



May 4, 2024

Re: 2024 Draft Comprehensive Plan and Draft Environmental Impact Statement

Mayor Harrell, Deputy Mayor Washington, Deputy Mayor Emery, Deputy Director Valles, Chief Operating Officer Lowe, Director Quirindongo, Director Torgelson, and Councilmembers,

AIA Seattle is a membership organization with more than 2600 members with a vision for the City of Seattle as a 15-minute city, a livable city with a variety of housing options near many types of amenities, retail cores, and transit that is accessible to everyone, where everything residents need can be reached within 15 minutes by walking, rolling, or public transit.

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AIA Seattle members appreciate the time, energy, and thought members of City of Seattle staff and elected officials have put into the Draft Comprehensive Plan and the Draft Environmental Impact Statement. Plans for the City of Seattle should include:

- 15-minute neighborhoods that provide housing diversity
- abundance of housing
- focus on equity
- mobility opportunities
- repurposing the right of way
- priority for growth strategies that reduce climate impacts
- urban design and placemaking which support and encourage thriving communities

Please find attached recommendations for the 2024 Draft Comprehensive Plan and 2024 Draft Environmental Impact Statement for an equitable, resilient, thriving City of Seattle.

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The City of Seattle should be a livable city with a variety of housing options near many types of amenities, retail cores, and transit that is accessible to everyone, where everything residents need can be reached within 15 minutes by walking, rolling, or public transit.

The following recommendations are based on the 2024 Draft One Seattle Plan and 2024 Draft Environmental Impact Statement (DEIS). The future of Seattle relies on a more robust plan than the current draft versions to truly provide a roadmap for where and how our city will grow and invest in communities over the next 20 years and beyond.

Urban Centers/ Regional Centers

Recommendations:

- Expand the number of Urban Centers around parks, open spaces and waterfront areas, even if they are on the periphery of the city to right the wrong of excluding housing options near parks and public schools.
- Maintain OPCD's proposed expansions of existing Urban Centers and include additional expansions to take advantage of the walk/roll accessible area¹ of Linkat places such as Columbia City and University of Washington Stations
- Create additional Urban Centers at all future Link Stations locations including NE 145, Interbay, and North Delridge.
- Add Urban Centers near our coastlines and adjacent to open spaces such as Discovery and Magnuson Parks.
- Maximize the potential for housing and allow high rise zoning in all Regional Centers and within Urban Centers adjacent to Link Stations.
- Allow eight story residential construction on the majority of land within all Urban Centers.

AIA Seattle supports the expansion of the Urban Centers and the naming of Ballard as a Regional Center. AIA Seattle recommends expanding the number of Urban Centers to other areas around parks, open spaces and waterfront areas, even if they are on the periphery of the city. Expanding the number of Urban Centers would create more livable neighborhoods and reduce reliance on cars, which will allow the City to achieve its goal of reducing carbon emissions by 58% by 2030 as outlined in the City's 2020 [GHG Inventory](#).

¹ Note: 'Walkshed' is a commonly used term which does not recognize accessibility by means other than walking. Throughout this document are references to walking/rolling in place of the term 'walkshed'.

Neighborhood Centers

Recommendations:

- Include in the final Comprehensive Plan all 42 potential areas studied in the DEIS as Neighborhood Centers.
- In the final EIS, study the addition of Neighborhood Centers within $\frac{3}{4}$ of a mile of every parcel not already served by more dense areas such Corridors, Urban Centers, or Regional Centers.
- Consider Neighborhood Centers within $\frac{1}{2}$ mile of each other as a single Neighborhood Center.
- Increase the maximum height limit in Neighborhood Centers to be no less than five stories (the maximum Seattle allows for solely wood construction) with a bonus of three additional stories for projects that are deemed affordable by the City.

AIA Seattle strongly supports the idea of Neighborhood Centers as a significant and energetic improvement to Seattle as a city. Neighborhood Centers have already formed organically, and with intentionality added by the Comprehensive plan could become more vibrant, walkable and rollable areas that everyone can enjoy. Neighborhood Centers will allow Seattleites to be able to access their daily needs within a short walk/roll of their home, in line with the City's stated goals of achieving a 15-Minute City.

The current plan has only 24 Neighborhood Centers indicated. The areas studied during scoping and removed from the Draft Comprehensive Plan are more affluent areas, and counter to the city's own statement that the plan approach addresses past exclusionary policies and practices and the need to expand housing and neighborhood access. AIA Seattle recommends all 42 potential areas originally included during scoping be studied in the DEIS and be included in the final Comp Plan.

In addition, AIA Seattle recommends studying in the final EIS the addition of a Neighborhood Center within $\frac{3}{4}$ of a mile of every parcel not already served by denser areas such as Corridors, Urban Centers, or Regional Centers. Additional Centers could be located around large open spaces, parks and other existing public amenities like libraries and community centers.

Neighborhood Centers could become the main street of a neighborhood by increasing the proposed zoning area from 800' radius to $\frac{1}{4}$ mile radius. 800 feet is too small an area for this type of development and future use of these areas.

Neighborhood Centers within $\frac{1}{2}$ mile of each other should be considered as a single Neighborhood Center to create areas that will attract locals and visitors to shop and support businesses. Neighborhood Centers in close proximity to each other and

considered to be a single Neighborhood Center could become an entrenched part of their community and exist for many decades to come.

In that spirit, AIA Seattle recommends the maximum height limit in Neighborhood Centers be no less than five stories (the maximum Seattle allows for solely wood construction) with a bonus of three additional stories for projects that are deemed affordable by the City. Measures to mitigate displacement of existing small businesses should be considered in zoning and development standards for Neighborhood Centers. Refer to the work of Africatown Community Land Trust and their work with the Liberty Bank Building in the Central District for example policies.

Urban Neighborhoods/Neighborhood Residential

Recommendations:

- Allow flexibility for/incentivize more housing types such as stacked flats instead of creating rules that only incentivize townhouses.
- Remove Floor Area Ratio (FAR) as a limiting factor in the draft EIS and as part of the Comprehensive Plan.
 - if FAR must remain, the FAR requirement should at least meet the Department of Commerce guidelines (1.2 for 4 units) and preferably higher; allowed FAR should increase as the number of units increases.
 - incentivize retention of existing houses by not counting them towards lot coverage/ FAR/ unit count.
- Incentivize more units with lot coverage—for example: allow 35% lot coverage for two units or less, 50% lot coverage for three units, and 65% lot coverage for four or more units.
- Remove unit limits.
 - Allow AADUs without counting AADUs towards the number of units on a parcel, so long as the AADUs are not pedunculated.
- Allow subdivision of parcels by right so homeowners can stay in their homes and sell off parcels.
- Eliminate parking mandates while providing on street EV charging.
- Study allowing four stories in the Final EIS to maximize flexibility.

AIA Seattle supports the concept of Urban Neighborhoods. The Draft Comprehensive Plan limits possibilities and flexibility in what is stated and implied in the plan. Though the Washington State Department of Commerce created a guide for how cities could modify their residential zones, such guidelines are a baseline, not a ceiling. Not every lot will be feasible to develop. Not every lot will be available in the marketplace to develop. Infill will happen incrementally over time. Flexibility now and in the future is key so that those parcels that do become available for development are able to provide needed infill housing instead of being limited for development. The Comprehensive Plan should not be based on what small builder developers construct right now under existing conditions and instead

should maximize what is possible so that other unit types such as stacked flats and others can be constructed in the future.

AIA Seattle recommends removing Floor Area Ratio (FAR) in Urban Neighborhoods from the Comprehensive Plan. Spokane has already implemented changes through zoning to maximize flexibility for parcels that provide infill housing. Spokane does not use the concept of density limits or FAR and instead controls height (35' maximum) and lot coverage (65% maximum). These changes would allow for more projects to be feasible in more areas of the city, increasing both availability of homes for purchase as well as housing options that can serve residents in all parts of the city.

Corner Lots

Recommendation:

- **Expand corner store concept to allow greater flexibility of uses for corner lots and “through lots” to encourage development.**

AIA Seattle supports the development of corner stores included in the Draft Comprehensive Plan. AIA Seattle recommends expanding the corner store concept to include corner lots and “through lots”, those lots that have a street on each end of them. Additional flexibility would allow the following:

- Variety of use, not just retail or food restaurant, including clinics, live-work, office, community space, daycare.
- Increased maximum building height for the interior 12'-0" to 14'-0" height necessary for ground level retail.
- Setback flexibility to include zero lot line structures.
- Simplified and reduced tree, stormwater, and utility requirements to incentivize development.
- Subdivision by right for corner lot and through-lot parcels.
- Taller heights and greater lot coverage/FAR by right even if only including housing.
- Corner lot use of adjacent small open spaces such as parklets.

Corridors

Recommendations:

- **Expand the definition of Corridors as communicated in the draft plan with an increased walk/roll area, increased allowed height, elimination of FAR or at least increase FAR requirements to the minimum embodied in the TOD bills HB 1517/SB 5466.**
- **Leverage the right of way for multi-modal transportation and consider future policies to incentivize land owners to participate in such systems.**
- **Create affordable housing development bonuses in Corridor areas.**

AIA Seattle supports the Draft Comprehensive Plan proposal to increase density along corridors. The area for development should go beyond Corridors as communicated in the Draft Comprehensive Plan, with an increased walk/roll area to allow more dense housing to be built on the transit corridor and in adjacent areas. Commercial uses should be allowed on corridors to contribute to the 15-minute city concept and ultimately to connect Neighborhood Centers.

The allowed height should be increased to what was studied in the DEIS: 5 stories in residential zones and 7 stories in commercial/multifamily zones with flexibility of use over time. If FAR is a continuing requirement, AIA Seattle recommends increasing the FAR to the minimums beyond the EIS scoping document. See the requirements in the TOD bill (HB 1517/SB 5466) from the 2023 legislative session:

- FAR 6 within 1/4 mile of high-capacity transit + 50% FAR bonus for affordable housing (FAR 9)
- FAR 4 within 3/4 mile of high-capacity transit + 50% FAR bonus for affordable housing (FAR 6)

AIA Seattle also recommends creating affordable housing development bonuses in Corridor areas.

Conclusion

The above recommendations, if implemented into the final 2024 One Seattle Plan and 2024 Environmental Impact Statement, would provide a roadmap for the next 20 years for a livable city with a variety of housing options near many types of amenities, retail cores, and transit that is accessible to everyone, where everything residents need can be reached within 15 minutes by walking, rolling, or public transit.