May 17th, 2024

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

RE: *Revised* LIHI Comments on Seattle Comprehensive Plan

Dear Director Quirindongo,

The Low Income Housing Institute (LIHI) is a nonprofit affordable housing developer that owns and operates over 70 properties with approximately 3,500 units of affordable housing. The majority of our housing portfolio resides in the City of Seattle with 48 properties. Our organization is also one of the largest enhanced shelter providers in the City with 11 Tiny House Villages, an RV Safe Parking lot, and a 24/7 enhanced shelter called Lakefront Community House. We are writing to you to secure improvements to the draft Comprehensive Plan, as it is the central document that must be a blueprint to expand affordability in every Seattle community.

We support the goals and policy changes articulated in the January 27th, 2023 letter from Complete Communities Coalition. In particular, we believe it is crucial to further expand density along transit corridors and to adopt principals that align with Equitable Transit Oriented Development (ETOD). This should include allowing midrise housing (4-8 stories) and mixed uses in all residential areas within walking distance of frequent transit throughout the entirety of the frequent transit and park access walkshed in the Corridor Alternative, not just in commercial zones on arterials. The plan must expand height bonuses for affordable housing to ensure we meet the City's equity goals.

The plan must 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 (MHA) 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. The city should also increase MHA fees to maximize revenue for more affordable housing.

We also propose that the City expand its land banking efforts in high displacement areas of the city, such as the Central District and where there are existing communities of color. As land value continues to skyrocket, banking the land now for future development drastically expands

the City's options and ability to build more affordable housing in the future. We know between now and 2044 the City expects another 250,000 people to move to Seattle. However, the draft plan only allows for an additional 100,000 new homes. This will continue to keep home prices out of reach except for the very wealthy, as evidenced by the fact that in order to afford a home in Seattle you have to earn $214,000 a year.

It is also crucial to expand emergency shelter to address our homelessness crisis that continues to grow each year. The City needs to address zoning changes to allow more Tiny House Villages and similar micro-shelters throughout the City. We recommend preserving the religious sponsor zoning exemptions for Tiny House Villages, and waive unnecessary code requirements that place undue administrative and financial stress on their development. This should include building code, energy code, and compliance with the Stormwater Manual. The City should preserve and expand expedited permit reviews for Tiny House Villages/Emergency Shelters.

Please accept this comment in support of policy LU 16.6: Use Incentives and Transfer of Development Rights (TDRs). TDRs can be a powerful tool to help offset the costs of preserving historic structures, which often require costly masonry reinforcement and specialty restoration. The value of the unbuilt airspace above such properties, especially in densely zoned neighborhoods such as South Lake Union, should be recognized and supported with TDR programs. The city should explore expansion of the Downtown Core protocols for TDR to the SLU and other zones.

Sincerely,

Sharon Lee, Executive Director
1253 S. Jackson St. Suite A
Seattle, WA 98144
sharon.lee@lihi.org