



December 6, 2024

One Seattle Plan Comprehensive Plan
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Dear One Seattle Plan team:

On behalf of the Magnolia Chamber of Commerce's over 550 business and family members, we have posed a series of questions regarding the proposed Comprehensive Plan, released on October 16, 2024. We hope these thoughtful questions and suggestions can help us better understand the new comprehensive plan's goals, how the city works with other essential departmental and government-to-government partners, and how and if analyses are conducted.

We appreciate that Seattle's proposed comprehensive plan is based on the laws, rules, and regulations guiding comprehensive planning under the Growth Management Act ([Chapter 36.70A RCW](#)), or GMA. The current GMA promotes future growth by encouraging compact urban development, reducing sprawl, prioritizing affordable housing, protecting critical environmental areas, promoting coordinated transportation options, and ensuring adequate public facilities and services support population growth. At the same time, it incorporates climate resilience strategies into local comprehensive plans.

We also appreciate that the state of Washington is undergoing rulemaking to require an inclusive and equity-driven approach to meeting the housing needs of all residents at all income levels. However, we are still determining whether those rules have been established under the Washington Administrative Code and the success determinants. In other words, what are the quantitative and qualitative outcomes of knowing that the comprehensive plan has succeeded?

Developing a "future desired condition" for housing may be advisable. Though usually used for ecosystem management, it may be helpful to describe a reference urban area with the desired inclusionary mix of the human population to measure the success of growth management actions while keeping it open to unexpected changes. This is particularly important as one of the goals of the new comprehensive plan is to reduce the effects of structural racism, such as historic redlining, while also increasing the housing stock at various levels of affordability. Monitoring and reporting progress toward a desired future condition in housing affordability, racial integration, and economic integration and ensuring that growth does not disproportionately serve or displace one group over another can be a reasonable strategy to check if the comprehensive plan is working on meeting its outcome-based goals.

Perhaps we are suggesting a publicly available process already established in urban planning and land use reform for objective measures to assess the success of racial and income integration in Seattle neighborhoods. We suggest that the OPCD share these adaptive management plans biennially or in whatever timeframe makes the most sense. This would help guide the public and policymakers in objectively assessing progress and reporting on the comprehensive plan's success in meeting its stated goals.

Below are a series of additional questions we have regarding the proposed comprehensive plan criteria, and we look forward to using public forums and private meetings to seek clarifications, increase understanding, and find answers:

Tax Base and Revenue Impacts

- A property's assessed value is the most significant factor affecting property taxes in funding essential services vital to Seattle and King County. How do the City and other taxing entities expect the updated comprehensive plan to impact residential and commercial property values and tax revenue? Are there any laws or regulations regarding property taxes and projected impacts of the proposed comprehensive plan, and how much can property owners pass on to renters? It may be helpful to provide projective analyses of how the increase in affordable and market-rate housing impacts dollars raised for property tax-funded services and whether there are rules and regulations guiding property owners and renters concerning property tax burdens.

Schools and Institutions

- **Seattle Public School Challenges.** How is the city working with Seattle Public Schools regarding the proposed comprehensive plan? The district recently proposed closing as many as 21 public schools, including Catherine Blaine K-8 School in Magnolia. That closure plan, aimed at addressing budget challenges, has been delayed, presumably indefinitely. However, the district's fiscal challenges remain, and as of this date, it is somewhat unclear how decisions are being made to tackle them.

Is the city linking comprehensive growth plans with the public school system? Are the city and SPS working together to ensure that long-term school plans incorporate comprehensive growth strategies? Magnolia's nearest public middle school is McClure, which requires students to be bussed to Queen Anne. The nearest high school is Ballard, which serves several Seattle neighborhoods slated for significant growth. Are there joint plans between SPS and the OPCD to project and plan for sustainable development and changing demographics—based on equity and affordability goals—consistent with HB 1110 and proposed WACs? Public schools are an essential neighborhood amenity and drive decision-making for families with children. Arguably, confidence in the longevity of neighborhood schools is a vital aspect of sustainable growth management.

- **Child Services.** What other public educational and childcare services, such as preschools, afterschool programs, and subsidized programs, will be available in Magnolia to address the increasing diversity of families living in new affordable and market-rate homes? While we understand that OPCD is focused on the plan's zoning elements, we hope there is coordination with other city departments in anticipation of increased demand for these services.

Transportation

- **Seattle Metro and Sound Transit.** We are very interested in better understanding the collaboration and cooperation with King County Metro to address the arguably less-than-adequate public transit via bus service in and out of Magnolia as and if growth plans are realized. Much of Magnolia is currently determined to be relatively low or subpar in transit scores and needs frequent routes. Are there plans to increase bus services in the Magnolia neighborhood, including the proposed affordable and supportive housing in Discovery Park, and how is the city working with King County Metro to assure residents that proposed growth plans will result in commensurate public transportation services?
- **Ballard Link and ST3.** How is the comprehensive plan considering the delays and anticipated cost overruns of the Ballard Link and ST3? The West Seattle Link has proven to be billions of dollars more expensive than expected and behind schedule. We are concerned that the projected cost escalations will affect the Ballard Link and may delay its completion. Is the city working with Sound Transit to ensure the comprehensive plan goals are met with additional affordable mass transit options to improve traffic flow and reduce car needs?
- **Magnolia Bridge.** By the city's admission, the Magnolia Bridge is the most direct in and out route to and from Seattle, based on Magnolia's current population (est. 20,000). It also has the most accessible access to I-5 & I-90 and Metro bus service in and out of Magnolia. However, the city evaluated and assessed the bridge and concluded it must be replaced with a new bridge or find an alternative route to connect with 15th Ave W & NW. The delayed bridge and transportation projects on the peninsula must be included in plans and conversations related to growth in Magnolia. How is OPCD working with other city departments to ensure the infrastructure exists to accommodate the growth proposed in the revised

plan?

- **Steep Hills and Micromobility Options.** We appreciate the city’s support for improving access to diverse forms of transit and eliminating parking mandates to increase the viability of housing development. We also understand the city’s commitment to enabling residents to use other forms of transportation to get to and from jobs and services and creating walkable neighborhoods that will welcome micromobility vehicles. Magnolia has many steep hills within the neighborhood and sidewalks in relatively poor condition. As more residents opt for micromobility alternatives instead of cars, especially given reduced parking, how will our topography influence those options? Will developers be required to add new sidewalks? By default, due to the lack of designated lanes in residential neighborhoods, how will traffic-related safety be encouraged or enforced, given current challenges with public safety access?

Infrastructure

- **Public Utilities.** Magnolia is an older neighborhood on a peninsula with glacial till soil. Many areas proposed for multi-dwelling housing will be on streets with inadequate, aging, or failing water, energy, sewer, and waste services. It will be helpful to know if OPCD is anticipating that the city will be responsible for needed upgrades or if the developers will be required to “fix” utilities to support significant increases in the City’s growth target and add hundreds of thousands of units of housing capacity while allowing for a broader range of housing types.

More broadly, how will the comprehensive plan goals address the challenges of expanding demands on aging infrastructure, extreme weather events, and code interpretations that can burden service applicants with additional costs and fees? How are Seattle City Light and Seattle Public Utilities engaged in developing the comprehensive plan? Like many of our questions, we’re interested in how OPCD partners with critical entities that provide essential services.

- **Public Safety Services.** Mayor Bruce Harrell recently stated that Seattle is in a “... police staffing crisis.” Indeed, the projection for 2024 continues the troubling trend over the last four years (see graph below, prepared by Seattle City Council staff, May 2024):

Sworn Staffing

SPD Staffing Plan – Actuals through Q1 and projections through Dec 2024



2024 Q1 SPD Actuals

Jan-March Actuals:

- Hires Planned: 31
Actual Hires Achieved: 11
- Separations Planned: 27
Separations Realized: 22

Additionally, the West Precinct currently struggles with response times, particularly in Magnolia, given the precinct also serves the Downtown Business District, Waterfront, Chinatown/International District, Pioneer Square, Belltown, Queen Anne, West Edge, SoDo, Westlake, Eastlake, Seattle Center, Denny Triangle, and South Lake Union.

Given their staffing and response time challenges, is SPD weighing in on their capacity to meet our growth projections? How will the comprehensive plan address or help create pressure to address Seattle’s current public safety challenges? How is OPCD collaborating with its Seattle public safety partners, including Seattle police, fire, CARE, and emergency services, as it proposes to double the housing in Seattle?

- **Affordability and Accessible Services and Amenities.** How does the plan assess current and future affordable services and amenities to complement affordable housing? The comprehensive plan is anticipated to increase affordable housing and the walkability of neighborhood centers. However, are there concerns about the current affordability and availability of goods and services in those centers? For example, Magnolia's highly affordable Albertsons store is slated to close for two to three years. A Safeway Superstore with a mixed-use development like the one on the northern end of the business strip along Queen Anne Ave. will be in its place. As another example, Magnolia's healthcare options are relatively limited and expensive, given the current private service providers.

Is it anticipated that neighborhood goods will become more affordable over time and that an array of services will increase? What are the models or determinants for evolving diverse local neighborhoods into ones that provide various affordable options for food, retail, groceries, childcare services, entertainment, and so on? We want to learn more about how the plan anticipates these changes to the hyperlocal economy or if the comprehensive plan focuses more singularly on its mission. Is there objective evidence, or is it well-established anecdotally that affordable and available *goods and services* will follow increases in affordable housing stock options? Will this information and economic development strategies be shared with neighborhood center organizations, such as local chambers? It will be immensely helpful to have examples of successful development of hyperlocal economies commensurate with the increases in affordable housing stock.

Environment

- **SEPA Exemption based on SB 5412.** We appreciate that public policy is often required to do tradeoffs. In this case, the One Seattle Comprehensive plan exempts residential and mixed-use projects from SEPA review to provide affordable housing quickly. We also understand and appreciate that the Washington State Legislature debated, voted on, and passed this ability to provide the SEPA categorical exemption to increase affordable housing and reduce delays that needed environmental review can create in urban zones.

We admittedly are surprised at this exemption due to the well-documented adverse impacts of an urban environment on water quality and, in the case of Seattle, threatened salmon species and water quality concerns in WRIA 8.¹ We respectfully ask how the city will encourage, incentivize, or require stormwater mitigation as we double housing and related infrastructure. Will Seattle encourage or incentivize green infrastructure techniques? We also look forward to how the city might address stormwater mitigation in neighborhoods such as Magnolia, located immediately adjacent to Puget Sound and Salmon Bay, a critical waterway for migrating coho salmon, an ESA-threatened species.

We appreciate that tradeoffs in public policy are always a factor in government decision-making at any level. We assume that the legislature took seriously and soberly the decision to provide SEPA categorical exemptions to urban housing development projects to increase density and affordability. Hence, given the SEPA exemption for reviewing individual housing projects, we look forward to learning more about how the city incorporates environmental concerns to ensure all the construction and new housing, buildings, pavement, lack of tree cover, etc., will have a minimal environmental impact, especially at a cumulative level. Below are some concerns that, considering the SEPA categorical exemption, may never be assessed for possible mitigation but arguably remain scientifically valid.

- **Environmental Impacts of Increases in Housing and Construction: Water Quality.** Magnolia, as already stated, is on a peninsula immediately adjacent to Puget Sound, specifically WRIA 8. Currently, the neighborhood has several large parks, open spaces, large forested and grassy habitat areas, and homes with permeable yards, mature conifers, and deciduous trees. Based on topography, location, soil type, etc., a SEPA analysis could assess whether constructing multiple dwellings on a single lot could benefit from additional mitigation to avoid the environmental contamination created by

¹. The Nature Conservancy [reports](#) that 75 percent of the toxic chemicals entering Puget Sound come from stormwater runoff. Just one acre of pavement can put a million gallons of polluted runoff into Puget Sound each year. In urban waters like Lake Union, stormwater may kill up to 80 percent of migrating coho salmon before they have had a chance to spawn—significantly higher than the 1 percent mortality rate that occurs naturally for pre-spawn salmon.

increased stormwater runoff, sediment runoff, chemical contaminants (particularly during construction), wastewater discharge, and erosion.

Additionally, are the assumptions about the global environmental benefits of car-less transportation accurate for the Magnolia Peninsula specifically, given (1) the current lack of frequent transit options on and off the peninsula, (2) a definitive timeline for the funding and completion of the Magnolia Bridge replacement or an alternative southern route in and out of Magnolia, and (3) the rising costs and delays in the construction and completion of the ST3 Ballard Link? If so, we would appreciate learning more about the environmental analyses or assumptions to alleviate concerns.

Cumulative Effects. Related to the query regarding the specific environmental impacts on water quality, we assume that the proposed increases in housing density, impervious structures, and construction or maintenance of housing and buildings will be assessed in some manner for the cumulative effects of these increases. As noted, polluted stormwater runoff is the number one source of toxic pollution to Puget Sound and surrounding waterways.

We look forward to learning more about how the public might receive this analytical information, how the cumulative impact analyses were conducted or are being undertaken, and proposed mitigations.

We are also interested in learning more about the cumulative effects of stormwater runoff caused by HB 1110's geographic scope, the density of housing structures this will create in urban areas and the expectations that car travel will be reduced instead of increased. Is the state conducting analyses to project the cumulative environmental impacts of HB 1110? We are interested in whether the Washington Department of Ecology expressed any cautions about the legislation, related rulemaking, and, importantly, new comprehensive plans such as, but not limited to, Seattle's. Similarly, we are interested in whether the state or city consulted with the National Marine Fisheries Service or the Environmental Protection Agency. Perhaps this consultation was unnecessary due to elements of the final legislation that we need to assess and evaluate. While these concerns may be outside the scope of OPCD's concerns, it would be helpful for residents to understand consultation processes, particularly under state and federal environmental laws, given our concerns over the cumulative effects of the statewide application of the SEPA exemption to expedite density in housing and related roofs and pavement.

- **Tree canopy.** Though this policy may be outdated, we understand that Seattle aims to increase tree canopy coverage to 30% by 2037. We appreciate that the One Seattle Comprehensive Plan incentivizes developers to plant "large trees" and waive parking requirements to retain trees. However, are there any additional requirements or incentives for replacing trees lost through the demolition of mature landscaping and the new construction of multi-storied or multiple homes on average 5000 sq. ft. lots? Intuitively, such density does not bode well for large trees or landscaping, and we are unclear if an environmental review of such impacts will exist to assess the developer's projects. We look forward to receiving clarification on this issue.

Who or what agency is responsible for the tree care and replacement envisioned in the plan? Will the plan compensate for the loss of mature conifers in existing yards? We ask these questions in the hope that urban planners, while creating more equitable and affordable housing through increased density, also appreciate the anticipated loss of mature trees and urban habitat in such development. Suppose an environmental review of development projects is not conducted, and we recognize we are less than clear on the environmental reviews required under the proposed plan. Will the city and the public lose the ability to analyze and mitigate urban trees' well-documented environmental and human benefits? We assume these concerns will be addressed through the plan's "large tree" planting and care, and we look forward to learning more.

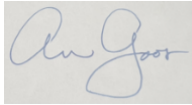
- **Low-impact development.** According to the state of Washington, buildings account for 23% of the state's carbon emissions. Several years ago, the state estimated that green buildings would require at least a 10-year market transition from fossil gas to heating, cooling, and cooking electrification. Can we assume new housing will provide affordable, replicable, and applicable clean technologies and processes to reduce or remove carbon when new homes or multi-dwelling buildings are constructed, operating, and where they are situated?

We look forward to learning more about the analyses or models demonstrating that public utilities can provide enough electrification for new affordable yet climate-friendly housing, particularly given the scope of HB 1110 and the loss of SEPA review due to SB 5412. We are still determining whether any requirements or incentives exist for low-impact development and green infrastructure techniques. We also need to determine if developers are required or encouraged to use planning and management tools to protect clean water and minimize urban flooding. We aim to understand the current regulations, which will ensure that significant increases in housing density are based on low-impact development best practices.

We appreciate the city's willingness to provide office hours and the chance to meet one-on-one with the planning team members. We also appreciate the opportunity to provide public comments. We look forward to contacting the city council as they review and debate the proposed plan. We are also looking forward to communicating with our 36th District legislators to help alleviate some of our concerns about the cumulative effects of HB 1110 over time and geography and to share these with our stakeholders. Hopefully, it will go a long way toward alleviating any concerns, setting improved expectations, and providing answers.

Sincerely,

Ann Goos, President



Jason Thibeaux, Executive Director



CC.

The Honorable Bruce Harrell, Mayor of Seattle
Dan Strauss, Seattle Councilmember, District 6
Robert Kettle, Seattle Councilmember, District 7
The Honorable Noel Frame, WA State Senator, District 36
The Honorable Liz Berry, WA State Legislator, District 36
The Honorable Julia Reed, WA State Legislator, District 36