



October 30, 2019

Re: Proviso \$500,000 in OPCD for the Comprehensive Plan Environmental Impact Statement

Dear Councilmembers:

We strongly urge you to approve the proposed [budget proviso](#) that would make funding for the Comprehensive Plan update's Environmental Impact Statement (EIS) contingent on including an alternative for allowing small-scale multifamily housing options in single-family zones, and for exploring related anti-displacement strategies. Opening up more of Seattle to more homes is one of the [most powerful actions](#) the city can take to confront our concurrent housing and climate crises.

Sightline has conducted extensive research on [middle housing](#) (also known as "missing middle") that includes duplexes, triplexes, fourplexes, townhouses, and small apartment buildings. Middle housing can offer [less expensive](#) homes in [exclusive](#) low-density neighborhoods; provide [workforce housing](#) near jobs, transit, [schools](#), and [parks](#); help multigenerational families live together and seniors [age in place](#); and cut climate pollution from both [cars](#) and [household energy use](#).

Seattle's middle housing ("lowrise") zones comprise just [12 percent](#) of the city's residential land. Meanwhile, Seattle bans middle housing on the [three quarters of residential land](#) it reserves solely for single-detached houses on large lots. Because of these restrictions, only [12 percent](#) of Seattle's homes are duplexes, triplexes, fourplexes, or attached townhomes ([roughly a quarter](#) of these were likely built before zoning changes banned them). In comparison, [43 percent](#) of the city's homes are single-detached houses, even though they take up far more land per home than middle housing types do.

The ban on middle housing in single-family zones has also prevented those vast areas from accommodating new residents, even as the rest of the city has grown rapidly. Nearly two thirds of Seattle's census blocks zoned for single-family actually [lost population since 1970](#). The tight zoning enforces a lose-lose for affordability: older houses get [torn down](#) and replaced one-for-one, yielding far more expensive houses but no additional homes to help the shortage.

Seattle's dearth of small-scale multifamily homes across so much of the city results in exclusion of middle- and low-income earners from neighborhoods of opportunity and entrenched

economic and racial segregation. This should come as no surprise: Seattle’s imposition of single-family zoning across more and more of the city from the [1920s through the 1960s](#) was originally motivated by the desire to segregate neighborhoods by class and race.

Any reform plan to correct harms caused by old and ill-conceived restrictions on housing must be vetted to ensure we don’t repeat the mistakes of the past—that the changes don’t negatively impact low-income people and communities of color. To this end, we strongly support the proposed proviso’s inclusion of analysis of [anti-displacement strategies](#) in the EIS. Going further, we encourage city officials to utilize the EIS process to explore how regulatory reform could be crafted to *benefit* historically marginalized communities.

Seattle’s Comprehensive Plan update will be the city’s roadmap for growth over the next 20 years. It would constitute planning malpractice to omit the option of opening up single-family zones to small-scale multifamily housing options. Relegalizing middle housing won’t solve the city’s affordability crisis all by itself, but it is a critical piece of the puzzle. Nor will it end climate pollution—but as our climate goals continue to slip away, every positive step we can take matters.

Thank you for your consideration.



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