ATTN: Mayor Bruce Harrell, OPCD Director Rico Quirindongo and Councilmember Morales
Seattle City Hall
600 4th Ave.
Seattle, WA 98144

Dear Mayor Harrell, Director Quirindongo and Chair Morales,

My name is Cliff Cawthon and I am the Advocacy and Policy Manager for Habitat for Humanity of Seattle-King and Kittitas Counties. I thank you for the opportunity to provide written comment on the draft One Seattle Comprehensive Plan.

First, I want to express gratitude on behalf of Habitat for Humanity for the work that the Seattle Office of Planning and Community Development has done on this draft. Habitat for Humanity Seattle-King & Kittitas Counties has been a permanently affordable housing provider in the region for the last 38 years by partnering with families to build homes and communities. Our vision is that we can create a world where everyone has a safe, decent and affordable place to live, and we believe that getting the comprehensive plan updated right is a critical part of achieving that goal.

We recognize that the intention of the One Seattle Draft plan is to offer a framework for more housing and forge an equitable, green, and dynamic path forward for the city to manage its growth, however we believe that the current draft can be improved in several areas.

Embracing Middle Housing and creating more opportunities to build housing.

The passage of HB 1110 has opened the door to now allow more affordable multifamily housing types in neighborhoods across the state in the form of duplexes, triplexes, and forms all the way up to sixplexes. Sadly, the One Seattle Plan in its current form does not live up to this vision that was originally charted by the city through the use of ADUs and DADUs before almost any other jurisdiction statewide. We urge the city of Seattle to fully implement HB 1110 in neighborhoods throughout the city instead of pursuing the alternative compliance route.

Habitat's record of developing permanently affordable homes in Seattle was possible through using more affordable housing typologies. For example, our High Point duplexes in West Seattle are where our homeowner, Christine bought her first home in 2010 and since then she's turned her adversity into purpose. She experienced incarceration and homelessness, while striving to be a fantastic mother. Buying one of the units in a duplex in the High Point' community gave her a life-changing sense of stability. Now, she's an Executive Assistant at Oracle and she spends her spare time advocating for incarcerated people and other marginalized people in her community. Under the current plan, building a home like Christine's in many areas of Seattle for someone like her or another family would be impossible.

Make sure new housing and new affordable housing projects can "pencil out".

The FAR standards in this plan are way too low. The draft plan calls for a standard of 0.9 FAR for density of at least 1 unit per 2,200 sq ft (e.g., three or four units on a 5,000 sq ft lot); 0.7 FAR for density between 1/4,000 and 1/2,200 sq ft (e.g., two units on a 5,000 sq ft lot), and 0.5 FAR for density below 1/4,000 sq ft (e.g., one unit on a 5,000 sq ft lot).

The FAR standards are too low for efficient use of land in Seattle, particularly for small lots. In Seattle, the rising cost of land requires affordable housing developers, such as, Habitat and other developers to often use 100% of a lot to accommodate the number of units necessary to make the project financially sustainable while meeting the needs of the community. For general housing construction, allowing for a FAR up to 1.6 for density for an average lot of 5000 sq./ ft, while allowing for up to 100% lot coverage will allow for production of more units on a single lot. Under the proposed plan in the draft, affordable housing development can go up to 1.8 FAR for affordable housing as well as a maximum lot coverage of 60%. We believe that increasing the lot coverage to 100% for affordable housing construction and allowing for a FAR bonus of 2.2 would allow more flexibility for permanently affordable homeownership projects to move forward.

For example, the Capitol View building is an example of these standards in action. Amber Cortez. She and twelve other households like hers are now homeowners. Amber is a local arts institution worker and previously she was almost priced out of Seattle. Now, she can live in a building without having to worry about eventually being displaced. This project an exemption from parking minimums due to its proximity to the light rail; and with 100% lot coverage we built thirteen new homes on what used to be a single-family lot.

End exclusionary zoning and advance racial equity.

We applaud the city of Seattle's commitment to addressing the harms of racism and exclusion in the past, as well as the anti-displacement policies that it proposes. We believe that an effective approach to reversing the exclusionary housing and growth patterns that we've seen in Seattle historically involves dispersing density and growth throughout the city, instead of concentrating most of the housing production in limited areas.

In the Office of Community Planning and Development's report from 2021 stated the Urban Village' model's failure:

> *The urban 9 village approach continues to reinforce the exclusion, generally, of everything except single-family residential construction on 75 percent of the residentially zoned land in the city. Given its racist origins, single-family zoning makes it impossible to achieve equitable outcomes within a system specifically designed to exclude low-income people and people of color.*

The Draft Plan retains the urban village model under a different guise. This is especially important as the lack of available homes and especially affordable first-time homeownership opportunities has caused housing prices to skyrocket. Instead of restricting growth to mainly Urban Centers, we recommend adding more Neighborhood Centers and allowing for structures in Urban Centers to go

up to twenty stories and adding a couple of floors of height for affordable housing in Neighborhood Centers, respectively.

Areas that have a high-displacement risk do not have enough affordable homeownership opportunities. Most affordable housing that is built in the city is at 50-60% of the Area Median Income ("AMI") and that average AMI level does not provide the financial basis for homeownership. that allows families to build generational wealth. Families can build generational wealth when they are able to gain equity on a property that they own, and they can use that equity to purchase another home, invest in a small business or family stability- all are anchors against physical or economic displacement.

Our homeowner, Lila has Black, Native and White ancestry and their family has lived in Washington State for generations. Habitat's program has allowed her to be one of the only people in her family to own a home and have an opportunity to develop generational wealth. We recommend creating opportunities for people like Lila through prioritizing first-time homeownership opportunities. We can take advantage of the opportunities that HB 1110 has afforded us to allow for more affordable housing types and utilize those as first-time homeownership opportunities. Allowing density up to a sixplex in every Neighborhood residential area will allow for the kind of development capacity that leads to more affordable homeownership options.

Furthermore, we recommend providing technical assistance to homeowners who are interested in redeveloping their property for multigenerational housing, or to create community-focused affordable housing.

Fully utilize transit-oriented development opportunities

New light rail stations and new Bus Rapid Transit opportunities in Seattle provide numerous opportunities to build housing near jobs and transit. To achieve our goals of creating more opportunities for upward mobility and eliminating the racial wealth gap we need to make opportunities available for homeownership near conduits of opportunity.

We recommend that in a revision to the One Seattle draft, rules should be changed to allow for midrise housing in all areas served by frequent transit, in the ¼ mile around frequent bus service and ½ mile around light rail. Furthermore, we suggest that we enlarge the proposed Neighborhood Centers, to ¼ mile and add proposed Neighborhood Centers that were studied under Alternative Five but not included in the Draft Plan.

Our joint project with African Community Housing and Development and the Office of Community Planning will produce 65 family sized and single-person condo units near the Columbia City light rail. This is due to incentives through Office of Housing Seattle's Rainier Valley Affordable Homeownership Initiative, which leverages transit and provided incentives that made our partnership possible. This is an example of how we hope the city will consider leveraging transit investments to promote housing units that Seattleites desperately need.

Remove parking mandates.

We encourage the city to remove all parking mandates. In our experience, we include one parking stall per unit, however, in several projects' suspension of parking minimums due to the availability of off-street parking and transit have allowed us to utilize several innovative housing types.

For one Habitat homeowner, Becaley, she would've faced displacement if not for her home in our Capitol View condos. A suspension of parking minimums allowed us to build our Capitol View homes. Becaley is an enthusiastic Habitat advocate and volunteer who has worked in the service sector in several different jobs, yet she found herself working 2-3 jobs (including gig work) to survive in Seattle. Now, as a Habitat homeowner she is finally able to own a stable home, in which she won't have to worry about potentially moving every year due to increased costs. Her condominium building was built on what used to be a single-family lot without the usual 1 parking spot per unit standard.

Locating denser affordable housing near transit, as discussed before, will allow developers to create more units that are desperately needed. For every additional parking stall, a developer will spend upwards of [figure needed]. That deducted cost will allow developers to pass those savings onto homebuyers.

The removal of parking mandates doesn't equate to a ban on parking. Instead, it gives developers and communities the flexibility to decide the kind of parking situation that will best meet their needs. For example, in our Highland Terrace development we included parking spots for each of our homes due to homeowners' requests.

Take an ambitious 'All-of-the Above' approach.

In conclusion, we will need various tools including funding mechanisms, incentives and proactive land use and zoning policies. Limiting density to specific Urban Centers repeats the failed Urban Village model and embracing a land use approach that opens previously exclusive parts of the city to denser housing will bring down housing costs while creating the mixed-income communities that leads to more equitable wealth distribution.

The scarcity of land has led to rising costs alongside the post-pandemic rising costs of construction materials and high interest rates have led to a current market, according to Axios, for single individuals that requires 27.1 years to save enough money to buy a typical starter home. For Black families, less than half of them own their homes, in comparison to white families- with other groups in-between.

Through many policy changes and financial tools, Habitat has expanded its five-year pipeline to over 300 units, serving over hundreds of families. We look forward to continuing this dialogue in the future and continuing to work with you to improve the One Seattle plan so we can achieve the dream of a Seattle where we have an equitable, green and prosperous city where everyone has a safe, decent and affordable place to live.

Habitat for Humanity®
Seattle–King & Kittitas Counties

Best Regards,

Clifford Carl Cawthon

Advocacy and Policy Manager
Habitat for Humanity Seattle-King and Kittitas Counties

CC: Other Council Members (Marco Lowe, Christa Valles)