

A few thoughts on the comp plan – Rob Clark

Connected streets; the solution you propose seems ok to me if, as Erin said, the Toole development through road would not have proceeded had the new policy existed at the time of application.

As I mentioned in the meeting, I feel you should add a time limit to the OR statement. If a family has lived on a dead end street for decades, there should be a re-evaluation even if a sign has been posted at the end of the street saying ‘future road’. Say 10 years. Lots of things could change the surrounding area like new adjacent developments or infrastructure changes and so on that would make some original study obsolete.

The appendix A is problematic. The way it reads one can assume that Newcastle has a checkered past and it makes us look bad. It is irrelevant where it is stored. Whether a separate document or in the comp plan, the result is the same. So, leave it in the comp plan but add a preamble statement such as:

- This study was required by (insert appropriate law or bill number) to examine the history of Newcastle and determine whether or not there is, or has been, racial, ethnic or other discrimination in our city’s past. The conclusion of this study is that no such discrimination currently exists or has existed since Newcastle was established in 1994.

If this statement is placed at the beginning of the appendix, then leave it in the plan and you will hear no more about it from me. I still think it is nonsense but I won’t object.

Vague, subjective, statements are a real problem. As Erin stated at the beginning of the meeting:

‘the developer must know what they are allowed to do or not to do within their property’

I completely agree and that is why I strenuously object to the numerous subjective DEI related policies and strategies. They are totally open to anyone’s interpretation. I understand these same vague statements are in the state law so our attorney will say they are required. However, what are we supposed to tell a developer? What is a racially and socially equitable plan for a development (P104)? Everyone reading this will have a different answer and that is a major problem. What if Newcastle decides the answer is that every new house must have at least 7 windows on each exterior wall but Woodinville decides that each house has to have a red front door. There is a huge cost difference and burden for developers. What if the Newcastle developer decides to sue us for unreasonable undue burden that his counterpart did not have to realize in another city. Farfetched? Not really in today’s world. Far dumber lawsuits have succeeded. Who in the city decides what the subjective policies should be and what if those people change? It is not hard to imagine that a new person would have a new interpretation. Seven windows per wall becomes two doors per wall? I could repeat the same argument with all of the vague P and S elements.

Force the state or county to give us concrete answers with specifics or leave all the vague stuff out. It seems to me that we are simply putting stuff in our comp plan because someone said we have to do so and we are not asking why. Don’t accept the vague state law. Push back. Why should we have to struggle to fill in the blanks? The supreme court just killed this concept at the federal level in

*Loper Bright v. Raimondo*. It is up to the state or county, not Newcastle, to create concrete interpretation of state or county policy.

DEI is dying a well-deserved death all over the country. Let's not be the last dinosaur.

Here is a list of all the vague policy or strategy items that need to be addressed and receive clarity or be tossed.

P87 - The City should plan for, in coordination with regional partners, addressing the impacts of climate change and natural hazards to enhance regional resilience. **Climate change is totally subjective. What are the impacts we are supposed mitigate? What is regional resilience? 'Should' item. Remove it.**

P104 - The City shall consider racial and social equity in planning and implementation processes. **Vague, subjective. Seven windows per wall? Red doors? Wider sidewalks? Flower beds? What exactly?**

P169 - The City should consider implementation of Equitable Development Zones, Barrier Reduction Programs, and Community Investment Funds to expand access to opportunities and remove barriers for economically disconnected communities. **What is an equitable development zone? What is an economically disconnect community? I could not afford to buy the house I live in. I sure feel economically disconnected and so do my neighbors. 'Should' item. Remove it.**

P174 - The City should encourage and support businesses to adopt practices that are environmentally and socially responsible. **Vague, subjective. What is a good environmental practice? What is social responsibility? 'Should' item. Remove it.**

P177 - The City shall ensure that its infrastructure is developed and maintained equitably to prevent and undo exclusionary impacts on marginalized communities. **Who decides what a marginalized community is? What is equitable infrastructure?**

P198 - The City shall consider the impacts on and inclusion of the history of Newcastle in development practices, requiring mitigation measures when deemed appropriate. **Based on appendix A, this is irrelevant.**

P205 - The City shall ensure that development regulations and procedures are based on best available science and best management practices are employed to mitigate environmental impacts. **Best science? Biology is science and biology says there are two genders, male and female. However, social justice warriors ignore the science they don't like. So who determines the science? Take this out.**

P214 - The City should consider protection for renters in residential and commercial spaces to mitigate displacement. **What protections? Be specific or I see this costing taxpayer money.**

S13 - Establish a limit for the maximum number of residences served on a dead end and cul-de-sac streets. **Why?**

S25 - Targeted investment programs should be developed to revitalize areas suffering from disinvestment, ensuring equitable distribution of resources. **Huh? Word salad nonsense. Take it out.**

S28 - Programs should be developed that prioritize services and access to opportunities for people of color, low income individuals, and underserved communities, aiming to improve quality of life and address past inequities. **Per appendix A, not relevant. Remove it.**

S29 - Implement inclusive engagement practices to involve historically marginalized communities in land use decision making. **Per appendix A, not relevant. Remove it. Even if it was relevant, what is an inclusive engagement practice?**

S31 - Implement measures to identify and mitigate environmental disparities, ensuring that all residents, particularly those from marginalized communities, have access to a clean and healthy environment. **What measures? Newcastle is already clean for everyone.**

S24 - Local policies and regulations should be thoroughly reviewed to identify those causing racially disparate impacts, displacement, and exclusion in housing. **Already done in appendix A. Remove this.**

S26 - Initiatives should be developed to mitigate climate change impacts on vulnerable communities and areas. **The climate is always changing. What are you going to mitigate? The hot days or the cold days and how do you do it? Vague and subjective and because this is a 'should' item, remove it.**

S30 - Implement programs and policies that acknowledge and empower the contributions of diverse communities and Indigenous Tribes, ensuring their inclusion and representation in all aspects of community development. **Everybody is already welcome in Newcastle and the level of involvement of any group or individual is a personal choice. Who decides what programs or policies and what acknowledgement looks like?**

P46 - The City should encourage connections from Local Access Streets to at least two locations on higher classified streets to encourage connectivity for faster emergency response times. **This could contradict the new proposed connected street policy. Was this considered? 'Should' item. Remove it.**

P60 - The City shall encourage the linkage of new developments with existing neighborhoods using new and existing streets. **See P46 above.**

P66 - Concurrency shall be deemed achieved for a development proposal if transportation improvements, strategies and actions required to meet the City's LOS standard are in place at the time new development occurs or a financial strategy is in place for completion within six years. **Why are we giving a 6 year window? Concurrency should be simultaneous or immediate. This is a good way to land the city on the hook for future expenses that a developer should take care of like improving the road before a development.**

P184 - The City should prioritize the location of community facilities in transit-accessible areas considering the impacts of climate change, economic factors, and social and health outcomes in site selection and design. **The second half of this statement, starting with the word 'considering' needs to be eliminated. Why do you need to consider all that vague, subjective stuff? Just put community facilities near transit. Period. Don't make it complicated.**

All of the 'shall' DEI statements can be separated and consolidated into one general statement which is fully reflected in our mission and vision. This statement covers all the bases in the state law.

### ***Newcastle Mission and Vision***

*The mission is to serve the Newcastle Community in an effective, efficient, professional, friendly and fiscally responsible manner that fosters a sense of community and assures equity, integrity, dignity and respect.*

*Our guiding vision for the community is that of a diverse, safe, tolerant and economically viable residential and business community, with its foundation in strong neighborhoods, family values, trust, respect for the natural environment and an appreciation of its history.*

In summary:

- Make the connected street issue airtight (in my opinion) by adding a time limit to the OR section then cull out any remaining contradictions such as P46 and P60
- Add the suggested preamble/ introduction to appendix A
- Remove all the vague/ subjective DEI and climate change policies and strategies and replace with the mission/ vision statement