Environmental Works
COMMUNITY DESIGN CENTER

6 May 2024

The Honorable Bruce Harrell Mayor of Seattle
Rico Quirindongo, Seattle Office of Planning and Community Development
via e-mail

RE: Seattle Planning Commission comments on the draft One Seattle Plan, Comprehensive Plan Update

Dear Mayor Harrell and Director Quirindongo:

As a nonprofit community design center that has been working with Seattle communities since 1970, we have closely reviewed the draft One Seattle Plan. We appreciate the opportunity to offer our comments and recommendations on this important document today.

In summary, there are a lot of promising ideas in the Plan, and it lays out a thoughtful response to the present conditions of a housing crisis in Seattle. We applaud the tireless work of City staff for having completed this amount of analysis, and for their efforts to make it accessible and to reach broad segments of our community for input and feedback.

While there is much we like about this plan, we think *it simply does not go far enough*. Just as Seattle is seen as a national leader for its progressive Energy Code, we want our City to be bold in its primary land use policy, too. **If we are to solve the twin crises of a housing shortage and climate change as a planet, a country, a state, or a region, we will need clearer leadership from the City of Seattle.**

Our primary points of departure from the draft plan are as the following four items:

1. We propose a **dramatic increase in the number of Neighborhood Centers, where dense residential and mixed-use development is allowed**. In addition to expanding the number of Neighborhood Centers, we would like to see increased height limits and densities along waterfronts, around region-serving parks, around the 145th Station area, and south of the stadiums. The Neighborhood Centers are now at the intersections of arterials and transit corridors, but these other areas of our city also provide amenities that people would want to live nearby. Additionally, providing housing near parks and open space would improve household health and active living outcomes. Based on the trajectory of growth over the past decade in this City, a new Comprehensive Plan must make way for more housing development not less. The current growth target of 100,000 units is only 5,000 new units of housing on average each year for the next 20 years, while Seattle's housing production has averaged over 8,000 units per year over the last ten years.

402 15TH Avenue East | Seattle, Washington | 98112 | 206.329.8300 Office | 206.329.5494 Fax | eworks.org

2. We propose that **middle housing** like triplexes, fourplexes, sixplexes, townhouses, and stacked flats **should be allowed as-of-right throughout all residential areas of the City**.

3. We propose **additional allowed height, density, and flexibility for projects that include publicly financed affordable housing**. As our city grows, we will need an increasing number of housing units overall, but especially those that are affordable to families earning less than our region's median income. Allowing increased height and density can help address this shortage by facilitating the construction of more housing units. Higher buildings can spread the fixed costs of construction over more units, potentially lowering the cost per unit. This is especially important for affordable housing projects, where cost-effectiveness is paramount. Additionally, flexible zoning regulations can allow for innovative design and construction methods that further reduce costs. We think the Comprehensive Plan should:

   a. incentivize the inclusion of **units with three or more bedrooms** in multifamily apartment buildings;
   b. **reduce parking minimums**, which increase the overall cost of housing development; and
   c. **reduce barriers to building permanent supportive housing (PSH) and emergency housing** in more areas of the city.

4. We applaud the attention to preventing displacement, and we appreciate policies promoting racial equity and equitable outcomes throughout the draft Plan. But we worry that zoning alone is too blunt a tool to address displacement. This Draft Plan proposes that most of the City has its zoning increased to allow four units on a standard 5,000 square, but the limit remains at three on land in many neighborhoods. **Reducing the zoning on land in South Seattle will have unintended impacts such as reducing access to development opportunities for communities that have historically been cut out from wealth-building opportunities.** We understand the intention is to prevent predatory development from speeding displacement, but the unintended consequences are significant, and are racially disparate.

Thank you for considering our comments and recommendations, and please contact us with any questions.

Sincerely,

Jess Zimbabwe, AIA, AICP, LEED-AP
Executive Director