May 6, 2024

Seattle Mayor Bruce Harrell
Seattle City Council
Seattle Office of Community Planning and Development
Via electronic upload and email

RE: Comments on the Draft Seattle Comprehensive Plan from anti-displacement allies in the Chinatown/International District

Dear Mayor, Council and City Planners,

The Chinatown/International District (C/ID) of Seattle is unique in the city, region and the state. No other place combines the history, culture, economy, architecture, and diversity in a single neighborhood. It is far more than a collection of historic buildings - it is a living, breathing legacy that harbors a diverse BIPOC and API community today, and promises refuge and prosperity for future generations. Unlike many Chinatowns across the U.S., the C/ID is still an immigrant gateway, is still powered by mom-and-pop businesses and is still a cultural home for thousands across the region.

Given the historic, racist practices and harms visited on the C/ID, we believe the City should do everything in its power to ensure the CID remains a living, working-class centered, and culturally vibrant community for generations.

Thus, we believe that the Seattle Comprehensive Plan (SCP) should reflect goals and policies that ensure the C/ID continues to thrive and grow without displacing current residents and businesses. We want the City to avoid the harmful impacts the C/ID experienced during past infrastructure projects and planning and ensure the community benefits from future growth and investment. We need deeper goals and planning than just a subarea plan for downtown, which runs the risk of further marginalization with the C/ID as an afterthought.

Over the last few years, many of us have participated in government-led planning processes, as well as our own community-led work, involving low-income tenants, small businesses, community organizations, land owners, seniors, and youth. Through this planning, we have generated creative and powerful recommendations for land use planning in the C/ID. Our recommendations in this letter reflect and build on those ideas.

Overarching City-wide Goals

The City uses all the right words in the draft SCP, including: equitable, inclusive, stable, connected, walkable, resilient, opportunity, healthy, multi-generational, community engagement, wealth building, etc. But nearly all the goals and policies are 1) aspirational,

2) vague, and 3) unmeasurable. While we appreciate the conceptual understanding of issues that impact BIPOC communities long-impacted by racism, aspirations and vague goals will not lead to equitable outcomes.

Instead, we urge the City to turn inclusivity language into measurable goals. We recommend the following. By 2044 our goals city-wide are to:

- House everyone who needs housing in Seattle.
- Maintain or increase the city-wide proportion of low- and moderate-income households as of 2020 (56%).
- Maintain or increase the proportion of all BIPOC people as of 2020 (45%). Also, return the proportion of Black and Indigenous people from a prior decade.[1]
- Increase the proportion of families and multi-generational households to match county-wide averages.
- Preserve all existing affordable housing units in older buildings as permanently affordable.

These goals are quantifiable and measurable and will provide City leaders with clear directions for decision making. Fear of falling short should not stop us from measuring progress.

In addition to these goals, the SCP must address the elephant in the room – too much of Seattle's land is restricted to low-density, forcing dense development into high-displacement areas, i.e. Urban Centers (formerly Urban Villages) and Regional Centers – of which the C/ID is part of. We cannot expect anything to change if the City continues to permit primarily large-scale apartment buildings with 0- and 1-bedroom units. As such, we recommend that:

- The SCP Future Land Use Map (FLUM) includes all proposed Neighborhood Centers found in Alternative 2, except in high displacement areas.
- The City allow low-rise density in Urban Neighborhoods (a.k.a. single-family zones), exclusively for permanently affordable housing, social housing, community- and tenant-owned development, and community land trusts. This will give affordable housing projects a chance to compete for land.

In the sections below, we connect our vision for growth in the C/ID with specific goals and policies for the SCP.

Affordable Housing

Over 50% of C/ID residents spend a large portion of their income on rent, facing financial strain that affects their quality of life. Our neighborhood has the highest percentage of

[1] We recognize that Black and Indigenous people have been harmed earlier and worse by displacement, and benchmarking diversity for them in 2020 is probably too late.

individuals below 30% AMI in Seattle, underscoring the acute economic hardship experienced by many of its residents.[2]

While we are fortunate to have our own community-based housing developers, we are running out of land and out of time. Between 2009 and 2019, a large amount of land in the C/ID was bought by market rate developers, while two waves of upzoning occurred (Livable South Downtown and MHA). Currently, we estimate that 34% of C/ID housing units are market rate. Based on the ISRD pipeline, we estimate that the C/ID as a whole is on track to being 44% market rate units in the near future.

We have long envisioned that the C/ID maintain a mix of affordable housing that aligns with our community of working-class families, seniors, and youth. InterIm CDA, for example, calls for a long-term affordability mix of one-third units at 50% AMI and below, one-third at 50-100% AMI, and one-third above that (market rate). For the C/ID and other neighborhoods, the City should include the following policy under the housing section of the SCP.

- For each moderate to high-displacement risk area, establish a target mix of affordable housing (30%, 50%, 80%, and 100% AMI) to inform local plans, regulations, permitting, and investments.

While we focus on maintaining affordability, it is important that other places in the city take the pressure off development in the C/ID, as well as take on their fair share of affordable housing. We recommend the following policy in the housing section of the SCP.

- For low-displacement risk and high-opportunity areas of the city, ensure that at least 30% of all units are affordable at 100% AMI or below.

Mandatory Housing Affordability (MHA) has produced very few on-site units in the C/ID nor in other high-displacement areas of the city. Most developers are paying the in-lieu fee. But with such little land available, we need stronger onsite production of units in market rate buildings. In addition, we believe that the gentrification effect of the last two upzones has outweighed the benefits of developer contributions to affordable housing. We recommend the following policies in the housing section of the SCP.

- In areas with medium to high risk of displacement, adjust MHA requirements so that adequate affordable housing units are being created to maintain minimum neighborhood goals.

The story in the Housing Appendix to the SCP is sobering – to meet County allocated housing needs over the next 20 years, 63% of all newly-created units must be affordable at

[2] Figure 54, Housing Appendix, Page 150.

80% AMI or below, with half affordable at 50% AMI or below.[3] The Housing Appendix also estimates we have at least a $30 billion gap. We cannot continue to raise the funding at this scale from regressive sources like sales and property taxes. It will only be possible with new progressive revenues, like Jumpstart. We suggest the following policy:

- Adopt new, progressive revenue sources adequate to meet Seattle's affordable housing allocations under State law and County policy.

Anti-Displacement

For many of us, displacement is the biggest threat to our survival as a community – something we share with many other BIPOC communities across the city. By the City's own analysis, the C/ID is considered at the highest risk of displacement for Seattle.

Lived experience tells us we have reason to worry. We can point to several buildings in the last decade that ceased to be affordable, either because units were renovated or because rent increased. Meanwhile, market rate development is creating units unaffordable to those households forced to leave, especially in Little Saigon. Businesses are also being displaced – like Viet Wah.

Data in the Draft Environmental Impact Statement (DEIS) shows the result of these trends. Figure 3.8.30 shows that over the last decade, the share of Black and API residents in the C/ID fell dramatically, while White households primarily increased – especially in Little Saigon. Similar reduction in the shares of Black and API residents have happened in the Central District, Beacon Hill and the Rainier Valley.

So we were very disheartened to learn from Publicola that nearly all new anti-displacement policies proposed by OPCD were removed from an earlier draft of the Anti-displacement Framework, leaving only current policies in place. We urge the City to add back the following important ideas, and turn them into policies if they don't fall under existing ones:

- Expand Tenant Protections
    - Strengthen existing tenant protections (not just keep the same).
    - Provide information and support for tenants and tenant organizing.
    - Fund rental assistance (such as during COVID).
    - Advocate for rent stabilization at the State (was proposed to be policy H 5.14).
    - Take measures to preserve smaller rental properties.
- Support homeowners to stay and thrive in place
    - Expand access to and awareness of property tax relief.
    - Support homeowners to participate in development.
- Invest in community ownership of land

[3] Page 17, Figure 3

    - Invest now in land banking.
    - Support for existing and new community land trusts.
    - Community ownership of real estate such as Tenant and Community Right to Purchase Acts.
    - Support housing produced by Public Development Authorities (PDAs), especially Seattle's Social Housing Developer.
- Create pathways to return
    - Expand Seattle's community preference tools.
- Keep businesses and cultural anchors in place
    - Implement Phase 2 of Equitable Development Zoning.
    - Pursue a new set of tools to create and preserve cultural spaces.

Equitable Transit Oriented Development

A search of the term "transit" reveals 190 times the City uses the word in just the draft SCP, signaling clearly that public transit is a core part of our growth strategies. Indeed, the concept of focusing growth in Urban Villages and Urban Centers reflected a city-wide strategy of funneling growth to neighborhoods rich in transit – such as the C/ID.

Yet, a search of "transit-oriented development" (TOD) yields only four mentions and "equitable-transit oriented development" (ETOD) yields two. Planning for Urban and Regional Centers is not the same as TOD, and certainly not the same as ETOD.

Now that we are absorbing even more regional light rail, we need a strong plan rooted in community vision that results in affordable housing and community-driven development. We cannot just hope that market rate development will create those benefits. The same is true for other new stations throughout the city, including Graham Street. We don't need another transit overlay zone – we need an ETOD plan organic to our neighborhoods.

For most of the majority-BIPOC neighborhoods that have received light rail investment, we've been in a race between market rate and non-profit developers to buy land, and ETOD has largely been a hope and a prayer that MHA will create enough local units – which is hasn't. All of the SCP planning documents clearly and frequently acknowledge that light rail results in an increase land values, rents, and displacement in equity areas. We have lost so many opportunities for affordable housing and community-driven development that we must re-tool our approach.

We urge the City to do the following:

- Elevate ETOD from a mere policy in the Growth Strategy Section to a new subsection, alongside Major Institutions, Parks and Open Space, and Annexation.
- Include as a policy that at least 30% of all new units of housing around station areas are affordable to 60% AMI and below.

- Create zoning that requires new development to include usable open spaces, cultural facilities, small business commercial space (under 1,500 sf), affordable housing, and amenities that center low-income families and communities.
- Prioritize resources for land banking and community-led development.

The City, County, and Sound Transit must also make investments in pedestrian safety for the many residents of the C/ID that do not drive and depend on transit for mobility. This is especially critical for the new light rail stations.

- Prioritize infrastructure investment to support a community vision for ETOD.
- When staging construction for City projects or coordinating with other government agencies, purchase land that can be developed into affordable housing after construction is over. Create a preference for local, community-based developers for purchase of that land.

Family Sized Housing

The Housing Appendix paints another clear picture: unless major intervention takes place, low-income BIPOC families of the future will continue to be forced to live in the suburbs, increasingly far away from Seattle. The current plan is really more of the same for new housing, and that means mostly 0- and 1-bedroom units in large apartment buildings. On the very first page of the SCP, the City writes "The shortage of quality, affordable family-sized homes is pushing too many young families out of our city or straining their resources to stay in Seattle." Yet, the term "family-sized" appears only once more in the entire document.

In the C/ID, we have a walkable, moderate scale, culturally rich neighborhood in which working people, youth and seniors can feel at home – the envy of many other auto-oriented places in Seattle. We have a steady stream of API families that first call the C/ID home in the U.S. But we are falling behind on creating affordable family-sized housing needed for the future generations.

We urge the City to adopt the following policies in the housing section of SCP:

- Set a goal that 25% of all new housing in Seattle has 2 bedrooms or more.
- Create requirements and incentives for developers to build family-sized units throughout the city, including elimination of remaining parking requirements
- Lift zoning limits (along with floor to area ratios) in Urban Neighborhoods in low displacement risk areas so that new detached and attached housing allows for 2 bedrooms or more.

Preservation

Preservation cannot just be about buildings. It must be about people too. Both the C/ID and the Central District became havens for BIPOC people at a time when the rest of city

was hostile. Preserving our communities now is about ensuring new and old buildings alike serve our economic, cultural, and social needs – not the other way around. As such, the International Special Review District code is outdated, with goals and regulations designed for the C/ID of the 1970s.

Also, many of the C/ID's historic buildings require extensive repair and rehabilitation, limited in size and scope, to accommodate modern needs without significant rehabilitation. The complexity of the repair process, combined with potential displacement issues for residents, necessitates a comprehensive approach that balances preservation efforts with community needs.

We urge the City to add the following land use policies under the Historic Preservation and Cultural Resources section:

- Allow Special Review Districts with significant low-income populations to establish targets and requirements for affordable housing, small business space, cultural space, and open space.
- Prioritize and invest in preservation of historic buildings with housing units so that the mix of affordability is maintained, and displacement of any residents prevented.

Community Led and Owned Development

One of the clearest lessons emerging from C/ID in the past five decades is the power of community ownership and development of land. In addition to our own affordable developers, many family associations collectively own buildings that maintain affordable rents to both businesses and residents. Also, local institutions that own their buildings don't have to worry about being forced out of the neighborhood. And generations of leaders have led the fight to stop the worst impacts from infrastructure, stadiums, and parking garages.

In addition, as with many lower-income neighborhoods in Seattle, the C/ID has vacant and under-used land that could be improved to benefit the community. But it could also be used to gentrify the area, as market rate developers can afford to pay more for land. For the C/ID to remain the treasure it is we must be able to collectively own and develop as much land as possible for affordable housing, affordable small business space, cultural space, and public open space.

Moreover, this strategy for community stewardship of land is needed by BIPOC neighborhoods across the city. We predict increased frequency of extreme heat and smoke, an influx of climate migrants fleeing the U.S. and global south, climate-induced food insecurity, and competition for increasingly scarce land. It is critical now that we take as much land out of speculation and use it to create collective benefit. This is what true repair of the harms of segregation and racist planning policies of the past looks like.

We urge the City to include the following goals and priorities:

- Prefer local community owned and led development in majority BIPOC communities and high-displacement areas over other non-profit and for-profit developers.
- Protect the Jumpstart payroll tax for racial equity programs and fully fund the 9% set aside for the Equitable Development Initiative.

Conclusion
Finally, we make these recommendations as a group of organizations that embrace change and growth, but not at the expense of our legacy and for the profits of real estate speculators. Collectively, we will carry the ideas and values in this letter throughout the SCP process, in future policy campaigns, in public debate and to other government agencies. We hope you will be inspired by, and adopt, our ideas and transformational vision for affordability, racial equity, and long-term measurable planning.

Sincerely,

InterIm Community Development Association

Puget Sound Sage

CID Coalition

Historic South Downtown

Asian Pacific American Labor Alliance

Wing Luke Museum of the Asian Pacific American Experience

Asian Pacific Islander Coalition Advocating Together for Health

API Chaya

Asian Counseling and Referral Service