City of Seattle
Seattle Planning Commission

April 25, 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 Harrel and Director Quirindongo,

As stewards of our city's Comprehensive Plan, the Seattle Planning Commission has closely reviewed the draft One Seattle Plan – the major update to the current Seattle 2035 Plan – and we appreciate the opportunity to offer our comments and recommendations on this important document that is "the centerpiece of local long-range planning, which contains a vision, goals, objectives, policies, and implementation actions that are intended to guide day-to-day decisions by elected officials and local government staff."[1]

In 2022, we released four issue-specific briefs to help inform the One Seattle Plan: Updating the Growth Strategy; Addressing Displacement in Seattle's Comprehensive Plan; Repurposing the Right-of-Way: Mobility Options and People-Oriented Streets in an Equitable City and Meeting the Challenge: Supporting Affordable Housing in the Comprehensive Plan.

We have approached review of the draft Plan by asking the following key questions:

- How is racial and social equity promoted throughout?
- How are anti-displacement strategies actionable?
- How is climate resilience prioritized?
- How is equitable housing access and choice ensured throughout the city, and
- How is a sustainable quality of life ensured for all residents?

Overarching comments applicable throughout the draft Plan

Approachability of draft Plan

The Planning Commission appreciates the readability of the draft Plan, the accessibility including the search function in the PDF, and the technical edits that render the draft Plan consistent in tone and content.

[1] MRSC. *Growth Management Act*. Accessed April 15, 2024. https://mrsc.org/explore-topics/planning/gma/growth-management-act

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Racial equity

We are encouraged to see that policies promoting racial equity and equitable outcomes are found throughout the draft Plan. In addition, there are explicit acknowledgments of harms disproportionately suffered by Black, Indigenous, and People of Color (BIPOC) and low-income communities because of past planning practices and decisions. However, identification of past harms is not enough without actionable reparative policies specifically related to addressing past and current harms. The draft Plan names three high-level strategies the City hopes to use to repair those harms: increase housing production, invest in affordable housing, and implement measures to prevent displacement. Yet, these high-level strategies do not specifically address the needs of communities who still face disparate housing outcomes today such as Native American, Black, Hispanic/Latino, Pacific Islander, and specific Asian communities like Vietnamese and other Southeast Asian communities.[2] The draft Plan appears to hope that improving housing affordability and displacement pressure overall will be enough to help overcome these long-term inequities. We are confident our city can do better. We would like to see meaningful policies that specifically address communities who experience the greatest burdens because of Seattle's past and current planning practices. We look forward to a final Plan that includes specific policies to both address these past harms as well as ensuring access to opportunity for all residents.

Displacement

The Commission is pleased to see a nuanced understanding of displacement included in the draft Plan. The draft Plan and its supportive documents recognize that displacement is multi-faceted and explore many types of displacement including physical, economic, commercial, and cultural displacement, as well as the cumulative impacts of exclusionary zoning on neighborhood choice. We also appreciate that anti-displacement policies are included across many different elements of the draft Plan as clearly demonstrated by Appendix B of the Anti-Displacement Framework supplemental document.

The Anti-Displacement Framework, however, is not enough to address the scale of displacement in Seattle. The Framework, as drafted, is a list of what the City is already doing to address displacement, yet displacement has already impacted many people and continues to happen. We want to see more of what the City will do differently moving forward to address displacement. For example:

- How will the many anti-displacement policies sprinkled throughout the draft Plan function together to form a complete strategy?
- How will the proposed policies work to address the specific issues of displacement raised by the Draft Housing Appendix and in the Draft Environmental Impact Statement (DEIS)?
- How will the City hold itself accountable to the community organizations they worked with in drafting the Anti-Displacement Framework?

We are concerned with the proposed approach to areas at high risk of displacement in Neighborhood Residential zones as described in the Updating Seattle's Neighborhood Residential Zones report.[3] The

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[2] City of Seattle. 2024. *Draft Housing Appendix*, Page 37 and 38. https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanDraftHousingAppendix.pdf

[3] City of Seattle. 2024. *Updating Seattle's Neighborhood Residential Zones*, page 21. https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanNeighborhoodResidentialConceptsDRAFT2024.pdf

report proposes reduced density in high risk of displacement areas of Neighborhood Residential zones which would in practice allow only three units on a standard 5,000 square foot lot as opposed to four. We see how this could be an effective strategy for reducing development pressure in high displacement risk areas. On the other hand, we have concerns that it may have unintended impacts such as reducing access to development opportunities for communities that have been consistently cut out from wealth-building opportunities in the past. We would like to see additional economic feasibility and impact studies around this concept.

We are interested to hear what the Office of Planning and Community Development (OPCD) learns from communities impacted by displacement in response to the anti-displacement policies proposed by the draft Plan. We hope to hear future updates from the City about whether impacted communities feel the policies included in the draft Plan are sufficient and whether they have concerns that still need to be addressed.

Measurable metrics to evaluate performance and course correct as needed

The draft Plan has many admirable goals and associated policies from which to build. We encourage additional aspirational goals with clear and measurable performance targets to build accountability. Measurable targets should be added throughout the Plan in each element to ground visionary goals in achievable benchmarks that can be tracked throughout the life of the Plan and subsequent subplans and policies. Policies should then articulate how the measurable target will be achieved, with interim targets to determine progress toward the established goals. The Climate and Environment element of the draft Plan has several strong examples of goals with measurable targets such as CE G1, CE G5, and CE G12. We would like to see more elements of the Plan include measurable targets like these. The Commission offers sample metrics for the transportation element on page 11 of this letter to illustrate what this could look like.

Summary of element-specific comments

Following is a summary of key comments and recommendations for the specific elements we reviewed including the issue of public health which was not a standalone element in this draft.

Growth Strategy

The One Seattle Plan 2024 update to the City's comprehensive plan is a critical opportunity to address Seattle's housing affordability crisis and prepare the city for a more sustainable, climate resilient future. The Draft One Seattle Plan growth strategy includes several promising features like expanding growth around compact, walkable hubs in new Neighborhood Centers; expanding certain existing Urban Centers; and including more types of development in Neighborhood Residential zones like duplexes, triplexes, fourplexes, sixplexes, and cottage housing and corner retail. While we think the draft growth strategy is moving in the right direction, ultimately the growth strategy does not do enough to change existing unaffordable, inequitable, and unsustainable patterns of development.

Recommendations:

Plan for additional growth. The draft growth strategy plans to accommodate 100,000 housing units over the next 20 years. This is only slightly above Seattle's adjusted housing growth targets and total housing needs allocated to Seattle in the King County Countywide Planning Policies, which establish the minimum

expectation for the amount of housing that Seattle must plan for. According to a 2021 BERK study, Seattle's growth target "represents a significant slowing of the rate of housing production in Seattle."[4] This same study suggested that a growth target above the minimum required by the state and closer to 120,000 new units by 2044 would be more inclusive. A more inclusive growth strategy would "increase housing that meets the needs of more moderate- and middle-income residents and reduces market pressure on lower income households."[5] Seattle exceeded its growth targets in the Seattle 2035 Plan and continuing to plan for the minimum housing growth targets and housing needs will not help us climb out of the existing housing deficit. 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.[6] In order to ensure everyone has a home they can afford in the neighborhood of their choice, we need to plan to increase, not reduce, our current rate of housing production. The City should plan for at least 120,000 units as studied in Alternative Five of the DEIS, if not more.

Go further to expand access to more housing types in more areas of the city. In broad strokes, the draft growth strategy proposed in the draft Plan only includes small, incremental changes to the existing growth strategy, which has been shown to raise housing prices, restrict access to areas of high opportunity, and create inequitable outcomes for communities of color.[7] An equitable growth strategy is one where everyone has access to all residential neighborhoods no matter their race, income, family size, ability, or other identity protected by our state and federal fair housing laws. Seattle's growth strategy should do more to meet this standard.

We appreciate that the draft Plan begins to expand areas of the city that allow multifamily buildings between five and eight stories (approximately 50 to 85 feet in height), as this is the housing type most likely to be affordable to low-income households making less than 80 percent of area median income (AMI).[8] The new Neighborhood Centers are a positive step toward a more polycentric and walkable city. Creating Neighborhood Centers will bring Seattle closer to a 15-minute city model of growth.[9] Expanding the borders of some of Seattle's constrained urban villages like Queen Anne makes sense and is a good step.

Yet, beyond these limited changes, housing growth under the draft Plan will continue in nearly the same way it has since the urban village strategy was introduced in the 1990s. A vast majority of growth will be focused in centers (regional, urban, and neighborhood) and concentrated along arterials, leaving much of the city zoned for areas that prohibit construction of housing at densities low-income households can afford.

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[4] BERK. 2021. *City of Seattle Market Rate Housing Needs and Supply Analysis*, page 51. https://www.seattle.gov/documents/Departments/OPCD/OngoingInitiatives/HousingChoices/SeattleMarketRateHousingNeedsAndSupplyAnalysis2021.pdf
[5] BERK. 2021, page 52.
[6] City of Seattle. 2024. *Housing Production Dashboard*. https://www.arcgis.com/apps/dashboards/1111d274c85e4ca48af719da4b26fe9f
[7]PolicyLink. 2021. *Advancing Racial Equity as part of the 2024 Update to the Seattle 2035 Comprehensive Plan and Urban Village Strategy*.https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/Seattle'sComprehensivePlan/ComprehensivePlanPolicyLinkFinalRecommendations.pdf
[8] Draft Housing Appendix, pages 115, 118.
[9] See our Updating the Growth Strategy issue brief for more information about the 15-minute city concept.

Upholding this pattern of economic and racial exclusion will do little to reduce disparities in housing affordability, access, and choice. According to the City's own analysis:

> "This kind of exclusionary zoning concentrates students of color in higher poverty schools that struggle to meet their needs. The location of multifamily housing near major roadways can help with transit access but exposes residents in these units to higher levels of air pollution. This land use pattern also results in inequitable access to large parks and open spaces that are more commonly located in neighborhoods with primarily single-family housing where yards with trees are already more abundant."[10]

See the Housing section of this letter for further discussion of housing affordability, access, and choice.

To truly expand access to housing for all households throughout Seattle and increase housing supply enough to reduce market pressures and lower prices, the City needs to allow five to eight story multifamily housing in many more areas of the city. The City should do this to ensure low-income households do not continue to be excluded from high opportunity areas of the city. It will also make the Plan more responsive to Countywide Planning Policy H-18.[11]

To achieve this goal, the City should:

- Substantially expand the number of Neighborhood Centers in the growth strategy with a focus on maximizing transit investments and existing neighborhood resources. Neighborhood Centers are an opportunity to use existing commercial and transit nodes to expand Seattle's options for housing in more neighborhoods while also providing access to daily needs. The City should be taking a proactive approach to planning business-supportive neighborhoods by providing broader opportunities and infrastructure to support small businesses and mixed-use developments citywide.
- In particular, the City should place more Neighborhood Centers in places considered "lower disadvantage and priority" according to Seattle's Racial and Social Equity Index. In communities with high risk of displacement, engage in strategies that prioritize allowing at-risk community members the choice to stay in place and to meaningfully shape the location of new upzoning in the places of highest opportunity for them.
- Allow buildings up to eight stories in Neighborhood Centers, with a particular focus on five to eight story buildings that are most likely to provide housing units affordable to households making at or below 80 percent of area median income.
- When focusing dense growth along arterials for access to transit, expand the placement of multifamily housing along arterials to one to three full blocks from the arterial. Pair this with development standards that put less massing of sensitive uses directly along the block facing the arterial. These changes could allow more households the opportunity to live in areas of the city that provide amenities like large parks and quiet streets for recreation while still improving access to transit.

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[10] Draft Housing Appendix, page 160.

[11] King County. 2021. *King County Countywide Planning Policies*, page 46. https://cdn.kingcounty.gov/-/media/king-county/depts/executive/performance-strategy-budget/regional-planning/cpps/kc_2021_cpps_ord_19660_113021.pdf?rev=dc68c4a4ea67465c8c79de0869fcb867&hash=A3EB1B05E22148F999802F018F0827B3

- Establish measures of interim success, informed by the City's Equitable Development Monitoring Program (EDMP), which seeks to track the City's progress to support more equitable access to housing and neighborhoods of choice. For example, track access to neighborhoods with essential components for livability[12] such as well-funded schools, healthy environments, open space, and nearby employment.

Make Neighborhood Residential zones more effective. The proposed growth strategy makes changes to the city's existing Neighborhood Residential zones with the goal of bringing more small-scale and middle housing opportunities to more households. The proposed changes, however, are not likely to change what can reasonably be built in those areas nor make it possible for low-income households to live in these neighborhoods.

The proposed zoning described in the Updating Seattle's Neighborhood Residential Zones report[13] will allow an additional unit on each lot, going from three to four, but keeps the developable area the same, which creates smaller units. The units produced by this strategy may be slightly more affordable than the accessory dwelling units (ADUs) that can already be produced today,[14] but they will also be much smaller and therefore less able to accommodate larger households. The small decrease in projected cost will still leave these units out of reach for the majority of Seattle households.[15] Additionally, simply allowing duplexes, triplexes, and fourplexes to be built is not the same as promoting their development. If the allowed development capacity does not create units conducive to resale, developers will likely continue to build large, detached homes rather than duplexes or fourplexes. We need stronger policy language and commitments to allowing middle housing in Neighborhood Residential zones.

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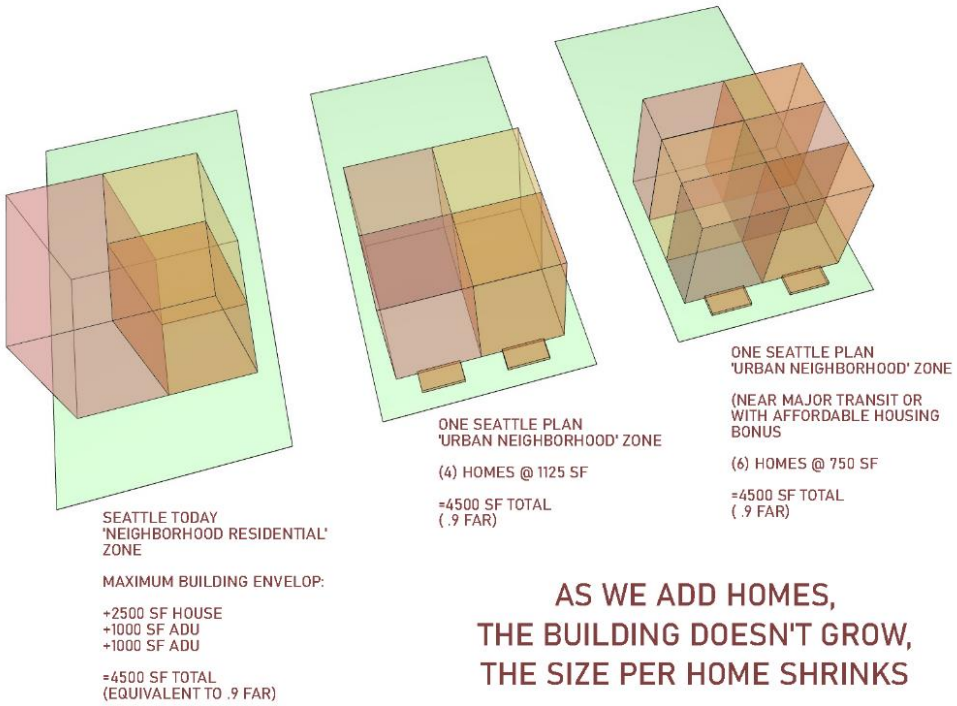
[12] Seattle Planning Commission. 2010. *Seattle Transit Communities*, page 13. https://www.seattle.gov/documents/Departments/SeattlePlanningCommission/SeattleTransitCommunities/STCFinalLayout.pdf

[13] City of Seattle. 2024. *Updating Seattle's Neighborhood Residential Zones*. https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanNeighborhoodResidentialConceptsDRAFT2024.pdf

[14] Table 16 in the Draft Housing Appendix shows that ADUs, while more affordable than some other types of condominiums available for homeownership, are still not affordable to households making at or below 142 percent area median income.

[15] Figure 37 in the Draft Housing Appendix shows that multifamily units in Seattle are selling for prices that only 25 percent of Seattle households could afford and that estimate includes older condominium buildings in the city. New units built under the expanded Neighborhood Residential zoning are likely to be affordable to an even smaller percentage of households.



The diagram above shows that the proposed zoning for Neighborhood Residential zones does not change development capacity when going from three units allowed on one lot to four or six units. The impact is like cutting a pie into smaller pieces when what we need to do is make the pie larger. Diagram by Matt Hutchins.

To make the updates to Neighborhood Residential zones more effective at expanding housing choice and affordability, the City must increase development capacity in Neighborhood Residential zones beyond what is proposed in the draft Plan. The City should look to the state's model code as a roadmap and strive to meet, if not exceed, the concepts the state is encouraging cities to embrace. Other cities are already leading the way, and we encourage Seattle to join them.

Ideas the Commission recommends include:

- Reward extra units by allowing for more bulk as units are added to a lot as an incentive like the standard suggested in the State model code.[16] Allow at least 1.2 Floor Area Ratio (FAR) for four or more units and increase FAR as units are added. Or use a simpler model of unlimited density within the buildable area like Spokane's successful Building Opportunity for Housing Program.[17]
- Align the affordable housing bonus, described in the Updating Seattle Neighborhood Residential Zones report,[18] with the needs of specialized builders like Habitat for Humanity and the Seattle Social Housing Developer. The City should match the requirements of the bonus with the ideal building type for these groups to make their projects more feasible and to encourage more

[16] Washington State Department of Commerce, 2024, *House Bill (HB) 1110 Middle Housing Model Ordinance*, page 13. https://deptofcommerce.box.com/s/2l4yetpanyztkjbpumdfdadghh2rfag7
[17]City of Spokane. *Building Opportunity for Housing.* Accessed April 15, 2024. https://my.spokanecity.org/projects/shaping-spokane-housing/building-opportunity-for-housing/
[18] City of Seattle, 2024, *Updating Seattle's Neighborhood Residential Zones*, page 22.

subsidized affordable housing throughout the city, which aligns with the stated goals of the draft Plan.

- Don't count Accessory Dwelling Units (ADUs) when counting density. The draft Neighborhood Residential zone update includes ADUs in the count of maximum units per lot, which undercuts some of the existing incentives for building them. The proposed changes would remove helpful code exceptions, like the exemption from the Mandatory Housing Affordability (MHA) program, that have made them easy to build. ADUs became popular in recent years because the City worked to reduce barriers to ADU permitting and development through projects like ADUniverse,[19] it does not make sense to discourage them now. They are a low-impact way to provide additional housing options and should still be encouraged alongside the added density in the Plan.
- Explore new models for adding affordable housing units in market rate developments in Neighborhood Residential zones. To bring more income-restricted housing in small-scale buildings across all neighborhoods, Seattle should consider a new inclusionary zoning model like the one recently adopted in Portland.[20] In the new model, the City fully subsidizes the gap between development costs and reduced rent for income-restricted units through a property tax break. The program may be more likely to create income-restricted units in more areas of the city than the expansion of Seattle's existing inclusionary zoning models into Neighborhood Residential zones.

Connect the growth strategy, housing, and transportation through one vision. The Plan needs to include a clear vision for how transportation will be prioritized within and between neighborhoods. The Plan should provide policy guidance on how to allocate street space based on land use characteristics and street mobility function. Additionally, the City needs travel demand management strategies that can scale and adapt with growth. When new housing starts coming online in Neighborhood Centers or in Neighborhood Residential zones, travel demand management strategies like transit and parking management should be ready to come online at the same time. *See the Transportation section of this letter for more details.*

Add a Neighborhood Center around the 145th Street Station Area. Every other station area in the Sound Transit 2 phase of light rail expansion and located in a residential zone has a plan for increased growth. Planning for a Neighborhood Center at the 145th Street Station is an important opportunity to create a vibrant, walkable, and more sustainable mixed-use area near transit. Greater density at the 145th Street Station area would also better align with the growth planned for this area on the Shoreline side of the City of Seattle boundary.

Land Use

Please see the Growth Strategy section of this letter above, as many of our Land Use recommendations are reflected there.

The Planning Commission applauds the tone and clarity of the updated Land Use element goals and policies. We would like to see a clear articulation of how the proposed land use policies achieve the desired

[19] City of Seattle. *ADUniverse*, accessed April 15, 2024. https://aduniverse-seattlecitygis.hub.arcgis.com/
[20] Andersen, Michael. February 23, 2024. "Now fully funded, Portland's affordability mandate should be a model." Sightline. https://www.sightline.org/2024/02/23/now-fully-funded-portlands-affordability-mandate-should-be-a-model/

outcomes and an overall vision for the future of the city. Additionally, we would like to see more evidence of how community input was incorporated in the updated land use policies.

Recommendations:

Eliminate exclusionary communities and create an affordable, equitable, and sustainable Seattle. The One Seattle Plan should focus growth and investment in complete, walkable, and sustainable communities across the entire city. We feel that it is imperative that the Plan include policies that encourage middle housing like triplexes, fourplexes, sixplexes, townhouses, and stacked flats throughout residential areas. We would like to see a growth strategy that ensures low-income households can live throughout the city, which may mean allowing more middle-density multifamily buildings (five to eight stories) in many more places than are allowed today. The growth strategy and supporting land use policies should create 15-minute connected neighborhoods that include housing and mixed uses within walking distance of frequent transit, daily needs, and the essential components for livability.

Reduce housing costs by removing minimum off-street parking requirements. The Commission would like to see an acknowledgement that parking minimums are a barrier to the production of housing. The high cost of incorporating off-street parking spaces increases the overall cost of housing developments and further reduces the availability of affordable housing options. We support inclusion of policy LU 5.3 to avoid setting minimum parking requirements for housing in areas well-served by transit. We understand that implementation of 2023 Washington State House Bill (HB) 1110 precludes parking minimums within one-half mile of bus rapid transit and light rail stops.[21] We recommend removing minimum parking requirements citywide to reduce housing costs and encourage alternative transportation modes. Many cities including San Francisco, CA and San Jose, CA have recently made this shift and Seattle should follow.

Expand the corner store concept. The Commission is supportive of the inclusion of corner stores and cafes in Neighborhood Residential zones to support the evolution toward communities where housing, shopping, schools, and jobs are within a 15-minute walk, bike, or transit ride. However, the Plan would benefit from a more detailed description of the policy vision for corner stores. Land use policies should recognize that population density must be adequately increased to make these neighborhood business opportunities financially viable. The concept of corner stores could be expanded to allow small business opportunities wherever the market sees an opportunity and a need. This small ground floor retail model could also be applied to locations with access by the city's extensive alleys.

Recognize the shift in where people live and work. The draft Plan does not adequately recognize the changing dynamic between residents' living spaces and where they work. With many people working from home more than before the pandemic, daily life and commuting patterns have shifted significantly with many more daily needs being met closer to home. The Plan should acknowledge this shift and incorporate flexibility into land use policies associated with residential and commercial uses.

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[21] State of Washington. 2023. *Engrossed Second Substitute House Bill 1110*. https://lawfilesext.leg.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/House/1110-S2.SL.pdf?q=20240424182455

Transportation

The Planning Commission is pleased to see that goals and policies related to prioritizing personal vehicles are no longer the primary focus of the Transportation element. The draft Plan presents an ambitious network for active transportation and transit to accommodate growth and provide transportation choices. Reducing car dependency and shifting to alternative travel modes will be of critical importance to meet the City's health, safety, climate, and racial equity goals. The goals and policies identified in the Transportation element in coordination with the new Seattle Transportation Plan (STP) will identify the necessary transportation infrastructure to increase mobility for all, mitigate local climate change impacts, and promote a healthy urban environment. We encourage ongoing coordination with the Seattle Department of Transportation to ensure that implementation of the STP and any updates to that Plan align with the final growth strategy adopted in the One Seattle Plan.

Recommendations:

Articulate a transportation system vision that advances our goals. The Transportation element includes positive language around sustainable transportation and improving equitable access to affordable transportation for everyone, but the future vision for the city's transportation system in 2044 is not clear. We recommend that the Plan establish a clear vision that ties all the goals together and develop an implementation hierarchy that determines how all conflicting interests integrate into a cohesive network that achieves our broader goals.

Allocate street space to reinforce our land use vision. Seattle's transportation system is key to achieving our future vision for Seattle. The way that we use our street space determines how we move and access opportunities aligned with our collective goals of climate action, racial equity, and safety. The Transportation element should provide clear right-of-way allocation guidance and decision-making hierarchy that supports the growth strategy and land use policies. Seattle's transportation system should be prioritized by place type:

- Within neighborhoods, focus on local, well-connected networks of active transportation (walking, cycling, rolling) for short, sustainable trips.
- Between centers and neighborhoods, prioritize trips by transit.
- Between Manufacturing Industrial Centers (MICs), major centers, and regionally significant transportation facilities such as the Port of Seattle and I-5, prioritize the safe and reliable movement of goods and services.

The prioritization framework should be operationalized with policy guidance on how to allocate street space based on land use characteristics and street mobility function based on the place types described above.

Establish visionary goals and measurable targets. The Transportation element, like all elements in the Plan, should include aspirational goals with clear and measurable performance targets to build accountability. Examples of measurable targets include:

- Vehicle-Miles Traveled: Reduce total vehicle-miles traveled (VMT) on city streets by at least 37% by 2044. (Relevant goal areas: TG 1, TG 3, TG 4, TG 6)
- Mode Share: Increase trips by active and shared zero-emission modes to represent 70% of all travel by 2044. Reduce travel by single-occupancy vehicle to less than 30% of all trips. (Relevant goal areas: TG 1, TG 2, TG 3)
- Climate Action: Reduce transportation related greenhouse gas emissions by 82% by 2030 from the 2008 baseline.[22] Prioritize mode shift first, then electrification. Prioritize electrification of public transit. (Relevant goal areas: TG 1, TG 3, TG 4, TG 6)
- Street Space for People: Increase travel by alternative modes, including walking, cycling, and transit on Seattle's busiest streets by 2044 by implementing connected multimodal networks.
- Build safe walking and cycling infrastructure in parts of the city where it is missing.

Elevate safety. The Transportation element should elevate the safety goal to the top of the element (up from goal TG 6) and place more focus on the high-crash network. We would like to see TG 6 re-titled to something more closely related to the City's stated commitment to eliminate traffic deaths and serious injuries. The focus should be on the high-crash network where 80 percent of deaths and serious injuries occur. The element should have a set of policies aimed at improving the safety of multilane arterials.

Plan for Complete Streets. Re-envisioning the public right-of-way as limited and increasingly valuable public space – and reprioritizing its use in response – will open a myriad of possibilities for improving city life while meeting important policy goals. Complete Streets are intended to create a transportation system that works for everyone. The Plan should integrate nuance on how we have limited space and need guidance on what's important on specific corridors. In 2007, the Seattle City Council passed Ordinance 122386, known as the Complete Streets ordinance, which directs the Seattle Department of Transportation (SDOT) to design streets for pedestrians, bicyclists, transit riders, and persons of all abilities, while promoting safe operation for all users, including freight.[23] The City should acknowledge the significance of this ordinance by prioritizing and implementing Complete Streets projects citywide, and not just on neighborhood streets.

Incorporate travel demand management. The Transportation element should include clear policies that articulate how the city's transportation system will adapt to change as the final growth strategy is implemented. The Commission recommends inclusion of innovative travel demand management tools such as road use charging, where drivers pay for use of the road network based on distance traveled, as well as providing incentives such as ORCA cards to reduce car trips. Any inclusion of travel demand management in the Plan should be paired with racial equity analysis and mitigation for low-income households that rely on cars due to the disproportionate impacts of displacement or lack of sustainable transportation infrastructure.

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[22] Seattle Office of Sustainability and Environment. 2013. *Seattle Climate Action Plan*, page 19. https://www.seattle.gov/documents/Departments/Environment/ClimateChange/2013_CAP_20130612.pdf
[23] Seattle Department of Transportation. *Complete Streets in Seattle*, accessed April 22, 2024. https://www.seattle.gov/transportation/projects-and-programs/programs/urban-design-program/complete-streets-in-seattle

Reform parking policies. The Commission is pleased to see that the Land Use element includes policies related to off-street parking. The Transportation element should reflect those land use policies and establish similar policies for off-street parking and parking demand management. Seattle is leading its peer cities in the number of cars owned per capita,[24] which requires a comprehensive parking management policy that considers both on- and off-street parking and should be flexible to adapt with the city's growth in areas with increased density of jobs and housing.

Make changing commute patterns central to the Plan. The Transportation element should elevate the importance of goals related to jobs and commuting patterns. The draft Plan does not appear to reflect the changing nature of work and overemphasizes centralized employment in Downtown and other Regional Centers. The Plan should recognize the changed relationship between job centers and neighborhoods as more employees have shifted to working from home more frequently.

Housing

The Housing element of the draft Plan includes many strong policies that align with the Planning Commission's vision for a more equitable and affordable future of housing in Seattle. We appreciate the language in the draft Plan around addressing past harms of exclusion, race-based discrimination and segregation caused by practices such as redlining, racially restrictive covenants, and exclusionary zoning that have led to large discrepancies in homeownership, housing-cost burden, and wealth building for people of color. We also appreciate the policies that start to repair those harms through more housing opportunities throughout the city and more housing choices that can work for households of all incomes, sizes, and needs including households with a member who has a disability and larger households with children or with multiple generations living together.

While we support the policy direction of the housing element, the proposed growth strategy will not support the policies in the housing element that seek to expand housing choices and opportunities for everyone. The growth strategy does not do enough to shift the current pattern of racial and economic exclusion from much of Seattle's residential neighborhoods and add capacity that can counteract decades of underdevelopment of housing and an increasingly expensive housing market.

Recommendations:

Pair strong housing policies with a growth strategy that promotes equity. Many areas of the draft Plan and Draft Housing Appendix note that past harms of racial discrimination, exclusionary zoning, and disparate housing cost burdens will be addressed in this Plan by expanding access to more affordable housing in more areas of the city. While we applaud this vision, the proposed growth strategy does not provide meaningful changes that are necessary to achieve this goal. The King County Countywide Planning Policies compel Seattle to adopt a plan that increases the ability of all residents to live in the neighborhood of their choice and reduce disparities in access to opportunity. The proposed changes in land use patterns

[24] Balk, Gene. February 18, 2021. "Seattle has finally reached peak car, and only one other densely populated U.S. city has more cars per capita." Seattle Times. https://www.seattletimes.com/seattle-news/data/seattles-car-population-has-finally-peaked/

are unlikely to be sufficient to ensure everyone in Seattle can afford to live where they choose and to reduce disparities between neighborhoods.

The One Seattle Plan as drafted does little to shift the existing land use patterns that have caused racially disparate outcomes. The Draft Housing Appendix provides data that shows many people of color in Seattle, particularly Black households and Indigenous households, experience higher rates of housing cost burden,[25] lower rates of homeownership,[26] and in the case of Indigenous people, are decreasing in population within the city.[27] The current housing market locks the most affordable homes, multifamily apartment buildings, into small areas of the city that are often along noisy and polluting major highway corridors or in areas that historically faced disinvestment. If the City continues to concentrate affordable housing types like multifamily apartments in the same areas of the city, these long-term patterns of inequity will not change. The City should plan for more multifamily housing in more areas of the city such as in high access to opportunity areas and near amenities like large parks, schools, and healthy food sources.

The Plan could also do more to improve the quality of life for households living in multifamily buildings. The City places many multifamily buildings along major arterials because these are often aligned with high-capacity transit corridors. The draft Plan doubles down on this strategy by allowing additional density in Neighborhood Residential zones on blocks that touch major arterial streets. While it makes sense to pair housing density with access to transportation, it is important to consider the quality of life of those living along transit corridors. The City can encourage housing growth near transit while also allowing multifamily housing to be placed one to three blocks away from high-volume and high-speed arterials. The City can also make changes to the arterials themselves to make them more pleasant to live near.

The diagram above shows how housing placed a similar distance away from a transit stop can have different access to amenities like open space and quiet streets for walking and rolling. Diagram by Matt Hutchins.

[25] Draft Housing Appendix, page 42.
[26] Draft Housing Appendix, page 39.
[27] Draft Housing Appendix, page 26.

The City should work to improve quality of life when zoning for housing along major arterials. This could be achieved in a variety of ways, such as:

- Allowing housing types like multifamily buildings further into Neighborhood Residential zones by one to three blocks;
- When selecting where to upzone along arterials, consider that not all arterials may be suitable for more housing due to their auto-oriented design, while others may provide the best access to resources such as a light rail or bus rapid transit stop; and
- Improving the arterials themselves, such as adding vegetation and widening sidewalks, to make them part of a broader livable environment.[28]

Increase housing supply overall to improve affordability. Seattle has not kept up with housing demand for decades, creating an increasingly tight market where more and more households are competing for homes. Seattle needs a housing strategy that can address the forecasted need and the backlog of housing production.

Seattle's current housing market is unaffordable to many households. The Draft Housing Appendix includes a telling table that indicates which housing types are affordable to households with various common jobs.[29] While a teacher or an electrician may be able to afford the average one-bedroom unit in Seattle, an electrician who is a single parent could not afford a two-bedroom unit. Two minimum wage workers who both work full-time would have to share a studio apartment because even the average one-bedroom unit would be unaffordable. One of the key drivers of this unaffordable housing market is chronic lack of supply.

Improving affordability of housing in the city has many benefits that impact everyone who lives in Seattle. Ensuring housing can be affordable to anyone who wants to live in the city means we all benefit from more diverse communities and the many cultural gifts each community can share. Building a city where more people can live near where they work and play also means we are building a more climate-friendly city with more sustainable transportation options. Additionally, building more workforce housing creates a more economically successful city where people can afford to live near jobs and their favorite shops and services, creating a strong supply of workers and customers for local businesses. To reap those benefits, Seattle needs to unlock more areas of the city to more compact and affordable housing types. The City should plan to accommodate more housing overall and open up more residential areas of the city to dense growth to increase overall supply and relieve market pressure. *See the Growth Strategy section of this letter for more details.*

Lean into a growth strategy that promotes better housing choice by allowing more types of homes, for more types of households, everywhere. In addition to not being affordable to low- and moderate-income households, Seattle's housing market is also not friendly to large households such as families with children or multigenerational households. Detached homes make up most of the housing in Seattle with three or more bedrooms, which would be large enough for moderate and large sized families.

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[28] McAndrews C, et al. 2017. *Understanding and improving arterial roads to support public health and transportation goals.* American Journal of Public Health. Volume 107(8) 1278-1282. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5508169/

[29] Draft Housing Appendix, Table 23, page 90

With the average new detached home requiring an income over 230 percent of area median income to be affordable,[30] and the few apartments in the City with three or more bedrooms not affordable to households with incomes at or below 120 percent of area median income,[31] most large households cannot afford housing in Seattle.

Most new housing built in Seattle is multifamily apartment buildings with studios and one-bedroom apartments. Very few new apartment buildings include units with three bedrooms or more and many of the ones that do are in subsidized, income-restricted buildings. If we continue on this path, we will become a city that has no space for large households, which can mean fewer households with children or aging adults. The City should incentivize the inclusion of units with three or more bedrooms in multifamily apartment buildings. The City should also adjust development capacity for middle housing in Neighborhood Residential zones to allow for larger units in multiplexes.

The City must also consider how development promoted by the draft growth strategy will impact people with special housing needs such as people with disabilities. People with disabilities often need homes that are a single level or that include wide hallways and open floor plans. People with disabilities are also disproportionately low-income, so many cannot afford to purchase or rent a detached home that meets their needs. As a result, many people with disabilities in Seattle are left to search for limited rental housing in multifamily buildings that were designed to be accessible. We appreciate language in the Housing Element that suggests housing should aim to serve people with accessibility needs through "universal design features and one-story layouts."[32] We are concerned that the proposed growth strategy will likely encourage more townhome-sized units in more areas of the city, which are often tall and narrow with many stairs. These housing types are not accessible to people with mobility challenges such as people who use wheelchairs, or aging adults. A better housing type would be stacked flats, which typically have one-level units and can be found in configurations like a sixplex or an eightplex. Allowing six units to a lot in more areas of the city could increase access to floor plans that work for people with disabilities. The City should allow for increased development capacity in Neighborhood Residential zones to promote more affordable and accessible housing types like stacked flats in more areas of the city.

We would like to see the Plan more directly address affordability and access to neighborhoods by incentivizing buildings that can be more affordable to families with children, multi-generational families, and those with disabilities.

Reduce barriers to building permanent supportive housing (PSH) and emergency housing in more areas of the city. The City's housing needs projection estimates that Seattle will need 15,024 more units of PSH and 21,401 emergency housing beds/units by 2044.[33] The Draft Housing Appendix notes the prohibitive costs of building and operating PSH and that access to residential treatment centers for mental and behavioral health has been decreasing due to labor shortages and closures of facilities in a

[30] Draft Housing appendix, page 77.
[31] Draft Housing appendix, page 83.
[32] City of Seattle. 2024. *Draft for Public Review One Seattle Plan Comprehensive Plan Update,* Page 102. https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanDraftPlan2024.pdf
[33] Draft Housing Appendix, Table 2, page 14

time when demand has increased notably. Given these substantial financial challenges that inadequately resource capital operations and services funding, the City should resource all aspects of PSH, reduce any procedural barriers, and encourage the placement of PSH and emergency housing in more areas of the city.

The City should document in the Housing Appendix known barriers to siting different types of PSH and emergency housing in consultation with developers and operators of those housing types and include needed policy changes to remove those barriers in the Plan. Identifying and removing these types of barriers is called for in both the Growth Management Act (RCW 36.70A.020(2)) and the Countywide Planning Policies H-1, H-2, H-4, H-12, and H-13).

Climate and Environment

The Climate and Environment element in the draft One Seattle Plan positions the city to be in compliance with the GMA (per Washington State House Bill 1181 passed and signed into law in 2023) well in advance of the 2029 deadline. Naming climate and sustainability as a key move in the draft Plan's introduction as well as including climate policy statements throughout the draft Plan is a positive emphasis of the importance of the integration of these policies. We appreciate the specific metrics included in the element including reducing core greenhouse gas emissions by 58 percent from 2008 levels by 2030 and attaining carbon neutrality by 2050 and look forward to more specific policy language in the final Plan.

Recommendations:

Emphasize mode shift and provide trip reduction detail. In the Transportation subsection of Part 1, emphasize mode shift before vehicle electrification and prioritizing electrification of public vehicles over private. Additionally, we suggest greater specificity around the types of vehicle trips to be reduced and by how much.

Include more strategies to help ensure an equitable transition to zero carbon energy. In the Buildings and Energy subsection (Part 1), include additional methods to lessen the impacts of transitioning to zero carbon energy on low-income renters and homeowners beyond providing more time to meet building performance standards.

Support an equitable food system. In the Solid Waste subsection (Part 1), consider expanding current policy language to encourage and support a food system that equitably distributes access to local and culturally relevant foods.

Articulate a clear and strong commitment to earthquake preparedness and response. Part 2 is missing dedicated policy elements tied to earthquake preparedness and response, instead appearing to lump earthquake preparedness and response under the term 'other natural hazards'. With the Cascadia subduction zone along the coast and the Seattle fault running through South Seattle, a major earthquake impacting Seattle is a question of when, not if, and with disproportionate impacts to Black and low-income communities especially. The Office of Emergency Management (OEM) conducted preliminary modeling in 2019 that showed that the larger the earthquake, the more outsized the burden on minority or low-income

communities.[34] We commend the City for including references to earthquakes and seismic retrofitting throughout the draft Plan in the Land Use, Housing, Capital Facilities, Utilities and Climate & Environment elements. However, because all other components of the comprehensive plan would likely be put on hold during response to and recovery from a large earthquake, the City should include a separate subsection dedicated to earthquake preparedness and response policies that address components such as seismic retrofitting, enhanced building codes, early warning systems, vulnerability assessments, emergency response systems, plans for immediate post-event population needs such as food, water, shelter, utilities, communications, etc., and equitable distribution of resources before and after catastrophic events.

Enable strong anti-displacement policies and affordable housing to foster stable and resilient frontline communities impacted by climate change. Acknowledge in Part 2 of this element adequate housing supply and options as a climate strategy for healthy, resilient communities. Include specific anti-displacement policy language in Part 2 of this element.

Strengthen commitment to achieving racial and social equity in health outcomes. In the Community-Based Climate Resilience subsection (Part 2) consider stronger and more specific language in the policy related to achieving racial and social equity in health outcomes.

Discourage additional growth in flood-prone areas and support communities already in place. In the Sea-Level Rise and Flooding subsection (Part 2) consider stronger language (in conjunction with Land Use policy 17.11) to discourage additional growth in flood-prone areas, as opposed to merely regulating development, while supporting communities already in place. Policies committing to additional investments and climate adaptive building requirements in those parts of the city subject to sea level rise, such as South Park, should be included in this element."

Ensure convenient access to food and reduce food insecurity. In the Healthy Food System subsection (Part 2), re-emphasize the need to eliminate food deserts and reduce food insecurity by providing options for a diversity of people. Strengthen policy language from "support convenient access to nutritious, affordable, and culturally relevant food… (CE 14.2)" to provide or ensure convenient access.

Ensure water bodies are safe during extreme heat events. In the Water subsection (Part 2), include a policy regarding the biological and chemical monitoring of water bodies likely to be used in times of extreme heat to cool so as to ensure those bodies are safe.

Parks and Open Space

We appreciate acknowledging the potential for the public right-of-way to be repurposed to create additional gathering and recreating spaces in this element. The need for citywide community gathering spaces can be

[34] City of Seattle. 2020. *Social Justice and Earthquakes: Modeling inequity with One Concern software*. https://southseattleemerald.com/wp-content/uploads/2023/02/2019_12.03_SocialJusticeAndEarthquakes_byCityOfSeattle-MayorsOffice.pdf

met, in part, by creative leveraging and use of the public right-of-way.[35] Policy language around parks and open space programming being responsive to the communities they serve is encouraging. Policy language throughout the element that emphasizes equitable access and investment and seeks to address inequities is promising.

Recommendation:

Consider a policy that prioritizes the retention and expansion of natural features and seeks options for non-permeable surfaces.

Public Health

While public health is not a separate element in this draft Plan, the commission thought it important to review the draft Plan for goals and policies related to public health, as an important indicator of racially equitable growth and a sustainable quality of life for all who live in Seattle. Policies related to public health are found in the Land Use; Transportation; Utilities; and Climate & Environment elements.

Recommendations

Consider noise pollution when assessing health impacts. Consider noise pollution in addition to other forms of pollution when considering public health impacts especially in relation to the siting of affordable housing.

Incentivize the creation of buildings that promote health and well-being. To promote public health, incentivize the use of health-promoting building certification standards for all buildings in the city, such as Fitwel (https://www.fitwel.org/) and WELL https://www.wellcertified.com/) standards, in addition to green building standards.

The Planning Commission appreciates the work of City staff and in particular Michael Hubner and his colleagues in the Office of Planning and Community Development. The Commission would not have been able to do as thorough a review of the public draft without the willingness of Mr. Hubner and staff to attend many meetings and present regularly on their work. The Commission looks forward to the recommended One Seattle Comprehensive Plan.

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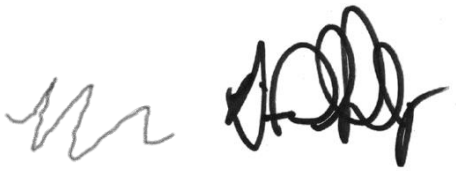
[35]Seattle Planning Commission. 2022. *Repurposing the Right-of-Way: Mobility Options and People-Oriented Streets in an Equitable City*. https://www.seattle.gov/documents/Departments/SeattlePlanningCommission/ComprehensivePlan/RightofWayIssueBrief_layout-V5-10.31.22.pdf

Thank you for your consideration of our comments and recommendations and please do not hesitate to contact us or our Executive Director, Vanessa Murdock, at vanessa.murdock@seattle.gov should you have any questions.

Sincerely,



McCaela Daffern and David Goldberg
Co-Chairs, Seattle Planning Commission

Cc: Seattle City Councilmembers
Ben Noble, Aly Pennucci, Lish Whitson; City Council Central Staff
Marco Lowe, Christa Valles; Office of the Mayor
Maiko Winkler-Chin; Office of Housing
Michael Hubner; Office of Planning and Community Development
Jessyn Farrell; Office of Sustainability and Environment
Gregg Spotts; Seattle Department of Transportation

DISCLOSURES/RECUSALS:

Co-Chair McCaela Daffern works for King County and has recused herself from review of the Seattle Comprehensive Plan in her role at King County. She disclosed that her opinions are her own, not her employer's.

Commissioner David Goldberg disclosed his views are his own and not those of his employer, the Washington State Department of Transportation.

Commissioner Xio Alvarez disclosed her views are her own and not those of her employer, LMN Architects.

Commissioner Rick Mohler disclosed his views are his own and not those of his employer, the University of Washington

Commissioner Radhika Nair disclosed her views are her own and not those of her company, Seva Workshop. While she has worked on many City projects, she has not worked on this draft Plan.

Commissioner Dhyana Quintanar disclosed that her views are her own, not those of her employer, WSP.

Commissioner Lauren Squires disclosed that her opinions are her own, not those of her employer, King County Metro.

Commissioner Jamie Stroble disclosed that she worked with one of the community-based organizations funded by the City to provide input on the One Seattle Comprehensive Plan. She disclosed that her opinions are her own, not those of any present (the Nature Conservancy) or former employer.

Commissioner Rose Lew Tsai-Le Whitson disclosed that their opinions are their own, not those of their employer, Jacobs Engineering.