City of Seattle
Seattle Planning Commission

August 2 2022

Rico Quirindongo, Acting Director
Office of Planning and Community Development

via e-mail

Re: Seattle Comprehensive Plan Environmental Impact Statement Scoping Comment Letter

The Seattle Planning Commission is pleased to provide our feedback as part of the scoping process for the Environmental Impact Statement (EIS) being prepared by the Office of Planning and Community Development (OPCD) as part of the State Environmental Policy Act (SEPA) review for the 2024 major update to the City of Seattle Comprehensive Plan. As stewards of the Comprehensive Plan, we are tracking this major update closely and will be weighing in throughout the SEPA and update processes. We appreciate the OPCD staff's efforts in preparing the draft alternatives and their willingness to regularly provide information and briefings to the Commission to keep us informed on the major update.

The 2024 major update to the Comprehensive Plan is an opportunity for the City to re-examine the urban village growth strategy, which has shaped growth in Seattle since 1994. The strategy achieved its goal of directing a majority of growth to the city's resource-dense urban centers and villages, however, the strategy also perpetuated historical patterns of inequitable investment and led to limited housing options for low-income households. The 2024 major update is a chance to adopt a growth strategy that better aligns with the City's values of equity and centering communities. As the City begins a process of forming a new 20-year plan for Seattle, the Commission hopes OPCD will hold the following intentions to help guide their work (as detailed in our letter on overarching themes for the major update):

- Commit to utilizing anti-racist practices to guide the update process and to develop anti-racist outcomes throughout the Plan's goals and policies.
- Increase access to the essential resources and services that make neighborhoods healthy, livable, and walkable.
- Advance a sustainable quality of life for current and future generations.

The Commission looks forward to a city-wide conversation on shaping the next 20 years for Seattle. The Commission believes the following recommendations will help ensure the EIS process analyzes a wide range of scenarios for how the city could grow and provides adequate information for the major update process.

Criteria for shaping the alternatives and analysis
  I.   *Analyze both displacement risk and anti-displacement policy potential.*

We appreciate OPCD's intention to include an analysis of displacement impacts for each alternative in the EIS and to direct higher levels of growth in areas of lower displacement risk while increasing housing choices in areas of higher risk. As the Commission noted in our Anti-Displacement Issue Brief, anti-displacement policies

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that aim to protect vulnerable communities will need to be paired with growth city-wide to provide for a more equitable pattern of growth than the Urban Village strategy created.[1] Additionally, investments can come in different forms, such as Real Estate development or community capacity-building, and the Comprehensive Plan will need to balance those resources carefully to support growth while preventing displacement. We recommend that the EIS clearly quantify displacement risks, evaluate how anti-displacement policies could reduce those risks, and identify under which alternatives the strategies could be most effective.

II. *Consider the equity of investments in infrastructure and access.*

The proposed alternatives are largely based on expanding upon the existing urban village growth strategy and continuing to focus growth in areas where the city has invested in infrastructure and service delivery. While there is logic to focusing growth near existing resources to take advantage of infrastructure investments, the City needs to be conscious of how this approach could perpetuate existing patterns of inequity even as it seeks to expand growth and access overall. The Focused and Corridors alternatives base growth around existing transportation investments which have a long history of harm for Black, Indigenous, and People of Color (BIPOC) communities, and contributed to displacement and negative environmental health impacts. The EIS analysis should address the "chicken or the egg" tension of basing growth on existing services, especially transportation, and tie any growth strategies based on existing services to a careful analysis of equitable access and distribution to avoid exacerbating patterns of harm.

III. *Balance housing growth with commercial and essential services growth*

OPCD's scoping materials note that some expansion of commercial space and at-home businesses is expected with each growth alternative but the details of where and how much non-residential growth will be allowed in future land use is not developed at this stage. Ensuring that access to services grows in step with housing and population growth will be an important way to improve equity in livability across the city. The Commission recommends studying the appropriate balance of housing growth with the growth of access to shops and services under each alternative in the EIS.

One recommended consideration for determining the appropriate balance of commercial and services growth along with housing growth is the ability for communities to access their essential daily needs without getting in the car. Increasing the availability of these services can promote walking, rolling, and transit use and help move Seattle closer to climate goals and a higher standard of livability for all. The proposed amendment to the Comprehensive Plan titled Essential Daily Needs submitted for consideration in the 2022-2023 annual docketing process provides several specific ways the Comprehensive Plan could be adjusted to facilitate these changes.[2] The EIS should study the ability for each alternative to ensure all households can reach essential services and amenities in 15 minutes or less without a personal vehicle.

IV. *Assign a range of housing growth targets to the alternatives that prepare for a variety of population growth scenarios.*

Under the no action alternative, the City is required to plan to accommodate a minimum of 80,000 new housing units over 20 years, based on growth projections from Washington State. During the last major update, the growth projections from the State proved to be under-projections and Seattle surpassed the total 20-year growth targets in only 10 years. The Commission recommends planning for growth well above the State projections. Alternatives should at least account for the existing housing deficit in addition to the

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[1] Seattle Planning Commission, 2022. Addressing Displacement in Seattle's Comprehensive Plan. https://www.seattle.gov/documents/Departments/SeattlePlanningCommission/ComprehensivePlan/SPC_Anti-displacement_Issue_Brief_March2022_Web.pdf

[2] Essential Daily Needs Comprehensive Plan Amendment Application 2022-2023. http://clerk.seattle.gov/%7Ecfpics/cf_322316_1.pdf

base growth targets. The Combined alternative should evaluate the capacity to accommodate an upper-end growth estimate well above projections to provide broad bookends to the study.

In addition to studying a broader range of projected growth, the EIS should consider whether each alternative not only provides enough new units of housing, but also adequate housing choices based on projected needs for low-income households and for growing populations such as the elderly, multigenerational households, or first-time homeowners. The housing choices studied should include a higher number of homeownership opportunities than the current growth strategy and opportunities for additional models of ownership such as Community Land Trusts and Limited Equity Cooperatives. The analysis should explore the types and sizes of buildings that could be produced, and the range of affordability needs that would be met under each alternative.

> *V.   Expand the Broad and Combined alternatives to study higher density in more areas.*

In the Broad and Combined alternatives, a broad upzone to allow three or four units per lot in all Neighborhood Residential areas may not achieve the desired level of housing growth. Seattle currently allows three units in Neighborhood Residential zones through the ability to build Accessory Dwelling Units (ADUs), yet the growth of housing through this path remains limited. If three- or four-unit projects do not create enough of an incentive for developers, they will continue to build large single-family homes instead. Early results from broad upzoning in Minneapolis and Portland indicate that in tight markets like Seattle, developers are not building housing with two, three, or even four units despite new zoning because the projects are not cost-effective.[3] Consider studying the allowance of projects with up to ten units in all Neighborhood Residential zones in the Broad and Combined alternatives.

> *VI.   Include considerations for equitable access in the selection criteria for new urban villages and small nodes in the Focused and Combined alternatives.*

To properly study the impacts of the Focused and Combined alternatives in the EIS, the City will need to identify specific locations for potential new or expanded urban villages and small neighborhood nodes to include in the analysis. Criteria for selecting locations for new growth should consider displacement risk, environmental justice, and equitable access to essential daily needs and services. The analysis of this growth model should assess whether the strategy can fill gaps in current access to daily amenities while being sensitive to displacement risk and neighborhood context.

> *VII.   Clarify and Define Concepts*

Both the Focused and Corridors alternatives intend to increase housing options near "amenities." While the Commission supports the goal of increasing access to daily needs and improving walkability and livability through this strategy, terms such as amenities, services, and daily needs are vague and can be interpreted in many ways. What do communities consider essential daily needs? Can the plan provide the flexibility to accommodate different needs for different communities? The Commission recommends that the City further define the term amenities through community engagement to clarify the types of amenities and services to study in the EIS.

The Commission also recommends further defining the transit corridor that the Corridors and Combined alternatives will study. The Corridors alternative intends to study increased housing options in corridors "near frequent transit and amenities." To make the most of transit infrastructure investments and to increase the number of households served, the Commission recommends using a broad definition. For

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[3] Beyer, Scott. "America's Upzoning Bills Are Already Creating More Housing." Catalyst, March 1, 2022. https://catalyst.independent.org/2022/02/28/americas-upzoning-housing/.

example, the City could study a scenario in the Corridors alternative that defines "near frequent transit" as all areas covered by the [Frequent Transit Service map](#).

Environmental Analysis Considerations

    I.   Assess the impact of each alternative on public health outcomes

Past growth patterns in Seattle have often placed concentrations of health hazards, such as highways and industrial uses, in BIPOC communities or areas with low-income households while also depriving these communities of healthy amenities such as parks and trees. Over time, the unhealthy environment causes negative health outcomes such as higher rates of asthma in children and a shorter lifespan overall.[4] Seattle's new growth strategy should not only seek to prevent further harm, but also to reverse past negative patterns and improve outcomes for disadvantaged groups. For each alternative, the EIS should ask: Will the alternative reduce racial and socioeconomic inequities in the built environment such as exposure to pollution and excessive heat or access to open space? Can the growth model promote improved health outcomes for disadvantaged groups, or does it perpetuate existing patterns? The EIS must provide enough information to understand how the growth strategy ultimately selected for the major update will impact the long-term health outcomes for all groups.

In the draft Equity and Climate Change Performance Metrics document created by OPCD to complement the EIS scoping information, Objective 6 covers reducing exposure to various types of pollution. The metrics for this objective focus on populations that live near pollution sources. The Commission recommends that the City update these metrics to consider both those living *and working* in high exposure areas.

    II.   Analyze climate change impacts and considerations for each alternative

The growth strategy selected for the Comprehensive Plan major update aims to guide growth for the next 20 years and the changes made to the built environment as a result of the plan will last much longer. The Plan must consider how the natural environment will change within the lifespan of the plan and the growth the plan fosters. The EIS should consider the following factors for each alternative:

- Identify the impact of new growth in areas at risk of damage from seismic activity or regular flooding in 50-100 years due to sea level rise and more frequent and severe rainfall.
- Identify the impacts of new growth patterns on resiliency of neighborhoods - will new areas of additional services support long-term resiliency of communities? Can the City increase access to cooling centers and outdoor spaces? Can the City increase density citywide while maintaining and increasing the tree canopy? Will the proposed growth alternatives address the vulnerabilities caused by current and past racial inequities?
- Explore the impacts of the growth alternatives on Seattle's climate goals – utilize models for how each strategy can support Seattle's goals of reducing single occupancy vehicle use, improve the sustainability of the built environment, and help reduce carbon emissions.

Communication Plan & Methods
Key to the success of the Comprehensive Plan is input and support from communities across Seattle on the vision for the future of the city. The EIS process is complicated and requires technical and detailed analysis to help weigh the impacts of each alternative. The Commission would like to offer the following suggestions for making the EIS an approachable part of the overall Comprehensive Plan major update project.

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[4] Lane, Haley M., et al. "Historical Redlining Is Associated with Present-Day Air Pollution Disparities in U.S. Cities." *Environmental Science & Technology Letters*, vol. 9, no. 4, Apr. 2022, pp. 345–50. DOI.org (Crossref), https://doi.org/10.1021/acs.estlett.1c01012.

- Clearly explain the role of the EIS compared to the role of the final plan to the public. The goal of the EIS is to study a full range of possibilities to understand the impacts of different scenarios. Clarify that the alternatives act as a menu of options to pick and choose components of to include in the final plan. The final preferred alternative will likely be a combination of the alternatives studied for the EIS, so it is important to ensure enough information is gathered on each alternative to help support well-informed choices later in the process.

- Present alternatives and impacts using a people-centered framework. For example, a guide by the Frameworks Institute shares ideas for how to discuss changes to land use and housing options in a way that helps people think about how changes will impact their neighbors and their quality of life rather than focusing on building size or zoning.

- Use visualizations to clarify the form of changes expected for each alternative. Growth strategies and land use changes can be hard to understand through text descriptions and abstract ideas. A variety of visual aids such as maps, charts, photos, and drawings can help communities understand the ideas and analysis explored in the EIS process, allowing for more informed feedback.

  Additionally, the City must be thoughtful in the images used to portray possible new building types, as the examples shared at this stage of the process can influence the vision carried forward into the Comprehensive Plan. For example, the Commission has concerns about the images of duplexes shared in the Place Types graphic included in the EIS Scoping StoryMap.[5] Designs that lift housing entrances above the street level to accommodate parking should be avoided. The Commission has included a few examples in attachment A to show missing middle housing types that create a better relationship with the street.

- Address common fears about growth and displacement upfront. In recent conversations around growth and housing, such as during the development of the Housing Affordability and Livability Agenda (HALA) and the formation of Mandatory Housing Affordability (MHA) policy, the Commission heard many communities express concern about the potential for displacement with any form of growth within the City. For many communities, concerns are based on lived experience of displacement resulting from previous growth policies. The City will need to address these experiences and concerns and demonstrate what growth without displacement can look like for Seattle communities. A clear picture of policies that could align with the growth alternatives to reduce displacement risk should be available along with the Draft EIS and highlighted in outreach to communities.

- Compare the potential impacts of the action alternatives to the no action alternative to help demonstrate that not updating the growth strategy is not a benign, "no impact" option. The current growth pattern is unsustainable and unaffordable for many. The EIS should include a comparison of the tradeoffs between alternatives and what the tradeoffs might look like on the ground.

130th and 145th Street Station Areas

The Commission is pleased to see that the 130th and 145th Street station areas will be studied within the same EIS process as the Comprehensive Plan Major Update. We support studying the potential for additional growth throughout the station areas and hope that by studying the station areas concurrently with the Comprehensive Plan update, the areas may be designated as urban villages or neighborhood nodes more quickly than if studied through a separate process. These station areas provide a substantial opportunity for
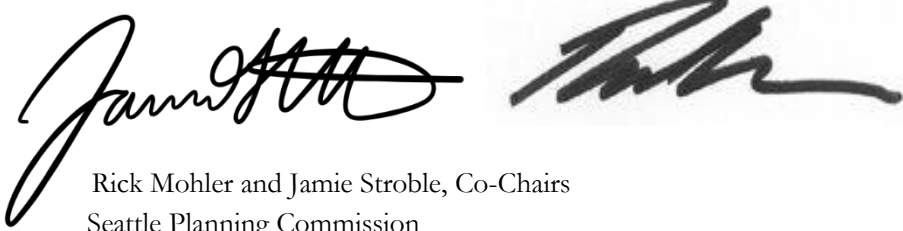
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[5] OPCD, 2022. One Seattle Plan Environmental Impact Statement Scoping. StoryMap.
https://storymaps.arcgis.com/stories/c4d30662e8c047b48ebec670b563df02#ref-n-lGgK2B

transit-oriented development, and it is important to study how they will fit into the overall growth strategy for the city.

In conclusion, we appreciate the hard work underway by City staff to complete a thoughtful and thorough EIS for the Comprehensive Plan Major Update. We hope our recommendations can build upon OPCD's existing work to create an EIS that will be a resource for Seattle communities as they provide their input for a shared vision of Seattle's future.

If you have any questions, please do not hesitate to contact either of us or our Executive Director, Vanessa Murdock, at vanessa.murdock@seattle.gov

Sincerely,

Rick Mohler and Jamie Stroble, Co-Chairs
Seattle Planning Commission

cc: Mayor Bruce Harrell
       Seattle City Council Members
       Michael Hubner, Office of Planning and Community Development

Attachment A: Additional Examples of Missing Middle Housing

Corner lot duplex in Oregon, Photo Credit: Sightline Institute

Modern duplex in Portland, Photo Credit: Sightline Institute

Triplex in Seattle, Photo Credit: NWMLS