May 17, 2024

To: OPCD
Re: Equitable Development Initiative (EDI) Advisory Board Input on the Draft Comprehensive Plan

From: The Equitable Development Initiative Advisory Board

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Dear OPCD, City Council, and Mayor Harrell,

As representatives of the Equitable Development Initiative (EDI) Advisory Board, we write to express our deep concern regarding the current Draft Comprehensive Plan (Draft Plan) put forth by the City of Seattle. After thorough review, including the Anti-Displacement Framework (ADF), we find that the Draft Plan fails to adequately address the pressing issues of housing affordability, equitable development, and cultural preservation in our community.

It is our firm belief that the Draft Plan, in its current form, does not align with the mission of the EDI or the City's inclusive growth and City's Race and Social Justice Initiative (RSJI) commitments. Furthermore, it does not consider the lived experiences of BIPOC community members and other marginalized groups who are disproportionately impacted by displacement and economic disparity in our city.

We urge OPCD, the Mayor, and City Council to reconsider the Draft Plan and instead adopt the original "housing abundance" version proposed by the Office of Planning and Community Development (OPCD). This version better aligns with our mission to promote and implement pro-equity frameworks and strategies that ensure the marginalized, BIPOC, and low-income communities in Seattle benefit from equitable access to opportunity, long-term ownership, and the joy of a true sense of belonging.

The EDI Board stresses the importance of policymakers supporting the adoption of a more inclusive Comprehensive Plan. Specifically, we call for the following key revisions to the Draft Plan:

- **Ensure an Ambitious Housing Strategy:** The City must prioritize a housing strategy that supports anti-displacement efforts, cultural preservation, and the creation of diverse, thriving neighborhoods.
- **Revise the Housing Abundance Map:** We support OPCD's earlier housing abundance map that shows nearly 50 larger neighborhood centers and five-story "Corridor" zoning within an eighth-mile of frequent transit. The version of the map provides for more housing options and addresses concerns about affordability across the city and better addresses community needs and concerns about housing affordability and ensuring inclusive growth.

- **Ensure Expansion of Housing Options Citywide:** The City should expand and increase housing options citywide by adopting a broader growth strategy that includes upzoning in more areas, allowing for bigger buildings in more places, and breaking away from the "Urban Village" strategy to alleviate housing scarcity.

- **Support Neighborhoods, Small Businesses, and Economic Opportunity:** The City must support vibrant neighborhoods and do more to support ownership by expanding retail and small business opportunities and allowing small-scale businesses, including corner stores, in all zones and not just on corners. The Board advocates for restoring the number of neighborhood centers from 24 to 42, and expanding housing options within a larger number of neighborhood centers. This would anchor and improve small neighborhood business districts, create more retail and small business opportunities, and provide more housing. This would provide more flexibility to encourage the establishment of neighborhood services and amenities that benefit residents and promote entrepreneurship and access to goods and services within a 15-minute walkshed.

- **Support Zoning Changes for Middle and Low-Income Housing :** The CIty should do more to expand middle and low-income housing: Zone for four-plexes and six-plexes that will actually get built and support families with three- and four-bedroom homes. Increase the floor area ratio (FAR) to match or exceed state minimums to allow for more housing diversity and accommodate the housing needs of different household sizes. City zoning regulations should support housing abundance for low income residents and provide for missing middle housing and transit-oriented development to accommodate diverse household sizes.

- **Prioritize Equitable Transit-Oriented Development (ETOD)**: The Board advocates for the City to prioritize Equitable Transit-Oriented Development (ETOD), including broader transit corridor upzoning and larger apartment and condo buildings near all frequent transit corridors. The Comprehensive Plan should reflect a commitment to ETOD, support anti-displacement and cultural preservation, and capitalize on transit infrastructure investments to provide additional housing options that increase access to opportunity and/or reduce reliance on cars.

- **Be Progressive About Parking Requirements:** We urge the City to reconsider parking requirements and support adopting less strict parking requirements to help reduce housing costs and promote affordability. Parking requirements are seen as a barrier to housing development and contradict efforts to address climate change and promote alternative modes of transportation.

- **Ensure Revisions to the Draft Plan Incorporate and Build on Public Input:** The Board advocates on behalf of the community and would like the City to ensure revisions to the Draft Plan reflect input from Boards and Commissions and also reflect the concerns and comments shared by the community during the public input period. The Draft Plan does not take into account public feedback already provided, and is not reflective of the lived experiences, values, concerns, and preferences expressed throughout all prior stages of scoping and development. The EDI Board supports a meaningful and inclusive process and revisions to the Draft Plan should reflect

community needs and priorities and apply an equity lens – community input calls for more housing options, greater affordability, and inclusive growth strategies that include funding community-led equitable development.

In conclusion, the EDI Advisory Board urges the City to prioritize equity and inclusivity in the development of the Comprehensive Plan. The Board believes the City's "housing abundance" version of the Draft Plan better supports creating a more just and equitable future for all residents of Seattle. As community advisors, we remain optimistic about the potential for positive change through robust community engagement and advocacy efforts and thank you for considering our feedback.

Sincerely,

Mark R. Jones, Ph.D. By: ***Mark R. Jones, Ph.D***.

Board Vice Chair, on behalf of the full EDI Advisory Board