

January 27, 2023

Rico Quirindongo
Office of Planning and Community Development
P.O. Box 94788
Seattle, WA 98124-7088

Subject: Comments on the revised scope of the Environmental Impact Statement for the One Seattle Plan 2024 Comprehensive Plan Update

Dear Director Quirindongo:

The undersigned organizations represent a coalition committed to creating an affordable, equitable, and sustainable Seattle. We recognize the important foundation that the major update to the Comprehensive Plan lays towards achieving these goals. This is a once-in-a-decade opportunity to change the fundamental land use framework by which our city grows—a chance to see abundant, affordable housing throughout all neighborhoods of Seattle.

The Office of Planning and Community Development (OPCD) has made great strides to center equity in planning and make repairing past harms a priority goal. We thank OPCD for the work done so far to scope ambitious growth alternatives that, when combined together, form the basis for the transformative growth strategy Seattle needs. OPCD's robust community engagement, both online and in-person, has demonstrated overwhelming public support for consideration of bold plans, including those that go beyond the Combined Alternative.

We therefore request that OPCD builds on this public momentum, and ensures the growth strategies in the draft environmental impact statement allow as much flexibility to build affordable homes as possible. We believe the scoping report can and should be clarified and expanded sufficiently to create a One Seattle Plan that truly meets Seattle's equity and climate goals. Our coalition recommends the following three high-impact changes:

- **Permit 5-story apartments throughout the entirety of the frequent transit and park access walkshed in the Corridor Alternative, not just in existing commercial zones on arterials.** People renting apartments should be able to live on quiet, safe side streets near transit, and not be forced to serve as a “buffer” for traffic noise and pollution.
- **Expand the proposed height bonus for affordable housing in the Broad Alternative to ensure it meets the city's equity goals.** We recommend a two-story height bonus (with a corresponding Floor Area Ratio bonus) for housing that does one of the following:
 - reserves a significant portion as affordable for people earning less than 80% of Area Median Income;
 - provides targeted first time homebuyer assistance to close the racial wealth gap;
 - supports homeowners at risk of displacement to stay in their homes and build additional housing on their property;
 - permanently maintains full public ownership, as in social or public housing.

To prevent further segregation of our city, all neighborhoods need affordable housing. A two-story bonus in allowable heights will help make the development of affordable rental

and for-sale homes feasible across the city, reversing decades of intentional exclusion and segregation.

- **Expand neighborhood anchors within the Focused Alternative to ensure they truly create 15-minute neighborhoods.** Anchors should be expanded beyond the proposed 1,000 foot radius to ensure they are able to fully support the range of amenities that people need. We suggest a 0.5 mile radius for anchors in areas with a low risk of displacement, and a 0.25 mile radius in areas with a high displacement risk.

We also request the following additions and clarifications to the One Seattle Plan to meet Seattle's equity, carbon reduction, and climate resilience goals and needs:

- **Un-gap the maps by identifying areas where transit can be made more frequent and park access can be improved.** In the Corridor Alternative, OPCD should account for the opportunity to improve transit service *alongside* increases to allowable housing density. Some notable geographic gaps could be filled with relatively modest investments in increased transit frequency. Such routes include:
 - Route 50 in West Seattle and South Seattle.
 - Route 125 in West Seattle.
 - Route 28 in Ballard.
 - Route 79 in Northeast Seattle.

The Corridor Alternative should also explore improved access to major parks. The current scoping looks at a 5-minute walk from entrances to large parks. However, some of these areas are limited by poor park infrastructure or by entrances that are not officially recognized or designated. OPCD should work with the Parks Department to identify opportunities to add corridors through improved park entrances and trail systems. The EIS could model park entrances placed no more than a 5 minute walk apart along park boundaries, or simply model park edges as defining corridors, and then Seattle would have the flexibility to make these changes over time.

- **Un-gap the maps by adding more neighborhood anchors.** For the Focused Alternative, the city provided a draft map of anchor locations. While these locations go a long way towards covering many parts of the city, there are still some notable and inequitable gaps. In particular, most of the waterfront portions of the city do not have nearby anchors or urban villages—Madison Park and Alki are the only anchors proposed on the water. This risks reinforcing existing patterns of racial and economic segregation. As part of the EIS, the city should analyze which residents would remain more than a 15-minute walk from an anchor or urban village. The city should identify additional anchor locations that would eliminate these gaps and offer a truly 15-minute city for all residents.
- **Remove density limits, eliminate side-setback requirements, and raise the base height in all residential zones for multi-family developments to 4-stories in the Broad Alternative.** This modest increase in allowable height would bring Seattle's code in line with the zoning code as it existed a century ago, when many beloved neighborhoods were first developed. The removal of density limits change would allow for building more stacked flats, with accessible ground floor flats amenable to aging in place. Removal of side

setback requirements, when coupled with retention of lot coverage limits, would allow for more usable open space and space for trees.

- **Make room for preserving and adding trees, by eliminating required setbacks and creating new height and density incentives when preserving exceptional trees or providing for new tree canopy cover.** Trees and housing should not be mutually exclusive, but we need to allow home-builders more flexibility to shift building mass around developable lots to preserve existing trees and/or create contiguous open space suitable for trees.
- **Incentivize deep green building standards,** such as new passive house and/or mass timber construction or preserving embedded carbon in existing structures, by creating a one-story height bonus and waiving facade modulation and upper level setback requirements for these buildings. Modulation and upper level setback requirements directly degrade building performance and energy efficiency.
- **Increase opportunities for commercial and community uses in residential areas.** In the Broad Alternative, allow small ground floor commercial uses that include gathering spaces like coffee shops and cafes, essential services like corner stores and standalone childcare centers, live/work options and other uses that are suggested in the community engagement process. In the Corridor Alternative, commercial and community uses should be permitted off of major arterials to allow for locally-oriented businesses, comfortable outdoor seating, and active pedestrian priority streets near frequent transit. Throughout all of the alternatives, OPCD should partner to develop funding tools and technical assistance strategies to break down barriers to starting a new small business for Black, Indigenous and other people of color.
- **Increase opportunities for high-rise construction in urban centers and near existing and future light rail stations in areas with low displacement risk.** High-rises maximize density near our limited light rail stations and regional centers, generate more Mandatory Housing Affordability contributions to expand the city's affordable housing stock, and could encourage sustainable mass timber construction. Additionally, high-rise construction creates more opportunities for quality union jobs.
- **Eliminate parking requirements.** Parking requirements drive up the cost of housing, lock in embodied carbon emissions, and require either expensive garages or extensive surface parking, taking space that could otherwise be used for vital tree canopy.
- **Plan for more growth to have the flexibility to meet demand.** In the seven years since the last major update in 2015, Seattle has added nearly 60,000 new homes—compared to a total projected growth of 70,000 homes through 2035. We need to account for this deficit as well as continued aggressive growth, given the likelihood of large-scale climate migration over the duration of the plan. The draft environmental impact statement should analyze the impact of adding population at the same rate as we have seen during 2015-2022. In addition, all multifamily development up to 200 homes should be categorically exempt from project-level State Environmental Policy Act (SEPA) analysis, regardless of whether the urban village or urban center it is occurring in has met the Comprehensive Plan's growth projections.

The undersigned organizations look forward to working with OPCD throughout the Comprehensive Plan update process. We are committed to shaping our city's land use to allow more, and more affordable, homes to be built, and to creating a more equitable, affordable, and green city. We thank you for the work done so far. We urge you to take a bold approach to the draft environmental impact statement and embed as much flexibility to build abundant, affordable homes as is possible.



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