

Responses to question on Comp Plan EIS

From: "Staley, Brennon" <brennon.staley@seattle.gov>
To: "Flemister, Lauren" <lauren.flemister@seattle.gov>, "Lowe, Marco" <marco.lowe@seattle.gov>, "Lee, Kye" <kye.lee@seattle.gov>, "Valles, Christa" <christa.valles@seattle.gov>, "Eder, Dan" <dan.eder@seattle.gov>, "Vallier, Cara" <cara.vallier2@seattle.gov>, "Hubner, Michael" <michael.hubner@seattle.gov>, "Welch, Nicolas" <nicolas.welch@seattle.gov>, "Day, Seferiana" <seferiana.day@seattle.gov>
Cc: "Quirindongo, Rico" <rico.quirindongo@seattle.gov>, "Housen, Jamie" <jamie.housen@seattle.gov>, "VanBemmel, Liz" <liz.vanbemmel@seattle.gov>, "Nolte, Dan (MOS)" <dan.nolte@seattle.gov>, "Anderson, Liza" <liza.anderson@seattle.gov>
Date: Wed, 20 Sep 2023 13:51:50 -0700

Christa, below are responses to your questions about the EIS, both in your email and in comments in Section 1 of the Draft EIS.

Context

Development of an EIS has three basic steps:

- Scoping: This process involves development of the alternatives and the methods for analyzing them
- Development of a draft EIS: This process involved conducting analysis of multiple alternatives and summarizing that work in a Draft EIS which is released to the public for comment
- Development of a final EIS: This process involves creation of a single preferred alternative which is analyzed and including in a Final EIS. No public comment is taken on the Final EIS.

We completed scoping in November of 2022 and are planning to release the draft EIS with the draft plan. At this point, we cannot change the alternatives, including housing and job number or the basic approach to analysis at this time. These decisions were locked in at the end of scoping. We are obviously happy to talk through why certain decision were made.

The alternatives were crafted to help understand the impacts of different policy choices such as a more compact versus a more diffuse development pattern or different degrees of growth.

Additionally, the alternatives had to be crafted to:

1. Meet City Council requirements that were included in budget proviso for this work.
2. Create distinct scenarios that would result in meaningful differences.
3. Create "bookends" such that the preferred alternative could fall within the range that was studied

The alternatives were not intended to be policy options that City would choose from. During internal briefings and public meetings, OPCD consistently stated that we expected that our draft growth strategy would likely be combination of alternatives. This is consistent with the draft growth strategy we have proposed which is a combination of multiple strategies and is less intense than alternative 5.

Growth and Distribution of Housing and Job Growth in the Alternatives

Each alternative has an assumption for housing and job growth in order to support analysis of potential impacts. However, the alternatives are concept-level scenarios without specific zoning proposals. Given this limitation and the challenges of predicting future development patterns

generally, housing and job assumes were intended to envision possible outcomes rather than being a specific prediction of the future. Below is a summary of how the housing and job numbers for each alternative were created:

- The amount of growth in No Action Alternative is GMPC minimum. We used this assumption because we are required to plan for this number even if we don't update the plan and because it is significantly lower than past growth so it seemed like a reasonable No Action scenario.
- The distribution of growth in No Action is based in equal measure on two data points:
 - distribution over the last 10 years: and
 - the Seattle 2035 growth targets
- The amount of growth in action alternatives is increased by:
 - 20,000 homes in alternatives 2, 3, and 4
 - 40,000 homes in alternative 5
- The distribution of growth in action alternatives goes entirely to new areas of growth in each alternative (neighborhood centers, corridors, urban neighborhoods, new/expanding urban centers)

EIS Housing Assumptions by Place Type and EIS area

The numbers of homes and jobs that were assumed for each place type and each EIS area are shown in slides in the shared MO Review folder at:  [20230918 EIS Slides for MO.pptx](#).

For numbers by place type, it is assumed that without any changes (i.e. alternative 1) 81% of new homes would be in regional and urban centers. This outcome is to be expected as the existing Urban Village strategy has focused growth and capacity in these areas. Under the action alternatives, the amount of housing outside of regional and urban centers would increase significantly. Between alternatives 1 and 5, it would increase from 19% to 39% of new housing.

The numbers by EIS areas show a shift from Center City (areas 4 and 5) to other areas of Seattle which is consistent with more growth outside of regional and urban centers. Variation between other EIS areas is subtle since each of the action alternatives creates new place types that occur in all of these areas.

EIS Population Estimates

Population estimates are derived by taking the housing unit assumptions by multiplying them by existing household size of 2.05 people. Analysis in the EIS is driven primarily by the growth of housing units so these estimates are primarily to give people a sense of scale.

Detailed Timeline

Below is a timeline for the creation of specific comp plan, zoning, and EIS products. The dates are based on a November release of the draft Comp Plan. All dates are estimates to give a general sense of timing.

- Release draft Comprehensive Plan and EIS: November 2023
- Engagement on draft Comp Plan: December 2023 – February 2024
- Develop proposed updated growth strategy and preferred alternative based on public feedback: March 2024
- Mayor approval of updated growth strategy and preferred alternative: April - May 2024
- EIS Consultants begin environmental analysis of preferred alternative: June 2024
- Create zoning maps using updated growth strategy: June - July 2024


- Release zoning maps: August 2024
- EIS Consultants review zoning maps and update analysis as needed: August – September 2024
- Engagement on draft zoning maps: August - October 2024
- Release Mayor’s Recommended Plan and Final EIS: October - November 2024
- State Deadline for Comp Plan Adoption: December 31, 2024
- Appeal Process for Final EIS: January - March 2025
- Release updated zoning maps and draft legislation for public comment: March 2025
- Transmit Mayor’s Recommended Plan to Council: April 2025
- State Deadline for Adopting Zoning Legislation: June, 30, 2025
- Transmit Zoning legislation: Summer 2025

Relationship of draft growth strategy and preferred alternative

OPCD is proposing to release a draft growth strategy with draft plan. This version of the growth strategy is a high-level concept that we are putting out for feedback. Neighborhood centers and corridors will be show simply as circles and buffers with no variation due to local conditions. After release, we will be doing extensive public engagement to get feedback. We will then update the growth strategy based on the feedback we received and develop detailed zoning maps with specific boundaries that consider local conditions and proposed zoning. The preferred alternative would be released with the Final EIS in late 2024. It will vary from the draft growth strategy primarily in that it will be informed by a round of engagement, have detailed boundaries for place types, and include a specific approach to zoning.

From: Valles, Christa <Christa.Valles@seattle.gov>
Sent: Friday, September 15, 2023 2:38 PM
To: Hubner, Michael <Michael.Hubner@seattle.gov>; Flemister, Lauren <Lauren.Flemister@seattle.gov>; Welch, Nicolas <Nicolas.Welch@seattle.gov>
Cc: Lowe, Marco <Marco.Lowe@seattle.gov>; Lee, Kye <Kye.Lee@seattle.gov>; Eder, Dan <Dan.Eder@seattle.gov>; Housen, Jamie <Jamie.Housen@seattle.gov>; Staley, Brennon <Brennon.Staley@seattle.gov>; Vallier, Cara <Cara.Vallier2@seattle.gov>
Subject: RE: MO/OPCD follow-up re: Growth Strategy

Thanks Michael.

I had a chance to review the  [summary chapter in the DEIS today](#) and see that it answers some of my questions below. I’ve also left some comments. One of the things I’m most perplexed abt is the assertion with Option 5 that the vast majority of growth will still go into existing Regional Centers and Urban Villages. It kinda defies logic to me, and also begs the question of why go so far above and beyond HB1110 in that case if most of the growth is still going elsewhere?

Anyhow, here’s some info I pulled together that might be helpful for my colleagues:

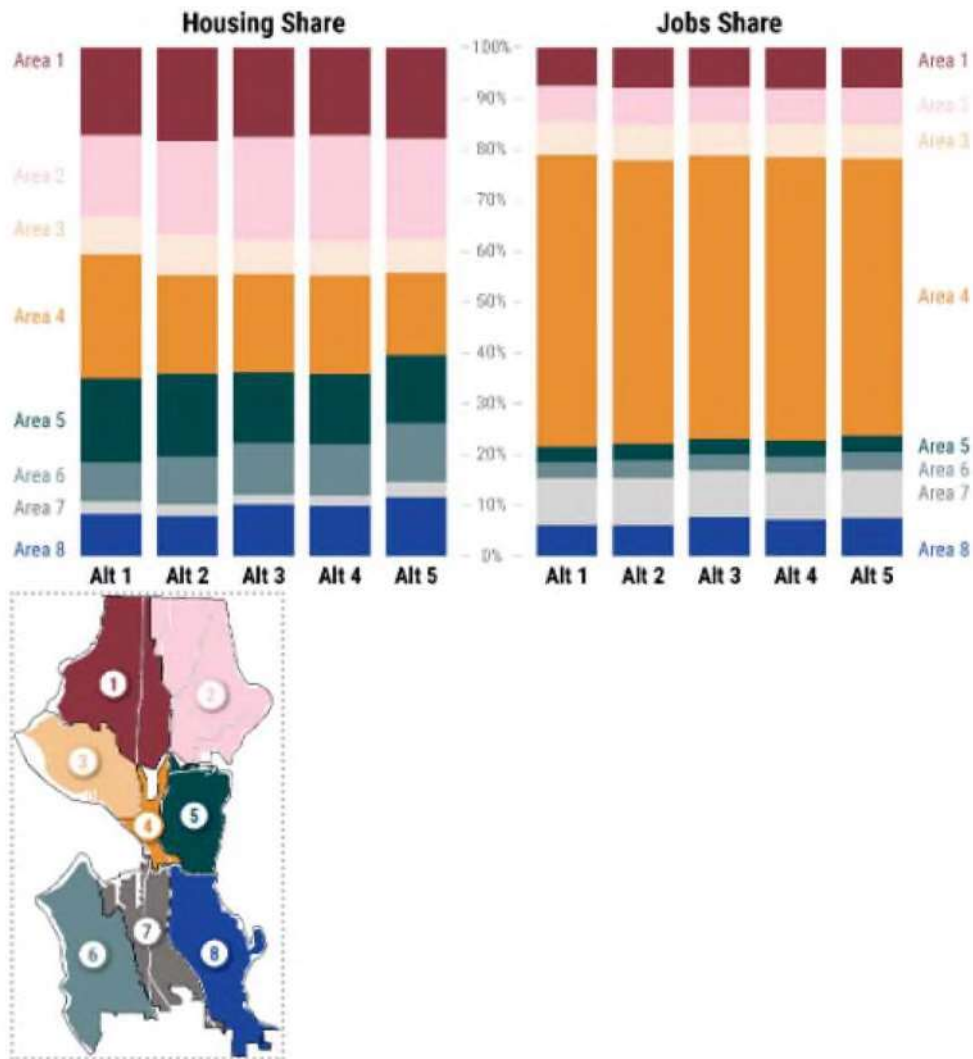
	A	B	C	D
1		Alt 1- status quo	Alt 2- focused	Alt 3- Broad
2	Description	Most housing & jobs funnelled into existing Urban Centers & Villages	Adds neighborhood centers, similar to urban villages by allowing wide range of housing types but smaller geo area & level of intensity	Allows wider range of scale housing options, duplexes, triplexes, and fourplexes and stacked flats, in all Neighborhood Residential (NR) zones part of a new Urban Neighborhood place ty
3	Projected Housing #	80,000	100,000	100
4	Population Growth Estimates	164,000	208,000	205,1
5				
5	GMPC targets for Seattle for 2024-44			
7	housing units:	80,000		
3	jobs	159,000		
3				

The pop. Growth estimates seem different than the GMPC targets- are these estimates based on the zoning capacity that would be created, as opposed to the projections assigned to us? If I'm reading all the info correctly, technically, it seems like we could meet our housing unit target with Alt 1 (not saying we'd want to do that, but is this technically correct)?

Another observation: It seems like Option 5 leaves a lot of flexibility to mix and match options in multiple ways, but OPCD is proposing one specific way in this draft plan that is relatively aggressive (leading to way more growth capacity than what the GMPC targets would suggest is needed). I also see that you go into subarea here, which tracks to some of my Qs, but I'm not getting what assumptions are being made abt why there is so little variability between housing share with the different options.

Looking forward to understanding your rationale better on Monday. Thanks.

Exhibit 1.49. Comparison of Housing and Jobs Growth Estimates Percent Share by Study Area—Citywide Alternatives



Sources: City of Seattle, 2023; BERK, 2023.



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From: Hubner, Michael <Michael.Hubner@seattle.gov>
Sent: Thursday, September 14, 2023 5:35 PM
To: Valles, Christa <Christa.Valles@seattle.gov>; Flemister, Lauren <Lauren.Flemister@seattle.gov>; Welch, Nicolas <Nicolas.Welch@seattle.gov>
Cc: Lowe, Marco <Marco.Lowe@seattle.gov>; Lee, Kye <Kye.Lee@seattle.gov>; Eder, Dan <Dan.Eder@seattle.gov>; Housen, Jamie <Jamie.Housen@seattle.gov>; Staley, Brennon <Brennon.Staley@seattle.gov>
Subject: RE: MO/OPCD follow-up re: Growth Strategy

Thanks, Christa.

I will confer with the team about what we can bring to the discussion in responses to these questions. There will be some limitations on points that would only be decided in detail later in the process (such as precise zoning boundaries), but I believe we can work on some meaningful responses to each at the level at which they are defined in the comp plan growth strategy proposal.

(Copying Brennon.)

Michael

From: Valles, Christa <Christa.Valles@seattle.gov>
Sent: Thursday, September 14, 2023 5:00 PM
To: Hubner, Michael <Michael.Hubner@seattle.gov>; Flemister, Lauren <Lauren.Flemister@seattle.gov>; Welch, Nicolas <Nicolas.Welch@seattle.gov>
Cc: Lowe, Marco <Marco.Lowe@seattle.gov>; Lee, Kye <Kye.Lee@seattle.gov>; Eder, Dan <Dan.Eder@seattle.gov>; Housen, Jamie <Jamie.Housen@seattle.gov>
Subject: RE: MO/OPCD follow-up re: Growth Strategy

Hi Michael,

Sounds like a good plan. I can take a shot at some Qs, but would encourage my colleagues to weigh in as well. In general, I think most of us are still trying to wrap our arms around the OPCD proposal and make sure we understand it.

As we've noted, we want to make sure we have a clear understanding of the areas of the City OPCD is suggesting we go beyond HB1110- and not just where and how, but to what extent. I believe you actually laid this out in your last deck, but I think we'd all like to get a little bit more granular if possible. Some thoughts on helping us get there:

1. Is there a way we can drill down even further on some of the maps and do a side-by-side compare and contrast of the different NRZ changes and how they stack up to HB1110? Since OPCD's approach would require exercising the alt. option in HB1110, to what extent are any of the proposed areas for upzone deviating from HB1110's base requirements of 4+2? Can we see & discuss more detailed maps that break out the three NR zones A, B, and C by region- NE, NW, SE, SW, Central. Also, want to understand more at a subarea level what the percentage change is- in other words, while you are saying abt ½ of current NRZ would be subject to HB1110 minimum requirements & half to more, looks to me like some

neighborhoods on the whole will see a much larger percent of current NRZ upzoned to more than HB1110- so we need to better understand what this means for different areas.

Changes to existing NR areas: mapped

About half of existing NR would be rezoned to allow new low-scale housing types (e.g., 2/3/4/6-plexes, cottage housing, stacked flats)

- Required by new State legislation on “middle housing” (HB 1110)
- Areas with displacement risk may include fewer units per lot (allowed by HB 1110)

About half of existing NR would be rezoned to allow moderate-density apartments within centers and corridors

- Going beyond HB 1110 in these areas meets anticipated demand for housing supply, diversity, and affordability
- Leverages current and future transit investments

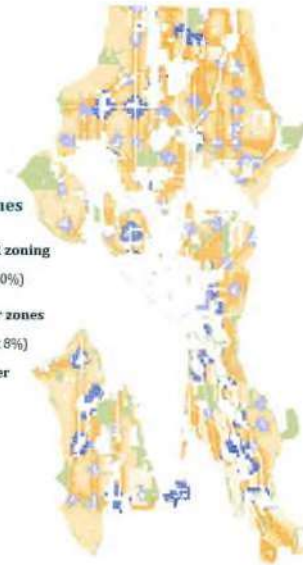
Proposed NR rezones by land area

Areas with updated NR zoning

- New NR zones (55-60%)

Areas changed to other zones

- Urban center (about 8%)
- Neighborhood center (about 8%)
- Corridor (25-30%)



LIBERATIVE DRAFT

2. OPCD staff mentioned that some of the upzoning beyond HB1110 was in anticipation of a TOD bill passing next session. Can we drill down into these areas more to discuss where you are making this assumption (corridors I'm assuming?) and importantly, what version of the State TOD bills floating around last year is OPCD using as a guide? Can we get more detailed maps showing the corridor proposal only and how many blocks beyond the major arterial would be swept up into these- and how are you deciding to bring in more blocks than just the arterial into the higher upzone beyond HB1110- and what are you defining as frequent transit routes? Is this more than BRT and Light rail? I understand the last TOD version that made it the farthest was just using rail and brt... the map suggests you are using a much broader definition if I'm reading things correctly.
3. How much growth did our current Comp Plan anticipate and plan for? How did projections pan out vs. actuals in terms of where and how the growth actually happened?
4. Can you please walk us through the City's new growth targets and what the legal requirement is for addressing these in the next plan? Am I recalling correctly that we are only are designating a certain amt of growth at the Regional Center level and we don't actually have to get more granular than that?
5. How much growth can the City's current existing zoned capacity accommodate? What areas of the City have existing underutilized zoning capacity- and what is the plan for those areas?
6. How much additional growth capacity would all the new proposed upzones allow for? If we just applied HB1110 where required, what would that get us?

If some of what I'm asking isn't clear, happy to jump on a quick call in advance of next week's mtg, might be easier than going back and forth over email. Thx. -cv



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From: Hubner, Michael <Michael.Hubner@seattle.gov>
Sent: Thursday, September 14, 2023 12:13 PM
To: Valles, Christa <Christa.Valles@seattle.gov>; Flemister, Lauren <Lauren.Flemister@seattle.gov>; Welch, Nicolas <Nicolas.Welch@seattle.gov>
Cc: Lowe, Marco <Marco.Lowe@seattle.gov>; Lee, Kye <Kye.Lee@seattle.gov>; Eder, Dan <Dan.Eder@seattle.gov>; Housen, Jamie <Jamie.Housen@seattle.gov>
Subject: RE: MO/OPCD follow-up re: Growth Strategy

Christa,

Nick is going to get back to you on sending the document. We will also set up a meeting about a week after you have to review the content and discuss.

In the meantime, we have a follow up meeting on Monday at 2 to continue discussion of the growth strategy and NR zoning. For that meeting, I propose we use the first 40 minutes to address any questions or issues that you would like to focus on. If you have a list ahead of time, please let us know in order to bring the best info to the table. For the last third of the meeting, it would be very helpful to talk about process and timing for remaining MO review. Does this sound reasonable?

Michael

From: Valles, Christa <Christa.Valles@seattle.gov>
Sent: Wednesday, September 13, 2023 3:28 PM
To: Flemister, Lauren <Lauren.Flemister@seattle.gov>; Hubner, Michael <Michael.Hubner@seattle.gov>; Welch, Nicolas <Nicolas.Welch@seattle.gov>
Cc: Lowe, Marco <Marco.Lowe@seattle.gov>; Lee, Kye <Kye.Lee@seattle.gov>; Eder, Dan <Dan.Eder@seattle.gov>; Housen, Jamie <Jamie.Housen@seattle.gov>
Subject: RE: MO/OPCD follow-up re: Growth Strategy

Hi All,

Thx for setting up this follow up mtg. Also wondering, when exactly can we expect to see the proposed anti-displacement strategy? We will likely need some time with you to discuss following our receipt of that as well. Thanks!



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-----Original Appointment-----

From: Flemister, Lauren <Lauren.Flemister@seattle.gov>

Sent: Tuesday, September 12, 2023 2:11 PM

To: Flemister, Lauren; Flemister, Lauren; Lowe, Marco; Lee, Kye; Valles, Christa; Eder, Dan; Vallier, Cara; Hubner, Michael; Welch, Nicolas; Staley, Brennon; Day, Seferiana

Cc: Quirindongo, Rico; Housen, Jamie; VanBemmel, Liz; Nolte, Dan (MOS)

Subject: MO/OPCD follow-up re: Growth Strategy

When: Monday, September 18, 2023 2:00 PM-3:00 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Microsoft Teams Meeting

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