May 6, 2024

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

PCD CompPlan EIS@seattle.gov

OneSeattleCompPlan@seattle.gov

Attn: Director Rico Quirindongo, Michael Hubner, Jim Holmes, Brennon Staley

# Subject: One Seattle Comprehensive Plan Update Draft EIS Comments and One Seattle Comprehensive Plan: Draft for Public Review Comments

Dear Director Quirindongo and OPCD staff,

Thank you for the opportunity to comment on the "One Seattle Comprehensive Plan Update Draft EIS" (DEIS) and the "One Seattle Comprehensive Plan: Draft for Public Review" ("Draft Plan"). Please find the comments of the Complete Communities Coalition listed below. We have included section headers to indicate the document to which each comment pertains.

The Complete Communities Coalition is an alliance of affordable housing advocates, community-based organizations, nonprofit developers, urbanists, environmentalists, the local business community, and more. Our coalition is dedicated to fostering an affordable, equitable, and sustainable Seattle through a transformational 2024 Comprehensive Plan Update. We seek to guide Seattle towards a future with abundant housing and inclusive growth.

We appreciate the Department of Planning and Community Development's (OPCD) work that produced the Draft Plan. We strongly share the values expressed in the Draft Plan and we concur with much of the Department's analysis of the challenges facing the city and their root causes. However, we are concerned that the plan will not achieve its desired goals because many of the policies are too similar to the City's current policies to create significant change. To truly make housing more affordable, advance racial equity, mitigate displacement, and meet our climate goals, we believe the Mayor's Recommended Plan and the Final Environmental Impact Statement ("FEIS") should incorporate the following revisions:



### **Steering Committee**

Jesse Simpson, Co-Chair Housing Development Consortium

**Tiernan Martin, Co-Chair** Futurewise

Scott Berkley, Tech 4 Housing

Cliff Cawthon, Habitat For Humanity Seattle–King & Kittitas Counties

Sarah Clark, Seattle Metropolitan Chamber of Commerce

Joshua Friedmann, Hillis Clark Martin & Peterson P. S. & NAIOP Washington

Tiffani McCoy, House Our Neighbors

Rian Watt, The Urbanist



### **EIS Preferred Alternative**

We recommend that the FEIS designate a "preferred alternative." While FEIS documents prepared pursuant to SEPA are not required to designate a preferred alternative, there is a sound reason why doing so has become common practice among lead agencies over the years. As the Department of Ecology has explained, designation of a preferred alternative gives public reviewers more awareness of which alternative the professional staff members within the lead agency feel is best, or which appears most likely to be approved. In the high-profile, contentious and complex instance of the One Seattle Plan, identification of a preferred alternative in the FEIS would be an especially useful step. Not only has the DEIS discussed and analyzed five different alternatives, but two different complex alternative proposals have also entered public discussion in the form of the Mayor's Draft Plan and the August 2023 OPCD staff recommended plan ("OPCD Draft Plan", see Attachment A). 1,2 Given the sprawling and complex interrelated impacts that the One Seattle Plan will have on the future of our City, the FEIS will be best positioned to inform productive discussion and understanding if it clearly designates a preferred alternative.

- The growth strategy described by OPCD staff in their August 2023 proposal should be the basis for the preferred alternative. The OPCD Draft Plan is the boldest growth strategy presented to date. It responds to the overwhelming community feedback provided during scoping, and we believe it will best meet the city's needs over the next decades.
- If the FEIS does not designate the growth strategy from the OPCD Draft Plan (or an updated version) as its preferred alternative, it should adopt a modified version of the DEIS's Alternative 5. Preferably, modifications to the DEIS Alternative 5 would incorporate as many attributes of the OPCD Draft Plan as possible, and as many of the policy positions requested in this letter as possible.
- If the FEIS adopts the Draft Mayor's Recommended Plan growth strategy as a preferred alternative, it should adopt many of the features of the OPCD Draft Plan or DEIS's Alternative 5, together with the additions requested by this letter.
- The FEIS should include a table that summarizes zoned land development capacity
  analysis and projected housing needs for the Preferred Alternative. The table should
  disaggregate housing unit development by area mediam income ("AMI") band,

<sup>&</sup>lt;sup>1</sup> See The Urbanist. "Planners Proposed Bigger Upzones Before Harrell's Team Intervened, Records Show", April 16, 2024.

https://www.theurbanist.org/2024/04/16/planners-proposed-bigger-upzones-before-harrells -team-intervened-records-show/

<sup>&</sup>lt;sup>2</sup> Also see PubliCola. "Mayor's Office Edited Ambitious Growth Plan for Seattle to Preserve the Status Quo", April 16, 2024.

https://publicola.com/2024/04/16/original-version-of-growth-plan/

following the guidance provided by the Department of Commerce, in order to ensure we are providing sufficient capacity for housing affordable to low-income people and demonstrate that the plan will comply with the Growth Management Act's Housing Element requirements provided in RCW 36.70a.070(2)(c)-(d). Table 34 in the <u>Draft Housing Appendix</u> provides an excellent template for this information.<sup>3</sup>

# **Urban and Regional Centers**

Regional and Urban Centers have been and will continue to be the areas where the most new housing is built in the city. Currently, the City is proposing very little change within existing centers, minor expansion of the smallest centers, and only one new center at NE 130th Street. The City should expand the potential for growth in Urban and Regional Centers by both increasing the area they cover and the intensity of development allowed. The City should also seek to undo the past harms of the Urban Village strategy<sup>4</sup>, which is the basis of our centers-based growth framework, by allowing more intense development near public facilities such as parks, water ways, and high performance schools. The City should also take this opportunity to address the inequitable distribution of Regional Centers, none of which are currently located in South Seattle.

To facilitate ilmmediate progress, the Mayor's Recommended Plan and any Preferred Alternative Should:

- Continue to include the addition of Ballard as a Regional Growth Center and 130th Street Station as an Urban Center.
- Continue to include the expansions of existing Urban Centers such as the Greenwood-Phinney Ridge, Queen Anne, and West Seattle Junction Urban Centers.
- Expand the University District Regional Center to include University Village and lands adjacent to Seattle Children's Hospital, or create a new Urban Center to incorporate these areas.
- Create additional Urban Centers at all future Link stations, excepting areas within Manufacturing and Industrial Centers.

https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanDraftHousingAppendix.pdf

<sup>&</sup>lt;sup>3</sup> See City of Seattle. "Draft Housing Appendix", p.122.

<sup>&</sup>lt;sup>4</sup> See PolicyLink. "Advancing Racial Equity as part of the 2024 Update to the Seattle 2035 Comprehensive Plan and Urban Village Strategy", April, 2021.

http://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/Seattle'sComprehensivePlan/ComprehensivePlanPolicyLinkFinalRecommendations.pdf

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Page 4 of 13

- Allow high rise zoning in all Regional Centers and within all Urban Centers adjacent to Link Stations.
- Allow eight-story residential construction on the majority of the land within all Urban Centers. Explore allowing greater height with the use of mass timber, to incentivize low carbon construction.
- Designate Mt. Baker and West Seattle Junction Urban Centers as future Regional Centers, include them in the list of Centers to receive updated subarea plans, and plan for combined jobs and housing unit density that exceed King County's Urban Growth Center threshold for both centers.<sup>5</sup>

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the maximum possible expansion of all existing Urban and Regional Centers.
- Study additional Urban Centers near all proposed Link Stations and adjacent to our greatest parks, including Discovery and Magnuson.
- Study increasing the zoning capacity of all Regional and Urban Center to maximize the productions of housing.
- Study the impacts of designating Mt. Baker and West Seattle Junction Urban Centers as Urban Growth Centers, using the definition provided in the 2021 King County Countywide Planning Policies.

## **Neighborhood Centers**

The One Seattle Plan's proposed "Neighborhood Center" model presents dramatic opportunities for our City. If fully realized, this could lead to increased housing supply and affordability, enhanced economic opportunities, improved walkability, and better environmental outcomes for more of Seattle's neighborhoods and a broader segment of the city's population. We request the following actions to bring the Council's request for a "fifteen minute city" and the Mayor's vision of "One Seattle" closer to reality.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

Allow for the development of all Neighborhood Centers studied under EIS Alternative
 5 and proposed under the OPCD Draft Plan. The total number of Neighborhood

<sup>&</sup>lt;sup>5</sup> The current activity unit density minimum is 30 units/acre and the planned activity unit density is 60 units/acre. See Attachment B: DEIS Alt 5 and Growth Center Designation Criteria Tables

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Page 5 of 13

Centers should not be less than 50. Additional Neighborhood Centers should include (but not be limited to): Alki, High Point, Seward Park, South Beacon Hill, Gas Works, North Magnolia, Roanoke Park (North Broadway), Nickerson (North Queen Anne), and Upper Fremont.<sup>6</sup>

- Expand the radii of Neighborhood Centers to ¼ mile to create enough land to support a small cluster of mixed-use development.
- Increase permitted Floor Area Ratio (FAR) to no less than 2.0 for multifamily housing in all Neighborhood Centers.
- Increase height limits to 85 feet throughout all Neighborhood Centers.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study expanding all Neighborhood Centers up to a ten-minute walkshed and 2.5 maximum FAR, for all multifamily housing across those areas.
- Be sure to thoroughly study any potential adverse environmental impacts of these
  actions, as well as the probable significant adverse environmental impacts of failing
  to take such measures.

### **Corridors**

The DEIS studies a "Corridor" growth strategy (Alternative 4) that would focus new housing in areas near transit and amenities. Increasing access to frequent transit and parks is one of our coalition's goals, and it will help the City reduce cost of living while improving quality of life. While the DEIS includes this strategy, the Draft Plan significantly reduces the amount of area where such flexibility and walkable density would be possible. This is inconsistent with the Mayor's One Seattle goals for housing, transportation, the environment and the climate. By restoring multifamily housing to the parcels off of arterials, the Mayor's Recommended Plan can avoid disproportionately exposing renter households to environmental harms caused by high-traffic roadways. This would be more consistent with the City's One Seattle values of racial and environmental justice.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

<sup>&</sup>lt;sup>6</sup> The Neighborhood Center names listed in this comment refer to the names provided in City of Seattle, "Additional Detail on Location of Neighborhood Anchors", 2023. https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/LocationsNeighborhoodAnchorsStudiedAlternative2.pdf

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Page 6 of 13

- Add a Corridor place type that allows mid rise housing up to 85 feet in height. This
  place type should include all parcels currently zoned Neighborhood Residential that
  are:
  - a. within 0.5 miles (roughly a 10-minute walk) of light rail or bus rapid transit; or
  - b. within 0.25 miles (roughly a 5-minute walk) of frequent bus stops.
- Where appropriate, add the Corridor place type to policies that reference the three centers (Regional, Urban, and Neighborhood).
- Impose a maximum FAR no lower than 2.0 for multifamily development in Corridor areas.
- Allow mixed-use residential development in Corridor areas.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study all Corridor areas contemplated by EIS Alternative 5 or the OPCD Draft Plan up to a ten-minute walkshed, and no less than 2.5 maximum FAR for all multifamily housing across those areas.
- Be sure to thoroughly study the probable significant adverse environmental impacts of failing to take such measures.

# **Urban Neighborhoods & Middle Housing**

This section focuses on the One Seattle plan's implementation of HB 1110 (2023) in Neighborhood Residential Areas and throughout the city. Full implementation of the state law needs to be planned to ensure we encourage a diversity of housing types, including backyard cottages, co-housing, townhouses, and stacked flats. Urban Residential zones need to be planned to help us meet our equity, environmental, and affordability goals.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Increase the allowed FAR for middle housing to feasibly allow for family-sized two, three, and four bedroom homes to be built throughout the city. At a minimum, the city should align standards with the Department of Commerce's model ordinance.
   We recommend no less than 1.4 FAR for fourplexes and no less than 1.6 FAR for sixplexes.
- Create a 0.2 FAR bonus for stacked flats in middle housing, to incentivize the creation of physically accessible housing.

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Page 7 of 13

- Create a 0.1 FAR bonus for each Multifamily Tax Exemption (MFTE) unit, along with increasing height to 40 feet if two or more MFTE units are included.
- Encourage the development of housing for large households, including families with children and elders, by providing a development incentive of 0.05 additional FAR for two-bedroom homes and 0.1 additional FAR for three- or four-bedroom homes.
- Create a 0.2 FAR bonus for housing that satisfies defined passive house, living building, or LEED specifications.
- Allow for a full range of middle housing types in Neighborhood Residential areas throughout the city, including allowing for six-plexes by right in all areas with low displacement-risk.
- Align the Draft Plan with HB 1110, by ensuring any alternative density requirements in high-displacement risk areas are temporary. Create a plan for implementing appropriate anti-displacement policies by the next implementation progress report. Partner with BIPOC-led community organizations to engage neighborhood and community residents, both present and former, to better understand how to accommodate their housing needs and improve community resilience.
- Eliminate requirements for side and front setbacks, to allow for more of the lot to be usable open space and accommodate trees.
- When calculating minimum density, do not include ADUs and DADUs in the unit density metric.
- Allow subdivision of lots into lots less than 1,000 square feet.
- Ensure that middle housing is not subject to more restrictive land use or other code requirements than single family housing, as required under HB 1101.
- Expand the "corner store" concept to allow greater flexibility for commercial uses to
  be introduced to neighborhoods that are currently primarily residential. Examples of
  greater flexibility include: non-residential uses that meet the daily needs of residents
  (e.g., health care, small grocers, "third place" leisure activities, etc.), ability to locate
  on off-corner lots, and increased height and FAR limits to facilitate the development
  of ground floor commercial units.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

 Study the impacts of removing side setback requirements in all areas, to allow for more of the lot to be usable open space and accommodate trees.

### **Affordable Housing and Social Housing**

The City of Seattle is facing a housing crisis in terms of scarcity and affordability. One of the goals of the One Seattle Plan, which we strongly support, is to achieve housing abundance:

"When housing is safe, affordable, and abundant, we can fulfill many of our goals for the future....Achieving housing abundance is fundamental to addressing our homelessness crisis, redressing historical patterns of segregation and exclusion, and creating opportunities for displaced residents to return to their communities."

We appreciate the inclusion of the affordable housing bonus to address this pressing need, by allowing for additional development capacity for income-restricted affordable housing in neighborhood residential areas that are within ¼ mile of frequent transit. Though we have not seen a detailed proposal for the income restrictions and set aside requirements, it is our understanding that this bonus is intended for use by non-profits and others building wholly affordable housing projects. This will blunt the impact of the proposed density bonus, as any developments benefiting from the bonus will need to compete for limited public funds available for affordable housing.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Revise the proposed affordable housing bonus to ensure it is usable by a broad range of developers-including private, nonprofit, and social housing developers-without needing scarce public funding. This could look like a requirement for no less than 20% of the homes to be affordable at 60% AMI for rental or 80% AMI for ownership.
- Increase the proposed FAR limit from 1.8 to no less than 2.2.
- Increase the proposed lot coverage from 60% to 70%.
- Allow the proposed affordable housing bonus to be used outside of frequent transit areas.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

• Study the impacts of allowing up to 80% lot coverage for developments using the affordable housing bonus.

### **Equitable Development and Anti-Displacement Strategies**

The City currently provides support to communities disproportionately impacted by displacement pressure, economic exclusion, and disinvestment through a variety of different equitable development programs and anti-displacement policies. We support the continuation of all existing equitable development and anti-displacement tools, notably the Equitable Development Initiative. However, it is not enough for the City to simply continue its current programs; the tools and policies need to be expanded based on feedback from communities disproportionately impacted by discrimination and displacement pressure.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Expand the City's land banking strategy to support affordable rental, affordable ownership, and social housing projects.
- Create incentives and provide technical assistance for small community-based organizations to partner with larger developers in Equitable Development Initiative projects.
- Facilitate generational wealth building, by providing a way for low-income and fixed-income families to sell their home and gain a new high-quality home on the site of the new development.
- Collaborate with the Seattle school district to plan for affordable, family-sized housing near schools, pursuant to City Ordinance 124919.<sup>7</sup>
- Provide information to support the development of Community Opportunity to Purchase Act (COPA) legislation, which would allow qualified non-profit organizations the first opportunity to make an offer on real estate sales involving multifamily buildings with low-income residents.<sup>8</sup>
- Incentivize the use of affirmative marketing and community preference policies for private developments not receiving public subsidy. Continue to incentivize such policies for publicly-funded projects.

<sup>&</sup>lt;sup>7</sup> City Ordinance 124919 states: "WHEREAS, a 2015 amendment to the Countywide Planning Policies approved by the Growth Management Planning Council of King County requires coordination between local land use plans and school districts" and Section 3.14.990 Office created---Functions, Section B.5., "In coordination with the Department of Education and Early Learning and in partnership with the Seattle School District No.1, OPCD will develop planning strategies that support the District's public school facility needs for anticipated student population consistent with adopted comprehensive plan policies and growth forecasts."

<sup>&</sup>lt;sup>8</sup> This is supported by the 2021 Racial Equity Analysis, which advocated for land value capture tools after upzoning.

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Page 10 of 13

 Continue to explore and support the expansion of short-term rental assistance programs.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

 Study the impact of displacement and lack of affordable housing on school enrollment and ensuing school budget constraints and create incentives for family-sized units near schools.

# **Multifamily Housing Mapping Error**

The Draft Plan appears to include an unintentional mapping oversight which, if not corrected, would likely result in a loss of *existing* zoned housing capacity and a reduction in the fifteen-minute walkable neighborhoods envisioned by the Mayor's One Seattle policies and championed by the City Council. This loss would be found in neighborhoods that are today designated for "Multifamily Housing" future land uses *under the currently effective Comprehensive Plan*, but erroneously have been proposed to transition into Urban Neighborhood status under the Draft Plan.<sup>9</sup> This change would replace a designation in the current Comprehensive Plan where "you might find duplexes or townhouses, walk-up apartments or highrise towers," with a new place type that "would primarily allow housing types within a three-story scale, such as detached homes, duplexes, triplexes, fourplexes and stacked flats." A ceiling of stacked flats in the proposed designation is much reduced from a ceiling of highrise towers in the existing designation. In particular, this issue would impact the proposed redevelopment of Fort Lawton with affordable housing, which is a major priority of the City of Seattle and Mayor's Office.

To preserve affordability, walkability and environmental progress made over the last ten years, the Mayor's Recommended Plan should:

 Ensure that all areas that are currently designated as Multifamily Residential on today's future land use map be redesignated as a Corridor, Neighborhood Center, Urban Center or Regional Center, rather than Urban Neighborhood.

# **Transportation**

Safe, accessible, and frequent transportation is a key element to the success of any city. We strongly support Goal TG 1 in the Draft Plan, which states, "Transportation decisions,

Seattle Plan Draft EIS at 1-8 and 2-3.

<sup>&</sup>lt;sup>9</sup> See Attachment C: Urban Neighborhood Areas Overlayed by FLUM 2035 Multi-Family Residential Areas for a graphic depiction of the multifamily housing mapping error.

<sup>10</sup> *Compare* Seattle 2035 Comprehensive Plan (Amended December 2022) at p. 53 with One

strategies, and investments support the growth strategy for the City and the region and are coordinated with this Plan's land use goals." In order to achieve this, Seattle should prioritize *proximity*-based strategies over mobility-based ones. 11 One example of this approach would be to plan for far more Neighborhood Centers than are included in the Draft Plan—especially in low-density, car-dependent neighborhoods (see the Neighborhood Centers section of this letter). In its mobility strategy, Seattle should prioritize carbon-neutral transportation modes such as walking, rolling, and cycling, and carbon-light modes such as mass transit and carpooling. Transportation infrastructure that primarily serves personal automobiles, including parking, should be deprioritized in relation to these other modes.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Plan to accommodate housing and job growth in a manner that will enable the City to achieve the following transportation and environmental goals: net-zero citywide emissions by 2050 (see T 4.1), 20% reduction in VMT by 2044 (see T 4.2), and a 37% reduction in VMT by 2044.
- Eliminate parking minimum requirements for all land uses types citywide.
- Plan to serve all Neighborhood Centers with frequent bus service.
- Add the Corridor place type to the lists of places described in T 1.2, T 3.1, and T.2.12; for example, "all centers (Regional, Urban, and Neighborhood) and corridors".
- Clarify that T 4.4, which describes neighborhood-scale strategies to reduce carbon emissions and pollution, applies to all types of neighborhoods—including neighborhoods with high-traffic arterial streets with frequent transit service.
- Use a racial equity lens when prioritizing sidewalk and pedestrian infrastructure construction in areas that currently lack it (see T 3.20).
- Plan to prioritize street right of way differently in different contexts: within centers
  and neighborhoods, streets should prioritize active transportation that is safe and
  sustainable; between centers and neighborhoods, streets should prioritize public
  transit; and within and between Manufacturing and Industrial Centers, streets
  should safely accommodate the reliable movement of goods.

https://www.planetizen.com/blogs/128363-planning-accessibility-proximity-more-important-mobility

<sup>&</sup>lt;sup>11</sup> See Todd Litman. "Planning for Accessibility: Proximity is More Important than Mobility", Planetizen, April 14, 2024.

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Page 12 of 13

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

• Study the environmental impacts of maximum parking requirements for residential and commercial uses in frequent transit service areas.

### **Climate & Environment**

The City is preparing to comply with new climate requirements that will be required by state law in 2029. We support the City's decision to get ahead of these upcoming requirements, and we applaud the goal of 58% reduction in greenhouse gas emissions from 2008 levels. We also support the City's study of the environmental impacts of planning for additional density within Seattle, which found that DEIS Alternative 5 would produce the lowest GHG emissions per capita. We particularly support the following statement in the DEIS:

While each [EIS] alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts. (DEIS, p.3.2-51)

We encourage the City to set additional specific climate goals that will allow for progress to be accurately assessed throughout the next twenty years.

To facilitate immediate progress, the Mayor's Recommended Plan and any preferred alternative should:

- Prioritize supporting transportation mode shift toward active mobility options over automobile electrification.
- Define specific anti-displacement strategies that meet the needs of communities most likely to be impacted by climate change.
- Set goals for building de-carbonization that can inform future revisions to the energy code.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

 Provide additional explanation for the conclusion that Alternative 1: No Action would have no significant adverse impacts on greenhouse gas emissions or air quality. Given the anticipated impacts that this strategy would have on greenfield development and increased vehicle-miles traveled, particularly by commuters, explain why these impacts would not be significant. Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Page 13 of 13

Thank you for considering our comments. If you require additional information, please contact Complete Communities Coalition Steering Committee co-chairs Tiernan Martin (tiernan@futurewise.org) and Jesse Simpson (jesse@housingconsortium.org).

Sincerely,

Tiernan Martin and Jesse Simpson

Co-Chairs, Complete Communities Coalition Steering Committee

### **Attachments**

This comment incorporates the following attachments by reference, and we ask that they be added into the public record as a part of these comments:

Attachment A: One Seattle Comprehensive Plan: Public Review Draft, August 2023

Attachment B: DEIS Alt 5 and Growth Center Designation Criteria Tables

Attachment C: Neighborhood Centers by Name and Location

Attachment D: Urban Neighborhood Areas Overlayed by FLUM 2035 Multi-Family Residential Areas

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Attachment A: One Seattle Comprehensive Plan: Public Review Draft

The Complete Communities Coalition requests the City of Seattle to include the following document in the public record:

City of Seattle. "One Seattle Comprehensive Plan: Public Review Draft", June 2023. Accessible for download at: <a href="https://futurewiseorg.sharepoint.com/:b:/g/EYK\_mzhgGw9CgVMoSvvajtwB1eTJkbe2RZ7UPQ-01Py57g?e=keR-Huq">https://futurewiseorg.sharepoint.com/:b:/g/EYK\_mzhgGw9CgVMoSvvajtwB1eTJkbe2RZ7UPQ-01Py57g?e=keR-Huq</a>

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Attachment B: DEIS Alt 5 and Growth Center Designation Criteria Tables

Environment, Impacts, & Mitigation Measures 🔹 Land Use Patterns & Urban Form

# Exhibit 3.6-112. Future Activity Units (AU)—Alternative 5

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 5 Acres	Alt. 5 AU	Alt. 5 AU/Ac.
Regional Centers <sup>1</sup>					
Downtown	377.4	473.2	952	447,351	469.9
First Hill/Capitol Hill	139.5	163.4	916	149,578	163.3
University Community	54.5	70.2	753	52,695	69.9
South Lake Union	236.7	344.1	340	115,612	340.2
Uptown <sup>2</sup>	131,3	161,3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard <sup>2</sup>	67.7	96,9	495	50,047	101.0
Hub Urban Centers <sup>1</sup>					
Bitter Lake Village	44.0	55,4	364	20,044	55.1
Fremont	71.9	1.88	214	18,877	0.88
Lake City	57.6	75.4	142	10,688	75.1
Mt Baker	36,0	47.4	491	23,135	47.1
West Seattle Junction <sup>2</sup>	70.4	100.2	449	26,934	59.9
Residential Urban Centers				400	
130th Street <sup>2</sup>	18,4	20.7	218	7,733	35.5
23™ & Union-Jackson	38.9	46.5	625	29,046	46.5
Admiral <sup>2</sup>	49.2	60,4	288	6,886	23.9
Aurora-Licton Springs	44.1	51.4	327	16,775	51.3
Columbia City	33.9	46.1	335	15,390	46.0
Crown Hill	25,3	31.4	271	8,492	31.3
Eastlake	70.2	82.0	199	16,323	81.9
Green Lake	70.6	87.4	109	9,492	87.3
Greenwood-Phinney Ridge <sup>2</sup>	84.5	101.6	315	9,579	30.4
Madison-Miller	65.3	85.1	145	12,349	85.0
Morgan Junction <sup>2</sup>	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.5	267	9,161	34.3
Othello2	23.7	29.0	584	17,894	30.6
Rainier Beach	23.0	26.0	346	12,893	37.3
Roosevelt	61.4	81.2	170	13,801	81.1
South Park	14.7	18.5	263	7,951	30.2
Upper Queen Anne?	89.5	110.5	329	5,857	17.8

2021 King County Countywide Planning Policies

	Metro Growth Centers	Urban Growth Centers	Countywide Growth Centers
3. freight access	Yes	To be addressed in subarea plan To be addressed in subarea plan	To be addressed in subarea pla
PART 3: CENTER CRITERIA			
A. Purpose			
1. Compatibility with VISION	Yes	Yes	Yes
centers concept, Regional			
Growth Strategy and			
Multicounty Planning Policies			
B. Activity level/Zoning 20			
1. existing activity <sup>21</sup>	60 activity unit density	30 activity unit density (AUs refer to combined jobs and population)	18 activity unit density
2. planned activity	Above 120 activity unit density	60 activity unit density	30 activity unit density
3. sufficient zoned capacity	Yes. Should be higher than target and supports a compact, complete, and mature urban form.	Yes. Should be higher than target.	Should have capacity and be planning for additional growth
<ol> <li>planning mix of housing types and employment types</li> </ol>	Planning for at least 15% residential and 15% employment activity	Planning for at least 15% residential and 15% employment activity	Planning for at least 20% residential and 20% employment, unless unique circumstances make these percentages not possible to achieve.
C. Geographic Size			
1. minimum size	320 acres	200 acres	160
2. maximum size	640 acres (larger if internal HCT)	640 acres (larger if internal HCT) 640 acres (larger if internal HCT)	500 acres
D. Transit			

1 See Exhibit 2.1-1 in Chapter 2 for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 2-5.
2 Proposed new center, redesignated center, or boundary expansion.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council, Highlighted urban villages fail outside King County so countywide center designation criteria from PSRC does not include an AU density threshold.
Sources: City of Seattle, 2023; BERK, 2023.

Westwood-Highland Park

42.2

51.5

258

13,248 9,386

51.4 34.1

<sup>20</sup> PSRCs 2015 guidance on Transit Supportive Densities and Land Uses cites an optimal level of 56-116 activity units per acre to support light rail, dependent on transit costs per mile. The guidance indicates an optimal threshold of at least 17 activity units per acre to support bus rapid transit. Note: the existing threshold in the CPDs is roughly equivalent to 85 AUs existing activity for King County Urban Centers.

<sup>21</sup> For existing centers, not meeting existing activity unit thresholds is not grounds for de-designation or re-designation by the Growth Management Planning Council.



