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August 18, 2022

Brennon Staley
Office of Planning and Community Development
P.O. Box 94788
Seattle, WA 98124-7088

Dear Mr. Staley:

Subject: Comments on the scope of the environmental impact statement (EIS) for the *One Seattle Plan 2024 Comprehensive Plan* update.

Sent via email to: brennon.staley@seattle.gov

Thank you for the opportunity to comment on the scope of the environmental impact statement (EIS) for One Seattle Plan 2024 Comprehensive Plan update. Futurewise agrees with the City of Seattle's (the City) determination of significance and the areas for study identified in the 'SEPA Determination of Significance and Request for Comments on the Scope of the EIS' document. We also appreciate the opportunity to comment on the scope of the environmental impact statement.

Mission Statement

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including in Seattle.

Executive Summary

Futurewise supports the general framework of the five alternatives being considered in the EIS. However, we suggest that the City revise the alternatives to allow for higher amounts of housing and jobs growth—both in designated growth centers and overall. In the comments below, we provide specific suggestions for each alternative and recommend studying a sixth alternative that would allow for higher levels of housing and jobs growth than the other five alternatives. For alternatives that would concentrate growth in specific nodes or corridors, we recommend the City use a “gap filling”



approach¹ when choosing where to concentrate the new growth. We strongly recommend using a racial equity lens to refine all action alternatives.

Futurewise also supports and agrees with the topic areas to be analyzed in the EIS identified in 'SEPA Determination of Significance and Request for Comments on Scope of EIS'. By analyzing environmental impacts and identifying mitigation measures, the EIS should provide the City with all the information it needs to a) adopt a comprehensive plan that complies with the requirements of the State Environmental Protection Act (SEPA)², and b) produce better-informed planning decisions in the comprehensive plan update processes specified in the Growth Management Act (GMA)³. We do have some suggestions for the topics to be analyzed in the EIS. We recognize that some or all of these topics may be within the topics already identified.

I. DECISION TO PREPARE AN EIS

We agree that an EIS is required and we are generally supportive of the contents proposed in the EIS scoping notice and related materials.

The City's Determination of Significance document states the following:

The Director of the Office of Planning & Community Development has determined this proposal is likely to have a "significant adverse impact" on the environment under Ch. 43.21C RCW, Policy Act (or SEPA). An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared.

We agree with this determination and support the City's decision to prepare an EIS. The purpose of an EIS is to identify and disclose the potential impacts of the proposed alternatives and to identify mitigating measures.⁴ The EIS should provide the City with the information needed to comply with the requirements of SEPA, while also preparing it to meet the requirements of the GMA and the multi-county planning policies included in Puget Sound Regional Council's (PSRC) VISION 2050 plan.⁵

¹ Futurewise uses the phrase "gap filling approach" here to refer to a densification strategy where areas with too few residents to support essential services (e.g., frequent transit, neighborhood businesses, public facilities, etc.) receive density increases in order to enable the expansion of those services. We recommend that this approach complement other densification strategies, such as increasing density levels in low-density areas that already have access to essential services.

² Chapter 197-11 WAC.

³ WAC 197-11-210

⁴ *Heritage Baptist Church v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 2 Wn. App. 2d 737, 752, 413 P.3d 590, 598 (2018).

⁵ Puget Sound Regional Council, *VISION 2050 Multicounty Planning Policies* (Oct 2020), last accessed on August 8, 2022, at: <https://www.psrc.org/sites/default/files/vision-2050-mpps.pdf>



By complying with the state and regional requirements, the City will both improve the quality of its comprehensive plan and strengthen its ability to defend against legal appeals concerning either the EIS or the contents of the comprehensive plan itself.

II. GROWTH STRATEGY ALTERNATIVES

Evaluate each growth strategy alternative's ability to achieve the goals of VISION 2050's Regional Growth Strategy

VISION 2050's Regional Growth Strategy (RGS) chapter establishes a framework for growth which contains specific policies and actions for cities to follow.⁶ As a Metropolitan City, Seattle must consider its role in accepting regional jobs and housing growth as it updates its comprehensive plan.⁷ Futurewise strongly recommends that the City evaluate each growth strategy alternative against all relevant policies and actions included in the Regional Growth Strategy.

Use higher growth targets when assessing the growth strategy alternatives.

RGS-Action-8 provides that "Metropolitan and Core cities experiencing high job growth will take measures to provide additional housing capacity for a range of housing types and affordability levels to meet the needs of those workers as well as the needs of existing residents who may be at risk of displacement."⁸ So the City has the flexibility and a requirement to analyze housing targets beyond those adopted by the Countywide Planning Policies and VISION 2050.

Given Seattle's high rate of growth over the past twenty years, the role of housing supply in preventing displacement, the existing public facilities and services, the continuing regional investments in light rail, and the environmental and climate benefits of accommodating this growth in Seattle, Futurewise supports having the EIS analyze higher levels of housing growth than those included in the Countywide Planning Policies and VISION 2050. We suggest that the City use housing and jobs growth targets equal to or greater than the past ten years' growth rates extrapolated to the end of the comprehensive plan's new target period (2024 - 2044).

In addition to assessing the proposed alternatives' ability to meet appropriately high growth targets, we suggest that the City revise the growth strategy alternatives in the ways described in the following comments.

⁶ Puget Sound Regional Council, VISION 2050: A Plan for the Central Puget Sound Region pp.43-44 (Oct.2020) [last accessed on August 8, 2022, at: https://psrc.org/sites/default/files/vision-2050-plan.pdf](https://psrc.org/sites/default/files/vision-2050-plan.pdf)

⁷ *Ibid.*, p.31

⁸ *Ibid.*, p.44



Use a “gap filling” approach when refining growth strategies to ensure citywide access to frequent transit and essential daily needs services.

VISION 2050 in RGS-Action-7 directs cities to “support the implementation of a full range of strategies, including zoning and development standards, incentives, infrastructure investments, housing tools, and economic development, to achieve a development pattern that aligns with VISION 2050 and to reduce rural growth rates over time and focus growth in cities.”⁹

Futurewise suggests that the City follow this guidance by using a “gap filling” approach—i.e., identifying areas of Seattle that do *not* align with the development pattern described in VISION 2050, and using tools like land use policy change and transportation infrastructure investment to bring those areas into alignment. As the City refines its conceptual growth strategies into neighborhood-specific land use plans, it should avoid circular logic traps (sometimes referred to as “chicken or the egg” questioning) around the question of whether residential density should *lead* or *follow* beneficial existing conditions like transit service, public infrastructure, commercial density, etc. The City is required to plan for housing and jobs density patterns that align with the regional growth plan (i.e., concentration in cities and near frequent transit) and plan to achieve those patterns through policy and public investment. To meet this requirement, Futurewise strongly recommends that the City refine its proposed growth strategy alternatives to add density both to places that currently have beneficial existing conditions and to places that lack those conditions. *In the case of the latter, the goal should be to encourage residential density levels that can support the citywide expansion of services like frequent transit¹⁰ and small businesses¹¹ that provide essential daily needs¹².* After all, the GMA provides that all elements, including the transportation and capital facility plan elements, “shall be consistent with the future land use map.”¹³

Use a racial equity lens when refining the growth strategy alternatives.

The City’s current comprehensive plan codifies its commitment to the goal of making racial equity a reality.¹⁴ And yet, a City-sponsored analysis of the Urban Village growth strategy

⁹ *Ibid.*, p.44

¹⁰ Puget Sound Regional Council, VISION 2050: A Plan for the Central Puget Sound Region, MPP-RC-7, p.20 (Oct.2020) last accessed on August 8, 2022, at: <https://psrc.org/sites/default/files/vision-2050-plan.pdf>

¹¹ Puget Sound Regional Council, VISION 2050: A Plan for the Central Puget Sound Region, MPP-DP-12, p.77 (Oct.2020) last accessed on August 8, 2022, at: <https://psrc.org/sites/default/files/vision-2050-plan.pdf>

¹² A 2022-2023 Comprehensive Plan Amendment application entitled ‘Essential Daily Needs’ uses the phrase “essential daily needs” to describe the following uses: commercial or non-profit groceries, childcare, health services, fresh healthy food merchants, home goods, and cultural anchors. http://clerk.seattle.gov/~cfpics/cf_322316_1.pdf

¹³ RCW 36.70A.070.

¹⁴ City of Seattle, “Seattle 2035 Comprehensive Plan: Managing Growth to Become an Equitable and Sustainable City 2015–2035” (2021), p.5, last accessed on August 8, 2022, at: <https://www.seattle.gov/documents/Departments/OPCD/OngoingInitiatives/SeattlesComprehensivePlan/ComprehensivePlanCouncilAdopted2021.pdf>



found that this growth strategy has not resulted in racially-equitable outcomes. To the contrary, the report found that while this strategy may have been created with good intentions, it “has not achieved its goals because it ultimately perpetuates the same housing insecurity of low-income Black, Indigenous, and People of Color (BIPOC) residents that has been in place for years”¹⁵. The Seattle Planning Commission reached a similar conclusion in its *NEIGHBORHOODS FOR ALL* report, which states that the City has exacerbated displacement pressure on BIPOC and low-income communities by concentrating growth into a small portion of the city while restricting housing options in areas with high property values.¹⁶

Racially-equitable outcomes should be one of the primary goals of every element of the *One Seattle Plan*—including the growth strategy. As the conceptual alternatives are refined into explicit land use plans and zoning alternatives, the City should use a racial equity lens to inform its refinement approach. For example, Futurewise supports the City’s intention to refine each alternative to maximize housing production in low-displacement risk areas while still expanding housing choices in high-risk areas alongside anti-displacement strategies.¹⁷ We also support the City’s plan to improve the Displacement Risk Index tool—which includes race and ethnicity as indicators of displacement risk—by adding new indicators and updating data sources to reflect the most recent data available. We strongly support the combination of city-wide growth and targeted anti-displacement strategies—especially a *set* of strategies that would operate in near-, mid-, and long-term time frames.¹⁸ This approach will improve the City’s ability to “address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions” when it updates its housing element, as required by the GMA.¹⁹

We also suggest that this anti-displacement refinement approach be extended to include areas with high and low concentrations of BIPOC-owned businesses and BIPOC

¹⁵ Policy Link, “Advancing Racial Equity as part of the 2024 Update to the Seattle 2035 Comprehensive Plan and Urban Village Strategy” (2021), p.5, last accessed on August 8, 2022, at: <http://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/Seattle'sComprehensivePlan/ComprehensivePlanPolicyLinkFinalRecommendations.pdf>

¹⁶ Seattle Planning Commission, “NEIGHBORHOODS FOR ALL: Expanding Housing Opportunity in Seattle’s Single-Family Zones” (2018), p.9, last accessed on August 8, 2022, at: <https://www.seattle.gov/Documents/Departments/SeattlePlanningCommission/SPCNeighborhoodsForAllFINALdigital2.pdf>

¹⁷ The ‘Displacement’ section of the EIS Scoping Story Map web page states, “As we create more detailed alternatives after scoping, each action alternative will be crafted to result in higher levels of growth in areas of low displacement risk while still increasing housing choice in high displacement risk areas.”, City of Seattle, ‘One Seattle Plan Environmental Impact Statement Scoping’ (2022), last accessed August 8, 2022, at: <https://storymaps.arcgis.com/collections/8c90f3a5e0704f8687213b669efa6fb0?item=5>

¹⁸ For a comparison of the effectiveness of anti-displacement strategies at different timeframes, see Table 1 in Chapple et al, “White Paper on Anti-Displacement Strategy Effectiveness” (February 2021), p.5, last accessed on August 8, 2022, at: <https://www.urbandisplacement.org/wp-content/uploads/2021/08/19RD018-Anti-Displacement-Strategy-Effectiveness.pdf>

¹⁹ RCW 36.70A.70(2)(iii)(f)



communities' cultural anchors. Where growth strategy changes result in new mixed use or commercial development, the City should work to achieve racially-equitable outcomes by supporting BIPOC businesses in securing commercial leases. These suggestions would align the City's growth strategy with several multicounty planning policies, including in MPP-DP-7 and MPP-Ec-12 from VISION 2050.²⁰

Because city activities and budgets must conform to the comprehensive plan, we suggest that racially-equitable access to public services and facilities, and amenities be prioritized in each growth strategy alternative.²¹

The City should continue to resource impacted communities throughout the process to guide the development of the new risk index (including businesses and cultural anchors) and the selection of anti-displacement strategies. It is particularly important that these communities are supported to engage early in the process and remain engaged through key decision points.

Plan for growth of commercial and essential daily needs services in each action alternative.

VISION 2050 in MPP-DP-1 provides that urban communities should “[d]evelop high-quality, compact urban communities throughout the region’s urban growth area that impart a sense of place, preserve local character, *provide for mixed uses* and choices in housing types, and encourage walking, bicycling, and transit use.” (Emphasis added) Given the disruptive impacts of the COVID 19 pandemic and the growing severity of the climate crisis, the importance of creating walkable, mixed use neighborhoods may be greater now than ever.

The City’s proposed growth strategy alternatives, however, are primarily focused on changes in housing density.²² This housing-focused approach would fail to assess the impacts of increasing access to jobs and services in neighborhoods that currently only allow residential uses. Rather than focusing primarily on housing, Futurewise suggests that the City’s growth strategy alternatives should also explore a range of different levels of integration between residential and commercial uses. Mixed use typologies should include: home-based businesses, corner stores with housing above, essential service facilities, live-work units, popup businesses and food trucks in public spaces. We suggest that the action alternatives reflect a variety of ways to expand access to shops and amenities that provide essential daily needs.

²⁰ Puget Sound Regional Council, VISION 2050: A Plan for the Central Puget Sound Region, p. 76 and p.96 (Oct.2020) last accessed on August 8, 2022, at: <https://psrc.org/sites/default/files/vision-2050-plan.pdf>.

²¹ RCW 36.70A.120.

²² The focus on housing density is most clear in action alternatives #3 and #4. However, even for alternatives #2 and #5, the intended impact on job growth and access to commercial and other services is not described in detail.



Increase the residential density, geographic coverage, and potential for mixed use development of all action alternatives.

Futurewise strongly recommends that the City revise the proposed action alternatives in order to achieve the following four goals: meet higher housing targets, fill “gaps” in access to transit, achieve a variety of equitable outcomes, and encourage expanded mixed use development to provide essential daily needs services in residential areas.²³

At this time, we do not have a comment about which proposed alternative is best. Instead, we suggest that the City revise its proposed action alternatives to incorporate the above-listed goals, and prepare an EIS that fully assesses the impacts and identifies mitigation measures for each alternative. We will provide comments on our preferred alternative once this information has been published in the draft and final EIS's.

Futurewise suggests the City make the following changes to the four proposed action alternatives:

- **Alternative 2 (Focused):**

Futurewise recommends the City expand the boundaries of all existing urban villages to include at least a 15-minute walkshed around a central hub, regardless of the current status of transit frequency. We also suggest adding new nodes where dense, mixed use development is allowed in areas with high access to opportunity and low displacement risk, as well as in areas where better access to frequent transit and local goods and services is needed. When refining the conceptual alternatives into place-specific land use plans, we suggest that the following neighborhoods, which are all expected to gain light rail stations as Sound Transit expands its system, should become high-density nodes: 145th Street, 130th Street, North Delridge, Avalon, the Junction, Ballard, and Uptown. We also suggest that high opportunity low-displacement risk neighborhoods lacking nearby urban villages (e.g., Wedgewood, Sand Point, Magnolia, and Madison Park) should be prioritized for new nodes. Any new nodes in high displacement-risk communities should include a comprehensive anti-displacement strategy and be developed in consultation with those communities. As we mentioned in a previous comment, Futurewise recommends that the City use a “gap filling” approach when deciding where to locate new density nodes—for both small nodes and new urban villages.

- **Alternative 3 (Broad):**

Futurewise recommends the City revise this alternative to increase housing density (up to six-plexes) on all residential parcels while allowing lowrise, mixed use apartments on corner lots. Broad increases in development capacity in metropolitan

²³ See the previous four comments for additional details for each suggestion.



areas are essential to meeting regional and local growth targets. Housing policy research suggests that increasing development capacity citywide—a strategy described as “building up the zoning buffer”—more effectively lowers housing costs than increasing capacity in specific areas because citywide increases lead to an abundance of development opportunities that “limits the market power of property owners, reducing or eliminating the land value increase that accompanies more concentrated upzones, and allowing for the development of lower-priced housing.”²⁴ While only a few major American cities have enacted broad upzones like the one proposed in this alternative, studies of those cities have shown that very few 2- or 3-unit homes were actually built after the land use changes were implemented.²⁵ Futurewise suggests modifying this alternative to allow six-plexes on all residential lots and lowrise, mixed use apartment buildings on corner lots. We suggest that the non-residential uses allowed on corner lots include businesses and amenities that meet residents’ essential daily needs.

- **Alternative 4 (Corridor):**

Futurewise recommends the City expand the geographic extent of this alternative to include 15-minute walksheds around transit stations in addition to moderate walksheds along transit corridors.²⁶ We suggest that this alternative allow mixed use, mid-rise development within 5-minute walksheds of transit stations, as well as low-rise apartments and other “missing middle” housing typologies within a 15-minute walkshed of transit stations. As we mentioned in a previous comment, Futurewise recommends that the City use a “gap filling” approach when deciding where to locate new density nodes and transit corridors. This alternative should not assume the present transit network and its associated service levels will remain unchanged. Additionally, this alternative should include reallocation of right-of-way on these transit corridor arterials to reduce local pollution and traffic safety impacts.

- **Alternative 5 (Combined):**

We suggest that this alternative include a combination of the revised alternatives described above.

In addition to revising the four proposed action alternatives, Futurewise suggests the City study a new alternative that would accommodate even higher amounts of housing and job growth than Alternative 5 (Combined):

²⁴ Phillips, S. (2022). Building Up the "Zoning Buffer": Using Broad Upzones to Increase Housing Capacity Without Increasing Land Values. p.19, UCLA: The Ralph and Goldy Lewis Center for Regional Policy Studies. Retrieved from <https://escholarship.org/uc/item/0r53h7pw>

²⁵ Halter, Nick, “Minneapolis move to legalize triplexes shows little impact”. (2021) last accessed on August 8, 2022, at: <https://www.axios.com/local/twin-cities/2021/03/01/minneapolis-triplex-legalize-impact-little>

²⁶ Futurewise is concerned about the impacts of focusing residential density along arterial streets. Please see the ‘Environmental Impacts’ section of this letter for our suggestions about what related impacts and mitigation measures to study.



- **Alternative 6:**

Expand access to frequent transit service and essential daily needs across all residential parts of the city, while focusing high-density development near light rail stations and allowing mid-rise apartment buildings in all residential areas. We suggest that this alternative include density bonuses for affordable homes by right, as well as encouraging ground floor commercial and community spaces to serve people's essential daily needs.

III. 130TH & 145TH STATION AREA ALTERNATIVES

Study the impacts of adding a new urban village within a 15-minute walk of the 130th and 145th Street Station Areas.

VISION 2050 MPP-RGS-8 states that high-capacity transit station areas should “Attract 65% of the region’s residential growth and 75% of the region’s employment growth”²⁷. In order to comply with this policy, the City should plan for high amounts of residential and job density at all light rail station areas in residential neighborhoods—including the new 130th and 145th Street Station Areas. Futurewise suggests the City revise the two action alternatives studied for 130th and 145th Street Station Areas to reflect the expanded vision for Growth Strategy Alternatives 2 and 4 (as described above). We also suggest adding a new higher-density alternative that would create an urban village encompassing these station areas.

Study the impacts of allowing publicly-owned golf course land within a 15-minute walk of the 130th and 145th Street Station Areas to be used for housing.

Futurewise suggests the City study the impacts of allowing residential development of public golf course land within the watershed of the proposed 130th and 145th Street Station Areas urban village.

IV. ENVIRONMENTAL IMPACTS

The purpose of an EIS is to identify and disclose the potential impacts of the proposed alternatives and to identify mitigating measures.²⁸ Futurewise supports the inclusion of impacts to the natural and built environment listed in the City’s EIS Scoping Notice. We strongly support the City’s decision to study objectives and metrics related to equity and

²⁷ Puget Sound Regional Council, VISION 2050: A Plan for the Central Puget Sound Region, MPP-RGS-8, p.43 (Oct.2020) last accessed on August 8, 2022, at: <https://psrc.org/sites/default/files/vision-2050-plan.pdf>.

²⁸ *Heritage Baptist Church v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 2 Wn. App. 2d 737, 752, 413 P.3d 590, 598 (2018).



climate resilience across the environmental elements studied.²⁹ In the sections below, we provide detailed feedback on environmental impacts to study—much of which may include topics already identified by the City.

Direct Consultation with Impacted Communities

- **Consult impacted communities when assessing existing conditions, impact effects, and mitigation measures.**

VISION 2050 in MPP-DP-8 directs cities to “[c]onduct inclusive engagement to identify and address the diverse needs of the region’s residents.”³⁰ Futurewise strongly recommends the City consult directly with members of the impacted communities for each type of environmental impact assessed in the EIS.

Equity

- **Assess the impacts of residential, commercial, and recreational displacement in the EIS.**

While Futurewise supports the City’s proposal to assess residential and commercial displacement impacts, *we do not support the exclusion of either of these studies from the contents of the EIS.*³¹

SEPA requires analysis of residential, commercial, and recreational displacement. In *Barrie v. Kitsap County* the Washington State Supreme Court held that State Environmental Policy Act environmental impact statements are required to consider socio-economic impacts.³² This is because “SEPA declares that the state’s policy is to ‘fulfill the social, economic, and other requirements’ of citizens. RCW 43.21C.020(1)(c).”³³ The SEPA rules that formerly did not expressly require a discussion of economic and social effects were invalid.³⁴

These socio-economic impacts include residential and commercial displacement. This is why the SEPA checklist in WAC 197-11-960B.8.i., j., and k. ask

²⁹ City of Seattle, “One Seattle Comprehensive Plan: EQUITY AND CLIMATE CHANGE PERFORMANCE METRICS” (June 2022), last accessed on August 8, 2022, at: <https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanEquityClimateMetrics.pdf>

³⁰ Puget Sound Regional Council, VISION 2050: A Plan for the Central Puget Sound Region, p. 76 (Oct.2020) last accessed on August 8, 2022, at: <https://psrc.org/sites/default/files/vision-2050-plan.pdf>.

³¹ While the City has proposed that its study of residential displacement be included in the EIS, the City has proposed that its study of commercial displacement impacts and mitigation measures be “informed by the EIS *but [is] anticipated to be evaluated through other planning efforts* as the City develops the One Seattle Plan.” (Emphasis added), *Ibid*.

³² *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858–59, 613 P.2d 1148, 1157 (1980).

³³ *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858, 613 P.2d 1148, 1157 (1980)

³⁴ *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858, 613 P.2d 1148, 1157 (1980)



“[a]pproximately how many people would reside or work in the completed project[,]”
“[a]pproximately how many people would the completed project displace[,]” and
“[p]roposed measures to avoid or reduce displacement impacts, if any ...” Similarly,
the SEPA checklist in WAC 197-11-960B.12.b. asks “[w]ould the proposed project
displace any existing recreational uses” Note that these questions are not limited
to residential displacement and impacts on businesses are socio-economic impacts.³⁵
For these reasons the EIS needs to analyze the impacts of residential and commercial
displacement. Otherwise, the City’s EIS may be found inadequate like the county EIS
in *Barrie* that did not analyze impacts of a rezone outside of downtown on downtown
businesses.³⁶

Futurewise supports the proposed metrics for both residential and commercial
displacement. For residential displacement, we recommend that the impact analysis
include metrics capable of measuring the four types of displacement described in the
Seattle Planning Commission’s ‘Anti-Displacement Issue Brief’: direct economic
displacement, indirect economic displacement, cultural displacement, and physical
displacement.³⁷ We support the use of both quantitative and qualitative methods in
this analysis. For commercial displacement, we suggest the City follow the guidance
of VISION 2050 MPP-Ec-12, which provides that cities should “[i]dentify potential
physical, economic, and cultural displacement of existing businesses that may result
from redevelopment and market pressure” and “[u]se a range of strategies to mitigate
displacement impacts to the extent feasible.”³⁸ We recommend that this analysis be
included in the EIS to, in part, help assess growth strategy alternatives’ impacts on
Minority Business Enterprises (MBE) and Minority/Women Business Enterprises
(MWBE) which have been disproportionately impacted by racially discriminatory public
policies, adverse impacts from public infrastructure projects, and both public and
private disinvestment.

- **Assess the impacts on exposure to environmental harms.**

SEPA defines environmental health as an element of the built environment.³⁹

Numerous science-based studies have demonstrated that communities of color are

³⁵ *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858–61, 613 P.2d 1148, 1157–58 (1980).

³⁶ *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858, 613 P.2d 1148, 1158 (1980)

³⁷ Seattle Planning Commission, “Issue-specific thoughts on the major update to the Comprehensive Plan Addressing Displacement in Seattle’s Comprehensive Plan”, p.4 (March 2022), last accessed on August 8, 2022, at: https://www.seattle.gov/documents/Departments/SeattlePlanningCommission/ComprehensivePlan/SPC_Anti-displacement_Issue_Brief_March2022_Web.pdf

³⁸ Puget Sound Regional Council, VISION 2050: A Plan for the Central Puget Sound Region, MPP-Ec-12, p.96 (Oct.2020) last accessed on August 8, 2022, at: <https://psrc.org/sites/default/files/vision-2050-plan.pdf>

³⁹ WAC 197-11-444(2)(a).



disproportionately impacted by environmental risk factors.⁴⁰ Futurewise suggests the City refer to the Washington Environmental Health Disparities index when developing its metrics and methods for measuring these impacts.⁴¹ We recommend that the City assess the impacts on environmental harms including (but not limited to): pollutants (air, water, ground), noise, and other environmental hazards. We also recommend that the City assess impacts on exposing people to streets with high rates of traffic-related injuries or deaths, which could be considered as “traffic hazards” under SEPA.⁴² The impacts of traffic hazards on people are particularly important to assess because two of the proposed growth strategy alternatives (Alternatives 4 and 5) would concentrate residential density along high-traffic, transit corridor arterial streets. We recommend that the City study appropriate mitigation measures for increased exposure to traffic emissions and hazards—including, a) establishing mandatory pedestrian/cyclist safety features for transit corridors, and b) establishing mandatory minimum requirements for the amount of transit corridor right of way space that must be reserved for emission-free transportation modes and non-transportation uses.

- **Assess the impacts on exposure to climate change-related hazards.** SEPA defines climate as an element of the environment.⁴³ While many climate change-related hazards will affect all Seattle communities, the negative impacts of these effects are likely to be disproportionately born by low-income communities and communities of color. As stated by Front and Centered—a coalition of communities of color-led groups from across Washington state—in their 2016 report,

It is true that the main climate change-related threats we face in Washington will affect everyone in the state in some way (wildfires, flooding, extreme heat, drought, ocean acidification, to name just a few upstream impacts). However, different communities are positioned differently because of their race, jobs, or wealth, and thus have different capacity (sic) to adapt to these threats. The disproportionate impacts communities of color face are just

⁴⁰ Bell, M., & Dominici, F. (2008). Effect modification by community characteristics on the short term effects of ozone exposure and mortality in 98 US communities. *American Journal of Epidemiology*, 167(8), 986-97.; Cushing, L., Faust, J., August, L., Cendak, R., Wieland, W., & Alexeeff, G. (2015). Racial/ethnic disparities in cumulative environmental health impacts in California: evidence from a statewide environmental justice screening tool (CalEnviroScreen 1.1). *American Journal of Public Health*, 105(11), 2341-8.; Kravitz-Wirtz, N., Crowder, K., Hajat, A., & Sass, V. (2016). The long-term dynamics of racial/ethnic inequality in neighborhood air pollution exposure, 1990-2009. *Du Bois Review*, 13(2), 237-59.

⁴¹ Washington State Department of Health, “Washington Environmental Health Disparities Map: Cumulative Impacts of Environmental Health Risk Factors Across Communities of Washington State”, last accessed on August 8, 2022, at: <https://deohs.washington.edu/sites/default/files/2022-08/311-011-EHD-Map-Tech-Report.pdf>

⁴² WAC 197-11-444(2)(c)(vi).

⁴³ WAC 197-11-444(1)(b)(iii).



beginning to enter the public conversation, but are well documented.⁴⁴

While Futurewise supports the proposed list of metrics for assessing the impacts of climate change⁴⁵, we recommend that the City assess the impacts to BIPOC communities and low-income communities specifically, as well as to the general population. Including a racial equity analysis in the assessment of climate change impacts will be necessary for the City to follow Seattle City Council's direction as stated in Council Resolution 32059.⁴⁶

- **Assess the impacts on protected-class community cultural anchors (formal and informal)**

SEPA defines “historical and cultural preservation” as an element of the built environment.⁴⁷ Futurewise recommends that the City assess existing conditions, impacts, and mitigating measures on the cultural anchors (formal and informal) of protected-class communities—particularly communities of color and LGBTQ communities, both of which have been disproportionately impacted by cultural displacement.

Climate

- **Assess alternatives impacts on greenhouse gas (GHG) emissions from transportation and vehicle-miles traveled (VMTs).**

SEPA defines climate as an element of the environment.⁴⁸ SEPA EISs are required to analyze greenhouse gas pollution.⁴⁹ Washington State enacted limits on greenhouse

⁴⁴ Colon, Jacques. “Front and Centered Report: The Disproportionate Impacts of Climate Change on Communities of Color in Washington State”, pp.2-3, last accessed on August 8, 2022, at:

<https://frontandcentered.org/wp-content/uploads/2016/07/Climate-Impacts-Communities-of-Color.pdf>

⁴⁵ The proposed metrics include the following: a) Precipitation (extreme high): Amount and percentage of population living in areas with high exposure to flooding and landslides, b) Heat: Amount and percentage of population living in areas with high temperatures, c) Heat: Amount and percentage of population living in areas with low tree canopy coverage, and d) Sea-level Rise: Amount and percentage of population living in areas affected by sea-level rise. City of Seattle, “One Seattle Comprehensive Plan: EQUITY AND CLIMATE CHANGE PERFORMANCE METRICS” (June 2022), last accessed on August 8, 2022, at:

<https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanEquityClimateMetrics.pdf>

⁴⁶ Resolution 32059 states the City's intent to “address climate change and improve resiliency as part of the One Seattle update to the Comprehensive Plan.” Seattle City Council, City Council 32059 (July 19, 2022), last accessed on August 8, 2022, at:

<https://seattle.legistar.com/View.ashx?M=F&ID=11113924&GUID=36C6FB22-F00B-45A1-99FC-C548597CCBB0>

⁴⁷ WAC 197-11-444(2)(b)(vi).

⁴⁸ WAC 197-11-444(1)(b)(iii).

⁴⁹ *Columbia Riverkeeper, Sierra Club, and Center For Biological Diversity v. Cowlitz County, Port of Kalama, Northwest Innovation Works-Kalama, LLC, and State of Washington, Department of Ecology* Shorelines Hearings Board (SHB) No. 17-010c, Order on Motions for Partial Summary Judgment (Sept. 15, 2017), at 18, 2017 WL 10573749, at *9.



gas emissions and a statewide goal to reduce annual per capita vehicle miles traveled for light-duty vehicles.⁵⁰ Futurewise, in full agreement with Seattle City Council Resolution 32059⁵¹, supports analyzing whether each growth strategy alternative will meet these limits and goals. For both GHG and VMT, we support the use of total and per capita metrics to measure impacts.

Comprehensive planning is one way to address both the reduction of greenhouse gasses and vehicle miles traveled. Almost half of all greenhouse gas emissions in our state result from the transportation sector. Land use and transportation strategies that promote compact and mixed use development and infill reduce the need to drive, reducing the amount of greenhouse gas emissions.

In an article published in a peer-reviewed scientific journal, Goldstein et al. analyzed greenhouse emissions from housing and concluded that:

If the electrical grid is decarbonized, then the residential housing sector can meet the 28% emission reduction target for 2025 under the Paris Agreement. However, grid decarbonization will be insufficient to meet the 80% emissions reduction target for 2050 due to a growing housing stock and continued use of fossil fuels (natural gas, propane, and fuel oil) in homes. Meeting this target will also require deep energy retrofits and transitioning to distributed low-carbon energy sources, as well as reducing per capita floor space and zoning denser settlement patterns.⁵²

The denser settlement patterns were fairly modest and could be met by building a mix of small apartment buildings and modest single-family homes at eight to ten housing units per acre.⁵³ Since Washington's greenhouse gas limits are modeled after the Paris Agreement, Goldstein et al. shows that a growing community can meet these limits with wise land land policies and regulations.

Another important method of reducing greenhouse gas emissions is to include complementary land uses not already present in local zoning districts, such as

⁵⁰ RCW 70A.45.020(1)(a) (greenhouse gas pollution limits) and RCW 47.01.440(1) (vehicle miles traveled benchmarks).

⁵¹ Resolution 32059 directs City staff to study and develop goals and policies that “Reduc[e] overall greenhouse gas emissions, and other harmful pollutants that exacerbate climate impacts, including: 1. Reducing per capita vehicle miles traveled within the city limits of Seattle”, Seattle City Council, City Council 32059 (July 19, 2022), last accessed on August 8, 2022, at: <https://seattle.legistar.com/View.ashx?M=F&ID=11113924&GUID=36C6FB22-F00B-45A1-99FC-C548597CCBB0>

⁵² Goldstein et al., *The carbon footprint of household energy use in the United States*, 117 PNAS 19122, 19122 (July 20, 2020) last accessed on July 13, 2022, at: <https://www.pnas.org/cgi/doi/10.1073/pnas.1922205117>

⁵³ *Id.* at 19128.



supermarkets, parks, schools, and services in residential neighborhoods.⁵⁴ These measures are often referred to as the “15-minute city”.⁵⁵ The EIS should assess the impact of these land use changes on GHG emissions. Futurewise strongly recommends that any transportation model used to assess these impacts account for multiple types of transportation behavior changes, including: shorter-distance personal vehicle trips, replacing personal vehicle trips with public transit or private carpooling, and replacing personal vehicle trips with emission-free modes (e.g., walking, rolling, and bicycling). Futurewise recommends that the transportation model assess the impacts on a wide variety of common trip types, including: daily workplace commuting, grocery shopping, visiting family and friends, visiting amenities, accessing childcare services, accessing social services, etc. The transportation model should include all GHG and VMT impacts from trips that begin outside Seattle and end in the city (e.g., suburban residents commuting to workplaces in the city)⁵⁶, as well as the inverse (e.g., city residents traveling to destinations outside the city). Per the SEPA requirements listed in WAC 197-11-060(4)(b), the lead agency preparing an EIS must include impacts which occur outside its jurisdiction.⁵⁷ Therefore, the City must include the GHG and VMT impacts both within and outside Seattle in their impact assessment and mitigation measure identification process.

- **Assess the impacts of climate change on the natural and built environment**
The second type of broad climate impacts are the impacts of climate change on the natural and built environment such as increased storm intensities, increased heat events, and sea level rise.⁵⁸ The EIS should also analyze the impacts of climate change on the natural and built environments. The City of Seattle has already done a significant amount of work on some of these impacts and the Seattle City Council has provided direction to consider climate impacts during the 2024 comprehensive

⁵⁴ Matt Bucchin and Aaron Tuley, *Planning for Climate Mitigation and Adaptation* p. 141 (American Planning Association, Planning Advisory Service (PAS) Report 601: July 2022).

⁵⁵ C40 Cities Climate Leadership Group, C40 Knowledge Hub, “How to build back better with a 15-minute city” (July 2020), last accessed August 8, 2022, at:

https://www.c40knowledgehub.org/s/article/How-to-build-back-better-with-a-15-minute-city?language=en_US

⁵⁶ A 2021 report found that over 34,000 low-wage workers commute long distances to jobs in Seattle. Growth strategies that increase housing supply in Seattle may reduce the distance that workers need to commute as well as offering alternative means of transportation like public transit. City of Seattle, ‘Market Rate Housing Needs and Supply Analysis’, p.50, last accessed on August 8, 2022, at:

<https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/HousingChoices/SeattleMarketRateHousingNeedsAndSupplyAnalysis2021.pdf>

⁵⁷ WAC 197-11-060(4)(b) provides that, “ In assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries (see WAC 197-11-330(3) also).”

⁵⁸ The University of Washington Climate Impacts Group has identified many of these impacts in reports and data products. Last accessed on July 12, 2022, at: <https://cig.uw.edu/>.



plan update.⁵⁹ Futurewise supports the proposed list of metrics for assessing the impacts of climate change.⁶⁰

Potential mitigating measures for both types of impacts should be identified. For example, the *California Coastal Commission Sea Level Rise Policy Guidance: Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Permits* has good suggestions for addressing sea level rise.⁶¹

- **Assess the impacts of GHG emissions associated with construction, rehabilitation, preservation, and operations.**

While transportation produces more GHG emissions than any other sector in Seattle, buildings are the second-highest emitting sector⁶² and, therefore, are important to assess and mitigate. Science-based research has shown that building preservation and reuse can prevent the emission of significant amounts of carbon emissions when compared to demolishing and replacing existing buildings with new ones.⁶³ Futurewise supports the use of total and per capita metrics to measure the impacts of building sector-related GHG emissions. We suggest that impact assessment and mitigation identification take a holistic approach to defining the building sector by including construction, rehabilitation, preservation, and operations in their analyses.

Housing

- **Assess alternatives ability to increase housing supply of both market-rate and subsidized housing.**

⁵⁹ Seattle City Council, City Council 32059 (July 19, 2022), last accessed on August 8, 2022, at: <https://seattle.legistar.com/View.ashx?M=F&ID=11113924&GUID=36C6FB22-F00B-45A1-99FC-C548597CCBB0>

⁶⁰ The proposed metrics include the following: a) Precipitation (extreme high): Amount and percentage of population living in areas with high exposure to flooding and landslides, b) Heat: Amount and percentage of population living in areas with high temperatures, c) Heat: Amount and percentage of population living in areas with low tree canopy coverage, and d) Sea-level Rise: Amount and percentage of population living in areas affected by sea-level rise. City of Seattle, "One Seattle Comprehensive Plan: EQUITY AND CLIMATE CHANGE PERFORMANCE METRICS" (June 2022), last accessed on August 8, 2022, at:

<https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanEquityClimateMetrics.pdf>

⁶¹ *California Coastal Commission Sea Level Rise Policy Guidance: Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Permits* (Nov. 7, 2018 last accessed on July 13, 2022, at): <https://www.coastal.ca.gov/climate/slrguidance.html>

⁶² According to data included in the City of Seattle's 'Understanding Our Emissions' data dashboard, in 2018 Seattle's transportation sector produced 60% of GHG emissions while the building sector produced 37%. Seattle Office of Sustainability and Environment, 'Understanding Our Emissions' data visualization dashboard, last accessed August 8, 2022, at: <https://www.seattle.gov/environment/climate-change/climate-planning/performance-monitoring#data>

⁶³ Preservation Green Lab, "The Greenest Building: Quantifying the Environmental Value of Building Reuse" (2011), p. vii, last accessed on August 8, 2022, at: <https://forum.savingplaces.org/viewdocument/the-greenest-building-quantifying>



SEPA defines housing as an element of the built environment.⁶⁴ Futurewise supports the assessment of existing conditions, impacts, and mitigation measures related to housing in the EIS. We support the list of market-rate housing metrics⁶⁵ and income-restricted housing metrics⁶⁶ proposed by the City. We suggest that the City assess the impacts on the supply and condition of all housing types listed in RCW 36.70A.070(2)(c), including:

government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes⁶⁷

- **Assess alternatives impacts on the Mandatory Housing Affordability (MHA) program**

Futurewise strongly recommends that the City assess the impacts of each alternative on MHA. We suggest that the City assume that proposed zoning changes under each alternative will incorporate the MHA program and assess the impacts to both a) on-site performance unit creation, and b) in-lieu fee payments to support affordable housing construction.

Other Elements of the Natural and Built Environment

- **Identify and disclose impacts on important elements of the natural and built environment.**

Futurewise supports the assessment of environmental impacts on all areas listed in the 'SEPA Determination of Significance and Request for Comments on the Scope of the EIS' document.⁶⁸ Within these areas of study, we specifically suggest that the

⁶⁴ WAC 197-11-444(2)(b)(ii)

⁶⁵ These metrics include: a) number of new units by type and area median income (AMI), b) availability of units that are appropriate for families and multi-generational households, c) availability of lower-cost ownership units and qualitative discussion on availability to equity priority groups, and d) a qualitative discussion of effect on overall cost of existing housing in Seattle and the region. City of Seattle, "One Seattle Comprehensive Plan: EQUITY AND CLIMATE CHANGE PERFORMANCE METRICS" (June 2022), p.1-2, last accessed on August 8, 2022, at: <https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanEquityClimateMetrics.pdf>

⁶⁶ These metrics include: a) Number of new income-restricted units by type and AMI. *Ibid.*

⁶⁷ RCW 36.70A.070(2)(c)

⁶⁸ Areas of study include: a) Earth and water quality, b) Air quality and greenhouse gas emissions Plants and animals, c) Energy and natural resources, d) Noise, e) Land use patterns and urban form, f) Historic Resources, g) Relationship to plans, policies, and regulations, h) Population, employment, and housing, i) Transportation, j) Public Services: Police, Fire/Emergency Services, Parks, and Schools, and k) Utilities. City of Seattle, 'SEPA Determination of Significance and Request for Comments on the Scope of the EIS', last accessed August 8, 2022, at: <https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanEISScopingNotice.pdf>



City assess the proposal's impacts on the following: tree canopy, fish and wildlife habitats including salmon habitat, American Indian treaty rights, and cultural and historic sites and structures. Measures to mitigate any adverse environmental impacts should be identified in the EIS.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email tiernan@futurewise.org.

Sincerely,

Tiernan Martin,
Livable Communities Program Manager,
Futurewise

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