



AIA
Seattle

April 16, 2020

Seattle City Council
600 Fourth Ave.
Seattle, WA 98102

RE: CB 119769 (+ housing policy)

Council President González and City Councilmembers:

AIA Seattle appreciates your ongoing efforts to protect the public, assist those most impacted, and support business viability in response to the combined COVID-19 and housing affordability crises. We believe CB 119769, which authorizes temporary land use permitting process changes that prioritize affordable housing development, is an important way to expedite desperately needed affordable housing projects across the city.

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While we support this legislation, AIA Seattle believes the city is missing a critical opportunity to address a larger issue impacting the development of housing. Seattle is entering a significant economic downturn during which time we believe we should be thinking in terms of counter-cyclical investments: how do we keep the housing economy building during down-cycles so that we avoid launching into another inflationary spiral as soon as the economy rebounds? With this goal in mind, we believe this is a pivotal moment when the city should be targeting policies and processes that help escalate all housing development – including market rate housing.

This legislation rightly targets affordable housing projects for an exemption from design review because we are facing an emergency: we have a housing shortage and an affordability crisis, and we need more affordable housing in the pipeline. But this is true for market rate housing as well. A policy which provides an effective procedural response for affordable housing development, while market rate housing development continues to be burdened by excessive process and delay, is short-sighted in our opinion.

While we support this legislation and recognize its urgency, we offer the following strategies by which the city might 1) take advantage of an important opportunity to support all housing projects, and 2) leverage this opportunity to implement more robust changes to the city's design review program to make all housing development more affordable.

1. In exempting design review, include projects that are in the system but not yet permitted for land use and zoning.

The design review exemption for affordable housing projects should be provided to existing projects currently in administrative design review, not just to new applicants. Including only new projects disadvantages existing projects and will unnecessarily slow their progress behind that of the newer projects.

2. **Step down all housing projects one tier of design review and allow them to stay in that lane once they are in.**

Extending the current legislation to all housing projects, not just affordable housing projects, would address the wider economic and housing crises. In our view, design review has not worked well even under very good economic circumstances; providing further hurdles for projects to get online now is not in the best interest of our city.

3. **Increase the threshold for Streamlined Design Review from 8,000 sq. ft. to 10,000 sq. ft.**

The flexibility granted by SDR is limited to a few standardized adjustments such as an increase in building length, slightly reduced setbacks, and a reduction to amenity area. While helpful, many small projects would choose to forgo these considerations in the interest of moving directly to the building permit process. (23.44.004 Table A C.2)

4. **Exempt deep green projects from design review entirely.**

The climate crisis remains at the forefront of the city's policy agenda and AIA Seattle's as well. While financial resources to address the climate impacts of the built environment will not be available for some time, the crisis remains urgent. Exempting projects that utilize Passive House, Built Green 5-Star, LEED Platinum, or Living Building Challenge programs would be an effective way for the city to incentivize deeply sustainable projects and provide case study examples for future ones. Currently, projects that participate in the Living Building Challenge Pilot Program must automatically go through full design review (23.41.004.A.4), which is an impediment to the city's climate goals.

5. **Eliminate the special requirement for design review on Single Family lots upzoned under MHA.**

Projects within a special lower threshold of 5,000-8,000 gross sq. ft. in areas rezoned from SF to LR1 or LR2 are currently required to go through SDR. In areas rezoned from SF to LR3/NC/C/etc., projects must go through ADR. This special lower threshold is scheduled to expire on December 31 2023, but we recommend sunsetting the requirement now in order to bolster the development of small scale, "missing middle" housing development.

6. **Exempt projects from design review if they choose MHA performance.**

One way to both streamline the design review process and encourage more applicants to participate in the MHA performance path would be to exempt projects from design review if they choose MHA performance. One obstacle to this idea is that the current zoning code has so many prescriptive rules that it is often quite difficult to design a building well without access to the departures and design flexibility that the design review process affords. With this in mind, we suggest that this initiative be coupled with a review of the zoning code to determine the most common departure requests and to simplify the corresponding elements of the zoning code to reduce the need for departures.

Other considerations:

Design review guidelines

AIA Seattle also recommends a critical assessment of design review guidelines, which are too numerous (design review boards are currently given 102 guidelines) to ensure a streamlined approach, especially for critically-needed projects such as housing. We believe a smaller number of guidelines can spotlight priorities without compromising quality.

Work by City Planners

We applaud the city's effort to expedite housing projects through design review and other changes. However, assigned planners will also need to expedite their reviews or the entire process will get bottlenecked – just at a different stage.

Thank you for your consideration of our recommended strategies for improving the city's housing development policies during the COVID crisis and beyond. We welcome the opportunity to discuss these and other ideas further. Interested parties may contact Kirsten Smith, manager of policy & advocacy, at kirstens@aiaseattle.org or 206-708-3199.

Best regards,



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