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May 6, 2024

City of Seattle Office of Planning and Community Development
Attn: Director Rico Quirindongo, Michael Hubner, Jim Holmes, Brennon Staley
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Subject: Futurewise Comments on the One Seattle Comprehensive Plan Update Draft EIS Comments and the One Seattle Comprehensive Plan: Draft for Public Review Comments

Sent via email to:
PCD_CompPlan_EIS@seattle.gov, OneSeattleCompPlan@seattle.gov

Dear Director Quirindongo and Staff of the Office of Planning and Community Development,

Thank you for the opportunity to review the One Seattle Comprehensive Plan Update Draft EIS ("DEIS") and the Draft Plan for Public Review ("Draft Plan"). We appreciate that the City of Seattle ("the City") has requested public comments to be submitted for the DEIS by 5pm May 6, 2024. Please find our comment on these documents, and their related appendices, listed below. Although we specify which document each comment relates to, any comment that may be applicable to both the DEIS and the Draft Plan should be considered as a comment on each.

Futurewise Mission Statement

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State, including in Seattle.

Draft Plan & DEIS Comments

Growth Strategy

Document	Comment
Draft Plan	**Ensure Adequate Public Services and Facilities for Seattle's Growth Targets** The Draft Plan and DEIS identifies the following growth targets 2024-2044 period: 80,000 housing units and 159,000 jobs.[1] However, Seattle is assigned net housing and job targets of 112,000 housing units and 169,000 jobs between 2019-2044.[2] The Draft One Seattle Plan Housing Appendix explains the City's rationale and method for prorating the King County targets to match the 20-year planning period of the plan.[3] While Futurewise agrees that it is reasonable to deduct the net housing units produced between 2019 and 2023 from the target total for housing-related planning purposes, the growth targets *apply to all growth-related needs*. These needs include public facilities and services such as parks, schools, transportation, utilities, and others. If the City intends to prorate the growth targets that it has been assigned, it must demonstrate that it has provided adequate services and facilities to meet the needs of the people living in housing units built between 2019-2023. The City should: > Demonstrate sufficient public services and facilities to meet the expected population growth associated with the housing and employment growth targets assigned to Seattle in the 2021 King County Countywide Planning Policies ("CPPs") for the full planning period of 2019-2044. > If a prorating method is used to adjust the housing targets, the City should disaggregate the net unit production between 2019-2023 by the housing needs categories provided in RCW 36.70a.070(2)(a)(i)-(ii), including "moderate, low, very low, and extremely low-income households; and emergency housing, emergency shelters, and permanent supportive housing."

[1] See City of Seattle. "One Seattle Plan—Draft for Public Review," p. 16, March 2024.
[2] See King County. "2021 King County Countywide Planning Policies," Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 23, March 2023
[3] See City of Seattle. "Draft One Seattle Plan Housing Appendix", p. 10, April 2024.

Draft Plan, Draft Housing Appendix, DEIS

Adopt a Goal-Oriented Approach for Converting Housing Units to Population

Seattle's growth target of 112,000 housing units is calculated based on the median population projection for King County. A formula incorporating three variables—group housing, vacancy rates, and household size—is employed to determine the housing unit requirement from the projected population. For metropolitan cities like Seattle and Bellevue, the formula utilizes an average household size of 2.12. While this is higher than Seattle's average household size in 2020, which was 2.05, it is substantially lower than both the 2.66 average for the rest of King County and the national average of 2.55.[4] Both the Draft Plan and DEIS use an average household size of 2.05 to convert housing units into population growth, which itself is used to forecast employment growth, level of service for parks, solid waste production, and per capita greenhouse gas emissions.

The City concludes, after examining census data and community feedback, that the scarcity of affordable, multi-bedroom homes contributes significantly to Seattle's lower average household size compared to the rest of the county.[5] Planning for the next two decades of growth based on the current average household size assumes that the city will remain unaffordable for larger households. However, this assumption contradicts the first of the Draft Plan's four key moves, which explicitly states that the City "must align [its] housing plans to meet this specific need and ensure that homes that meet the needs of families".[6]

The City should:

> When calculating the population from the projected 2044 housing unit target, use an average household size that anticipates a future in which the City successfully attracts and retains larger households, especially families with children and/or seniors.

> Target an average household size that strikes a balance between Seattle and the rest of the county by calculating the mean of two. This approach would yield a target of 2.35 people per housing unit, on average.

[4] See *Ibid.*, p. 45.
[5] See *Ibid.*, p. 45.
[6] See City of Seattle. "One Seattle Plan—Draft for Public Review," p. 3, March 2024.

Draft Plan, Draft Housing Appendix

Identify and Take Steps to Mitigate Current Zoning Regulations with Discriminatory Effects and/or Racially Disparate Impacts

RCW 36.70a.070(2)(e) provides that cities such as Seattle must "[Identify] local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: (i) Zoning that may have a discriminatory effect." In an unreleased draft of the Draft Housing Appendix, staff wrote the following sentence:

> After [using zoning to segregate neighborhoods explicitly on the basis of race] was ruled unconstitutional in 1917, city officials substituted ostensibly race-neutral standards like minimum lot size and prohibitions on multifamily housing — both still present in Seattle's zoning today — as covert ways to shield white neighborhoods from lower-income residents and people of color.[7]

This finding is supported by peer-reviewed science.[8] Furthermore, the King County CPPs require jurisdictions, including Seattle, to "[e]xplain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity."[9] and to "Adopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color households from past and current racially exclusive and discriminatory land use and housing practices. Promote equitable outcomes in partnership with communities most impacted." Given the importance of such a finding in informing changes to policies and regulations, it should be included in both the Mayor's Recommended Plan and its Housing Appendix.

The City should:

> Include the finding the following sentence in both the Mayor's Recommended Plan and its Housing Appendix: "… city officials substituted ostensibly race-neutral standards like minimum lot size and prohibitions

[7] See Attachment B: Draft Housing Appendix August 2023, p. 4.;
Also see Barnett, Erica. "Mayor's Office Removed All New Anti-Displacement Proposals from Draft 'Anti-Displacement Framework'". Published April 23, 2024.
https://publicola.com/2024/04/23/mayors-office-removed-all-new-anti-displacement-proposals-from-draft-anti-displacement-strategy/
[8] See Bronin, Sara C. "Zoning by a Thousand Cuts." *Pepperdine Law Review* 50 (2023): 719-784.
[9] See King County. "2021 King County Countywide Planning Policies," Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 43, March 2023

on multifamily housing — both still present in Seattle's zoning today — as covert ways to shield white neighborhoods from lower-income residents and people of color."

> Clarify what actions are being taken to mitigate the historic and current racially discriminatory effects and disparate impacts.

Draft Plan, DEIS

Quantify the Relationship Between Zoning and Racial Demographics for Current and Proposed Growth Strategies

Addressing the racially disparate impacts of zoning is required by the state's Growth Management Act and King County's CPPs.[10] The City acknowledges that practices of racial exclusion and discrimination have resulted in lasting segregation across Seattle[11] and that low-density zoning is "perpetuating patterns of racial and economic exclusion and contributing to market pressures that cause displacement and gentrification."[12] It indicates its intent to address this pattern of segregation in Growth Strategy Goal 1 and Growth Strategy Policy 1.2, which states that it is a policy to "encourage and plan for a variety of housing types in all neighborhoods to provide opportunities for a diverse population to live throughout the city and to allow people to stay in their neighborhoods as their needs change."[13]

However, the City fails to provide a quantitative assessment of the relationship between its zoning policies and racial demographics. This makes it difficult to determine the likelihood that the proposed changes will have their intended effect. Providing a quantitative measurement of this relationship would provide valuable guidance on the degree to which it aligns with its own goals. This approach has been undertaken by numerous studies, including one that focused on number-of-unit zoning in Connecticut[14], and another that assessed minimum lot size regulations in Massachusetts[15]. Applying such a method to

[10] See RCW 36.70a.070(2)(f); see also King County. "2021 King County Countywide Planning Policies," Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 45, March 2023
[11] City of Seattle. "One Seattle Plan—Draft for Public Review," p. 91, March 2024.
[12] *Ibid.* p. 15
[13] *Ibid.* p. 17
[14] See Freemark *et al*. "Bringing Zoning into Focus: A Fine-Grained Analysis of Zoning's Relationships to Housing Affordability, Income Distributions, and Segregation in Connecticut", June 2023. https://www.urban.org/sites/default/files/2023-06/Bringing%20Zoning%20into%20Focus.pdf
[15] See Resseger, Matthew. "The Impact of Land Use Regulation on Racial Segregation: Evidence from Massachusetts Zoning Borders", October 2022. Mercatus Research Paper, https://ssrn.com/abstract=4244120

Seattle's growth strategy would provide important information that is missing from the Draft Plan and DEIS.

The City should:

> Quantify the statistical relationship between zoning and racial demographics in the current growth strategy and each DEIS alternative. Specifically, we suggest measuring the association of the following variables: share of each major US census racial and ethnic category ; and presence of residential zoning that prohibits building types generally affordable to households earning 50-80% of AMI. Racial demographics should also be compared with the low-density residential areas that are not transit-served and therefore under the current draft are not eligible for the increased affordable housing bonus program. [16]

> Use the coefficient of this statistical model as a metric for comparison. Explain how each DEIS alternative compares with the current baseline. Use this comparative analysis to inform the preferred alternative in the FEIS and the growth strategy described in the Mayor's Recommended Plan.

Draft Plan

Plan for Substantially More Housing Production in Low-Displacement Risk Areas to Address Racial Disparities

The GMA's Housing Element now requires cities, including Seattle, to "address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions."[17] Additionally, King County CPP H-5 requires local jurisdictions, including Seattle, to "[d]emonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices" while H-9 directs them to "[a]dopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color households from past and current racially exclusive and discriminatory land use and housing practices."[18]

The Draft Plan growth strategy proposes to address racial disparities with the following two changes: concentrating Neighborhood Centers in

[16] The City finds that "Zones with 50 to 85 ft. height limits (Multifamily flats in buildings between 5 and 8 floors)" are viable for serving households earning 0-80% AMI, see City of Seattle. " Draft One Seattle Plan Housing Appendix", Table 32, p. 119, April 2024.
[17] See RCW 36.70a.070(2)(f)
[18] See King County. "2021 King County Countywide Planning Policies," pp. 43-44,, March 2023

low-displacement-risk areas; and limiting development capacity to three units per lot in high-displacement-risk Urban Neighborhood areas. Although it is difficult to assess the potential impact of these changes on racial disparities without a quantitative metric (see our previous comment), it is clear that there are several ways that the City could improve the likelihood of success.

The first is to allow the development of midrise, multifamily buildings in low-displacement-risk areas. Midrise buildings are approximately five to eight stories in height, and are the building type most likely to be financially accessible to households earning 50-80% of AMI.[19] While market-rate, midrise apartment buildings will not be affordable to every individual Person of Color, they are much more likely to serve this population than detached single-unit homes or "middle housing" typology buildings.

The second is to allow sixplex development by right in all low-displacement-risk Urban Neighborhood areas. This will further concentrate development opportunities in low-displacement-risk areas, reducing development pressure on high-displacement-risk areas and providing time for additional anti-displacement policies to be put into place.

The City should:

> Add all Neighborhood Centers included in the August 2023 Draft Plan (see Attachment A) to the growth strategy. This includes a total of 50 Neighborhood Centers, the vast majority of which are located in areas of the city with low displacement risk. See Attachment B for a graphic showing the 2023 Draft Plan Neighborhood Centers overlaid on the 2022 Displacement Risk Index.

> Add the Corridor place type, as described in the August 2023 Draft Plan (see Attachment A) to the growth strategy. This will add a significant amount of midrise development capacity in low-displacement-risk areas throughout the city. See Attachment C for a graphic showing the 2023 Draft Plan Corridors overlaid on the 2022 Displacement Risk Index. Of particular importance, the corridor place type should include areas near major park entrances (as in the DEIS, but not in the draft plan) to balance out the racially disparate impacts of a corridor strategy that focuses solely on

[19] See Draft One Seattle Plan Housing Appendix", Table 32, p. 119, April 2024.

existing frequent transit corridors.

> Increase the baseline maximum unit count in low-displacement-risk Urban Neighborhood areas to six units and increase the base maximum floor area ratio to 1.6 to align with Washington Department of Commerce's Middle Housing Model Ordinance.[20] Increase the baseline maximum unit count in low-displacement-risk areas near frequent transit service to eight units.

Draft Plan, DEIS

Increase the Ability of All Residents to Live in the Neighborhood of their Choice

Countywide planning policy H-18 requires that cities "Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents in jurisdictions throughout the county to live in the neighborhood of their choice, reduce disparities in access to opportunity areas, and meet the needs of the region's current and future residents by:

a) Providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity;

b) Expanding capacity for moderate-density housing throughout the jurisdiction, especially in areas currently zoned for lower density single-family detached housing in the Urban Growth Area, and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy; Chapter: HOUSING 46 2021 King County Countywide Planning Policies

c) Evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing; and

d) Providing access to housing types that serve a range of household sizes, types, and incomes, including 2+ bedroom homes for families with children and/or adult roommates and accessory dwelling units, efficiency studios, and/or congregate residences for single adults.

To better show how the city is complying with these requirements the city should:

> Expand the missing middle affordable housing incentive program to the

[20] See Washington Department of Commerce. "TIER 1 AND 2 CITIES MIDDLE HOUSING MODEL ORDINANCE", p. 13, January 2024. https://deptofcommerce.app.box.com/s/2l4yetpanyztkjbpumdfdadghh2rfag7

high opportunity areas that are currently not part of the frequent transit service area.

> Ensure that the distribution of new neighborhood centers furthers the opportunities for affordability and housing choice throughout the city, especially in areas currently zoned for lower density.

Draft Plan, DEIS

Plan for Centers Near New Light Rail Stations

VISION 2050, the long-range growth strategy for the four-county Puget Sound region, directs Metropolitan Cities, including Seattle, to focus growth in their Regional Centers and high-capacity transit areas.[21] MPP-RGS-8 specifically directs jurisdictions, including Seattle, to "[a]ttract 65% of the region's residential growth and 75% of the region's employment growth to the regional growth centers and high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments."[22] VISION 2050 identifies the 130th Street and 145 Street light rail stations as a high-capacity transit station areas[23], a term that it explicitly defines as an area "within ½ a mile of existing or planned light rail".[24]

The City should:

> Designate the residential area within a half mile of the 145th Street light rail station as Neighborhood Center. This area is west of Interstate 5 and south of the jurisdiction boundary that separates Seattle from Shoreline.

> Plan for transit-oriented development in all areas within a half mile of the 130th Street light rail station. Replace all Lowrise 1, Lowrise 2, and Lowrise 3 zones with Midrise Multifamily within this high-capacity transit station area.

Draft Plan, DEIS

Plan for Regional Centers in South Seattle and West Seattle

There are currently no Regional Centers in either South Seattle or West Seattle, and none are planned to be added in the Draft Plan. As Seattle City Councilmember Tammy Morales observed at a council briefing in March 2024,

[21] See Puget Sound Regional Council. "VISION 2050", MPP-RGS-8, p. 31, October, 2020.
[22] *Ibid.*, MPP-RGS-8, p. 43, October, 2020.
[23] *Ibid.*, p. 72
[24] *Ibid.* p. 128

it is inequitable to concentrate employment opportunities in the central and northern parts of the city.[25] While there are certain criteria that must be met in order for a center to qualify as an Urban Growth Center under King County's CPPs[26], there is an opportunity to plan for enough housing and employment activity in several South Seattle centers to meet these criteria. According to DEIS Exhibit 3.6-112 Future Activity Units (AU)—Alternative 5, both Mt. Baker and West Seattle Junction meet the criteria for existing activity unit (AU) density and size. While these two centers do not currently meet planned activity unit density minimum[27], the City has the ability to adjust the planned density in this comprehensive plan update.[28]

The City should:

> Increase development capacity in both the Mt. Baker and West Seattle Junction centers to exceed King County's minimum planned activity unit density of 60 AU/acre.

> Add Mt. Baker and West Seattle Junction to the list of Regional Centers described in the Growth Strategy—Area Planning subsection.

> Add Mt. Baker and West Seattle Junction to the list of Regional Centers described in the Regional Center Subarea Plans section on p. 194.

> Update the Growth Strategy maps to show Mt. Baker and West Seattle Junction as Regional Centers instead of Urban Centers.

Draft Plan, DEIS

Amend Alternative 5 and Replace the Draft Plan Growth Strategy with the Amended Version

Based on the information provided, we believe that DEIS Alternative 5: Combined ("Alternative 5") is most likely to meet the goals and responsibilities of the City of Seattle provided it fully complies with the Growth Management

[25] See Seattle City Council. "Council Briefing, Inf 2419, One Seattle Comprehensive Plan - Draft Plan Overview and Rollout", March 11, 2024. Video recording accessible at: https://www.seattlechannel.org/CouncilBriefings/?videoid=x155383&Mode2=Video
[26] See King County. "2021 King County Countywide Planning Policies," Appendix 6: King County Centers Designation Framework, pp. 106-111, March 2023
[27] In DEIS Alt. 5, the planned density of Mt. Baker and West Seattle Junction are 47.1 and 59.9, respectively; the minimum planned activity unit density for an Urban Growth Center in King County is 60.
[28] See Attachment E: DEIS Alt 5 and Growth Center Designation Criteria Tables for a side-by-side comparison of future AU density and King County's Center Designation Framework criteria.

Act ("GMA"), Puget Sound Regional Council ("PSRC") VISION 2050, multicounty planning policies, and King County Countywide Planning Policies ("CPP") requirements, goals, and objectives. Alternative 5 plans to accommodate a higher housing unit target than the other action alternatives (120,000 and 100,000 respectively).

The DEIS finds that Alternative 5 will produce the most affordable housing units on net[29], the lowest ratio of physical displacements to affordable housing units built, the greatest reduction to economic displacement pressure[30], the greatest benefit for low-income renter households[31], the lowest greenhouse gas emissions per capita[32], and the lowest vehicle-miles traveled ("VMT") per capita[33].

The City should:

> Amend Alternative 5 to reflect all relevant changes suggested in this comment letter

> Designate the amended version of Alternative 5 as the preferred alternative in the Final EIS ("FEIS")

> Include the amended Alternative 5 growth strategy in the Growth Strategy Element of the Mayor's Recommended Plan

Transportation

Document	Comment
Draft Plan	**Prioritize Carbon-Neutral Transportation Modes**

The City should:

> Keep the following transportation and environmental goals: net-zero citywide emissions by 2050 (see T 4.1), 20% reduction in VMT by 2044 (see T

[29] City of Seattle. "Draft EIS: One Seattle Comprehensive Plan Update", Exhibit 3.8-47. Comparison of Demolished Units to New Affordable Housing from MHA and MFTE, March 2024
[30] *Ibid.* p. 3.8-54
[31] *Ibid.* p. 3.8-61
[32] *Ibid.* p. 3.2-23
[33] *Ibid.* p. 3.10-103

4.2), and a 37% reduction in VMT by 2044.

> Eliminate parking minimum requirements for all land uses types citywide.

> 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.

Housing

Document	Comment
Draft Plan, Draft Housing Appendix	**Revise the Regulatory Barrier Analysis, Follow Department of Commerce Guidance** RCW 36.70A.070(2)(d) requires cities planning under the GMA, such as Seattle, to include in their comprehensive plan a housing element that "[m]akes adequate provisions for existing and projected needs of all economic segments of the community, including… (ii) [d]ocumenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations." The Department of Commerce provides guidance on how to identify barriers to housing production, including development regulations and process obstacles. Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist lists ten types of development regulations and six types of process obstacles that jurisdictions should assess.[34] The Draft Housing Appendix identifies only three regulatory barriers to housing production: zoning, development standards, and permitting times.

[34] See Washington Department of Commerce. "Guidance for Updating Your Housing Element: Updating your housing element to address new requirements", Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist, pp. 117-118, October 2023.

The document provides a single paragraph description of each, without identifying specific types of each and addressing them in turn. This approach fails provide a detailed analysis of how different regulatory policies[35] affect housing production and what actions may be needed to address each barrier.

The City should:

> Complete the Barrier Review Checklist provided in Exhibit B2 of the Department of Commerce's "Guidance for Updating Your Housing Element: Updating your housing element to address new requirements" report.

> The regulatory barrier analysis should also include a review of specific barriers to a variety of household sizes for those affordability levels including 2+ bedroom homes for families and congregate residences for individuals as specified in Countywide Planning Policy H-18.

Draft Plan, DEIS

Summarize Development Capacity by Projected Housing Need Category for the FEIS Preferred Alternative

The City should:

> Include a table that summarizes zoned land development capacity analysis and projected housing needs for the FEIS preferred alternative and the growth strategy described in the Growth Strategy Element of the Mayor's Recommended Plan. The table should disaggregate housing unit development by AMI band, following the guidance provided by the Department of Commerce[36], 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 Draft Housing Appendix provides an excellent template for this information.

[35] Examples of regulatory barriers to housing production include prohibition of moderate-density housing types, high minimum lot sizes, low maximum FAR, etc. See Washington Department of Commerce. "Guidance for Updating Your Housing Element: Updating your housing element to address new requirements", Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist, pp. 117-118, October 2023.
[36] See Washington Department of Commerce. "Guidance for Updating Your Housing Element: Updating your housing element to address new requirements", October 2023.
https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh

Draft Plan, Updating Seattle's Neighborhood Residential Zones

Increase FAR Maximum in Neighborhood Residential Zones to Meet or Exceed Middle Housing Model Ordinance

The table titled "Key standards in updated Neighborhood Residential zones" on p. 12 of "Updating Seattle's Neighborhood Residential Zones" states that the baseline maximum floor area ratio (FAR) will be 0.9. This is less than the suggested development intensity included in Department of Commerce's Middle Housing Model Ordinance, which is designed to meet the *minimum* criteria in HB 1110 and stipulates 1.2 FAR for 4-unit developments and 1.6 FAR for 6-unit developments. Limiting FAR will result in small homes that are unlikely to meet the needs of large households, especially families with children and/or seniors.

The City 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 six- plexes.

> Retain the FAR incentives retaining existing structures and consider additional FAR incentives for retaining large and culturally significant trees.

Draft Plan

Expand Mandatory Housing Affordability Program to Include All Centers and Corridors

Housing Policy H 3.14 includes inclusionary zoning as one of tools used to create affordable housing. Seattle's inclusionary zoning program, known as Mandatory Housing Affordability ("MHA"), was launched in 2017. Since then, it has generated $246.1 million to support affordable housing development in Seattle. However, MHA would not automatically extend to areas outside the current Urban Centers and Urban Villages that experience significant increases in development capacity. If the program isn't expanded in line with proposed growth strategy changes, the City risks losing a substantial amount of funding for affordable housing.

The City should:

> State that MHA will be applied to all areas within Region Centers, Urban Centers, Neighborhood Centers, and Corridors.

> Explore the implications of implementing inclusionary zoning fees in middle housing zones and propose MHA adjustments that balance the objectives of increasing middle housing production and generating funds for publicly-subsidized affordable housing.

> Identify financing, payment schedule, and on-site compliance challenges that small developers face and incorporate strategies to address those challenges without completing excluding MHA from middle housing zones

Draft Plan, Draft Anti-Displacement Framework

Add to and Expand Anti-Displacement Strategies, in Collaboration with Impacted Communities

The Draft Anti-Displacement Framework does not introduce new methods or expand existing tools to prevent displacement. However, an earlier, unpublished draft of this document included many ways that Seattle's anti-displacement "toolkit" could be improved.[37] These improvements included increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in housing development, promoting land banking, community land trust development, and Public Development Authority-led development, and introducing a Community Opportunity to Purchase Act, among others.

According to the draft report, many of these ideas were shared with the city by community members who have experienced displacement and/or are working on solutions to displacement.[38] Despite engaging with these community members, the City did not incorporate any of their proposals in the final Draft Plan or Anti-Displacement Framework. This omission raises concerns about the City's compliance with King County CPP H-8, which directs jurisdictions (including Seattle) to "*Collaborate* with populations most disproportionately impacted by housing cost burden in developing, implementing, and

[37] See Barnett, Erica C. "Mayor's Office Removed All New Anti-Displacement Proposals from Draft 'Anti-Displacement Framework'", April 23, 2024. https://publicola.com/2024/04/23/mayors-office-removed-all-new-anti-displacement-proposals-from-draft-anti-displacement-strategy/; also see Attachment D: Draft Anti-Displacement Framework August 2023
[38] See City of Seattle. "One Seattle Plan Anti-Displacement Framework — DRAFT NOT FOR DISTRIBUTION", p. 10, August, 2023.

monitoring strategies that achieve the goals of this chapter. *Prioritize the needs and solutions articulated by these disproportionately impacted populations* [emphasis added]."

The City should:

> Add the new and expanded anti-displacement strategies listed in the August 2023 draft of the Anti-Displacement Framework to the Mayor's Recommended Plan and final version of the Anti-Displacement Framework.

> Conduct additional focused engagement with populations disproportionately impacted by housing cost burden to receive feedback on the anti-displacement strategies

Thank you for considering our comments. If you require additional information, please contact Tiernan Martin (tiernan@futurewise.org).

Sincerely,

Tiernan Martin, Director of Research
Futurewise

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. Draft One Seattle Plan August 2023

Attachment B. Displacement Risk Index with Neighborhood Centers from August 2023 Draft Plan

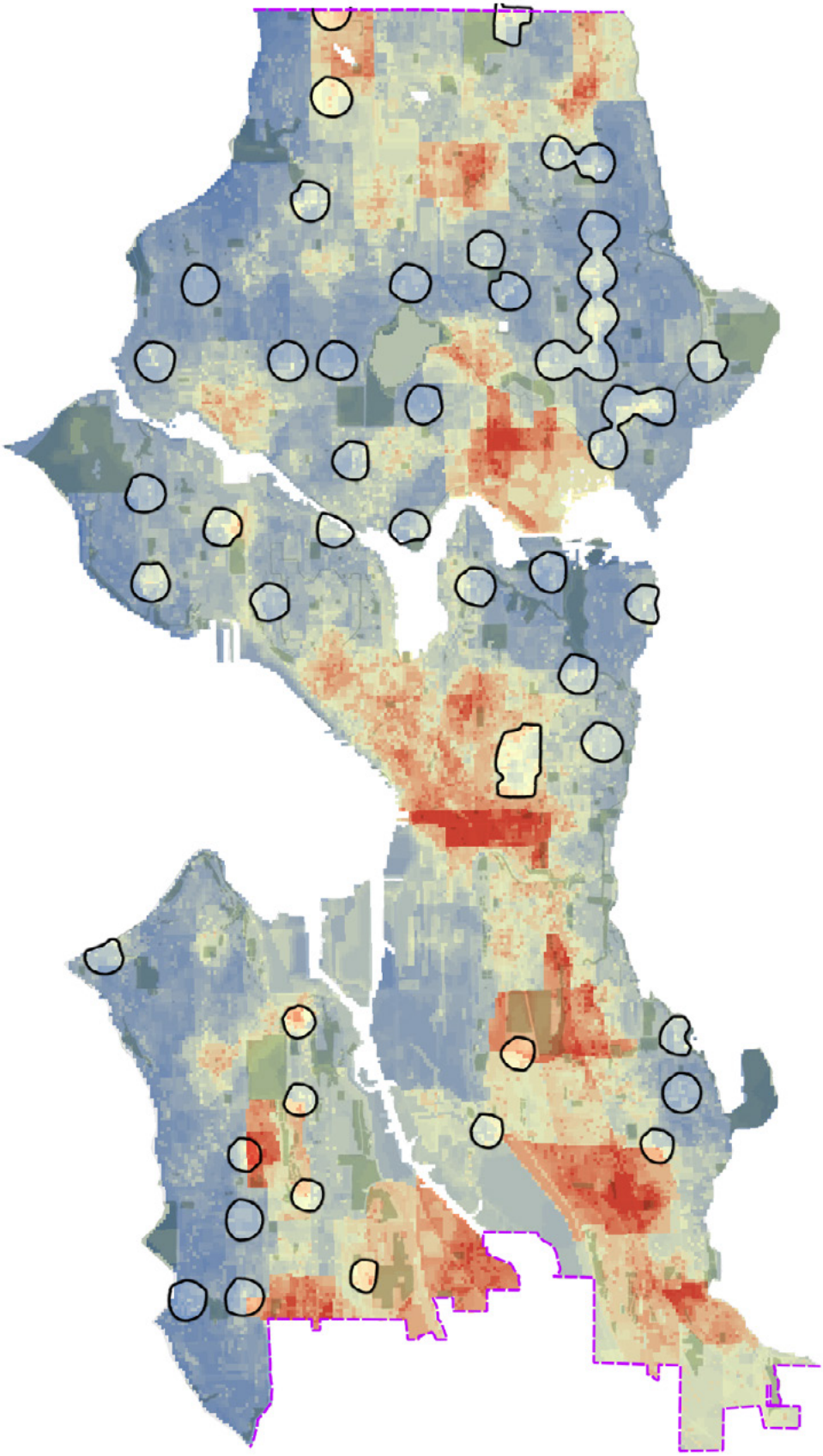
Attachment C. Displacement Risk Index with Corridors from August 2023 Draft Plan

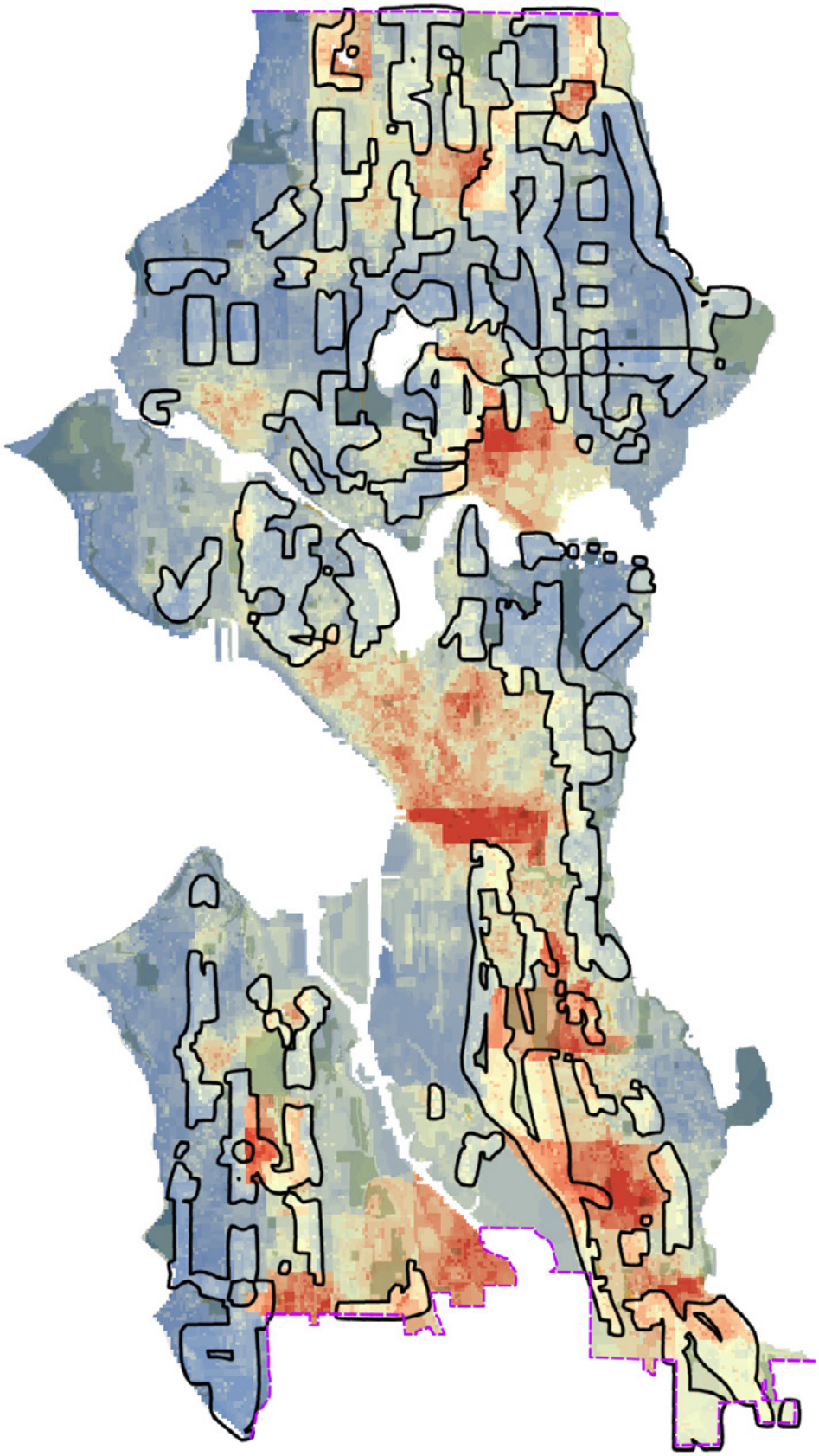
Attachment D. Draft Anti-Displacement Framework August 2023

Attachment E. DEIS Alt 5 and Growth Center Designation Criteria Tables

The Futurewise 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: https://futurewiseorg.sharepoint.com/:b:/g/EYK_mzhgGw9CgVMoSvva-jtwB1eTJkbe2RZ7UPQ-01Py57g?e=keRHuq





The Futurewise requests the City of Seattle to include the following document in the public record:

City of Seattle. “Draft Anti-Displacement Framewprl”, August 2023. Accessible for download at: https://futurewiseorg.sharepoint.com/:b:/g/EYp7Go9C-pZDmqO27INDoQwBvGtOWpWD-mql_FfcP_eyRuQ?e=CWxkMB

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[1]					
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[2]	131.3	161.3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard[2]	67.7	96.9	495	50,047	101.0
Hub Urban Centers[1]					
Bitter Lake Village	44.0	55.4	364	20,044	55.1
Fremont	71.9	88.1	214	18,877	88.0
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[2]	70.4	100.2	449	26,934	59.9
Residential Urban Centers[1]					
130th Street[2]	18.4	20.7	218	7,733	35.5
23rd & Union-Jackson	38.9	46.5	625	29,046	46.5
Admiral[2]	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[2]	84.5	101.6	315	9,579	30.4
Madison-Miller	65.3	85.1	145	12,349	85.0
Morgan Junction[2]	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.5	267	9,161	34.3
Othello[2]	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[2]	89.5	110.5	329	5,857	17.8
Wallingford	42.2	51.5	258	13,248	51.4
Westwood-Highland Park	27.9	32.6	275	9,386	34.1

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 fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.
Sources: City of Seattle, 2023; BERK, 2023.

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
PART 3: CENTER CRITERIA			
A. Purpose			
1. Compatibility with VISION centers concept, Regional Growth Strategy and Multicounty Planning Policies	Yes	Yes	Yes
B. Activity level/Zoning [20]			
1. existing activity [21]	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
4. planning mix of housing types and employment types	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)	500 acres
D. Transit			

20 PSRC's 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 CPPs is roughly equivalent to 85 AUs existing activity for King County Urban Centers.

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