



Comprehensive Plan: Talking Points

Hey 350 Seattle Community!

As you might have heard, the [Seattle Comprehensive Plan](#) Draft was released earlier this year and is currently receiving public comment until May 6th. The Comprehensive Plan plays a major part in how our city will grow and thus is one of the most impactful climate policies for the next 20 years.

Housing policy has played a major role in environmental racism and is intimately connected to climate justice. In the past, redlining and racial covenants concentrated communities of color into particular neighborhoods. Zoning laws have been used to continue this segregation while placing industrial sites next to, and [highways through](#), BIPOC communities. These neighborhoods are exposed to higher levels of pollution, [lower air quality](#), less access to green space, and are more likely to be 'heat islands'. These same communities have been the first to see impacts from the climate crisis and will be the communities most impacted going forward. Housing and zoning policy have greatly contributed to our current environmental and health disparities and must be centered as we sustainably grow our cities.

How we grow our cities and create housing for all have major impacts on our mitigation and adaptation to climate change. Denser cities create [2-2.5 times less GHG emissions](#) per capita, increase the access to and use of public transit, and lead to less deforestation and loss of farmland. In contrast, sprawl can lock in energy and transportation dependencies and complicate mitigation of climate impacts. When we allow for more and more types of affordable housing across Seattle, we combat displacement and curb climate-destroying commutes. When we invest in a transportation system that enables every Seattle resident to get around safely, conveniently and affordably without a car, we tackle our city's largest source of climate pollution – while investing in healthy, rooted communities where people want to live, work and play. And when we support communities to thrive in place, we build climate resilience: the everyday community connections that make for a good life become life-saving during a heat wave or wildfire smoke.

To assist you all in your comments, we have pulled together talking points from the [Complete Communities Coalition](#) as well as [The Urbanist](#). We have also called out the explicit climate connections to many of these comments so that we have firmly drawn the connection between climate and allowing more and more affordable homes to be built in Seattle.

Please use these talking points to [comment on the comprehensive plan here](#) by May 6th!



Talking Points

- 1. Support walkable and complete communities throughout all of Seattle by creating neighborhood anchors that include sufficient capacity for housing and mixed-use developments to truly create 15-minute neighborhoods.**

Equity and Environmental Considerations

- The 15-minute city concept highlights that everyone should be able to access their basic needs (food, basic medical care, green space, public transit) within a 15 minute walk of where they live.
- This type of development drastically reduces the amount of time people spend in their cars, makes it much easier for people to get around by walking, biking or rolling, and more equitably spreads green spaces and community resources.
- The comprehensive plan currently nods towards this idea through the use of 'neighborhood centers', but these centers are inequitable distributed and far too small. For example, they are currently only 800 feet across (think one city block) and over 15 of the neighborhood centers proposed in primarily single-family portions of the city in earlier versions of the plan were removed.

Specific Requests

- Enlarge the proposed Neighborhood Centers, from 800-ft to ¼ mile.
- Reintroduce Neighborhood Centers that were studied but not included in the Draft Plan.
- Allow and incentivize the development of small ground floor commercial uses and community gathering spaces in neighborhood centers.
- Allow small scale businesses in all zones including small cafes, stores, services, and even small scale production. Let's let it happen on any part of the block, not just the most expensive corner lots. Remove parking minimums from small scale businesses.



2. Support Equitable Transit-Oriented Development

Equity and Environmental Considerations

- [Transportation accounts for 61% of Seattle's carbon emissions](#). To reach our climate goals, we need to get people out of their cars and onto public transit. Allowing ample housing within walking distance of all frequent transit stops is an ideal way to make using transit convenient.
- [Equitable transit-oriented development](#) combines the increase in housing around frequent transit with community-ownership of land. The goal is to give the community more power in planning and ownership over the development so they can create neighborhoods where people can thrive in place.
- Currently, the Comprehensive Plan allows for increased density only on the major arterial roads themselves. This forces renters to live on the busiest, noisiest, and most dangerous streets with the highest air pollution, and doesn't allow enough new housing to meet the need. Expanding the corridors where density is increased even a few blocks on each side of major arterials can go a long way towards giving renters access to safer areas of the city to live in, and allow many more people to live within walking distance of frequent transit

Specific Requests

- Allow for midrise (6-8 story) housing in all areas served by frequent transit, in the ¼ mile around frequent bus service and ½ mile around light rail.
- Allow high-rise housing within ¼ mile of light rail stations and urban centers, particularly in low-displacement risk areas.
- Include a wide corridor that allows for new housing not just hugging the busy road but for multiple blocks on either side. People should have access to affordable housing on safe, residential streets close to transit.
- Connect urban villages with dense corridors that can provide additional services to adjacent neighborhoods.
- Remove parking requirements to reduce housing costs and promote sustainable transportation options. The high cost of parking spaces limits the feasibility of affordable housing development. By eliminating these requirements, we can



create more affordable and sustainable housing options while also encouraging alternative transportation methods.

- Designate the CID and Graham Street station areas as specific sites for zoning and land use regulation that will result in at least 30% of the land surrounding the stations being in community ownership and 30% of the housing as permanently affordable (under multiple models such as community land trusts, cooperatives and social housing).

3. Allow Middle Housing across the city

Equity and Environmental Considerations

- Single-family zoning was long used as a way to exclude low-income and minority groups from living in large parts of the city.
- Middle housing adds 'gentle density' that spreads growth across the city while giving groups that were excluded from single-family neighborhoods the opportunity to live and develop community in them.
- People who live in multi-family buildings use less energy to heat and cool their spaces since they both tend to have smaller living spaces and part of their space is bounded by a neighboring indoor space that is already heated.
- Increased density often brings up concerns about the removal of neighborhood trees. However, middle housing is often the same size as single-family housing already there. This means it can be added in the footprint of previous buildings without harming trees. By adding more housing on less land, middle housing leaves more land for trees and greenspace. [A recent Seattle tree survey](#) highlighted that development was a very minor factor in tree canopy loss, which shows that more housing and trees can coexist.
- Currently, the comprehensive plan allows for certain types of middle housing across much of the city but has a very low [FAR](#) (floor area ratio). FAR is the square footage of a structure divided by the square footage of the lot it's built on. The current FAR of 0.9 for example means you could build a one-story structure over 90% of a lot or a two-story structure of 45% of the lot. Low FARs mean you get smaller buildings and smaller units. Without an increase in the FAR, it won't be feasible to build sixplexs or two and three bedroom units. The increase in FAR



also means it's more possible to grow up and not out, allowing more space for trees.

- The current comp plan also limits the types of middle housing that are allowed meaning a lot of more townhomes and not more accessible housing types like stacked flats. Stacked flats allow more space for trees compared to townhomes and ADUs.

Specific Requests

- Allow the full complement of “middle housing”—duplexes, triplexes, fourplexes, accessory dwelling units, cottage clusters, townhomes, stacked flats, and courtyard apartments—in all residential areas across Seattle. These housing options are relatively affordable, fit in well in neighborhood residential areas, and can create affordable homeownership options.
- Enable the development of family-sized homes in middle housing by allowing for more development capacity in fourplexes, sixplexes, and other middle housing options. Align Seattle’s middle housing standards with the Department of Commerce model ordinance, at a minimum, to ensure middle housing can be feasibly built (ie. a minimum floor area ratio of 1.2 for fourplexes and 1.6 for six plexes).
- Create development incentives, like floor area ratio bonuses, for stacked flats and family-sized homes.

4. Increase incentives for Green Housing

Equity and Environmental Considerations

- We know we need to build more housing, but HOW we build that housing is important. The comprehensive plan is a great opportunity for us to create more incentives that push towards less carbon-intensive and more energy efficient housing!

Specific Requests

- Encourage sustainable construction by offering incentives for meeting deep green building standards, such as passive house construction or preservation of embedded carbon in existing structures.



- Allow the development of cross-laminated timber highrise buildings in Regional and Urban Centers.
- Remove residential density limits and requirements for side-setbacks, upper-level setbacks, modulation, and articulation. Such development standards require more complex building envelopes, directly reducing energy efficiency and making innovative construction methods like cross-laminated timber or modular construction more difficult.

5. Increase incentives for Affordable and Accessible Housing

Equity and Environmental Considerations

- Increasing housing costs are displacing the lowest-income residents out of Seattle and are the [main driver of increasing homelessness](#). We need to make sure that we are setting up our zoning in a way that encourages the development of affordable units and build in anti-displacement measures that ensure that long-term residents of our communities can afford to stay in their communities alongside development.
- Much of the new housing that has been built in the past 20 years is single-bedroom apartments and townhouses. These spaces are often inaccessible to people with disabilities or do not accommodate families that need more than one bedroom.
- We also know that affordable units alone won't fix our housing crisis. We need an all-of-the-above approach that encourages building housing of all types, even market rate. [New housing can reduce the competition for affordable housing and make it easier to prevent displacement. Rent growth is slower in low-income neighborhoods after new market-rate apartments are built.](#)

Specific Requests

- Encourage the development of affordable and social housing, cooperative, and community land trusts by providing a height, density, and floor area bonus for properties that contribute to equity goals. This should involve reserving a significant portion for people earning less than 80% of Area Median Income, supporting homeowners at risk of displacement, and all-income housing that maintains full public ownership.



- Promote the creation of housing options that are physically accessible to people with disabilities, as well as unit sizes that can accommodate multigenerational households, housing for elders, and housing with sufficient rooms for larger families.
- Strengthen the Growth Strategy's anti-displacement impact by allowing sixplexes on all residential lots in Urban Neighborhood areas with low displacement risk.

6. Center Equity in the Growth Plan

Equity and Environmental Considerations

- Inequitable development leads to displacement and gentrification forcing people of color and low-income residents to drive more.
- The current comprehensive plan focuses our economic development and growth in 'regional centers' but none of those centers are in South Seattle.
- The current proposal doubles down on the 'urban villages' strategy, which [OPCD itself has called](#) a failure to mitigate displacement of BIPOC residents, and an extension of historic racist and exclusionary zoning policy.
- While the current comprehensive plan highlights the racial and economic disparities created by redlining, zoning, and past development, it does nothing to address those harms or prevent them from being repeated in the future. This is unacceptable.

Specific Requests

- Designate a Regional Center in South Seattle and conduct sub area planning.
- Allow the most growth in low-displacement areas. Fund community-based developments that utilize an affirmative marketing and/or community preference policy to allow displaced people to return.
- Consider the health and safety impacts of infrastructure routes in decisions about future land use and housing density. Mitigate the pollution caused by freeways, airports, and other carbon-emitting transportation options, which are disproportionately located in marginalized communities, through lids and other strategies.