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Sent: Friday, August 04, 2017 1:16 PM

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Subject: Comments on the Citywide Implementation of Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS)

Dear Director Assefa:

On behalf of the Seattle Planning Commission, please accept the following comments on the MHA DEIS. The Planning Commission continues to offer strong support for the ongoing work of the Office of Planning and Development (OPCD) and other City agencies to implement Mandatory Housing Affordability (MHA) citywide. We commend the supplemental Housing and Socioeconomic analysis to which you have already committed to include in the Final Environmental Impact Statement (FEIS). This additional racial and cultural analysis in the FEIS will serve to inform community members and elected officials alike as the MHA program moves into an implementation phase.

Comments and considerations regarding a final alternative

After review of all comments received regarding the DEIS, we suggest taking the following into account in selecting a final alternative for the FEIS.

- Consistent with our [Seattle Transit Communities](#) report, we suggest all urban village boundaries be determined by a ten-minute walkshed from frequent and reliable transit, which includes both bus and link light rail service.
- We support maintaining the *proportions* of growth as depicted in Alternative 3, with the village boundaries determined as suggested above. Urban villages with higher access to opportunity and lower risk of displacement should receive greater increases in development capacity than those with low access to opportunity and high risk of displacement.
- In urban villages where a ten-minute walkshed is adjacent to a public investment, including schools, parks, major institutions, and community centers, expand the boundary to include those facilities and adjacent blocks in order to expand housing opportunities near these essential services.
- Expand urban village boundaries to include areas between urban villages and areas in close proximity to urban villages that are already zoned for a mix of uses.
- Consider allowing greater residential density, including taller building heights, around high capacity transit, such as light rail and Rapid Ride stations.

- In areas identified as having a high risk of displacement, shift the proposed capacity towards a denser node at the core of the village and around schools, parks, and community centers—not just along major corridors—and allow for more Residential Small Lot (RSL) zoning designation throughout the rest of the village. RSL zoning, when paired with technical assistance and regulations that encourage homeownership retention and self-development, can be a useful anti-displacement tool. We believe this approach helps balance long-term capacity with near-term anti-displacement strategies.

Suggested additional displacement mitigation measures

Recognizing that zoning has limited ability to respond to market shifts and underlying factors that contribute to displacement, we offer for your consideration the following suggested mitigation measures to be paired with zoning changes:

- Study future boundary expansions of urban villages not addressed in the current MHA program with high access to opportunity and a low risk of displacement.
- Allow several smaller developments in the same urban village to ‘pool’ MHA requirements for each project if performance units are provided.
- Waive or reduce fees for one to three units created through conversion in RSL and LR1 zones to encourage retention of homeownership.
- Discourage large, new detached housing in RSL through minimum densities or FAR tied to development typologies.
- Minimize the amount of lowest-density zoning, including RSL and LR1, in urban villages with high access to opportunity and a low risk of displacement
- Incentivize and encourage development to choose performance units, especially in areas with a high risk of displacement, through expedited permitting, administrative Design Review, and/or using City subsidies to “buy down” performance units.
- Offer technical assistance to small builders who perform as oppose to pay in lieu.
- Increase City subsidies for ownership units.
- Use ‘Only in Seattle’ grants to keep small businesses and community anchors in place.
- Explore exempting property taxes for seniors and low income home owners.

Element -specific comments

Drawing conclusions based on analysis done with many assumptions is problematic. This is especially evident in the displacement analysis in the **Housing and Socioeconomic** chapter. We suggest clearly stating all the assumptions made and noting conclusive analysis is not possible. We also suggest including the impacts of and mitigation for eviction – a particular form of displacement.

The **Aesthetics** chapter would benefit from a description of how shading is measured and at what time of year and day the shading analysis was done. In addition, a definition of protected view corridors versus personal (unprotected) view corridors would be helpful.

Mitigation measures noted in the **Transportation** chapter include increasing the acceptable threshold of congestion; this action does not mitigate the impact.

As MHA is not required in historic districts, some districts may need to be expanded so as to protect historic and cultural resources not located within a historic district. (**Historic Resources**)

Provide better transit access to the largest parks and open spaces in the City as a mitigation measure to help address the decrease in available park and open space per resident noted in the **Open Space and Recreation** chapter.

In the **Public Services & Utilities** chapter, the internal strategic plans of various agencies including the Police Department and Seattle Public Schools are used to measure potential impact, however the plans themselves are not critically analyzed. While such an analysis is out of the scope of the DEIS, using these internal plans is problematic in making conclusions. Additionally, specific to Seattle Public Schools, making standard adjustments to enrollment practices is noted as mitigation. More focus on adjusting the processes so as to result in more equitable outcomes is encouraged.

The construction impacts noted in the **Air Quality & Greenhouse Gas** chapter are characterized as temporary, however the accumulative effects of construction in a time of increased development are longer term. We support the proposed Air Quality Effects on Sensitive Land Use amendment to the Comprehensive Plan in the 2016/17 cycle that reads “*Consider and seek to reduce the potential health impacts of air pollution on residential populations and other sensitive uses near corridors with high volumes of vehicle traffic, the King County Airport, major rail yards, freight routes, and point sources of pollution.*” and encourage the implementation of this policy to address both short and longer term impacts.

Thank you for the opportunity to comment. Please feel free to contact me if you have any questions or would like to discuss any of these comments further.

Sincerely,
Vanessa



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Executive Director

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