crescent COLLABORATIVE

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City of Seattle Office of Planning and Community Development
Attn: Director Rico Quirindongo, Michael Hubner, Jim Holmes, Brennon Staley
P.O. Box 94788, Seattle, WA 98124-7088
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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,

We write to you on behalf of the Crescent Collaborative: a coalition of community-based organizations working to support equity within the urban neighborhoods of Chinatown-International District-Little Saigon (Asian-Pacific Islander, Southeast Asian), the Central Area (African-American/Black), Yesler Terrace (home to generations of new immigrants), First Hill, and Capitol Hill (LGBTQ) that lie adjacent to downtown Seattle. Our neighborhoods face ongoing challenges resulting from historical and systemic racism, impacts from the COVID-19 pandemic, and ongoing residential and commercial displacement pressures. Our goal is to counter gentrification in these significant historic neighborhoods that are cultural anchors for marginalized and low-income communities as we foster social equity, economic opportunity and great educational and health outcomes for residents and BIPOC small businesses.

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 see below for comments from the Crescent Collaborative. Our comments are intended to convey our concerns that the Draft Plan will not effectively combat displacement or support equitable development. Additionally, the Draft Plan does not represent the original round of community feedback conducted by OPCD.

Growth Strategy

<u>Replace the Draft Plan Growth Strategy with Alternative 5.</u>

- Alternative 5 plans to accommodate a higher housing unit target than the other action alternatives and the DEIS finds that this alternative will produce the most affordable housing units on net, lowest ratio of physical displacements to affordable housing units built, greatest reduction to economic displacement pressure, and greatest benefit for low-income renter households
- Include Alternative 5 in the Growth Strategy Element of the Mayor's Recommended Plan.

Housing

<u>Build more family sized housing.</u>

- In the Draft Plan, the City concludes, after examining census data and community feedback, that the scarcity of affordable homes with multiple bedrooms contributes to Seattle's lower average housing size compared to the rest of the country.
- 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 and families.
- Recommendations:
    - Use an average household size that anticipates a future in which the City retains larger households, especially families with children and seniors.
    - Expand middle housing for family-sized homes: Increase the development capacity for fourplexes and sixplexes and allow for 3+ bedroom homes to be built.
    - Expand the affordable housing density bonus.

<u>Identify and mitigate current zoning regulations with discriminatory effects and racially disparate impacts.</u>

- The history of racial segregation is still reflected in the current development patterns, housing conditions, and access to opportunity. Through zoning regulations like minimum lot size and prohibition on multifamily housing, white and wealthy neighborhoods are shielded from denser development.
- Recommendations:
    - Clarify what actions are being taken to mitigate the historic and current racially discriminatory effects of these zoning regulations.
    - Plan for more housing production in low-displacement risk areas to address racial disparities.
        - This includes adding all Neighborhood Centers that were included in the August 2023 Draft Plan to the Growth Strategy.
        - Add the Corridor place type as described in the August 2023 Draft Plan to allow for midrise development capacity in low-displacement risk areas.

Anti-Displacement Framework

<u>Add to and expand anti-displacement strategies in collaboration with impacted communities.</u>

- The anti-displacement framework does not introduce new methods or expand existing tools. BIPOC communities are being displaced from Seattle. It is concerning to hear that under the current anti-displacement framework, the City of Seattle is not shifting the development paradigm to retain BIPOC residents.
- Potential improvements to the suite of strategies could include increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in equitable housing development, promoting land banking, and more.
    - These strategies were shared by communities who are impacted by displacement or leading policy efforts to address displacement in their communities.
- Recommendations:

- Include a better comprehensive approach reflecting new and stronger strategies that reflect what community members - particularly those from marginalized communities - shared during 2023 engagement efforts.
- Include stronger tools to ensure that growth is equitable such as increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in equitable housing development, promoting land banking, and more.

We look forward to continuing to work with you in advancing this important plan for our entire city and ensuring that all residents can thrive. If you have any questions, please contact Sarah Tran, Lead Consultant, at sarah@samapraxis.org.

Thank you,

Crescent Collaborative Board

Andrea Caupain Sanderson (President)	BIPOC ED Coalition
Jamie Lee (Vice-President)	SCIDpda
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