May 8, 2024

From: Joy Hollingsworth, Councilmember, District 3

To: Rico Quirindongo, Director, PCD

Cc: Brennon Staley, PCD
Michael Hubner, PCD

Director Quirindongo,

Our office has reviewed the Draft Environmental Impact Statement accompanying the Draft One Seattle Plan. We appreciate your department's incredible contribution to the success and health of the city. We know this plan will inform some of the most important decisions that our Council and our Mayor will make.

I do have several questions and I am requesting this feedback be incorporated into the final EIS.

The baseline and all alternatives plan for addition of 158,000 jobs in Seattle during the planning horizon. This suggests that for all alternatives, a varying number of people must live outside the city and commute in for work. As a result, the alternatives that result in fewer housing units constructed within the city would cause an increase in trips from outside of the city and vice versa, which has varying impacts.

- **Transportation –** The transportation analysis appears to only account for residents living within any given subarea and does not include the additional out-of-city trips and commutes caused by imbalance between job and housing additions. Alternatives that provide less housing in the city, likely cause more commutes and other trips into and out of the city limits. These commutes would be longer than any in-city commute. Non-work trips into the city would also be more frequent.

  Request: Please include in the analysis of each alternative the transportation impacts that are caused by the imbalance between the number of projected new jobs vs the projected number of new housing units, accounting for the implied trips caused by new in-city workers that necessarily live outside the city limits.

- **GHG Emissions –** Unlike criteria pollutants, greenhouse gas emissions are not locally toxic or harmful. Greenhouse gas management is solely a global collective

action problem. The DEIS appears to assume that the studied alternatives have no effect on GHG emissions outside of the city. It is important we know the true GHG impacts of the city's choices on the goal of preventing catastrophic climate change.

When the city plans for 158,000 new jobs but not enough homes to house all those new workers, a number of new households will necessarily be formed outside of the city limits. Those households, across all their lifestyle choices and constraints, will likely have a carbon footprint, up to double that of a typical Seattle household.

Request: Please account for the changes to GHG emissions that result from the imbalance between housing increases and job increases in each of the alternatives. Please model changes in the carbon intensity from living in the city vs outside the city among the following: construction, transportation & car dependency, residential heating and cooling loads, and land-use intensity (i.e. changes in habitat destruction outside the city limits).

- **Plants & Animals –** While in-city tree canopy and plant coverage provide a wide variety of critical environmental and livability benefits to the city, the city's impacts on habitat outside the city limits are likely just as more impactful for the objectives of wildlife preservation, fish health, and environmental stability. Because some new households will necessarily be formed outside the city limits, those households will likely form in areas where each one consumes much more land for the housing itself as well as the supporting public and private services (e.g. roads, parking, and commercial shopping centers).

  Request: In addition to analyzing the effects on tree canopy, habitat loss, and aquatic environmental health within the city limits, please also analyze the effects outside the city limits as implied by the jobs-to-housing deficits in each alternative.

- **Population –** When comparing the population distribution of Seattle versus the population distribution of Washington State, it is clear Seattle has far larger share of young adult, childless individuals than the State, and has a severe deficit of both children and middle-aged individuals. Similarly, when comparing households by income, Seattle has higher shares of high-income households and low-income households, with a significant deficit of middle-income households (50% - 150% AMI).

  These demographic trends suggest that Seattle is failing to supply adequate housing for middle class households, and especially households with children.

Those households appear to have been displaced to elsewhere in the State. Alternatives that produce more family-sized housing would likely reduce this displacement and similarly plans that fully satisfy demand for single-member, middle income households would likely reduce the formation of roommate households, leaving more inventory for families.

Request: Please also analyze how each alternative changes the changes the supply of housing suitable for households with children as well as how they change demand pressure for the formation roommate households. Also, please evaluate how the impacts the supply of housing for middle-income households.

Neighborhood Character

A significant concern I hear from District 3 residents is retaining neighborhood character while still growing. Most—if not all—Seattle neighborhoods have a significant supply of multifamily structures that were built either prior to the creation of Seattle's first zoning code in 1923, or prior to the major revision in 1957. These multifamily structures are definitionally part of the neighborhood character and beautiful charm of Seattle.

It is important that the Comprehensive Plan address neighborhood character concerns by allowing new multifamily structures that are similar to the historic multifamily structures that have existed since Seattle's neighborhoods were formed.

Request: Please ensure that the Final EIS not preclude zoning changes in the Comprehensive Plan that would bring all or substantially all the multiple family structures built prior to 1957 to conforming status in the zone they reside in as of April 18th, 2024, and/or legalize new multifamily structures of equivalent appearance, size, shape, floor area, height, position on lot, etc. To the extent additional EIS analysis is required, assume a street configuration and tree canopy in adjacent right of ways that is consistent with existing multifamily structures.

Building Form

I have heard from many District 3 residents that we are seeing a lack of diversity in the forms of new housing being constructed in the city. Townhome construction is heavily represented in larger sized unit construction. The large number of stairs in townhomes

provides significant challenges to individuals with mobility limitations, the elderly, and families with young children. Our city needs to provide incentives for stacked flats and larger apartment homes to meet the housing needs of these households.

Request: Please ensure that the Final EIS does not preclude future changes to the Comprehensive Plan that could be used to incentivize the construction of multifamily structures as alternatives to townhomes. Possible changes could be unit count bonuses, height bonuses, lot coverage increases, setback reductions, FAR bonuses, parking exemptions, height limit increases, and similar measures for the construction of small apartment buildings or stacked flats.

Thank you for your hard work preparing this DEIS, the draft One Seattle Plan, and your tireless efforts these last two months presenting the plan to the public. Your team has done a phenomenal job, and we look forward to working with you to bring the plan to reality for our community.

Joy Hollingsworth

District 3 Councilmember