

One Seattle Comprehensive Plan DEIS Comment Letter

The Seattle Planning Commission appreciates the opportunity to comment on the One Seattle Plan Draft Environmental Impact Statement (DEIS). The Seattle Planning Commission is a 16-member independent, advisory body. We provide guidance and recommendations to the City of Seattle's Mayor and City Council, as well as City departments, on planning goals, policies, and plans for the physical development of the City. We offer the following comments to help expand the environmental analysis and support the City in drafting a transformative Comprehensive Plan for Seattle. We have also provided comments on the Draft One Seattle Plan, which can be found here ([include link](#)).

First, we want to highlight some aspects of the DEIS that we appreciate. We value the inclusion of the detailed historical context of housing in Seattle. The Land Use section provides a summary of the history and impacts of housing segregation, redlining, and exclusionary zoning in Seattle. The Population, Housing, and Employment section describes how a long history of under-production of housing has led to a housing shortage and how decades of discriminatory housing policy created an inequitable housing environment in Seattle. In addition to a well-written narrative of these past harms, the DEIS provides evidence of housing disparities by race, ethnicity, and income present in Seattle's housing market today that the One Seattle Plan must work to reconcile. The inclusion of this racial equity and historical harms lens provides an important grounding for the work of this Comprehensive Plan and we are glad to see it included to shape the discussion around housing and land use in the plan.

We also appreciate the City's multi-faceted approach to studying displacement in the DEIS. We recognize that displacement is a complex mixture of many different forces and choices that can be challenging to study. We are pleased to see the DEIS explore an expanded concept of displacement by studying potential causes and impacts of physical, economic, and cultural displacement.

Areas for Additional Analysis

Overall Recommendations

- Provide a detailed explanation for how the areas and place types are defined and selected.

The Planning Commission would like to see a detailed explanation for how the areas and place types studied under each alternative are defined and selected. For example, it would be helpful to know more about how a corridor is defined. The Corridors alternative is described as focusing growth within a short walk of frequent transit, but more information is needed to understand the exact parameters. We would also like to learn more about the criteria used in the selection of Neighborhood Centers and how those analyzed were narrowed down from the original list of Neighborhood Centers in the EIS Scoping Report.

- Provide a more complete exploration of racial equity impacts throughout the DEIS.

The DEIS summary indicates that equity is one of the main objectives of the major update. Each section of the DEIS analysis includes an equity impact section, yet many of these discussions focus on income disparities and do not include an exploration of disparate impacts by race or ethnicity. While themes of racial equity are explored at a high level throughout the document, these themes are not carried through to the detailed analysis by alternative and by study area. The application of this lens is inconsistent throughout the document. For example, the Race and Social Equity Index is

mentioned in the Transportation chapter, but not in the Housing chapter. The DEIS should use the already established Race and Social Equity Index maintained by the City to conduct an equity analysis for each topic area that recognizes the complex and intersectional nature of equity concerns in Seattle.

- Include an analysis of Seattle's emergency preparedness and response for major earthquakes.

The EIS should include a study of how the updated Comprehensive Plan and the proposed growth strategy interact with the City's existing emergency preparedness and earthquake preparedness and response plans. It is not a matter of if, but a matter of when Seattle will experience a major earthquake and the EIS should analyze whether the City is prepared to handle such an emergency as Seattle plans to accommodate more people and changes to the built environment. Mitigation measures should be proposed if the analysis shows existing emergency plans fall short in preparing for growth.

- Inclusion of the 130th/145th Street Station Area in this larger EIS adds confusion.

The summary of potential impacts in the 130th Street and 145th Street station areas does not appear to provide a full analysis of these two new station areas. For example, it may be confusing to the public that impacts on these station areas are only studied for Alternatives 2 and 5, because it is assumed that the station area plans would not be applied under the other growth strategies. While the attempt at efficiency by including these in the DEIS is appreciated, the Planning Commission recommends completing these studies separately from the One Seattle EIS.

- Study the Planning Commission's recommendations (found [here](#)) on the draft One Seattle Plan, specifically those related to Growth Strategy, Land Use, Housing, Transportation and Climate and Environment in the Final EIS

The Commission requests the study of recommendations, when not addressed in the DEIS, in the Final EIS to assist decision makers in determining the best path forward in the City's plan for sustainable and equitable growth. This includes analyzing Accessory Dwelling Units as a unique housing type not likely to be fully built out across the city in all areas and providing a housing option for a select number of people/households.

Air Quality and GHG Emissions

- Study the impacts of locating sensitive uses near additional high-volume traffic roadways beyond the freeways.

We appreciate that the DEIS provides a detailed explanation of the criteria pollutants studied and their potential impacts, such as how PM_{2.5} can increase the risk of cardiovascular and respiratory problems. The DEIS also notes the risks associated with locating sensitive uses (residential, daycare, schools, etc.) next to major roadways and rail lines. Due to these risks, the DEIS shows what a 1000-foot buffer around freeways through the City would look like and what uses are currently in these buffer areas. The DEIS does not, however, discuss the potential air quality impacts of large arterials like Aurora Ave N or MLK Way S, which also move large volumes of cars through the city.

Additionally, the DEIS does not draw a connection between the impacts of locating sensitive uses such as housing along roadways and the Corridors strategy in Alternative 4, which would focus housing growth along such roads.

The land use decisions made today can have long-term impacts for the health of future Seattle residents. Particularly for uses such as housing and schools, which require large amounts of land, can be challenging to site through the permitting and building process, and will likely be used for the next 50 to 100 years. The City should study the impacts on sensitive uses near other high-capacity roadways and arterials beyond just the freeways, especially if policy will be developed to apply the mitigation measures identified in the DEIS, such as additional ventilation or air purification requirements, near studied pollution sources.

Land Use Patterns & Urban Form

The Planning Commission appreciates inclusion of a thorough summary of the history and impacts of housing segregation, redlining, and exclusionary zoning in Seattle. This section provides important background and context for the analysis of impacts and proposed mitigation.

- Provide more detail and context on negative land use impacts and the consequences of those impacts.

The land use impacts analysis emphasizes the following potential negative impacts:

- Increased frequency of areas with mixing of uses and heights.
- Different land use types locating close to one another.
- Land use patterns that contain mixes of land uses with differing levels of intensity.

This analysis is general across all the action alternatives and does not adequately describe the rationale for why these impacts are negative and what the consequences of these negative impacts are. Similarly, the impacts analysis states that redevelopment would create a potential for localized adverse compatibility issues and sharper transitions. This analysis is general across all the action alternatives and does not adequately identify the consequences of these negative impacts.

- Emphasize that negative impacts resulting from urban growth are expected and only temporary.

The DEIS repeatedly uses language describing the potential negative impacts of height, bulk, scale, and transitions that is likely to be of concern to residents in existing low-density neighborhoods. The mitigation analysis states that these impacts would be temporary as an expected characteristic of urban population and employment growth and will be resolved over time. To alleviate the concerns of neighboring residents, it should be emphasized that no significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under any of the alternatives.

- Highlight both positive and negative equity impacts.

The Planning Commission appreciates the inclusion of Equity and Climate Vulnerability Considerations in the impacts analysis for each of the alternatives. This section discloses both positive and negative equity issues for a range of populations. We applaud identification of increasingly negative impacts on people living along inhospitable arterials with unhealthy traffic

impacts, such as safety, air quality, and noise, in the Relationship to Social Wellbeing and Sociability section. We also appreciate the discussion of positive equity impacts related to increased density in the action alternatives, including more equitable impacts to housing choice, a more varied urban form, more opportunity for vibrant neighborhoods, and opportunities for more multifamily housing. Lastly, we appreciate the identification of the positive relationship between intensifying land use and opportunities for increasing active transportation. Increased density across all neighborhoods in Seattle would allow more people to live in walkable and bikeable communities with improved access to transit.

- Include additional mitigation measures in areas of the city subject to sea level rise.

Encouraging growth in areas subject to sea level rise, such as South Park, should be accompanied by policies committing to investments and building requirements in those parts of the city.

Population, Housing, and Employment

- Provide additional employment analysis related to the changing nature of work location post-pandemic.

The DEIS should do more to explore impacts and changes to work location and employment opportunity across alternatives. The DEIS assumes the pattern of job growth in Seattle will remain largely the same as current patterns regardless of the growth strategy selected. The DEIS does not explain why this assumption is made nor does it consider the changing nature of work location due to the increase in remote work and the shifting climate of work post-pandemic. We recommend the City provide further analysis of how different land use configurations in the alternatives may influence job location and acknowledge that employer location may differ from worker location for some employees, creating different travel patterns and consumer patterns within and across neighborhoods.

- Study how each alternative may support or hinder the implementation of anti-displacement policies in the draft plan beyond just Mandatory Housing Affordability (MHA).

The DEIS provides a strong exploration of the historical context of housing in Seattle and displacement pressures in the city and we appreciate the inclusion of this context. The DEIS also attempts to break down and explain displacement occurring in the city through exploration of physical, economic, and cultural displacement but lacks enough data to provide a clear picture of how each alternative would impact displacement in high-risk areas of the city. We recognize that displacement is a complex topic that is challenging to study, and we think the following suggestion could help provide a more complete picture.

To provide further analysis of how the One Seattle Plan can impact displacement, the EIS should study how each alternative growth strategy may support or hinder the implementation of anti-displacement policies beyond just MHA. For example, the EIS could provide an analysis of the displacement strategies explored in the draft plan which include allowing only three units in Neighborhood Residential zones in high displacement risk areas rather than four units in low-risk areas. The EIS could also include a discussion of how other efforts might be impacted, like projects

supported by the City's Equitable Development Initiative or community land trusts operating in the City. Providing a direct comparison between each alternative and the Displacement Risk Index would also help strengthen this analysis.

- Study the impact of each alternative on housing affordability and supply more deeply.

The current housing analysis in the DEIS looks at housing affordability through a generalized, high-level discussion. The EIS should go deeper and explore the potential AMI levels served by the types of housing allowed under each alternative. The analysis could also discuss the economic feasibility of building different housing types that the plan hopes to encourage, such as middle housing and more affordable ownership options, under each alternative.

The EIS should also clearly identify how the supply of housing will be impacted if the housing target for each alternative is achieved. The analysis should consider what types of housing can be built under each alternative and how that aligns with the housing needs identified in Exhibit 3.7-4 Net New Housing Units and Emergency Housing Needed, 2019-2044. For example, looking at Alternative 1, if you add up the housing units needed for all categories of housing serving households at 80 percent AMI and below, the need is over 50,000 units. How does the supply of housing expected under Alternative 1 align with these stated needs for low-income housing units? The EIS should study how the supply of housing units anticipated in each alternative stacks up against the stated housing need at each income level. Additionally, how do policies proposed in the draft plan, such as only allowing up to three housing units per lot in high-displacement risk areas, impact the anticipated supply of housing?

- Include a discussion of how each alternative impacts housing choice in areas of high opportunity.

The EIS should include an analysis of housing choice in areas of high opportunity for each alternative. The City previously created an Access to Opportunity Index that explores how different areas of the city compare in terms of access to resources such as high-performing schools, jobs, parks, and stores with fresh produce. The DEIS discusses the legacy of harm created by past planning policies that prevented low-income households and households of color from living in certain areas of the city. The EIS should have a more nuanced discussion of where each alternative increases housing options in the city and to what extent the alternatives address that legacy of harm. The analysis should consider where each alternative creates new housing relative to the Access to Opportunity Index and who will be able to afford that housing. The DEIS should examine how the alternatives compare in the effort to change existing patterns of racially disparate housing outcomes in Seattle's housing market.

Transportation

- Describe the relationship between transportation analysis for this DEIS and the Seattle Transportation Plan.

The Planning Commission would like to better understand the relationship between the transportation impact analysis conducted for the One Seattle Plan DEIS and similar analysis conducted for the Seattle Transportation Plan (STP). We understand that the STP used the One Seattle Plan's Alternative 5 growth strategy for its baseline to determine transportation impacts.

However, it is our understanding that the One Seattle Plan used existing land use conditions as the baseline for its transportation impact analysis.

The DEIS states that the action alternatives are expected to result in higher vehicle miles traveled (VMT) than the No Action Alternative due to increased growth levels. The impact analysis also states that all the action alternatives are expected to have significant impacts to transit passenger load, corridor travel time, intersection level of service in the NE 130th/NE 145th Street Subarea, and state facilities. The proposed mitigation measures include targeted transportation capacity improvements; bicycle, pedestrian, and freight connections; and demand management using policies, programs, and investments aimed at shifting travel to modes other than single occupant vehicles. While we are supportive of these mitigation measures, we would like more information on whether these mitigation measures are consistent with those proposed in the STP.

- Proposed mitigation measures should be inherent to development of a citywide transportation system.

The Planning Commission appreciates identification of specific negative impacts in the equity discussion, including the following:

- Underserved communities often face the highest effects of vehicle emissions.
- Freight traffic emissions or poor air quality due to proximity of housing to heavily congested roadways and freeways.
- Increased population in areas with low sidewalk connectivity.

We are very supportive of all the proposed mitigation measures, including pedestrian and bicycle system improvement, transit strategies, parking management, and safety strategies. These transportation programs and investments should be essential components of a citywide transportation system even in the absence of the perceived negative impacts of growth described in the DEIS.

- Provide more information on significant unavoidable adverse impacts to transit capacity.

The DEIS states that significant unavoidable adverse impacts to transit capacity are expected from the action alternatives. We would like more information on the potential magnitude of this impact and the consequences for regional transit agencies. These documented impacts could serve as an opportunity for our regional transit agencies to plan for significant expansion of capacity to meet the need.

- Results of the impact analysis should be presented in terms that are accessible to lay audiences.

The Planning Commission applauds the comprehensive nature of the detailed analysis of transportation impacts, but the results are presented in jargon and technical terms that could be difficult for lay audiences to understand. The language and overall communication of the analysis could be improved to be more easily digestible for comprehension by the public.

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.

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