September 25, 2019

The Honorable Bruce Harrell, President
Seattle City Council
P.O. Box 34025
Seattle, WA 98124-4025

Re: Council Bill 119600 / SEPA Reform

Dear President Harrell:

The Seattle chapter of the American Institute of Architects writes in strong support of Council Bill 119600 to align the City’s SEPA regulations with recent changes in state law. SEPA is a powerful tool that has made our state a very desirable place to live; however, it has recently been mis-applied to delay the creation of critical urban housing.

We wholeheartedly agree with state legislators that not all projects warrant an ability to appeal the EIS, especially since many of the impacts are already addressed under functionally equivalent development codes. Indeed, the environmental considerations SEPA was created to address have long since been incorporated into our basic codes (as outlined in Attachment 1 to CB 119600), leaving behind a process that results in excessive delays and costs to no meaningful effect.

AIA Seattle has worked to support Council actions and improve departmental processes in an effort to champion initiatives that produce more types of housing, in more areas, and for all types of people. As you know, SEPA reform is critical to achieving these goals. We particularly endorse exemptions from SEPA appeals related to the following actions:

- upzoning 250+ acres with frequent transit service;
- allowing duplexes, triplexes and apartments in SF zoned lots;
- increasing categorical exceptions that encourage urban infill development; and
- allowing for subdivision of lots into smaller parcels.

The flexibility to enact these changes without bad faith delay will be critical for Seattle in the years ahead. We strongly urge you not to accept amendments that will weaken the legislative language by exempting parts of the city from these reforms.

The timing of these changes is very appropriate, as the City has put MHA and ADU reform behind it and we look to move forward with new, robust housing initiatives. We urge the Council to take advantage of the recent amendments
to state SEPA law by conforming Seattle’s Municipal Code to state law. These changes will provide more consistency and clarification for environmental reviews while allowing them to move forward without sidelining projects based on unrelated issues.

Respectfully,

Lisa Richmond  
Executive Director

Meredith Everist  
President