.

Sincerely,



Kji Kelly  
Executive Director

## Recommendations for the Historic Preservation Component

### Seattle 2035 Comprehensive Plan

Historic Seattle offers the following recommendations to promote preservation and enhance planning, regulations, and incentive tools:

#### EXPAND THE HISTORIC PRESERVATION GOALS

The Draft Comp Plan distills the Historic Preservation component down to one goal (page 140): *ACG5 – Preserve assets of historic, architectural, archeological or social significance*. Seattle Municipal Code (Chapter 25.12 – Landmark Preservation) states “the economic, cultural and aesthetic standing of this city cannot be maintained or enhanced by disregarding the heritage of the City and by allowing the unnecessary destruction or defacement of such cultural assets.”

The Historic Preservation component should establish a long-range vision for how historic and cultural resources will be used in the future. Other goals to consider include:

- Foster stewardship of neighborhood, place, and landscape as contributors to the city’s viability and vitality
- Promote a broad, comprehensive definition and awareness of historic preservation
- Celebrate the diverse physical form and fabric of the city
- Promote the city’s historic and cultural resources as an economic asset
- Promote the environmental benefits and opportunities of preserving and adaptively reusing historic buildings
- Prioritize preservation and rehabilitation opportunities as a strategy and planning tool in Seattle’s land use regulations

#### STRENGTHEN THE HISTORIC PRESERVATION POLICIES

The draft plan outlines six policies related to historic preservation and cultural resources. The language found within the Draft Comp Plan is weaker than the existing plan and three of the policies (CR12, CR14 and CR15) have been removed. Other policies to consider include:

- Identify and establish alternative means to protect the historic character of neighborhoods selected as urban centers and villages
- Protect the scale and character of the established urban fabric, while encouraging compatible and context-sensitive infill development
- Encourage rehabilitation and adaptive use of buildings to conserve resources, reduce waste, and demonstrate stewardship of the built environment
- Promote seismic and energy efficiency retrofits of historic buildings to reduce carbon emissions, save money, and improve public safety

- Identify historic resources that can be successfully used to meet the city’s housing goals
- Encourage the creation of ecodistricts to achieve sustainability and resource efficiency at a district scale
- Develop planning tools to conserve and protect older neighborhoods that have a unique scale and identity, but are not currently protected
- Encourage adaptive use of historic community structures, such as meeting halls, schools, and religious buildings, for uses that continue their role as neighborhood anchors
- Mitigate impacts of new development on historic properties
- Identify, preserve, and protect archeological resources

### **STRENGTHEN AND EXPAND THE PROPOSED SURVEY/INVENTORY POLICY**

The survey and inventory policy (AC5.3) should prioritize and expand future inventory efforts that:

- Focus on areas of anticipated growth as part of future planning projects
- Encourage preservation in areas that are currently under-represented
- Maintain and conduct periodic updates to the city’s Historic Resources Survey identifying potentially significant resources

Additionally, these efforts should go beyond the baseline inventory and take a more proactive approach to nominate and designate individual properties and historic districts.

### **CONNECT HISTORIC PRESERVATION WITH OTHER COMP PLAN ELEMENTS**

Historic preservation is integral to all four of the plan’s core values and should be referenced throughout the Plan’s goals and policies:

- **Land Use** – encourage building and site designs that respect the unique built natural, historic, and cultural characteristics of Seattle’s neighborhoods. A study by the Preservation Green Lab, *Older, Smaller, Better*, documents how the character of buildings and blocks – their human scale, structural rhythm, massing and aesthetic balance – contribute to the urban vitality of a neighborhood. The Comp Plan should use this to inform land use policies and encourage context-sensitive development that fills in gaps within the established urban fabric.
- **Housing and Economic Development** – include adaptive use projects as part of the solution for providing quality, affordable housing options. Rehabilitation of existing housing units and other building types (i.e., former schools, warehouses, etc) provides residents with choices and contributes to a variety of housing options.

Rehabilitation of historic buildings is pivotal to responsible neighborhood development. Projects benefit both small entrepreneurs and larger developers taking advantage of tax incentives. The PGL’s *Older, Smaller, Better* report provides clear and powerful data that these older buildings draw a higher percentage of local businesses than new construction.

- **Environmental Stewardship** – the city should demonstrate its leadership by developing a strong policy that encourages stewardship of existing buildings as part of its sustainability goals. The policy for establishing energy-efficient standards (Policy E15.6) places emphasis on high-performance new buildings as a means of reducing the greenhouse gas emissions.

As the adage goes, “The greenest building is one that is already built.” Building reuse offers environmental savings over demolition and new construction. It saves on landfill space and energy expended in recycling materials from demolition, not to mention the building’s embodied energy. Life spans for new buildings are often 30-40 years vs. more than 100 years for most historic structures.

- **Neighborhood Planning**– older buildings play a vital role in defining Seattle’s sense of place and the character of its neighborhoods. Updates to the citywide neighborhood planning policies should take into consideration a neighborhood’s distinctive physical characteristics including building scale, massing, materials, etc.