Seattle City Council

June 15, 2015

Diane Sugimura, Director
Department of Planning and Development
700 5th Ave. Suite 2000
Seattle, WA 98124-4019

Dear Director Sugimura,

Thank you for responding to our request last summer to develop a Displacement Vulnerability Index and to conduct an equity analysis of the growth alternatives, which are presented in your Growth and Equity Analysis for Seattle 2035. Indices that map areas of opportunity and areas most at risk of displacement can be critical tools when developing planning policies that deliver equitable growth. These tools can help us minimize the unintended consequences that can occur when the intensity of growth in a particular area causes upward pressure on property values and rents and can lead to displacement of vulnerable populations.

The Displacement Vulnerability Index explains:

> *"There is very little vacant or undeveloped land in the city. Therefore, most new development will be replacing some existing use, which often includes housing. When housing is replaced by a new use, the current residents in that housing are displaced. This analysis focuses on displacement that affects marginalized populations. It combines three categories of data (vulnerability, amenity, development potential) to identify areas where displacement of those populations may be more likely."*

The paired tool that analyzes access to opportunity identifies areas with the amenities like quality schools, frequent transit and proximate access to healthcare, open space and parks. This tool can help us understand when policies could increase exclusivity in these high opportunity areas, and prevent communities of color, renters or low-income households from accessing the benefits of amenity-rich neighborhoods.

As you know, the result of this analysis was to identify neighborhoods with:

a. high displacement risk and low access to opportunity
b. high displacement risk and high access to opportunity,
c. low displacement risk and low access to opportunity, and
d. low displacement risk and high access to opportunity.

These characteristics reflect existing conditions and we know that mitigation strategies are warranted, regardless of where and how much, growth happens in the future. Our current Comprehensive Plan does not equip the City with the strategies necessary to address these existing conditions and we are looking to your team to help us craft new strategies that will work.

City Hall, 600 Fourth Avenue, Floor 2, PO Box 34025, Seattle, WA 98124-4025
(206) 684-8888, Fax: (206) 684-8587, TTY: (206) 233-0025,
E-Mail Address: council@seattle.gov Internet Address: http://www.cityofseattle.net/council
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Thank you for also using the Displacement Vulnerability Index and Access to Opportunity Index to analyze the growth alternatives being studied in the Seattle 2035 Environmental Impact Study (EIS). In Resolution 31577, the City agrees to "analyze and report on how the growth scenarios being reviewed in the environmental impact statement could have differential impacts on marginalized people, including the public interventions needed so that these populations can benefit from and not be displaced or overly burdened by the future impacts of growth, and recognizing that impacts may be different for different communities."

In light of the conclusion in your Growth and Equity Analysis that Alternatives 3 and 4 allocate the greatest number of new housing units to high displacement risk areas and thus are the most likely cause the greatest displacement of marginalized populations without robust public intervention, we request that DPD's Final Environmental Impact Statement include a 5th alternative that distributes higher growth in "high opportunity/low-displacement risk" areas and distributes less growth to areas with "high displacement risk."

Recognizing that displacement is occurring today and allocating growth in this way will relieve but not remove development pressure, please ensure that this alternative is coupled with Goals and Polices to:

a. Make it more possible for low income people to live in high opportunity/low displacement risk areas.

b. Direct public investment to stabilize households, businesses and cultural communities in existing "high displacement risk/low opportunity" areas and create more opportunity for the people living there.

It would also be very helpful if you would identify specific strategies and ordinances that could directly mitigate displacement; for example, required one-for-one or even greater replacement of affordable housing, mandatory set-asides for affordable housing, and measures to increase the likelihood that locally-owned, small businesses could continue to thrive in areas where development is occurring.

Thank you for prioritizing race and social justice in your analysis of the Comprehensive Plan. As the foundational document that sets the Vision, Goals and Policies for how our City will grow, it is critical that we use Seattle 2035 to set policy for a more equitable future.

Sincerely,

Councilmember Mike O'Brien, PLUS Committee Chair

Councilmember Tim Burgess, PLUS Committee Vice-Chair

Councilmember Nick Licata, PLUS Committee member