

Rico Quirindongo, Seattle Office of Planning and Community Development
via e-mail

RE: Seattle Planning Commission comments on the new Growth Strategy and proposed zoning changes for the One Seattle Plan.

Dear Director Quirindongo,

As stewards of our city's Comprehensive Plan, the Seattle Planning Commission has actively followed the development of the One Seattle Plan. We last [commented](#) on the draft Plan in April of this year and we welcome the opportunity to comment on the proposed zoning changes released in mid-October to implement the Plan. This letter focuses on specifics of proposed Neighborhood Residential (NR) zoning changes and development standards and common themes across proposed Neighborhood Center zoning maps. Further comment on the Plan itself, including the new Growth Strategy, will follow in 2025 after the Mayor transmits his plan to the Seattle City Council and Council begins its review, deliberation, and approval of the Plan.

The Commission is pleased to see the inclusion of many changes in the proposed zoning update that will improve livability and development outcomes for a large portion of the city. In particular, we appreciate the following:

- The increase in maximum floor area ratio (FAR) in Neighborhood Residential zones up to 1.2, which increases density, making housing for larger households more feasible.
- The inclusion of the new Neighborhood Centers place type to increase residential density near existing transit and services in more areas of the city.
- The creation of a stacked flats bonus to encourage this more affordable and accessible housing type.
- The improvements to the affordable housing bonus based on input from affordable housing developers to increase the feasibility of affordable housing projects in Neighborhood Residential zones.
- The helpful materials produced by the Office of Planning and Community Development (OPCD) shared online and at open houses to show the details of proposed zoning changes.

Overarching Comments on the Implementation of the One Seattle Plan

While reviewing the preferred Growth Strategy and proposed zoning changes to implement the One Seattle Plan, we identified concerns related to the Growth Strategy and implementation of goals in the Plan. We offer the following overarching comments to support implementation of the Plan.

- The Commission is disappointed that this Plan does not reach much beyond the minimum changes required by state mandates. Seattle typically leads the state in progressive ideas and implementation of policies but, in this comprehensive planning cycle, other jurisdictions have pushed further in areas such as promoting new housing and eliminating parking minimums. We would like to see the Plan and its implementation through zoning be bolder as appropriate for a 20-year horizon.
- The Commission would like to see even more Neighborhood Centers added and for the proposed Neighborhood Centers to be slightly larger. The Plan does not adequately increase the ability of all residents in Seattle to live in the neighborhood of their choice. Many renters, low-income households, and people with disabilities will still be unable to access housing in many of Seattle’s neighborhoods near amenities like parks, schools, and low-traffic, slower-speed tree-lined streets. In our comments on Neighborhood Centers below, we offer suggestions for making affordable development in these areas more feasible, and we would like to see this type of development allowed in more neighborhoods throughout the city.
- The City’s anti-displacement strategies are insufficient to deal with potential outcomes from the proposed level of change. As noted in our previous paper on [displacement](#), increases to density without sufficient anti-displacement strategies can lead to a less socially and economically diverse city as vulnerable households, cultural anchors, and culturally relevant businesses and non-profit organizations are pushed out due to redevelopment and rising costs. Strategies included with the Plan thus far are largely pre-existing from before the Comprehensive Plan update and were not sufficient before these proposed zoning changes – displacement has already occurred in Seattle and will continue without stronger efforts by the City.
- The Plan should look further ahead and strategically seed growth for future development patterns that benefit the city. For example, the Plan should respond to the following questions:
 - How can the City lay the groundwork for adding more Neighborhood Centers in the future?
 - Can we get the ball rolling now for future centers that are built near our major parks and schools?
 - What about cultivating small centers along neighborhood greenways?

We want this Comprehensive Plan to create a framework for growth where uses are integrated, and people can have access to walkable services and amenities, regardless of where they live in the city. We should not be constrained by existing patterns of commercial development, parcel sizes and lot lines, or transit access. We encourage the City to think beyond existing centers and corridors shaped by previous exclusionary and car-centric zoning. We should zone for the land use pattern we hope to see in the future.

Draft Zoning and Design Standards Recommendations

Accessibility – Seattle needs to encourage additional development of accessible units to support people with physical disabilities and Seattle’s aging population. We support zoning to promote more accessible housing types like stacked flats that provide single floor living, or buildings above five stories with elevators, in more areas in the city. Low Rise 3 (LR3) zones and Mid Rise 1 (MR1) zones, which allow buildings with five or six stories respectively, are particularly important and need to be included in more areas of the city. We are concerned about how little accessibility is coming up in the City’s planning and discussions during this process. Seattle should view Neighborhood Centers and transit corridors through universal design principles with the goal of creating accessible, multi-generational communities that support active mobility for people of all ages and abilities. The City should work toward more universal design, increased requirements for accessibility in building code, and additional zoning for five or more story multi-family buildings with elevators. Without such changes most homes will remain inaccessible and communities facing the greatest barriers will be unable to access the benefits of a 15-minute city.

Affordable Housing Bonus – The Commission appreciates the affordable housing bonus and suggests adding a similar bonus in Low Rise and Mid Rise zones to encourage more income-restricted affordable housing units and buildings in Neighborhood Centers.

Arterials/Frequent Transit Routes – The Commission supports an equitable buildout of neighborhoods throughout the city with appropriately dense zoning. We are concerned about the current proposal to concentrate multi-family housing — the primary housing type that the City projects to be affordable to low-income households — along arterials. This approach exacerbates health, safety, and livability impacts for people who live in the upzoned areas along arterials. We would like to see a balance between additional housing in proximity to transit and allowing for the choice to not have to live on loud, dangerous arterials with poor air quality, noise pollution, and vibrations from traffic. We support expanding the proposed upzones beyond one parcel on either side of an arterial to move further into the blocks away from the arterial. We recommend using a four-minute walk from the arterial to expand denser housing and commercial opportunities. This criterion has already been determined by the City to be an appropriate walking distance for establishing the baseline radius of Neighborhood Centers. The Commission supports upzoning within this four-minute walkshed to LR3 or above to encourage multi-family apartment buildings near transit, parks, schools and other amenities.

Connecting Centers – The Commission would like to see a clear plan for connections between proposed and existing centers. In some areas of the city, Regional Centers, Urban Centers, and Neighborhood Centers are close together with relatively small gaps of intervening

Neighborhood Residential zoning between them. An example of this is the gap between the new Tangletown Neighborhood Center and the existing Wallingford Urban Center. These gaps are a missed opportunity to create connected corridors of increased density and amenities between centers. The Commission recommends OPCD consider connecting centers that are within a few blocks of each other with denser zoning to LR3 or above, including MR1, along arterials.

Corner Stores – The Commission appreciates the inclusion of corner stores in the Comprehensive Plan update. Neighborhood-based commercial establishments are important contributors to economic development, small business incubation, and job creation. Small-scale commercial retail can be a significant component of future Neighborhood Centers and 15-minute cities. The Commission recommends building in more flexibility on locations and hours to the corner store proposal. As we recognize that these types of stores are already challenging to develop and keep in business, we would like to see OPCD make it easier to create small retail opportunities in more neighborhoods. The City should allow these businesses to decide what hours will work best for their community and address issues as they arise. A robust network of neighborhood-based retail will help improve convenient, walkable access to daily needs and services.

Design Standards and Land Use Code Specifics – The Commission has several recommendations regarding design standards and specifics within the Land Use Code.

- Include parcels with mapped Steep Slope Environmental Critical Areas in the proximity to frequent transit density bonus when no hazard exists. Facilitate the appeals process for man-made steep slopes as outlined in [Seattle Department of Constructions and Inspections \(SDCI\) Tip 327a](#), page 2. For example, a 5,000 square foot lot, with a small retaining wall could be mis-mapped as a steep slope, and as such would only be able to accommodate three homes, similar to today. Whole blocks where the street was cut through adjacent to the property could also result in mapped steep slopes. These sites with some steep slope area would automatically be excluded from the 2021 House Bill 1110 middle housing bonus, regardless of size or proximity to transit.
- Keep the existing formula for rounding up units per parcel. The draft code rounds everything down in both Neighborhood Residential and Low Rise zones, shaving off potential new homes across the city. A 4,999 square foot site, at a density of one unit to 1,250 square feet would only be allowed three units ([23.44.012.D.1 on page 37](#)).
- When counting unit density on a lot, exclude attached accessory dwelling units.
- Consider a more generous porch bonus.

Neighborhood Centers – The Commission recommends several changes to the criteria used to determine the boundaries of and zoning within Neighborhood Centers to improve the affordability and livability of future development.

- Expand Neighborhood Center boundaries to encompass a minimum radius of one-quarter mile – approximately a five-minute walk. The proposed centers are small and do not take full advantage of the potential for additional housing around existing services and transit stops.
- Increase the use of MR1 zoning in Neighborhood Centers to encourage buildings up to six stories, which will be more likely to achieve affordable, multi-family apartment buildings than LR zones. As stated in the draft [One Seattle Plan policy GS 5.3](#): "Zoning in Neighborhood Centers should generally allow buildings of 3- to 6-stories, especially 5 and 6 story residential buildings to encourage the development of apartments and condominiums." To meet this intent, more MR1 zoning should be designated in Neighborhood Centers.
- Focus MR1 zoning in the middle of Neighborhood Centers and along central corridors that are not currently zoned as Neighborhood Commercial.
- All remaining residential parcels in Neighborhood Centers should be zoned for LR3 to achieve more five-story buildings, that are the minimum threshold for feasible development of affordable and accessible multi-family apartment buildings under current development trends and based on findings in the City's draft land capacity analysis (pages 115-118). LR1 and LR2 zones do not produce density that is sufficiently affordable or accessible in Neighborhood Centers and should only exist outside of Neighborhood Centers.

Neighborhood Centers: Commercial Displacement – The Commission is also concerned about the balance between much needed growth near transit and services and the desire to prevent commercial and community displacement. A single business that acts as a third place in a Neighborhood Center can be an anchor for the entire neighborhood. We recommend the City ensure there is adequate capacity on nearby parcels zoned for commercial use to allow for businesses displaced during redevelopment to have a place to relocate. We suggest the following measures to help mitigate the displacement of existing businesses and naturally occurring affordable retail/commercial spaces in Neighborhood Centers as the areas grow.

- Slightly expand Neighborhood Commercial zoning to new parcels in these Neighborhood Centers to allow for new development that does not wipe out all existing commercial development. Pay particular attention to areas that have little to no commercial zoning nearby.
- Provide more MR1 zoning in place of LR zoning in Neighborhood Centers to allow more opportunity for ground level commercial space. As MR1 zones allow ground floor

commercial uses but do not require it, they allow the market to determine the right balance of commercial space for a neighborhood.

- Explore incentives or pilot programs in partnership with the Office of Economic Development to facilitate the development of appropriate open commercial spaces for businesses to relocate to during redevelopment.

Open Space – The Commission appreciates that new open space requirements in Neighborhood Residential zoning would result in more usable open space for residents. However, we would like to see more nuance around the open space requirement, as we are concerned that a 20 percent of lot area minimum may be overly restrictive. This Comprehensive Plan’s updated Neighborhood Residential zoning proposal is already balancing a lot of regulations on small parcels. We would be more comfortable with the minimum open space requirement if there were not also a parking requirement. Open space is a higher priority than parking for several reasons including protecting tree canopy, maintaining greenspace, and providing opportunities for residents to be outside. The City already has impervious surface limits and tree requirements in Neighborhood Residential zoning development standards. We encourage OPCD to rely on these existing regulations for open space within a parcel’s footprint.

Parking Requirements – As stated in OPCD’s Updating Neighborhood Residential Zoning summary, off-street parking requirements can increase the cost of housing, car usage, and greenhouse gas emissions. Parking adds an additional constraint for residential developers, which subsequently adds real costs to development and drives up housing prices. As stated above, the City should not prioritize parking over open space or options like stoops and balconies that can assist with building community. The Commission recommends a more integrated approach to parking that includes a complete removal of parking minimums everywhere and managing on-street parking better as off-street requirements are decreased. At a minimum, there should be more flexibility in options such as no parking requirements if developers exceed open space requirements or include income-restricted units.

Seattle Transportation Plan Integration – The Commission sees an opportunity for the Comprehensive Plan to integrate with the Seattle Transportation Plan and ensure consistency between the plans. Different street types can serve as logical connections between centers and include appropriate land uses between these centers. The Commission recommends referencing the various street types identified in the Seattle Transportation Plan – see the [Part II Technical Report \(PDF page 20\)](#) – to inform land use through zoning. Below are some examples of this approach:

- **Main Streets/Destination Streets** should be the hearts of Urban Centers and Neighborhood Centers. These street types already largely align well with the proposed zoning that define the commercial cores of Urban Centers and Neighborhood Centers.
- Frequent transit streets could be useful for identifying **Connector Streets**.
- **Strolling Streets** as well as the **non-arterial bike network** (i.e., neighborhood greenways) connecting to parks and schools could present opportunities for more low-rise zoning.

Social Housing Developer – The Commission encourages OPCD to work with the Social Housing Developer to develop a pilot program that facilitates the economic feasibility of social housing development (accommodating a mix of incomes up to 120 percent Area Median Income (AMI)) within Neighborhood Residential zones.

Stacked Flats Bonus – As stated earlier in this letter, the Commission supports the creation of a stacked flats bonus to encourage this more affordable and accessible housing type. However, we recommend removing the proposed 6,000 square foot lot limitation and allow for the 1.4 FAR bonus throughout all Neighborhood Residential zones, not just on lots over 6,000 square feet within one-quarter mile of frequent transit. Reducing these requirements will allow for broader development of this building type in more neighborhoods throughout the city.

The Planning Commission appreciates the work of City staff, and particularly those in the Office of Planning and Community Development, for their ongoing work in developing this important update to the City's Comprehensive Plan. This update to the Plan is our critical opportunity to strategically seed growth for future development patterns to benefit the city. The Commission looks forward to the opportunity to review and provide comments on the final recommended One Seattle Comprehensive Plan.

Thank you for your consideration of our comments and recommendations. Please do not hesitate to contact us or our Executive Director, Vanessa Murdock, at vanessa.murdock@seattle.gov should you have any questions.

Sincerely,
McCaella Daffern and Jamie Stroble
Co-Chairs, Seattle Planning Commission