To: Mayor Harrel; Seattle Office of Planning and Community Development
OneSeattleCompPlan@seattle.gov
CC: City Council Members
From: Representative Gerry Pollet, 46th District (Gerry.pollet@leg.wa.gov; gerry@gerrypollet.com)
Comments on the One Seattle Draft Comprehensive Plan and Draft EIS
May 5, 2024

Mayor Harell, OPCD and Council Members:

I join other members of the Seattle Legislative Delegation in thanking you for briefings and committing to work with the City and your staff to improve the One Seattle Plan (Draft Comprehensive Plan) as incorporated below.

I join many of my Seattle Legislative Delegation colleagues in their comments, which begin:

> Thank you for the briefing your team provided to the Seattle legislative delegation on the initial draft of the One Seattle Comprehensive Plan. We appreciate the opportunity to share our feedback based on years of working with community members on these complex issues.
>
> As legislators, we share the goals you and your team outlined in the plan, including increasing housing and affordability, promoting a more equitable city as we grow, and focusing investment on building complete, walkable communities. We have concerns that the first draft release of the One Seattle Plan falls short of these shared ambitions, particularly as it relates to encouraging diverse housing types, equitable development, affordability, and displacement protections.
>
> Seattle legislators have led our colleagues in policymaking to address a statewide housing crisis which impacts our city most acutely, through the passage of landmark bills such as HB 1923 in 2019, HB 1220 in 2021 and HB 1110 in 2023, among others. We are deeply in tune with what Seattleites are asking for – a housing plan that encourages the development of dense and vibrant communities. As such, **we are asking to partner with you and your staff to update the housing provisions in the current draft plan to fully realize our collective bold vision for the city's housing future.**
>
> Washington State is experiencing a housing crisis caused in large part by a shortage of homes and many of us have been working to address this for several years if not our whole careers. We are proud of the actions the legislature has acted to enable the construction of diverse housing options by legalizing permanent supportive housing, accessory dwelling units, middle housing, and co-living spaces. These steps are crucial to beginning to bend the curve of our housing shortage and begin building abundant housing. **Our local governments are essential partners in facing this challenge and taking adequate steps to address it.**

In addition, I provide my own comments on key elements of the Plan and the draft EIS which include:

- Urging **adoption of an increased goal for housing units; and specifically calling out the need for the Plan to meet the requirements of HB 1220 (2021), now codified in RCW 36.70A.070(2).**

Those requirements are for the Plan to identify the needs for housing units for households at every economic / income level and plans for how the City will meet those needs.[1] The draft Plan fails to provide any plan to meet these needs, particularly for lower income residents and working families, in addition to the overall goal for housing units being inadequate.

- As part of this increased goal, I agree with other legislators who have urged increasing the number of "neighborhood centers." The Plan should assess what radius to include in various settings and how to ensure via good planning that neighborhoods transition from higher to loser density with distance from the fixed transit and commercial center.[2]
- Alternatives 2, 3 and 5 would result in approximately 20,000 more housing units over the next twenty years than the no action alternative base of 80,000; and Alternative 5 would produce an estimated 40,000 more units. Reductions in areas proposed for neighborhood centers, etc. would result in the proposed Plan only increasing the number of housing units projected for by 2045 from 80,000 to 89,000.[3]

  This meager increase is not the level of growth in housing units that my constituents and I believe is adequate or acceptable.

- Your administration worked closely with me to ensure that Seattle was not preempted from applying its own anti-displacement and affordable housing programs in housing legislation, such as for middle housing (HB 1110). I appreciated that close collaboration.

  Thus, I have been surprised in my extensive reading of the Plan and participating in several briefings, meetings and open houses to find that there is no meaningful discussion, *new* proposals or consideration in the Plan of appropriate policies to prevent displacement in the identified areas with high displacement potential for people /

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[1] The requirements include identifying "sufficient capacity of land" to meet the identified needs for housing that is affordable to each economic segment of households in the City. RCW 36.70A.070(2)(c). The Plan does identify land for duplexes, triplexes and town homes (and four units per lot in each residential area and six units when closer to major transit stops, pursuant to HB 1110). But the Plan and EIS do not propose or assess any strategies for designating land or what portion of available land that will be available for the required units of housing to be built that is affordable to persons in each income segment below median income. The number of units identified as needed for households below 120% median and above the levels eligible for publicly supported subsidized housing dwarfs the number of units projected as needed for households over 120% of median. The Plan lacks any proposal and analysis of how the City will meet this need for housing for persons of modest income who are often the backbone of our workforce that we want to attract and keep in Seattle, such as educators, workers in health care, social workers, hospitality workers and police.

[2] Increasing multifamily midrise [over 3 story] development over 3-5 blocks from frequent transit and which is not centered on permanently anchored frequent bus transit or stable commercial development is likely to leave residents stranded, e.g., when a bus stop or route is moved, or private commercial stores closed. Many constituents in the 46th District have moved to live close to bus transit, which they relied on for work health care and school – including high school students, and subsequently found themselves without reliable transit when bus service was reduced or eliminated. The Plan and the transportation element must include commitments for reliable continuity of bus service for areas that are designated to have increased housing based on proximity to bus service.

[3] See Draft EIS Vol 3. 3 for an example of the summary of housing units for each alternative.

households who currently reside in housing that is affordable for persons in the below median income levels. Indeed, the Plan and Draft EIS leave the City and public without a clear view of the likely degree of loss of "naturally" occurring affordable housing and alternatives for preserving communities and affordable housing opportunities in these high risk areas.

I hope to be able to partner with you and the City to ensure that the City has all the tools it needs to prevent displacement and preserve affordable housing.

- The City is missing an opportunity to develop a plan for how it will attract and retain families with school age children and essential workers in health care, education, other public services, hospitality, etc. Retaining these important portions of our workforce depends on producing housing that is affordable to moderate income households. If the City only plans for increasing housing by 89,000 units, then market forces will result in the growing high income workforce gobbling up a disproportionate share of new housing and forcing all housing rents and prices to skyrocket. The City should adopt a proactive plan to provide support for public service workers with families, including health care workers and educators, to afford rent and purchase of homes in Seattle. This would entail programs that provide incentives for inclusion of those units in new developments and subsidies.

  The Plan does not include any provision to ensure that modest income working households will be able to afford housing in the areas of increased density in Regional Centers. The City should include a commitment to revisit the HALA program to have housing which is affordable at different income levels in all housing that benefits from proximity to the massive public investments in transit and other infrastructure.
  - The City could consider using a form of tax increment financing to capture the greatly increased value of properties near our public transit and infrastructure investments, e.g., NE 130th St. Station upzone area, and devote the revenues to providing affordable housing in those units. This could be done either through direct subsidy of rent or purchase or building units (with nonprofit partners). This, of course, could be included as an anti-displacement strategy.

  For example, the plan and EIS do not consider new approaches to use of the Multi Family Tax Exemption (or even if it would be more cost effective to stop losing property tax revenue in exchange for a small portion of units being set aside in MFTE developments and, instead, use the increased revenue to provide funds for building new affordable units and providing subsidies.

- The Plan should commit to ensuring that new housing developments that benefit from proximity to the taxpayers' massive investments in light rail, fixed transit and other infrastructure do not result in windfall profits and exclusive high income housing. Increased housing density near public investments in transit should be accompanied by a **change to HALA policies to require inclusion of affordable units of housing in new developments** taking advantage of increased density allowances. Equity and improving access to the benefits of transit and other public infrastructure should be reflected in adoption of policies to ensure that a significant number (20-25%) of housing

units in these areas serve the City's goals to provide affordable housing for persons (and family units) at the <30%, < 60%, < 80% and < 100% AMI levels.

Why should the beneficiaries of the increased housing around public investment in transit go only to the highest income level households? Why should the developers of these properties not be required to share the windfall from the public investment by including housing for lower income households?

- **The Plan and EIS fail to address new statutory requirements for consideration of climate change and environmental justice**. This includes failing to address the City's admitted **backsliding on Seattle's adopted goal to have 30% tree canopy by 2037**, and the documented impacts this has on human health and the environment for overburdened communities and vulnerable populations.

- The new Urban Center at NE 130th St: I have heard from numerous constituents that this area should have additional planning with additional density along Roosevelt Way NE. Currently, the plan is centered on the future light rail station – which is years away. Commercial and midrise development are already anchoring Roosevelt Way NE. Allowing for further development potential would create a neighborhood center that is viable and strong.

The Draft Comprehensive Plan and EIS Fail to Reflect the Requirements of HB 1220, Which Requires Cities to Plan for Adequate Housing to Meet the Needs of Residents of All Economic and Income Levels.

- HB 1220 / RCW 36.70A.070(2) requires planning to meet projected housing needs for households at every income level. This is a major change from prior planning cycles when cities only had to identify capacity to meet an overall housing need for the projected growth in population. **The draft Plan fails to identify a plan to meet these needs at each income level, particularly for lower income residents and working families, in addition to the overall goal for housing units being inadequate**.

- The Plan forecasts that approximately 20,000 housing units are needed for households between 50% AMI and 120% AMI by 2045. Housing Appendix Tabel 2, Page 14.

- The Plan forecasts about 13% of the projected 89,000 units needed by 2045 will be for housing affordable to households earning from 50 to 80% AMI, or 11,570 units.[4]

- After identifying these targets, per RCW 36.70A.070(2), **the Plan and EIS fail to propose how a new Plan will ensure that there is housing for each of these segments of our population.**

- *The Plan misses the opportunity for Seattle to adopt a more aggressive target to attract more essential workers, public servants, educators, etc. to live in Seattle by ensuring that there will be housing affordable to these households earning below 100% AMI.*

[4] Id.

    - The Plan and forecast fail to take into account that the AMI for Seattle has skyrocketed due to the influx of very high wage tech workers.
    - The Plan should assess workforce housing needs for city employees and other public servants, educators, health care workers and what housing strategies can increase housing available for those households.

- The overall housing need from 2019 – 2045 was projected at 112,000. The Plan is for 2025-25, a twenty year window. However, the City chose a goal of 89,000 units. The minimum goal should have been in the 110,000 range.

- 63% of the housing needed is for households <80% AMI.[5] That would be 56,070 units. What is the plan to build 56,070 units affordable to persons below 80% AMI?
  The Plan lacks any plan to add 56,070 affordable housing units.

  Moreover, the plan acknowledges that the middle income level housing needs are double that forecast. If governmental supported housing is relied on for the 0-50% AMI bands, a plan is needed for how the city will ensure adding about 13% of the need for housing from 50 to 80% AMI, or 11,570 units[6] and for approximately 20,000 units for households with incomes of 50-120% of AMI.[7]

- The Commerce model relied on for these projections dramatically underestimated the need for moderate income housing in Seattle. It is based on the erroneous theoretical assumption that each new unit added to accommodate a currently cost burdened lower income household frees up one additional housing unit in the income band above it.[8] This is clearly at odds with reality in Seattle where the lower income need remains far above the new supply. This also ignores the reality that the City has thousands of unhoused residents awaiting new housing units. Adding desperately new units for thee extremely low and very low income level unhoused residents does not free up a housing unit in the economic band above. Thus, the new unit at 0-30% or 30-50% AMI *does not* vacate a unit for someone else who is in the next higher up income to now rent the vacated apartment without being cost burdened. Another household in the lower income level desperate to find housing close to work, healthcare or school will be cost burdened and seek to fill the unit vacated by someone moving to publicly supported housing and the pressure from higher income workers joining the city's workforce will keep the rent high.
    - As the Housing Appendix acknowledges, this model likely results in a major underestimation of housing need at the lower and middle levels:

      > "By assuming needs within the lowest income categories are met, the model may underestimate needs of other low- and moderate-income households. After all, if the needs of the lowest-income households remain unmet, those shortfalls will not only leave those households cost

[5] Housing Appendix at page 16
[6] Id.
[7] Draft Plan page 94.
[8] Housing Appendix footnote 12, page 15.

burdened but also contribute to shortages felt by households somewhat higher up the income ladder."[9]

- **Thus, at least another 11,570 units affordable for households earning from 50-80% AMI should be in the Plan's goals**.

- HB 1110, for example defines affordable housing at <60% of AMI for renting and < 80% for home ownership. The Plan is required to implement HB 1110 but does not reflect this aspect. Nor does it include a breakout of need for these units rather than breaking out need for housing for households earning over or under 120% AMI and for low and extremely low incomes.

- The Plan should include proposals to ensure that the full mix of housing units proposed under HB 1110 (which includes stacked flats, cottages, and duplexes through sixplexes) to be affordable for purchase by households < 80% AMI or rented by those <60% AMI will be available to meet the projected need.

- **In addition to planning just by income level, the Plan should revisit the City's definition of family sized housing**. This is now defined as 2 bedrooms. There is no analysis of the impact of this on the ability of households with school age children to remain in Seattle Public Schools and reside in Seattle. At minimum, the Plan should include policies for households needing 3 bedrooms.

Tree Canopy and Climate; Tree Preservation and other Environmental Elements are Not Adequately Addressed in the EIS. Required Mitigation Measures to Achieve Policies are Not Addressed or Proposed in the Comprehensive Plan or SEPA Review / EIS.

The results from this failure to properly address the required climate change and tree canopy policies and lack of inclusion in the Plan and lack of analysis in the EIS are likely to be:

- a tremendous loss of mature tree canopy as the City falls further and further behind from its **adopted policy goal for 30% tree canopy coverage by 2037**;
- adverse health impacts from loss of tree and green space (particularly for overburdened or highly impacted communities);
    - health impacts will almost certainly include increasing mortality and hospitalizations of vulnerable populations due to projected increasing days of severe high temperature with the highest temperatures in residential areas that lack tree canopy and whose residents have the most adverse social determinants of health (e.g., overburdened and highly impacted communities and populations under the State HEAL Act).
- adverse impacts due to increased storm water runoff, including stream erosion, contamination entering surface waters, harm to salmon or fish habitat and recovery and biological diversity in surface waters and shoreline habitat,
- impacts on meeting legal requirements to reduce combined sewage overflows and lack of mitigation for increased runoff from increasing impervious surfaces from other plan policies.

[9] Housing Appendix page 16.

Mature trees in urban settings have been well documented to reduce stormwater runoff[10] as well as decreasing urban temperatures. As such mature tree canopy must be an important element of a climate change element under comprehensive planning to reduce the impacts of climate change and severe high temperatures, particularly in residential areas with lower and moderate income residents and older housing stock that lack air conditioners.

The findings of the City's own Tree Canopy Assessment were summarized by the City:

- **Canopy loss is not happening equitably.** Neighborhoods impacted by racial and economic injustice started with less canopy and lost more than the citywide average. Compared to neighborhoods with greater advantages,[1] these neighborhoods had 31% less canopy in 2021, an increase in disparity from 2016 (when they had 27% less). While there were some canopy gains in environmental justice priority areas attributed to forest restoration programs, the losses outpaced the gains.

- **Tree canopy cover is critical for lowering temperatures and reducing heat island effects in our warming climate**. Trees are a key component of our climate preparedness and resilience strategies as they protect us from extreme heat and improve air quality. The report finds that, on a hot day, neighborhoods[2] with 25% canopy cover were 1 degree cooler than neighborhoods with no canopy. Industrial areas and major transportation corridors have lower canopy and warmer temperatures. These conditions were also found in some neighborhoods, such as in the Chinatown-International District and in the south end of Rainier Valley.

*"The data show we are further away now than we were five years ago from our goal of 30% canopy coverage**," said Jessyn Farrell, Director of Seattle's Office of Sustainability & Environment**. "To reverse this backward slide and achieve our vision of an equitably distributed urban forest in Seattle, our strategies must better align development and tree preservation and include innovative and equity-driven actions in planning, maintenance, planting, and engagement. In short, a healthy, thriving Seattle needs more housing and more trees and we can absolutely do both."*

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[10] For example, of the well documented reduction in storm water runoff associated with mature tree canopy in urban areas, see:
US Environmental Protection Agency resources: Center for Watershed Protection, Swann, Chris; Review of the Available Literature and Data on the Runoff and Pollutant Removal Capabilities of Urban Trees; 2017.
Michael Richter *ORCID, Kirya Heinemann, Nadine Meiser and Wolfgang Dickhaut ; Trees in Sponge Cities—A Systematic Review of Trees as a Component of Blue-Green Infrastructure, Vegetation Engineering Principles, and Stormwater Management; Department of Environmentally Sound Urban and Infrastructure Planning, HafenCity University Hamburg;
"Trees reduce stormwater runoff and soil erosion through direct retention on leaves and branches when they become wet (interception), runoff of water via the trunk (stem runoff) and infiltration through the soil [20]. Additionally, substrates filter pollutants from stormwater before it infiltrates into groundwater"
Citing:
Elliott, R.M.; Adkins, E.R.; Culligan, P.J.; Palmer, M.I. Stormwater infiltration capacity of street tree pits: Quantifying the influence of different design and management strategies in New York City. *Ecol. Eng.* **2018**, *111*, 157–166.
Charles River Watershed Stormwater Association. Stormwater, Trees, and the Urban Environment. A Comparative Analysis of Conventional Street Tree Pits and Stormwater Tree Pits for Stormwater Management in Ultra Urban Environments. 2009.

City of Seattle, *"Seattle Releases 2021 Tree Canopy Assessment Showing Slow Decline in Canopy Cover Between 2016 and 2021",* Viewable at this link.

The Draft EIS also recognizes that mature tree canopy reduces pollution in runoff, which is toxic to fish, in addition to the benefits in regard to heat and climate resiliency.[11]

Much of the mature tree canopy and habitat in Seattle's residential neighborhoods, which are home to nearly 50% of the tree canopy despite being a much lower percent of the total land area, are evergreen trees. Evergreen, including Douglas Fir and Cedar, are documented to intercept 27 to 66% of precipitation (preventing that from reaching the ground to be rapid runoff).[12] This is far more than deciduous trees.

Seattle's existing native mature tree canopy has a far greater percentage of evergreen trees, which intercept and prevent stormwater runoff, than deciduous. However, tree replacement, especially street tree planting, is primarily deciduous and of much smaller canopy, resulting in a far greater relative increase in stormwater runoff. Preservation of mature tree canopy in residential areas is, therefore, necessary mitigation to accomplish the City's Tree Canopy, Climate and runoff goals and policies.

HB 1181, Chapter 228, Laws of 2023 requires cities to incorporate climate change goals and elements in comprehensive plans. There is a concomitant requirement to address climate change impacts and related policies in the Environmental Impact Statement (EIS) accompanying the draft comprehensive plan.

RCW 36.70A.070(9) now requires that the City's Comprehensive Plan:

> 'must enhance resiliency to and avoid the adverse impacts of climate change, which must include efforts to reduce localized greenhouse gas emissions and **avoid creating or worsening localized climate impacts to vulnerable populations and overburdened communities."**

(emphasis added).

Neither the Plan nor the Draft EIS adequately consider how the loss of tree canopy, which has already been documented by the City, and which will accelerate under the proposed Plan, will result in increased "heat islands" and adverse health effects on vulnerable populations and overburdened communities from reducing tree canopy. Indeed, the Plan and EIS are required to have strategies to reverse the documented loss of tree canopy reflected in Seattle now being further from its goal than when the goal was adopted.

The Climate section of the draft Plan refers to a Climate and Environment Policy CE 9.3[13]:

> "Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events."

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[11] Draft EIS Vol 3 Page 3.3-3.

[12] Center for Watershed Protection. 2017. Review of the Available Literature and Data on the Runoff and Pollutant Removal Capabilities of Urban Trees. Crediting Framework Product #1 for the project Making Urban Trees Count: A Project to Demonstrate the Role of Urban Trees in Achieving Regulatory Compliance for Clean Water; at 4.

[13] Plan at page 147.

As I quote the City's own findings, the City is losing tree canopy. Thus, a plan is required along with analysis of alternatives and mitigation measures to not only stem the loss but to "expand" tree canopy. No plan is presented.

The Tree Canopy section is devoid of any plan or meaningful discussion. Most notable, there is no plan or discussion relating to how the development goals will be coordinated with proactive policies to preserve and increase mature tree canopy in residential areas, where most of the tree canopy, and most of the risk for loss of canopy under the Plan will occur.

Policy CE 12.6[14] refers only to City property and street tights of way which cannot meet the goals:

> Preserve, restore, maintain, and enhance tree canopy on City property and rights-of way.

Street trees offer far less of the benefits than large mature trees.

CE 12.8 recognizes this with a policy goal:

> Encourage the protection, maintenance, and expansion of tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy to equitably distribute benefits.

How will the City "encourage" protection, maintenance and expansion of tree canopy?

Mitigation is required for specific climate, environmental and human environment (including environmental justice) policies that are adversely impacted by competing policies.

The Draft Plan and EIS fail to adequately address that it is not possible to retain or replant trees when the land area is covered by new structures. The Seattle Comprehensive Plan should follow Portland's example by acknowledging that the only means of achieving 30-percent equitable citywide canopy cover is to designate at least 30% of the residential lot area with space for trees.

The DEIS discusses the in-lieu fee program which may result in increasing tree canopy in overburdened communities that currently have less than 25% tree canopy.[15] While this may provide vitally important benefits, cutting trees in one area while replacing them with new trees that require approximately $5,000 for their first four years of survival is untested and does not account for the reality that it would take many years for the new trees to provide the same net benefits of the cut trees. Nor does the City consider the reasonably foreseeable adverse impacts on the areas (and streams) that will lose tree canopy.

The Draft EIS and plan do not consider the reasonable alternatives for revising the City's Tree Ordinance, including measures which would assist in reaching the goal or reducing loss of canopy, such as applying the ordinance evenly to all areas / zones in the City.

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[14] Plan at page 150.
[15] DEIS page 3.3-28.

The Draft EIS explicitly states that none of the alternatives considered include any proposal to improve regulation or incentives to reduce the pace of tree canopy loss, much less to reverse and make progress towards the goal of having 30% canopy coverage by 2037:

> Under any of the alternatives, the potential for adverse effects on plants and animals would be avoided, minimized, documented, and mitigated to the greatest extent possible through regulatory reviews and permitting processes that apply to individual projects (see Section 3.3.3). None of the alternatives propose any modifications to those processes.

Draft EIS Section 3.3.2 at page 3.3-13.

The Draft EIS does not even acknowledge that many of the housing projects which might adversely affect the tree canopy retention policies will be exempt from further SEPA review under the City's adopted categorical exemptions. This will preclude consideration of area specific or cumulative impacts from multiple individual developments authorized under the Comprehensive Plan and Development Ordinances.

The Draft acknowledges the obvious: that the existing tree ordinance and policies are failing, as shown in the loss of canopy.

But, without any analysis, the DEIS asserts that the new tree ordinance will reverse this. However, the City refused to do an EIS or new analysis on the drastically revised ordinance that the Council passed. Thus, there is no analysis or basis for statements that the new ordinance will improve performance towards the goal. Further, the DEIS acknowledges that the new ordinance anticipates replacing mature canopy with street trees.[16] SEPA requires environmental analysis of the impacts – and mitigation measures – for such a switch since the record establishes that street trees cannot replace the heat, habitat, stream protection and stormwater benefits of mature trees.

To reflect the adopted Tree Canopy goal and required climate change element, and SEPA requirements for mitigation to achieve polices, the Comprehensive Plan and EIS should:

- explicitly include increased height bonuses or adding other residential unit area for preserving the entire tree canopy space required to keep existing significant trees healthy;
- include mitigation measures to apply the same tree protections and requirements for retention and permitting / review for removal by existing property owners to all new development in residential zones;
- adjust FAR ratios for each zone, to accommodate tree preservation;

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[16] DEIS page 3.3-13 and 14: Stating that the existing tree ordinance "did not prevent development and redevelopment projects from contributing to tree canopy loss. After that study was completed, however, the City updated its regulations to implement stronger tree planting requirements and to require street trees to be planted as part of development in Neighborhood Residential zones. With the current regulations, it is expected that a substantial amount of development-related loss of tree canopy would be reversed over time as replacement trees grow larger. Since some tree placement would occur off-site through the fee-in-lieu option, this could also result in a shifting of canopy cover onto public property and the right-of-way where the City might have more control over tree establishment and maintenance." This is speculation without any analysis of the potential adverse effects or mitigation measures to ensure that the City would even meet its own expectations.

commit to requiring that the height bonus be utilized rather than merely being an option, as under current code, for developers to save significant trees by increasing development height or square footage elsewhere above what would otherwise be allowed to compensate for the area of the development reduced to ensure that significant trees on the property or adjacent properties are preserved and healthy.

> E.g., developers of a five story building currently have a choice to remove a tree in the proposed building envelope, or to save the tree and add replacement footage. Mitigation and commitment to the Seattle Tree Canopy Goal and required Climate goal per HB 1181, Chapter 228 Laws of 2023, should result in the Plan and mitigation commitments under SEPA including this change which honors both increased housing unit goals and climate and tree preservation policies.

- Provide examples of developments that meet increasing housing goals (including reflecting the requirement to allow various types of housing with four to six units per lot, depending on location) while preserving healthy existing mature trees on a development lot;
- Commit to adoption of an ordinance adjusting lot split and short plat lot lines to maximize preservation of existing mature trees as an element of required mitigation and commitment to the City's tree canopy and climate goals.
- Commit to increasing height for residential units in regional and neighborhood centers and expanding those centers along the entire arterials that have infrastructure completed or committed to for both light rail and bus rapid transit with the 800 foot walkable diameter zone (and fully consider on a local basis whether to expand each from three blocks / 800 feet to a quarter mile / five blocks with decreasing height and FAR moving away from the transit stop; and, couple this with the tree preservation mitigation elements above to prevent this expansion from adversely affecting climate resiliency due to loss of further mature tree canopy.
- Include consideration of potential mitigation requiring both street tree planting and small pedestrian or child friendly public access areas with larger shade trees within developments close to transit. Adjust the FAR to include increased height potential for meeting a required inclusion of plazas with trees, seating areas and play structures.

Park considerations: if the City moves to include specifically increasing height and housing units based on proximity to parks as an equity issue, then the EIS must address how increasing height and development FAR (requiring greater lot coverage) will impact natural habitat within the park boundaries. This must include mitigation measures to ensure that development close to park boundaries will not adversely affect either the tree root system or tree canopy habitat for trees within the park, habitat for birds and bats, light pollution in the park, the effect of shade and blockage of sunlight. The EIS would also have to address impacts from loss of sunlight and other impacts on parks that are primarily recreational. The consideration of increased density near parks should differentiate between natural areas and recreational areas (i.e., ball fields, courts, lawns, play areas).

Increased housing density that is explicitly based on increasing equitable access to parks should include a **change to HALA policies to require inclusion of affordable units of housing in new developments** taking advantage of increased density requirements. Equity and improving access to the benefits of parks requires adoption of policies to ensure that a significant number (20-25%) of housing units serve the City's goals to provide affordable housing for persons (and family units) at the <30%, < 60% and < 80% AMI levels.

Increasing the height and development potential (FAR) next to parks would be a windfall for developers. The value and market rent or sale value of units next to parks, especially with a view of preserved public park space, is far above that of other properties. If developers are going to be given such a potential windfall, there needs to be a requirement that a significant number of the units are dedicated to lower income residents and working families.