



December 18, 2024

Re: 2024 Draft rezone maps, Draft Phase I legislation for updated Neighborhood Residential zoning, and Draft 'Phase II' legislation

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 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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In order to achieve a vision for a livable city, AIA Seattle urges the City to adjust draft rezone maps and draft Phase I legislation for updated Neighborhood Residential zoning to:

1. Maximize flexibility and simplicity by eliminating design standards
2. Remove complicated and conflicting requirements for areas of land parcels that are not buildings/structures.
3. Increase development opportunities in transit corridors and Neighborhood Centers by expanding the proposed boundaries of these place types.

Recommendations for the draft 'Phase II' legislation:

1. In all LR3 and MR zones, limit height by number of stories rather than by number of feet of height.
2. Expand Neighborhood Center boundaries to ¼ mile radius and adjust zoning for six stories.
3. Reduce or remove parking requirement in SMC 23.54.015 Table B.

Please find attached recommendations to support 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 One Seattle Plan [draft rezone maps](#), [draft Phase I legislation for updated Neighborhood Residential zoning](#), and [draft 'Phase II' legislation](#).

The draft versions of maps and legislation are a great first step to adding housing. However, due to the urgent need for housing we recommend that the map and zoning legislation are adjusted to increase the opportunity for more and efficient development of housing. These recommendations will eliminate some constraints on increasing housing supply in Seattle, which will support access to housing and provide much needed revenue for the City, due to the tax funds generated by housing development.

Draft Rezone Maps

Recommendation: Increase development opportunities in transit corridors and Neighborhood Centers by expanding the proposed boundaries of these place types.

Neighborhood Centers in Proposed Zoning Map

Provide additional housing opportunities in Neighborhood Centers.

Increase the proposed zoning area to at least $\frac{1}{4}$ mile radius. The proposed area in draft materials is too small for this type of development and future use of these areas to truly increase the availability of plentiful housing, and to create the opportunity for more housing in proximity to arterials, away from noise and pollution.

Corridors in Proposed Zoning Map

Provide additional housing opportunities around Corridors.

- Expand the higher density zoning along Corridors with an increased walk/roll area to 2 blocks, increased allowed height, elimination of FAR, or at least increase FAR requirements to the minimum embodied in the TOD bills HB 1517/SB 5466.
- Create affordable housing development bonuses in Corridor areas.

Draft Phase I Legislation for Updated Neighborhood Residential Zoning

Recommendations: (1) Maximize flexibility and simplicity in the draft legislation by eliminating design standards, and (2) Remove complicated and conflicting requirements for areas of land parcels that are not buildings/structures.

Maximize flexibility and simplicity in the draft zoning legislation

The current draft zoning legislation is overly complex, which creates design, permitting, financial and timeline uncertainty that stymies development, and requires the City to expend resources to explain the code or review extensive documentation. Eliminate redundancies that are covered in the Building and Fire

code like interior structure setbacks, eave overhangs and access. Individual parcel characteristics and requirements vary, as well as their potential to be developed, so a simpler code would encourage development.

Remove Design Standards 23.44.029

AIA Seattle recommends removing design standards in Neighborhood Residential Zones. As written, the design standards are overly specific, limit possibilities, create complexity, and add cost and time during permit review for City staff and builders. **If some form of design standards must remain, then we recommend the following:**

1. **Let the marketplace decide some aspects of design**
 - a. Remove section 23.44.029.B regarding entrances which is overly complex.
 - b. Remove portion of section 23.44.029.C regarding transparency, since as written, garage and utility doors cannot fulfil the window/door requirement.
2. **Remove the highly specific requirements in Section 23.44.029.D.**

The current draft, material section essentially bans Hardie panel, Hardie lap siding, wood T&G siding, wood shiplap siding, stucco, flat metal panel siding on the street facing façade of a structure.

 - a. D2. Brick, stone, brick/ stone veneer --remove dimensions, the dimensions are too specific.
 - b. D3,4, 5. **Siding and cladding are designed and specified in terms of their visual exposure and/ or reveal.** The language in this draft legislation discusses material dimensions/ thicknesses. Because of this language, as written it would prevent the use of lap siding, shingle siding, architectural panels with reveals, metal siding, shiplap siding, and others.
 - c. **Instead of the highly specific requirements, delete the proposed language in D3,4,5 and include language such as:** D3. Siding/ cladding with reveals or exposures that are not greater than 24 inches either horizontal or vertical but not both (up to 24" x unlimited dimension either horizontal or vertical would be allowed).

Remove complicated and conflicting requirements for areas of land parcels that are not buildings/structures.

1. **Simplify overlap of setbacks, amenity areas, parking, solid waste storage, stormwater drainage, tree protection.** Increase lot coverage to 60% or delete completely and allow setbacks, FAR, amenity areas, parking and other requirements to dictate coverage. Such changes would align legislation with what is required in L1 zoning.
2. **1. 23.44.022.D Allow any required amenity area to be anywhere instead of stipulating the percentage at the ground.** For example, amenity areas should be allowed to entirely be on the ground, entirely be on the roof, or entirely be decks attached to the structures or divided in any proportion among those types of areas. An adjustment to the required amenities area beyond just the ground would maximize flexibility for the individual parcel and circumstance and facilitate variety in design.

Other Comments:

- 23.44.012.B.1
Remove arbitrary requirement regarding 6,000 SF minimum lot for stacked flats. Draft legislation excludes areas mapped with steep slope from being included in the 6,000 SF minimum area, which will further reduce locations where a stacked flat would be allowed. Let the market determine what can be developed.
- 23.44.012.D.1
Allow rounding, .5 and greater should allow another unit, .49 and below should not. This will maximize the number of units.
- 23.44.012.B.2.c & 3.d
Exclude steep slope as there are many parcels with manmade steep slopes and other reasons why they may have relief from prohibition, exemption or exception.
- 23.44.012.D.5.d
Clarify that non-disturbance area does not include steep slope buffers or any steep slopes for which an exemption, variance, or exception has been obtained.
- Incentivize retention of existing houses by not counting them towards lot coverage/FAR/ unit count.
- Remove parking mandates where there is no improved alley.
- Expand locations for Corner Stores by allowing commercial uses on all lots. The example provided in Comprehensive Plan document, Seven Coffee Roasters Market and Cafe, is a midblock store.
- Remove restriction on hours of operation for Corner Stores to align regulation for this use with other similar use regulation sections of Seattle Municipal Code.
- If ADUs are in the bottom story of primary unit, they should not count towards density limit, similar to LI.

Draft 'Phase II' Legislation

Recommendations:

1. In all LR3 and MR zones, limit height by number of stories rather than by number of feet of height.
2. Expand Neighborhood Center boundaries to ¼ mile radius and adjust zoning for six stories.
3. Adjust parking requirement in SMC 23.54.015 Table B

In all LR3 and MR zones, limit height by number of stories rather than by number of feet of height.

The building code allows buildings with wood framing to be up to six stories in height. By limiting much of the Neighborhood Centers to 55', it is effectively eliminating a potential to develop an additional story of housing, which is essentially "free" as the same sunk costs occur whether the building is five or six stories. We recommend to either make all of the Neighborhood Centers MR1 zoning to 65', or similarly to City of Everett, limit by number of stories rather than number of feet.

Neighborhood Centers Recommendations:

1. Expand Neighborhood Center Boundaries to encompass a minimum radius of 1/4 mile.

2. Increase heights at residential parcels to 6 story / MRI at center of Neighborhood Center. All remaining residential parcels in Neighborhood Centers should be LR3.
3. LRI and LR2 zones do not produce appropriate density for Neighborhood Centers and should only exist outside of Neighborhood Centers.
4. Within the boundaries of Neighborhood Centers outside of the NC zoning of the commercial core, utilize MR zoning along frequent transit streets.

As stated in OPCD's Neighborhood Center designation criteria: "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 OPCD's Neighborhood Center designation criteria of allowing "buildings of 3-to-6 stories, especially 5 and 6 story residential buildings", more mid-rise zoning, MRI, should be designated in Neighborhood Centers to allow 6-story housing that is decoupled from ground level commercial mandates, in areas where more commercial is not necessary. And in areas where commercial is appropriate, the MRI zone allows for more "gentle" commercial in Neighborhood Centers outside of the commercial core that would allow for empty seat retail opportunity for displaced existing small businesses to move were they to be displaced as their parcel is redeveloped.

Remove or reduce parking requirement in SMC 23.54.015 Table B

Update the current legislation to read:

II. Residential use requirements for specific areas

M. All residential uses in commercial, RSL, and multifamily zones within urban villages *centers*, neighborhood centers, and transit corridors as shown in the One Seattle Plan, that are not within urban centers (*now Regional Centers*) or the Station Area Overlay District, if the residential use is located within a frequent transit service area have no minimum parking requirements.

Many of the new multi-family areas along arterials are outside of Urban Villages and must maintain a parking ratio of one parking space per unit. For many standard lots with the benefit of an alley, physical constraints still make parking more than 6 cars nearly impossible without assembling multiple lots and building expensive structured parking garages. **Consequently, under the proposed draft legislation, most of the new higher density development capacity is limited by parking well below the allowable FAR or potential number of units.**

More than half the Neighborhood Centers are not within 1/2 mile of BRT or light rail stops and are also subject to parking requirements. If the current parking requirements are not removed, where we would hope to see a distributed network of new affordable housing, we will instead be plowing millions of dollars into below-grade parking garages with every new development, and none of it will be feasible for affordable housing projects.

Conclusion

The above recommendations will support more efficient development of housing, ultimately supporting more equitable, resilient, thriving communities.