



August 19, 2022

Dear Office of Planning and Community Development,

AIA Seattle is a membership organization with more than 2600 members with great care and concern for our communities, and specific interest in the Seattle Comprehensive Plan process. As architects and residents, we envision Seattle as a unique and vibrant place to live and work, as a tightly knit network of strong neighborhoods, and a place where access to opportunity, housing, and services are enjoyed by everyone.

Seattle is evolving as it grows, and the core question of the EIS alternatives should be how best to build the future city we want to live in. We face deep challenges with housing affordability, climate change and structural racism. The EIS alternatives must be bold to meet these challenges with transformational solutions, rather than incremental measures.

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AIA Seattle’s Comprehensive Plan Work Group has reviewed the proposed alternatives for EIS Scoping, and determined Alternative Five is the only viable option presented for study. Alternatives 1, 2, 3, and 4 (No Action, Focused, Broad, Corridor) are not adequate visions for a future Seattle, and not worthy of independent study in the EIS. Alternative 1 would continue the Urban Village Strategy which has been criticized by the City’s [Racial Equity Analysis](#) for perpetuating historical patterns of exclusionary zoning, underproducing housing, and causing displacement. Alternatives 2 and 3 share those flaws. Alternative 4 concentrates new households along hazardous arterials, rather than where frequent transit is more broadly available currently.

OPCD should study three EIS Alternatives which expand on Alternative 5. The Alternatives could be modeled in a variety of ways and should:

- Share six underlying principles
- Incorporate important variables
- Consider additional metrics to measure impacts

Principles of viable EIS Alternatives:

1. Encourage ‘15 Minute’ Neighborhoods
2. Provide Housing Diversity, Affordability and Abundance
3. Focus on Equity and Redressing Past Harms
4. Consider Mobility and Repurposing the Right of Way
5. Prioritize Growth Strategies that Reduce Climate Impacts
6. Champion Great Urban Design and Placemaking

Variables:

1. Range of regulatory flexibility
2. Housing types, locations, price range, feasibility
3. Focus on resident and visitor experience
4. Creation of new neighborhood nodes
5. Concentration on human health
6. Contrast approaches to address climate change

OPCD should establish three Alternatives evolving from Alternative 5 which incorporate the principles and variables above to study the amount of affordable and market rate housing, aggressive anti-displacement measures, strategies for incentivizing mixed uses in every zone, and show an urban form with more missing middle housing (up to 4 stories, with minimum allowable densities up to ten units per parcel). The three Alternatives should lay groundwork for new 'third places', and have the flexibility for current ones to develop into neighborhood centers. Every alternative should prioritize fewer cars and less driving, but analyze different mode shifts and transportation strategies.

Finally, all the Alternatives must be paired with visual representations of the high-quality urban form and places we're hoping to achieve. Having accessible visuals and graphics is key to engaging the broad public. For expanded information about the Principles, Variables and Metrics to Measure Impacts, please refer to the supplemental information attached to this letter. We look forward to seeing OPCD expand possible alternatives for EIS Scoping based on Alternative 5, and invite continued engagement with OPCD and our members to inform the Seattle Comprehensive Plan Process

Sincerely,

The AIA Seattle Comprehensive Plan Work Group

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The AIA Seattle Comprehensive Plan Work Group is comprised of architects and allied professionals from engaged member committees such as the Urban Design Forum, Housing Task Force, Public Policy Board, Justice and Equity for Diversity and Inclusion Council (JE:DI), Committee on Homelessness, Small Practice and Residential Committee, and Committee on the Environment.

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SUPPLEMENTAL INFORMATION

Principles of Viable EIS Alternatives

Encourage '15 Minute' Neighborhoods

Alternatives should create well-connected, well-resourced and equitably developed neighborhoods, characterized by greater quantity and variety of housing types and uses, convenient access to high quality amenities and daily needs, and mobility options to curb reliance on automobiles. True '15 Minute' Neighborhoods will be both substantially different from current low density land use and substantially better for residents' quality of life. All alternatives should measure the presence of essential daily needs that can be accessed without a car.

Additional metrics:

- Gap Analysis of missing essential services, like a 'walk score' measuring neighborhood completeness. We suggest using community engagement to identify missing components, and gear zoning rules to allow flexibility to meet needs.
- Map potential and developing neighborhood nodes outside of urban villages and create flexible zoning to encourage more.
- Reduction of VMT per capita, project increased demand for transit, and model mode shift away from automobiles.

Provide Housing Diversity, Affordability and Abundance

Alternatives should distribute housing growth across the city, by expanding mixed use zoning, supporting many new walkable neighborhood centers, and allowing greater flexibility in all residential zones. Barriers that prohibit new missing middle housing must be removed. Market analysis of feasibility is critical to align the proposed changes with housing targets. In the past, plans have underestimated demand and exacerbated the housing crisis. Place additional tiers of development capacity in areas delineated by the Frequent Transit Map, not arterials, and within ¼ mile and/or ½ mile proximity to light rail station locations.

Additional metrics:

- Outline housing targets for alternatives that exceed the mandated minimums.
- Set affordable housing targets well above projected need.
- Create a much larger 'zoning buffer' to foster development and limit cost escalation through speculation.
 - <https://www.lewis.ucla.edu/research/building-up-the-zoning-buffer-using-broad-upzones-to-increase-housing-capacity-without-increasing-land-values/>
- Market analysis to determine new units by type, area median income and neighborhood location relative to access to opportunity and displacement risk maps
- Model likely impact of increased supply on housing rents, purchase prices and affordable housing.

Focus on Equity and Redressing Past Harms

Our city must redress the legacy of racist and restrictive land use policies. This begins by balancing new growth in high opportunity areas with anti-displacement strategies that protect neighborhoods that are most vulnerable to development and gentrification pressure. New patterns should advance wealth building opportunities specifically for BIPOC residents, for whom access has been denied by past policies.

Planning should focus on the underlying infrastructure and amenities needed to support the city's quality of life as it grows with development, including resource conservation, sidewalks, parks and open spaces, schools, and access to transit especially in neighborhoods that have historically been under-resourced.

Plans should prioritize the needs for people with disabilities, including mobility, transit access and robust connections between housing, jobs, and services serves everyone.

Additional metrics:

- Amount and demographics of population living and working in areas with high exposure to air, noise and environmental hazards under each alternative
- Gap Analysis of missing services, like a 'walk score' measuring neighborhood completeness. We suggest using community engagement to identify missing components, and gear zoning rules to allow flexibility to meet needs
- Market analysis to determine new units by type, area median income and neighborhood location relative to access to opportunity and displacement risk maps

Consider Mobility and Repurposing the Right of Way

The transportation element of the comprehensive plan should set aside any assumption that the right of way's primary function is to serve personal automobiles. As our city grows, there simply is not enough space. Our rights of way are precious public spaces which we need not only for mobility and economic activity, but for open space, recreation, and social activity. They bring us together.

Future mobility is not only about moving people around but also about moving destinations - bringing daily needs and services to single use residential neighborhoods in addition to bringing people to daily needs and services.

Many rights of way in neighborhoods that have suffered from a history of under-investment continue to be missed opportunities to improve connections between housing and services. These neglected rights of way should be studied for the "walk-score" impact of investments in well-designed new sidewalks, stairs, and ramps that utilize the existing rights of way to increase the real-world size of the 15-minute neighborhood.

Additional metrics:

- Vision Zero. In order to prioritize safety over speed, the alternatives should visualize complete networks for people outside of automobiles.

- Project shift from personal automobiles to less carbon intensive options or walking, rolling, or taking mass transit.
- Time in transit. In addition to measuring time spent in commuting/job access, the EIS should capture time spent accessing daily needs and services. The goal should be comparative times between automobile travel and other modes.
- Model daily ridership of mass transit, especially light rail, under each alternative
- Proactive planning for street trees everywhere.

Prioritize Growth Strategies that Reduce Climate Impacts

Growth and land use strategies must be developed in parallel with policies that reduce both carbon emissions and energy use. Greater housing density is itself a sustainability action, as density and walkable/rollable access to goods and services reduce automobile use and support mass transit. By clustering housing, everyday needs and services, and job centers around transit stations, cities can reduce their carbon impact and support more sustainable living.

Housing and transportation issues are intertwined and directly impact the climate crisis. We must plan for, fund, and build more homes at all levels of affordability near existing and expanded transit and jobs, with walkable and rollable access to community amenities and services to reduce our reliance on the automobile.

The current plans do not leverage our investments in light rail as potential population and job centers, and the 130th Station/ 145th Station planning efforts have opportunity to create car-light eco-districts.

Additional Metrics:

- Maximize energy codes, incentives, and other policies to eliminate the use of fossil fuels in residential buildings. All new buildings meet Passive House, LEED Silver or above, or Living Building standards.
- Promote policies that encourage, require, or incentivize energy retrofits of single- and multi-family residential buildings.
- Propose policies to reduce embodied and operational carbon in buildings and transportation
- Encourage policies that facilitate greater adaptive reuse of buildings.

Champion Urban Design and Placemaking

The Comprehensive Plan is more than a map. It is a vision for the city's urban fabric, its neighborhoods, and the public realm. The EIS alternatives should showcase the ways that a denser city becomes a better city full of activity and amenities that enrich the inhabitants' experiences.

Well-loved cities bring people together with lively streets, compact urban forms that have order, variety and reinforce the strong sense of place (where you know not only that you're in Seattle but which neighborhood you are in). Pandemic urbanism has given us a taste of some of what is possible, with connected Stay Healthy Streets, and cafes replacing street parking and lessening traffic impacts.

Include more aspirational examples of the desired urban form—among the current images shown in the outreach documents are duplexes with visually dominant driveways and garages, which are both bad urban design and inadequate to meet our future housing needs.

Variables

Range of Regulatory Flexibility

Integrate a range of regulatory flexibility into the policy assumptions in order to allow communities to grow more organically. This could include reducing restrictions or limitations in certain areas, addressing exclusionary zoning more directly, and/or altering the design review/approval process. It could also include building code changes to allow more small projects to fall under the Seattle Residential Code. These types of policy assumptions in one or more alternatives may result in different development assumptions and therefore impacts assessed in the EIS.

Housing types, location, price range, feasibility

Explore a variety of options of how we achieve our housing goals. There are many ways our neighborhoods might grow but analyzing what kinds of housing will go where and the impacts on vulnerable communities, on housing affordability and how it shapes the character of the city are critical illustrations for making decisions.

Focus on Resident and Visitor Experience

This idea focuses on what types of spaces we are creating, what types of people we are inviting, and how people will experience our city. For example, one alternative could lean into creating places for people of all ages, including those raising families in the urban core. Another may focus on providing destinations across the city that attract a healthy mix of tourists, long time locals, and new residents. Perhaps a third could include a goal of making many new smaller nodes that make each micro-neighborhood unique and bring people together with their neighbors. What are the types of policies and land uses that would support each of these? They would look very different from one another and result in unique impacts from residential and business displacement to housing affordability that should all be studied in the EIS.

Creating new neighborhood nodes.

While all alternatives should create more '15-minute' Neighborhoods, the alternatives could differ in overall growth strategy. Do many small nodes connect with linear corridors or medium nodes with transition areas to moderate low density throughout the city better address affordable housing needs? What kind of mixed-use zoning will give rise to new neighborhood centers, such as the flexibility to include small scale retail or commercial spaces in NR zoning?

Concentration on human health

While all alternatives should consider human health, leaning into it to an extreme in at least one alternative would allow the EIS to show the benefits and issues with these policies. Promoting physical health, active mobility, and better air quality for sensitive land uses is important but has wide-ranging impacts that should be studied clearly. This should also be layered with equity analysis to understand who is benefiting from better health options today and in each alternative.

Contrast approaches to address Climate Change

We cannot address climate change unless we embrace a more compact urban form and build every new building to higher standards of performance. We do not have high density zoning around many of our current and future light rail stations and should. The alternatives can analyze the impacts of a green building mandate, where new buildings must meet Passive House, Living Building Challenge or LEED standard or set targets to drastically reduce the embodied and operational carbon in buildings and transportation. The alternatives should present the benefits and tradeoffs of living in a city free of fossil fuels and the need for electrification.

Summary of Additional Metrics

- Outline housing targets for alternatives that exceed the mandated minimums.
- Set affordable housing targets above projected need.
- Create a much larger 'zoning buffer' to foster development and limit cost escalation through speculation.
 - <https://www.lewis.ucla.edu/research/building-up-the-zoning-buffer-using-broad-upzones-to-increase-housing-capacity-without-increasing-land-values/>
- Market analysis to determine new units by type, area median income and neighborhood location relative to access to opportunity and displacement risk maps
- Model likely impact of increased supply on housing rents, purchase prices and affordable housing.
- Outline housing targets for alternatives that exceed the mandated minimums.
- Amount and demographics of population living and working in areas with high exposure to air pollution, noise and environmental hazards under each alternative
- Vision Zero. In order to prioritize safety over speed, the alternatives should visualize complete networks for people outside of automobiles.
- Project shift from personal automobiles to less carbon intensive options or walking, rolling, or taking mass transit.
- Time in transit. In addition to measuring time spent in commuting/job access, the EIS should capture time spent accessing daily needs and services. The goal should be comparative times between automobile travel and other modes.
- Model daily ridership of mass transit, especially light rail, under each alternative
- Proactive planning for street trees everywhere.
- Model carbon footprint per capita, per neighborhood as baseline, and propose strategies to reduce it with mobility/mass transit improvements, zoning that supports compact missing middle housing, and investments within neighborhoods to reduce trips.
- Maximize energy codes, incentives, and other policies to eliminate the use of fossil fuels in residential buildings. All new buildings meet Passive House, LEED Silver or above, or Living Building standards.
- Promote policies that encourage, require, or incentivize energy retrofits of single- and multi-family residential buildings.
- Propose policies to reduce embodied and operational carbon in buildings and transportation
- Encourage policies that facilitate greater adaptive reuse of buildings.
- Support increased housing density around high-capacity transit stations to reduce single occupancy vehicle use.
- Model effect of removal of parking minimums for all housing projects.



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