

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeals of
**WALLINGFORD COMMUNITY
COUNCIL, ET AL.**

of adequacy of the FEIS issued by the
Director,
Office of Planning and Community
Development.

Hearing Examiner File:
W-17-006 through W-17-014

**DECLARATION OF G. LEE RAAEN
RE OPCD MOTION TO DISMISS
and WCC MOTION FOR SUMMARY
JUDGMENT.**

I, G. LEE RAAEN, declare under penalty of perjury under the laws of the State of
Washington that the following is true and correct to the best of my knowledge and belief.
The following information is presented in support of the Wallingford Community Council's
Response to DPD's Motion to Dismiss and its Motion for Summary Judgment.

The attached exhibits are true and correct copies of the following documents:


Exhibit A: Page 1.6 from the MHA Draft EIS dated June 2017. (Underlining added)

Exhibit B: Page 1.6 from the Final EIS dated November 2016. (Underlining and
strikeouts are in the original document)

1 Exhibit C: 2015 SEPA Checklist updated 2014 and SEPA Threshold Determination
2 dated June 8, 2015. (Underlining in text has been added for convenience of the Hearing
3 Examiner. Underlined paragraph headings are in original.)

4 Exhibit D: Community Housing Caucus Recommendations, *Solutions to Seattle's*
5 *Housing Emergency*, (3/16/2015)

6 Signed and dated by me this 1st day of May, 2018 at Seattle, WA.

7
8 
9 G. Lee Raaen, WSBA #6258
Attorney for Wallingford Community Council

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that this document was filed on this date by E-file with the Seattle Hearing Examiner’s Office. This declaration with exhibits was served on the parties' attorneys or authorized representatives of record at the email addresses listed below:

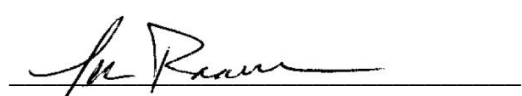
City of Seattle

- Jeff S Weber, Jeff.Weber@seattle.gov
- MHA.EIS@seattle.gov
- Alicia.reise@seattle.gov
- Daniel B Mitchell, Daniel.Mitchell@seattle.gov
- Geoffrey Wentlandt, Geoffrey.Wentlandt@seattle.gov

Appellants

- Beacon Hill Council, mira.latoszek@gmail.com
- Friends of Ravenna-Cowen, Judy Bendich jebendich@comcast.net
- SCALE, Claudia M. Newman, newman@bnd-law.com
David Bricklin, Bricklin@bnd-law.com
cahill@bnd-law.com
telegin@bnd-law.com
Talis.abolins@gmail.com
- Fremont Neighborhood Council, toby@loupploup.net
- Friends of North Rainier, masteinhoff@gmail.com
- Seniors United, David Ward, booksgalore22@gmail.com
- West Seattle Junction, Rich Koehler, rkoehler@cool-studio.net
Junction Gen, admin@wsjuno.org.
- Morgan Community Association, Deb Barker, djb124@earthlink.net

Signed and dated by me this 1st day of May, 2018 at Seattle, WA.



G. Lee Raaen, WSBA #6258
Attorney for Wallingford Community Council

1.4 ALTERNATIVES

The City has identified three alternatives. None is formally proposed or preferred at this time. Modified alternatives and/or a preferred alternative may be identified in the Final EIS.

ALTERNATIVE 1 NO ACTION

Alternative 1 assumes that MHA is not implemented in the study area; no development capacity increases or area-wide rezones would be adopted, and there would be no urban village boundary expansions. Overall growth would be similar to the scenario described in the adopted Seattle 2035 Comprehensive Plan.

ACTION ALTERNATIVES

Alternatives 2 and 3 both assume implementation of MHA to achieve the stated objectives. The total amounts of growth and MHA income restricted affordable housing is similar between Alternative 2 and 3. However, Alternatives 2 and 3 differ in the intensity and location of development capacity increases and the patterns and amounts of housing and job growth across the city that could result. The size of urban village boundary expansions for different urban villages also varies between Alternative 2 and 3. Each action alternative is associated with a detailed zoning map and a set of urban village boundary expansions (See Appendix H).

The location and intensity of zone changes, and the urban village boundary expansions varies between Alternatives 2 and 3 based on different approaches to the urban village displacement risk and access opportunity types. The intent is to test whether and how the policy objective of growing equitably is achieved by directing more growth to areas of opportunity, and moderating growth in areas at high risk of displacement, as well as measuring other potential environmental impacts associated with the amount and location of additional growth.

changes) would also result in higher affordable housing requirements. The scale of the zoning change and amount of the MHA requirement would be indicated by an (M), (M1), or (M2) suffix at the end of the zone title. These suffixes (M), (M1), and (M2) tiers would be an indication of the degree of the MHA change in an area, with larger changes for (M1) tier capacity increases, and the largest degree of change in areas of (M2) capacity increases.

1.4 ALTERNATIVES

~~The City FEIS has identified three~~ four alternatives: a No Action alternative, which is required by SEPA, and three action alternatives, which would implement MHA in different ways. The FEIS reviews the three alternatives that were evaluated in the Draft EIS along with a new Preferred Alternative that combines elements of the DEIS action alternatives. ~~None is formally proposed or preferred at this time. Modified alternatives and/or a preferred alternative may be identified in the Final EIS.~~

ALTERNATIVE 1 NO ACTION

Alternative 1 assumes that MHA is not implemented in the study area; no development capacity increases or area-wide rezones would be adopted, and there would be no urban village boundary expansions. Overall growth would be similar to the scenario described in the adopted Seattle 2035 Comprehensive Plan.

ACTION ALTERNATIVES

~~Alternatives 2, and 3, and the Preferred Alternative all both~~ assume implementation of MHA to achieve the stated objectives. The total amounts of growth and MHA income-restricted affordable housing is similar ~~between in Alternatives 2, and 3, and the Preferred Alternative.~~ However, ~~Alternatives 2 and 3~~ the action alternatives differ in the intensity and location of development capacity increases and the patterns and amounts of housing and job growth across the city that could result. The size of urban village boundary expansions for different urban villages also varies ~~between among Alternatives 2, and 3, and the Preferred Alternative.~~ Each action alternative is associated with a detailed zoning map and a set of urban village boundary expansions (See Appendix H).

The location and intensity of zone changes, and the urban village boundary expansions varies between Alternatives 2 and 3 based on

2.3 PROPOSED ACTION AND ALTERNATIVES

The ~~Draft Final~~ EIS evaluates three alternatives ~~that were included in the Draft EIS and an additional Preferred Alternative.~~ The Preferred Alternative is a modified MHA proposal that combines elements of the Action Alternatives considered in the Draft EIS. Changes to the MHA program reflected in the Preferred Alternative respond to the analysis contained in the Draft EIS and to comments received on that document during the comment period. ~~None is formally proposed or preferred at this time.~~ The City is using the SEPA process to test and construct a program that will ultimately be proposed, in a form similar to the Preferred Alternative, for action by the City Council. Further refinement of the MHA program may occur during the legislative process; additional opportunities for public comment will be provided during the City Council's review process. ~~Modified alternatives and/or a preferred alternative may be identified in the Final EIS.~~

The Final EIS considers four alternatives. Alternative 1 No Action assumes that MHA is not implemented in the study area; no development capacity increases or area-wide rezones would be adopted. Alternatives 2, and 3, and the Preferred Alternative ~~both~~ all assume implementation of MHA to achieve the objective of at least 6,200 affordable housing units built in the study area by the year 2035.

Alternatives 2, and 3, and the Preferred Alternative differ in the intensity and location of development capacity increases and the patterns and amounts of housing growth across the city that could result. Exhibit 2–5 summarizes overall citywide household growth and the MHA rent- and income-restricted housing generated from growth in the study area in the ~~three~~ four alternatives. ~~Appendix 7~~ Appendix G summarizes in detail the approach to modelling how we model growth under each alternative. ~~In summary,~~ the methodology includes estimating total residential and commercial growth in each urban village, estimating MHA affordable housing production that development in each urban village would generate, and modeling for analysis purposes the distribution of affordable housing funded through MHA payments collected from development citywide. Since MHA is in effect or is proposed to be implemented in Downtown, South Lake Union, University District, and Uptown through separate actions, Exhibit 2–5 shows that some MHA affordable housing units would be built in the study area using MHA payments in Alternative 1 No Action. Alternative 1 also includes rent- and income-restricted housing produced through Incentive Zoning (IZ) in the study area under existing regulations. For Alternatives 2, and 3, and the Preferred Alternative, Exhibit 2–5 includes a distinct

SEPA ENVIRONMENTAL CHECKLIST

UPDATED 2014

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

A. Background

1. Name of proposed project, if applicable:

Affordable Housing Mitigation Program and Incentive Zoning Update; Comprehensive Plan Changes Regarding Affordable Housing

2. Name of applicant:

City of Seattle, Department of Planning and Development

3. Address and phone number of applicant and contact person:

Department of Planning and Development
700 5th Avenue, Suite 2000
Seattle, Washington 98104
Contact: Brennon Staley, Urban Planner, (206) 684-4625

4. Date checklist prepared:

May 29, 2015

5. Agency requesting checklist:

City of Seattle, Department of Planning and Development

6. Proposed timing or schedule (including phasing, if applicable):

Approval by City Council and Mayor in late 2015.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

City staff are working on the following initiatives which are related to this proposal:

- A separate concurrent proposal for the 2015 Update of the Comprehensive Plan. This update contains comprehensive plan amendments intended to satisfy State

periodic update requirements (including changes to the housing element and housing appendix) as well as various other amendments.

- An additional separate proposal may also be considered in 2015 that contains other Comprehensive Plan amendments -- generally related to neighborhood-specific policies in the University District -- which have been evaluated in the University District Urban Design EIS.
- Seattle 2035 Comprehensive Plan update

The Comprehensive Plan amendments contained in the proposal reviewed in this checklist are not necessary as part of the periodic comprehensive plan update under the Growth Management Act, nor does this proposal depend on the comprehensive plan amendments contained in the 2015 update or the U. District comprehensive plan amendments. However, DPD is aware of those other amendments and has determined that nothing in those amendments changes the analysis in this checklist.

Some of the comprehensive plan amendments in the proposal reviewed in this checklist call for the City to consider legislation or programs beyond those contained in this proposal. Any such other legislation or programs, if not exempt, would be subject to its own SEPA review under phased review.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

In addition to the SEPA determination that will be prepared for this proposal, the following documents were prepared that are related to this proposal:

- Background Report for Affordable Housing Mitigation Program and Incentive Zoning Update by City of Seattle (June 2015)
- Seattle City Council – Workforce and Affordable Housing Program Review: Existing Conditions
- Seattle Incentive Zoning: Analysis of Data related to the Historical Production under Seattle's Incentive Zoning program, Cornerstone Partnership, February 4, 2014
- Policy Options for Refining Seattle's Incentive Zoning Program, July 2014, Cornerstone Partnership
- Seattle Affordable Housing Incentive Program Economic Analysis, October 10, 2014, David Rosen & Associates
- Seattle Affordable Housing Nexus Study and Economic Impact Analysis, Administrative Review Draft, May 13, 2015, David Rosen & Associates
- Seattle Affordable Housing Nexus Study and Economic Impact Analysis for Low- and Mid-Rise Residential, Mixed-Use and Non-Residential Prototypes, May 18, 2015, David Rosen & Associates
- Recommendations for implementation of an Affordable Housing Linkage Fee, September 12, 2014, memo by Cornerstone Partnership
- Seattle Workforce Housing Programs and Policies Related to meeting Workforce Housing Needs in Seattle: A Survey and Analysis of Best Practices in Comparative Jurisdictions, May 2014, OTAK
- Apartment Vacancy Report, 20+ unit buildings, 14-market areas within Seattle, Spring 2015, Dupre and Scott Apartment Advisors
- Map of proposed high, medium, and low cost areas, October 2014, Cornerstone Partnership
- Jobs Housing Nexus Analysis, Office and Hotel Buildings, Downtown Seattle Linkage Program, March 2001, Keyser Marston Associates, Inc.

- Residential Nexus Analysis, City of Seattle, July 2005, Keyser Marston Associates, Inc.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No.

10. List any government approvals or permits that will be needed for your proposal, if known.

Approval of ordinances by Seattle City Council.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

This proposal would implement an affordable housing mitigation program requiring new development to provide affordable housing in proportion to the gross floor area of their project. The proposal also includes changes to the City's current incentive zoning provisions. The City's current affordable housing incentive zoning program enables developers to achieve extra floor area beyond a base FAR or height by providing public benefits such as affordable housing. The program is voluntary in that a developer would not need to provide any benefits if no extra floor area is sought. By contrast, the proposed affordable housing mitigation program would require developers to provide affordable housing (either through performance or payment of a fee) regardless of whether an incentive was used, in order to mitigate (to some extent) the impacts of new development on the need for affordable housing. While the incentive zoning requirement would be calculated based on the amount of extra floor area achieved, the affordable housing mitigation program requirement would be calculated based on the total floor area of the project regardless of its size. These programs could be structured such that the requirements are additive or such that compliance with one program could be counted toward compliance with the other.

Key aspects of the affordable housing mitigation program include:

- **AMI target.** Housing provided through the performance option would have to be affordable to households making, at a maximum, 80% of Area Median Income (AMI) for rental and 100% of AMI for ownership; however, these targets could be reduced to as low as 60% of AMI for units with one or more bedroom and 40% of AMI for smaller units such as those under a specific size threshold.
- **Performance or payment requirement.** The proposal would require provision of affordable housing by means of performance or payment, either alone or as alternatives or in some combination:
 - **On-site or off-site performance requirement.** The proposal could require affordable housing equivalent to as much as:
 - For residential, 10% of total housing units; or
 - For non-residential, net rentable square feet of affordable housing equal to 10% of total gross floor area of non-residential area.
 - **Payment requirement.** The proposal could require payment into a fund to pay for affordable housing; this requirement could be as high as \$28 per gross square foot.

- **Uses impacted:** The proposal could apply to all uses except manufacturing uses in manufacturing and industrial centers; different uses could be subject to different production or payment requirements.
- **Geographic variation:** Different areas could be subject to different performance or payment requirements.
- **Waiver/Reduction:** The proposal could provide the ability to waive or reduce a mitigation requirement through an administrative or appeal process.

Decisions made on the AMI targets and geographic variation of the affordable housing mitigation program could also be applied to the existing incentive zoning program.

Policies regarding administrative process, agreements, limits on public subsidy, location of affordable housing, timing of completion, comparability of affordable housing units to others in the development, and long-term monitoring and associated fees could in some cases be consistent for incentive zoning and affordable housing mitigation programs. Any performance or payment required through this program would be counted such that the requirements are either additive or such that compliance with one program counts toward compliance with the other.

The following changes to the existing incentive zoning program could be made, some of which could also impact an affordable housing mitigation program.

- Modify or eliminate the performance option for ownership housing developments;
- Modify or eliminate the off-site performance option;
- Require a minimum number of affordable housing units in order to use the performance option;
- Prohibit the same affordable housing units from satisfying both the Multifamily Tax Exemption program (MFTE) and the requirements of incentive zoning and/or the affordable housing mitigation program;
- Consolidate policies on use of payments for affordable housing in Office of Housing's Housing Funding Policies;
- Allow affordable housing to be distributed throughout first 85 feet of height for highrise buildings;
- Allow a payment option in every incentive zoning area;
- Create uniform 65%-35% split between housing and non-housing benefits citywide for areas with heights greater than 85 feet;
- Adopt incentive zoning with quasi-judicial rezones;
- Phase out option to purchase Housing TDR as an alternative to affordable housing performance or payment for incentive zoning;
- Simplify the payment option for residential projects in Downtown Mixed Commercial zones to be consistent with other downtown highrise zones;
- Remove additional affordable housing requirements for project that include the demolition of certain multi-family units formerly occupied by tenants eligible for assistance per the Tenant Relocation Assistance Ordinance;
- Eliminate alternative performance option for 50% AMI units;
- Consolidate and clarify land use code provisions.

Additionally, this proposal would make certain changes to the Comprehensive Plan. Generally, the proposal for comprehensive plan changes is to:

- Clarify the City's goals and policies related to affordable housing to strengthen the City's policy direction and provide further policy support for addressing the need for affordable housing.
- Broaden the range of affordable housing strategies the City should consider.
- Make clear that both incentive-based and non-incentive-based strategies should be considered.

- Make clear that the City may establish a program whereby impacts on affordable housing that are generated by total project area, not just area above a base height or density, may be required to be at least partially mitigated.

Specific proposed amendatory language is attached to the Background Report.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

This ordinance could impact locations throughout Seattle.

B. ENVIRONMENTAL ELEMENTS

** PER WASHINGTON STATE ADMINISTRATIVE CODE, THIS SECTION IS LEFT BLANK. **

1. Earth

- a. General description of the site
(circle one): Flat, rolling, hilly, steep slopes, mountainous,
other _____
- b. What is the steepest slope on the site (approximate percent slope)?
- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.
- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.
- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?
- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.
- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.
- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

3. Water

a. Surface Water:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.
- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.
- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.
- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.
- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.
- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

b. Ground Water:

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.
- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

2) Could waste materials enter ground or surface waters? If so, generally describe.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

4. Plants

a. Check the types of vegetation found on the site:

___deciduous tree: alder, maple, aspen, other

___evergreen tree: fir, cedar, pine, other

___shrubs

___grass

___pasture

___crop or grain

___ Orchards, vineyards or other permanent crops.

___ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other

___ water plants: water lily, eelgrass, milfoil, other

___other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

c. List threatened and endangered species known to be on or near the site.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

e. List all noxious weeds and invasive species known to be on or near the site.

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include:

birds: hawk, heron, eagle, songbirds, other:

mammals: deer, bear, elk, beaver, other:

fish: bass, salmon, trout, herring, shellfish, other _____

b. List any threatened and endangered species known to be on or near the site.

c. Is the site part of a migration route? If so, explain.

d. Proposed measures to preserve or enhance wildlife, if any:

e. List any invasive animal species known to be on or near the site.

6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.
- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.
- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

7. Environmental health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.
 - 1) Describe any known or possible contamination at the site from present or past uses.
 - 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.
 - 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.
 - 4) Describe special emergency services that might be required.
 - 5) Proposed measures to reduce or control environmental health hazards, if any:

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?
- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.
- 3) Proposed measures to reduce or control noise impacts, if any:

8. Land and shoreline use

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

c. Describe any structures on the site.

d. Will any structures be demolished? If so, what?

e. What is the current zoning classification of the site?

f. What is the current comprehensive plan designation of the site?

g. If applicable, what is the current shoreline master program designation of the site?

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

i. Approximately how many people would reside or work in the completed project?

j. Approximately how many people would the completed project displace?

k. Proposed measures to avoid or reduce displacement impacts, if any:

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

c. Proposed measures to reduce or control housing impacts, if any:

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

- b. What views in the immediate vicinity would be altered or obstructed?
- c. Proposed measures to reduce or control aesthetic impacts, if any:

11. Light and glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?
- b. Could light or glare from the finished project be a safety hazard or interfere with views?
- c. What existing off-site sources of light or glare may affect your proposal?
- d. Proposed measures to reduce or control light and glare impacts, if any:

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity?
- b. Would the proposed project displace any existing recreational uses? If so, describe.
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe.
- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.
- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.
- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?
- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.
- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?
- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.
- h. Proposed measures to reduce or control transportation impacts, if any:

15. Public services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.
- b. Proposed measures to reduce or control direct impacts on public services, if any.

16. Utilities

- a. Circle utilities currently available at the site:
 electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,
 other _____
- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: on file
 Name of signee: Brennon Staley, Urban Planner
 Position and Agency/Organization: City of Seattle, Department of Planning and Development
 Date Submitted: June 8, 2015

D. Supplemental sheet for nonproject actions

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Overall, this proposal is not likely to result in significant adverse environmental impacts in the form of increased discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise.

Proposed measures to avoid or reduce such increases are: None

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Overall, this proposal is not likely to result in significant adverse environmental impacts to plants, animals, fish or marine life.

Proposed measures to protect or conserve plants, animals, fish, or marine life are: None

3. How would the proposal be likely to deplete energy or natural resources?

Overall, this proposal is not likely to result in significant adverse environmental impacts in the form of depleted energy or natural resources.

Proposed measures to protect or conserve energy and natural resources are: None

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Overall, this proposal is not likely to result in significant adverse environmental impacts to environmentally sensitive areas or areas designated for government protection.

Proposed measures to protect such resources or to avoid or reduce impacts are: None.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

This proposal is not likely to result in significant adverse environmental impacts to land use and shoreline use or to allow or encourage land or shoreline uses incompatible with existing plans.

This proposal would not change the maximum height, floor area ratio, or density for any properties. Developments affected by this proposal would still have to meet existing standards for bulk, design, landscaping, etc.

Portions of this proposal are intended to help mitigate the adverse impact of new development by requiring new development to provide for affordable housing units. Analysis contained in many documents related to this proposal, as well as the updated Housing Appendix included as part of the Comprehensive Plan 2015 Annual Amendments

produced by the City of Seattle, demonstrates that there is a substantial need for affordable housing in the City.

New development creates an additional need for affordable housing beyond current existing needs directly through the location of new jobs in non-residential development and indirectly through the creation of new jobs generated by demand of residents. Low-income employees in these jobs require housing that is affordable; however, this need is not being met by the private market. According to the Spring 2015 Dupre + Scott apartment vacancy report, in the 14 Dupre+Scott rental market areas wholly within the Seattle city limits, the average monthly rent for units built from 2013 to 2015 is \$1,386 for studio units, \$1,802 for one bedroom units, \$2,181 for 2 bedroom/1 bath units, and \$3,295 for 3 bedroom/2 bath units. Based on the U.S. Department of Housing & Urban Development (HUD) housing affordability standard of 30% of household income, these units are considered affordable to households with incomes approximately 88%, 107%, 108%, and 141% of area median income, respectively. The Seattle Affordable Housing Nexus Study produced by David Rosen & Associates describes and quantifies the need that will be generated by new development including maximum supportable fees. Analysis in the Background Report estimates that the affordable housing mitigation program could result in as many as 11,600 new affordable housing units over 10 years at the highest percentage and fee amounts analyzed.

Adverse environmental impacts from this proposal could occur if the proposal shifts development from Seattle to outlying areas such that residents or employees drive more or development occurs in greenfield or environmentally sensitive areas. These impacts could occur if the cost of the affordable housing mitigation program makes development in Seattle less attractive than other areas. Any shift in market-rate residential development could be offset, at least in part, by increased production of affordable housing units in Seattle generated by the affordable housing mitigation program.

Seattle Affordable Housing Incentive Program Economic Analysis report produced by David Rosen & Associates contains an assessment of existing market conditions that was developed to inform this update. This work included the development of proformas for various residential and non-residential development types in low, medium, and high cost markets. David Rosen & Associates further analyzed these proformas under 6 market scenarios representing three sets of price escalations (versions A, B, and C) and two cap rate scenarios. The Background Report for Affordable Housing Mitigation Program produced by the City uses this data to analyze the potential benefits and costs of various housing mitigation scenarios in proportion to total development costs based on the numbers developed in David Rosen & Associates' report. This analysis suggests that the cost of a new affordable housing mitigation program at current AMI levels could be equal to between 4.9% and 7.7% of total development costs for the projects identified.

Tables 10 through 15 of the Seattle Affordable Housing Incentive Program Economic Analysis report indicate the estimated return on equity under various scenarios. This analysis shows that many proformas had returns on equity significantly above a 6% feasibility threshold for residential projects and a 10% feasibility threshold for commercial projects. Under the Low Cap Rate Version A scenario, some rental proformas showed a viable return on equity even with a 10% affordable housing requirement including medium-cost midrise, high-cost midrise, low-cost 6-story, and low-cost 7-story. This data suggests some projects might still be viable under current market conditions with increased incentive zoning or mitigation standards even under the scenario with the highest mitigation requirements. Efforts to further quantify the extent to which this proposal would

shift development to outlying areas and the extent to which this development pattern would indirectly impact transportation patterns, public services and utilities, environmentally critical areas, areas designated for government protection, energy resources, or other natural features would be speculative.

Adverse environmental impacts could occur if the proposal results in increased demolition of existing structures where necessary to develop new affordable housing funded by payments from an affordable housing mitigation program.

Adverse environmental impacts could occur if the proposal indirectly encourages or discourages development in different areas of the City due to variation of percentage and payment amounts in different geographic areas. Efforts to quantify the extent to which this might occur would be speculative due to the complex market factors that influence development.

Adverse environmental impacts could occur if the proposal indirectly encourages or discourages different types of uses due to variation of percentage amounts or fee rates vary between use categories. Efforts to quantify the extent to which this might occur would be speculative due to the complex market factors that influence development.

Adverse environmental impacts could occur if the proposal indirectly encourages or discourages use of extra floor area due to changes to the existing incentive zoning program that increase or decrease the value of the extra floor area. These impacts are likely to be minor since, with the potential exception of certain residential projects in DMC zones, the proposal would not increase existing percentage or payment amounts under incentive zoning.

The proposal also considers a number of secondary policy options that could modify the overall impact of this legislation. It is not anticipated that any of these policy options will have significant adverse environmental impacts, individually or cumulatively. Below is a discussion of potential impacts of these policy options.

Remove the performance option for ownership housing developments

This option, which would require ownership projects to use the payment option, is not likely to significantly change the overall impact of this proposal as the background report considered the potential impact of the payment option.

Modify the performance option for ownership housing developments

This option is not likely to significantly change the overall impact of this proposal as the developers would still be allowed to use the payment option and the background report considered the potential impact of the payment option.

Remove the off-site performance allowance

This option, which would remove one option that developers would have to meet the requirements, is not likely to significantly change the overall impact of this proposal as the background report considered the potential impact of payment and on-site performance options.

Require a minimum number of affordable housing units in order to use the performance option

This option, which would require some smaller developments to use the payment option, is not likely to significantly change the overall impact of this proposal as the background report considered the potential impact of the payment option.

Prohibit the same affordable housing units from satisfying both Multifamily Tax Exemption (MFTE) and incentive zoning/housing mitigation requirements

This option is not likely to significantly change the overall impact of this proposal as MFTE is a voluntary program. The background report considered potential impacts even if MFTE was not used.

Consolidate policies on use of payments for affordable housing in Office of Housing's Housing Funding Policies

This option is not likely to significantly change the overall impact of this proposal as it would only change the location of the policies that impact how the City uses funds obtained in lieu of providing affordable housing.

Allow affordable housing to be distributed throughout first 85 feet of height for highrise buildings

This option is not likely to significantly change the overall impact of this proposal as it would provide more flexibility to developers in meeting requirements.

Allow payment option in every incentive zoning area

This option is not likely to significantly change the overall impact of this proposal as it would provide more flexibility to developers in meeting requirements.

Create uniform 65%-35% split between housing and non-housing benefits citywide for areas with heights greater than 85 feet

This option would increase the amount of non-housing benefits required by some developments and reduce the amount required by others. Overall, it would tend to make the cost more consistent across different areas and uses. Since housing and non-housing benefits tend to cost similar amounts per square foot to achieve, it is not likely to significantly change the cost to developers under incentive zoning. This option could, however, result in higher cost to developers under an affordable housing mitigation program if it increases the amount of non-housing benefits that must be provided in addition to the affordable housing required under the mitigation program. This increase in cost is likely to be minor in comparison to the overall cost of an affordable housing mitigation program.

Adopt incentive zoning with quasi-judicial rezones

This option is not likely to significantly change the overall impact of this proposal as the benefits and costs of meeting incentive zoning requirements would tend to be significantly less than the potential benefits and impacts of an affordable housing mitigation program.

Phase out option to purchase Housing TDR as alternative to performance or payment in affordable housing incentive program

This option, which would remove one option that developers would have to meet the requirements, is not likely to significantly change the overall impact of this proposal. The background report considered potential impacts even if the Housing TDR option was not available.

Simplify payment option for residential projects in DMC zones

This option, which might modify the fee level required for certain residential projects in DMC zones is not likely to significantly change the overall impact of this proposal as the background report considered the potential impact of the proposal at higher fee levels.

Remove additional affordable housing requirements for projects that include the demolition of certain multifamily units formerly occupied by TRAO-eligible tenants

This option is not likely to significantly change the overall impact of this proposal as the current provision only applies to a limited number of projects and would tend to reduce the overall cost of obtaining additional floor area in the limited circumstances that it applies.

Eliminate alternative performance option for 50% AMI units

This option is not likely to significantly change the overall impact of this proposal as the potential impact of the highest percentage amounts and fee levels was considered. As of April 15, 2015, this option had never been used.

Consolidate and clarify land use code provisions

This option would result in numerous small changes which would not have a significant influence on the overall impact of this proposal.

Cumulatively, these options could marginally increase the overall benefits and costs of an affordable housing mitigation program. For example, removing existing options for payment, performance (for small numbers of units), and housing TDR while maintain existing requirements for production of additional affordable housing units where certain demolition occurs could result in higher benefits and costs for the same percentage and payment amounts. However, these changes would have minor potential to change the overall impact of the proposal and are not likely to generate significant adverse environmental impacts, individually or cumulatively.

Proposed measures to avoid or reduce shoreline and land use impacts are: production of new affordable housing in Seattle.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Overall, this proposal is not likely to result in significant adverse impacts in the form of increased demands on transportation or public services and utilities. Minor adverse environmental impacts from this proposal could occur if the proposal shifts development from Seattle to outlying area such that residents or employees drive more or development occurs in greenfield or environmentally sensitive areas as discussed in question 5. Efforts to quantify the extent to which this might occur would be speculative due to the complex market factors that influence development.

Proposed measures to reduce or respond to such demand(s) are: production of new affordable housing in Seattle.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The proposal is believed to avoid conflicts with local, state or federal laws and requirements for protection of the environment.

Both the current comprehensive plan and the updated comprehensive plan, as proposed to be amended in this proposal, provide multiple goals and policies that support the creation of both market-rate and affordable housing as well as non-residential development. This proposal seeks to balance and accomplish many of these objectives. To the extent that there are provisions in the

current comprehensive plan that need to be changed to facilitate the legislative strategy that is part of this proposal, the comprehensive plan changes that are part of this proposal address that need.

In particular, the proposed affordable housing mitigation program could:

- help to achieve the city's goals for accommodating its share of affordable housing needs consistent with the countywide planning policies (HG1, H30¹)
- reduce involuntary housing cost burden for households by supporting the creation and preservation of affordable housing (HG2.5)
- provide new low-income housing through market-rate housing production (HG13)
- encourage dispersion of housing opportunities for low-income households throughout the city and throughout King County to support inclusion and opportunity (HG15)
- help provide low-income households with access to education, employment, and social opportunities; support the creation of a more inclusive city; and reduce displacement of households from their neighborhoods or the city as a whole through the provision of housing affordable to low-income households. (HG29.8)

Additionally, the Comprehensive Plan contains many goals and policies that articulate the amount, distribution, and character of growth that should occur throughout the City. These goals and policies include the Growth Targets contained in Urban Village Appendix, the General Distribution goals in UVG32, the Jobs/Housing Ratio goals in UVG7 and UVG20, and many other goals and policies that describe the Urban Village strategy, the type of housing we want to generate, our desire to efficiently use land, and the mix of uses that are desired. As discussed in question D.5, it is possible that this proposal could have minor impacts on the amount, distribution and character of development occurring citywide. However, it is unlikely that this proposal would significantly impact the City's ability to achieve these policies. Moreover, these policies must be balanced with other goals and policies to address housing affordability.

¹ Note, HG30 is proposed for deletion in the 2015 comprehensive plan update. Accommodating Seattle's share of the countywide need for housing affordable to low-income households consistent with the countywide planning policies is addressed by amended HG1 in the 2015 update.

CITY OF SEATTLE

**ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

**SEPA Threshold Determination
for the
Affordable Housing Mitigation Program and Incentive Zoning Update; and
Comprehensive Plan Amendments Regarding Affordable Housing**

Project Sponsor: City of Seattle Executive and City Council

Location of Proposal: The amendments pertain citywide

BACKGROUND

In September 2014, Mayor Murray and the City Council adopted Resolution 31546 calling for the creation of a Housing Affordability and Livability Agenda (HALA) and convening a HALA Advisory Committee. The purpose of HALA is to chart a course for the next 10 years for ensuring the development and preservation of housing that addresses the wide diversity of housing needs of people across the income spectrum. The HALA Advisory Committee is anticipated to deliver to City Council and the Mayor a set of housing strategy recommendations in June 2015.

In October 2014, Council voted 7-2 to approve Resolution 31551, which requests the Executive to produce legislation to implement an “affordable housing linkage fee program” (one of the affordable housing mitigation policy options under discussion by the HALA Advisory Committee). The Affordable Housing Mitigation Program addressed by this report encompasses the “linkage fee” concept, but because Resolution 31551 was non-binding and there is the potential to change various parameters contained in the resolution, the report for the proposal uses the broader title Affordable Housing Mitigation Program.

Discussions about the Affordable Housing Mitigation Program and voluntary incentive zoning have largely been informed by three reports produced by consultants hired by City Council. Two of the reports were authored by David Rosen & Associates: (1) *Seattle Affordable Housing Incentive Program Economic Analysis* (October 2014); and (2) *Seattle Affordable Housing Nexus Study and Economic Impact Analysis* (May 2015). The third report, authored by the Cornerstone Partnership, *Policy Options for Refining Seattle’s Incentive Zoning Program* (July 2014), explores potential options for updating Seattle’s incentive zoning for affordable housing, including a linkage fee.

Other related efforts have included:

- Background Report for Affordable Housing Mitigation Program and Incentive Zoning Update by City of Seattle



- Seattle City Council – Workforce and Affordable Housing Program Review: Existing Conditions
- Seattle Incentive Zoning Analysis of Data related to the Historical Production under Seattle’s Incentive Zoning program, Cornerstone Partnership, February 4, 2014
- Recommendations for implementation of an Affordable Housing Linkage Fee, September 12, 2014, memo by Cornerstone Partnership
- Seattle Affordable Housing Nexus Study and Economic Impact Analysis for Low- and Mid-Rise Residential, Mixed-Use and Non-Residential Prototypes, May 18, 2015, David Paul Rosen & Associates
- Seattle Workforce Housing Programs and Policies Related to Meeting Workforce Housing Needs in Seattle: A Survey and Analysis of Best Practices in Comparative Jurisdictions, May 2014, OTAK
- Apartment Vacancy Report, 20+ unit buildings, 14-market areas within Seattle, Spring 2015, Dupre and Scott Apartment Advisors
- Map of proposed high, medium, and low cost areas, October 2014, Cornerstone Partnership
- Jobs Housing Nexus Analysis, Office and Hotel Buildings, Downtown Seattle Linkage Program, March 2001, Keyser Marston Associates, Inc.
- Residential Nexus Analysis, City of Seattle, July 2005, Keyser Marston Associates, Inc.

DESCRIPTION OF PROPOSAL

This proposal would implement an affordable housing mitigation program requiring new development to provide affordable housing in proportion to the gross floor area of their project. The proposal also includes changes to the City’s current incentive zoning provisions. The City’s current affordable housing incentive zoning program enables developers to achieve extra floor area beyond a base FAR or height by providing public benefits such as affordable housing. The program is voluntary in that a developer would not need to provide any benefits if no extra floor area is sought. By contrast, the proposed affordable housing mitigation program would require developers to provide affordable housing (either through performance or payment of a fee) regardless of whether an incentive was used, in order to mitigate (to some extent) the impacts of new development on the need for affordable housing. While the incentive zoning requirement would be calculated based on the amount of extra floor area achieved, the affordable housing mitigation program requirement would be calculated based on the total floor area of the project regardless of its size. These programs could be structured such that the requirements are additive or such that compliance with one program could be counted toward compliance with the other.

Key aspects of the affordable housing mitigation program include:

- **AMI target:** Housing provided through the performance option would have to be affordable to households making, at a maximum, 80% of Area Median Income (AMI) for rental and 100% of AMI for ownership; however, these targets could be reduced to as low as 60% of AMI for units with one or more bedroom and 40% of AMI for smaller units such as those under a specific size threshold.

- ***Performance or payment requirement.*** The proposal would require provision of affordable housing by means of performance or payment, either alone or as alternatives or in some combination:
 - ***On-site or off-site performance requirement:*** The proposal could require affordable housing equivalent to as much as:
 - For residential, 10% of total housing units; or
 - For non-residential, net rentable square feet of affordable housing equal to 10% of total gross floor area of non-residential area.
 - ***Payment requirement:*** The proposal could require payment into a fund to pay for affordable housing; this requirement could be as high as \$28 per gross square foot.
- ***Uses impacted:*** The proposal could apply to all uses except manufacturing uses in manufacturing and industrial centers; different uses could be subject to different production or payment requirements.
- ***Geographic variation:*** Different areas could be subject to different performance or payment requirements.
- ***Waiver/Reduction:*** The proposal could provide the ability to waive or reduce a mitigation requirement through an administrative or appeal process.

Decisions made on the AMI targets and geographic variation of the affordable housing mitigation program could also be applied to the existing incentive zoning program.

Policies regarding administrative process, agreements, limits on public subsidy, location of affordable housing, timing of completion, comparability of affordable housing units to others in the development, and long-term monitoring and associated fees could in some cases be consistent for incentive zoning and affordable housing mitigation programs. Any performance or payment required through this program would be counted such that the requirements are either additive or such that compliance with one program counts toward compliance with the other.

The following changes to the existing incentive zoning program could be made, some of which could also impact an affordable housing mitigation program.

- Modify or eliminate the performance option for ownership housing developments;
- Modify or eliminate the off-site performance option;
- Require a minimum number of affordable housing units in order to use the performance option;
- Prohibit the same affordable housing units from satisfying both the Multifamily Tax Exemption program (MFTE) and the requirements of incentive zoning and/or the affordable housing mitigation program;
- Consolidate policies on use of payments for affordable housing in Office of Housing's Housing Funding Policies;

- Allow affordable housing to be distributed throughout first 85 feet of height for highrise buildings;
- Allow a payment option in every incentive zoning area;
- Create uniform 65%-35% split between housing and non-housing benefits citywide for areas with heights greater than 85 feet;
- Adopt incentive zoning with quasi-judicial rezones;
- Phase out option to purchase Housing TDR as an alternative to affordable housing performance or payment for incentive zoning;
- Simplify the payment option for residential projects in Downtown Mixed Commercial zones to be consistent with other downtown highrise zones;
- Remove additional affordable housing requirements for project that include the demolition of certain multi-family units formerly occupied by tenants eligible for assistance per the Tenant Relocation Assistance Ordinance;
- Eliminate alternative performance option for 50% AMI units;
- Consolidate and clarify land use code provisions.

Additionally, this proposal would make certain changes to the Comprehensive Plan. Generally, the proposal for comprehensive plan changes is to:

- Clarify the City's goals and policies related to affordable housing to strengthen the City's policy direction and provide further policy support for addressing the need for affordable housing.
- Broaden the range of affordable housing strategies the City should consider.
- Make clear that both incentive-based and non-incentive-based strategies should be considered.
- Make clear that the City may establish a program whereby impacts on affordable housing that are generated by total project area, not just area above a base height or density, may be required to be at least partially mitigated.

Specific proposed amendatory language is attached to the Background Report.

The proposed changes to the Comprehensive Plan support the Affordable Housing Mitigation Program and incentive zoning update portions of this proposal as well as other potential future legislative strategies, and also eliminate some provisions that might be regarded as inconsistent with the Affordable Housing Mitigation Program.

Examples of these recommended policy changes include but are not limited to:

- Adding a policy HG2.5 in the Housing Element that says, "Seek to reduce involuntary

housing cost burden for households by supporting the creation and preservation of affordable housing.”

- Adding a policy HG8.5 in the Housing Element that says, “Encourage a shared responsibility among the private and public sectors for addressing affordable housing needs”
- Amending policy H8 to broaden from a recommendation only of “Consider providing incentives...” to “Consider using programs that require or encourage...” affordable housing.
- Adding to discussion in the Housing Element on affordable housing, by indicating the critical nature of low-income-affordable housing for giving “access to the diverse opportunities” in the city, and reducing existing disparities, to support “a host of positive social and economic outcomes in areas such as education, employment, and physical and mental health, especially for children and families” as well as “protecting our environment and sustaining a strong economy...” Other discussion added notes that “Seattle’s low-income households have disproportionately high housing needs” and that “housing costs unduly affect people of color” and that the consequences of past housing policies have “resulted in chronic inequity and racial disparities” and underscoring that “addressing these inequities and protecting marginalized populations is a primary focus of the Housing Element.”
- Adding a Housing policy H29.4 that says, “Consider requiring that new development provide housing affordable to low-income households. Consider adopting such an approach either with or without rezones or changes in development standards that increase development capacity.”
- Adding a Housing policy H29.6 that says, “Consider implementing programs to preserve or enhance currently affordable housing in order to retain opportunities for low-income households to live in Seattle.”
- Edits to DT-G10 that amend references relating to bonusing and transfer of development rights, and add language that allows for “non-incentive-based strategies” as well as incentive-based strategies.
- Edits to DT-LUP8 delete explanatory language that establishes “base” and maximum density levels for Downtown, where base density levels are indicated as representing a level of development the City would accommodate without requiring additional mitigation measures.
- Edits to DT-LUP10 that clarify ability to pursue voluntary agreements to mitigate the impact of development, delete text about earning floor area increases above a base density, and encourage consideration of “adopting non-mitigation-based” strategies for the provision of low-income housing.
- Edits to several neighborhood-specific policies that refer to affordable housing, including for Fremont, North Beacon Hill, North Rainier, Rainier Beach, and South Lake Union. The latter area policy edits note the possibility of “requirements” for provision of housing for people across a range of incomes, not just “incentives.”

ANALYSIS - OVERVIEW

The following describes the analysis conducted to determine if the proposal is likely to have a probable significant adverse environmental impact. This threshold determination is based on:

- the proposal, as described above;
- the information contained in the SEPA checklist;
- additional information, such as analyses prepared by or for City staff; and
- the experience of DPD analysts in reviewing non-project actions.

It should be noted that there is a separate concurrent proposal for the 2015 Update of the Comprehensive Plan. This update contains comprehensive plan amendments intended to satisfy State periodic update requirements (including changes to the housing element and housing appendix) as well as various other amendments. An additional separate proposal may also be considered in 2015 that contains other Comprehensive Plan amendments -- generally related to neighborhood-specific policies in the University District -- which have been evaluated in the University District Urban Design EIS.

The Comprehensive Plan amendments contained in the proposal covered by this determination are not necessary as part of the periodic comprehensive plan update under the Growth Management Act, nor does this proposal depend on the comprehensive plan amendments contained in the 2015 update or the U. District comprehensive plan amendments.

ELEMENTS OF THE ENVIRONMENT

Adoption of the possible amendments would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below generally evaluates the potential for long-term adverse impacts from net differences in future land use patterns that might be possible as a consequence of the proposed amendments. This is a programmatic level analysis oriented to addressing matters pertinent to SEPA elements and concepts. Conclusions are presented in a relatively high-level summary fashion, without an intent to exhaustively interpret the potential environmental impact ramifications (or lack thereof) of each and every change-item included in the proposal.

BUILT ENVIRONMENT

Land Use, Height/Bulk/Scale, Relationship to Plans and Policies

The proposal includes numerous edits to Land Use Code regulations that include development standards, for the purposes described in the “description of proposal” above and in the environmental checklist. These changes are intended to accommodate the accomplishment of an affordable housing mitigation program, and updates to incentive zoning options and related details. The proposal does not include changes to maximum height limits or maximum density

limits in the Land Use Code. While the set of changes inevitably would have a bearing on the technical functioning of these codes, standards and policies, the proposal is not likely to result in changes that would substantially increase development capacities, or development envelopes, or otherwise expand development size capabilities in any given zone or part of the city. It is also not likely that changes would substantially diminish total development capabilities in ways that might be construed as negatively affecting future development and its relationship to broad land use patterns in the city.

This does not rule out the possibility that through the amendatory changes there might be alterations that have some effects of marginally changing total development capabilities. However, there is not an intent to generate different amounts or types of growth capabilities on any given property in the city. Nor does the proposal intend to substantially change in any adverse manner the range of land uses permitted to be built on any given property across the city. Nor does the proposal intend to alter development capabilities in terms of substantially changing the maximum height limits of development on any given property across the city.

The observations in the two preceding paragraphs assist in drawing a conclusion that on a property by property basis, there is a low likelihood of the proposal inducing future development and land use patterns in ways that might generate significant adverse land use pattern, compatibility, or height/bulk/scale impacts. While there could be a *de minimus* potential that differences in the proposal's regulatory schemes exist in ways that could alter aspects of future building designs, there appears to be little or no potential for such differences to generate land use impacts that are significant and adverse for any given property. This means that density-related impacts (as contemplated under Height, Bulk, and Scale in the City's SEPA policies) and land use compatibility-related impacts (as contemplated under Land Use in the City's SEPA policies) are not anticipated to affect the built environment in a manner that is significantly adverse.

The conclusion above does not necessarily apply to the question of whether the proposal's details could lead to differences in broad distribution patterns of future growth within the city, or even in the gross distribution of total growth amounts between Seattle and other places in the region. This question relates less to whether localized compatibility or density impacts might arise, and more to whether significant adverse consequences could arise from altered growth distributions between Seattle neighborhoods or among other jurisdictions.

Details of the affordable housing mitigation program portion of the proposal include differences in fee and performance levels, and also in how they might be differently charged for development in different geographic portions of the city, and charged to different categories of land uses. Details of the incentive zoning update portions of the proposal would amend a variety of aspects of how the range of programs and their specific details are applied to future development, with some policy changes affecting Downtown zone environments differently in terms of levels of change in policy and/or regulatory approach. Several of the incentive-zoning proposal items are oriented to simplifying and bringing incentive zoning treatments applicable to different parts of the city into greater alignment or consistency with one another. This includes modifying how and when in certain cases performance or payment options are possible.

This SEPA analysis cannot definitively rule out the possibility that the affordable housing mitigation program proposal could influence future development patterns both within the city,

and potentially in the distributions of growth between Seattle and other jurisdictions. This could vary in its degree depending on the manner in which fee or performance requirements are applied to properties, and the related effects such requirements could have on future choices made by prospective developers. There could be a range in magnitude of possible effects, from a minimal degree of change in development patterns to a more noticeable degree of change where certain places may be more advantageously disposed toward growth. For example, incremental added requirements conceivably could lead to more frequent favoring of development choices in areas where higher levels of financial return are most likely. The likelihood of the proposal's actual future influence on future development decisions could thus relate to what level fee/performance requirements are set at, and/or to what subset of land uses the requirement is applied to, and/or geographic differences in the levels of the requirements. It is also possible that such fee choices and other details could be calibrated in ways that end up limiting potential effects to levels that would have minimal effect on development choices.

The next logical question to interpret is whether the proposal's regulatory or policy details would generate changes in future growth patterns, or land use patterns, that should be considered significant or adverse. Probable added costs of future development are stipulated by the materials that explain the proposal. However, that alone does not automatically dictate a conclusion that future developer decisions would be caused to more frequently "go elsewhere" with development, or that by "going elsewhere" an adverse or significant adverse impact would result, either in parts of Seattle differently affected by altered future growth patterns or in other jurisdictions outside of Seattle. It does not appear, based on an estimated magnitude level of 1-7% added costs due to fees, that the potential cost effects on development would be so heavy a burden as to cause systemic changes in how and why development decisions are made, that would overcome locational factors that are typically strong influences on real estate development choices. For example, it does not appear likely that a developer who perceived advantages of building an office building in Uptown/Lower Queen Anne would instead choose to pursue an office building in Columbia City instead based merely on differences in fee levels. Rather, factors relating to feasible rent levels, geographic proximity, size of available properties, zoning, and attractiveness of location to potential non-residential tenants are more likely to continue to outweigh the effects of marginal differences in costs to develop such a building. This is not to discount the fact that total development costs or marginal cost differences are important, but to suggest the comparative strength of other location-related and economic-related factors in development choices.

It also does not appear evident that by merely possibly influencing development choices that this analysis must logically conclude that pernicious, adverse changes in Seattle's or the region's future development patterns would occur.

It might be equally supportable to argue that the proposal could:

- encourage more growth to be consolidated in central urban core neighborhoods of Seattle due to their higher potential development profit potential from residential development; or
- conversely, possibly create conditions encouraging growth to more frequently occur in low-fee areas before more often preferring high-fee areas.

Within the context of Seattle's economy and feasible levels of development potential around the city, either or both kinds of scenarios could occur over many years without clearly identifiable significant adverse land use pattern impacts likely to be apparent. Such differences might even be difficult to distinguish from other broad overall patterns of Seattle's growth that would occur regardless of this proposal.

In order to make conclusions of probable significance of adverse land use impacts from this proposal, there would need to be a clearer hypothesis of purported causes of adverse impact potential that might surmise why an incremental potential for different timing or different distributions of growth among Seattle neighborhoods, or among Seattle and other cities, would necessarily create substantial and significant adverse impacts on land use patterns. In the absence of understandable cause-effect relationships with tangible and substantial potential for adverse impacts, this analysis concludes that significant adverse land use and height/bulk/scale impacts are not likely to occur.

A similar conclusion pertains to the proposed reforms to incentive zoning program details. It is likely that details of the recommendations would change the terms and factors that might come into play in formulating development plans and associated choices by potential applicants. But, with the intent of increasing consistency of programs and regulations pertaining to housing, increasing the relative consistency of treatment of future development across many zones, and avoiding options that would create less desirable and more intensive regulatory and monitoring responsibilities, the incentive zoning recommendations do not appear to generate meaningful potential for significant adverse land use or height/bulk/scale impacts upon the environment.

Relationship to Plans and Policies

The existing Comprehensive Plan goal and policy language can be interpreted as setting the focus for affordable housing strategies to a great degree on an incentive-zoning based approach that also focuses on setting base-density and maximum-density levels. The "incentive" aspect of this approach has essentially offered an incentive or bonus ability to develop above a base density, at least partly in exchange for considerations relating to affordable housing – such as on-site provision of such housing or agreements that provide other funding for affordable housing purposes.

Given the specificity of existing language in several goals and policies, retaining it would constrain the City's ability to consider a variety of possible reforms or additional programs that would be aimed at differently supporting and accomplishing affordable housing production in Seattle. As pointed out by proposed additional discussion in the Housing Element, there are a number of social equity and economic considerations, including that inequitable consequences of past policies should be addressed through future efforts to reform affordable housing policies and practices. These factors contribute to the justification for reforms that would allow for consideration of a wider spectrum of strategies rather than remaining constrained within established policies and practices. From this perspective, not taking action to pursue such reforms would continue to have an effect of foreclosing future opportunities for steps that could be successful, therefore contributing to perpetuation of affordable housing challenges that also weigh disproportionately on people of color and low-income households.

The plan and policy recommendations of the proposal thus should be interpreted as enabling the possibility of a wider spectrum of possible affordable housing solutions to be identified and considered, leading to an increased potential for beneficial public policy outcomes. The affordable housing mitigation program and incentive zoning reform components of the proposal under review represent one course of possible actions that could be taken, subject to further discussion during the legislative process for the proposal. It would also be possible that other future strategies and reforms – subject to other future reviews – could be enabled by the recommended Comprehensive Plan changes.

A review of the proposed Comprehensive Plan amendments related to this proposal suggests that they would establish relevant comprehensive plan policy support that would provide for sufficient consistency of the affordable housing mitigation program and incentive zoning reform components with the Comprehensive Plan.

Housing

The proposal's elements, including an "affordable housing mitigation program" and adjustments to incentive program components, are intended to amend, update and expand upon existing programs to accomplish an increased production of affordable housing supply as a direct consequence. And, it does appear that the likely result would be to generate additional affordable housing and/or resources for affordable housing. Per City housing policy approaches that include requirements such as 50-year regulatory agreements, such housing is likely to remain at affordable levels (within the context of Seattle's economy and housing markets) for a long-term period.

At a somewhat broader level and in relation to the findings in the Land Use discussion earlier, while this analysis cannot rule out the possibility that differences in growth distribution would occur across Seattle or between Seattle and other jurisdictions, there is not a clearly identifiable pattern that would likely occur, nor would possible patterns necessarily generate pernicious adverse land use impacts upon the places that experience them. Arguable hypotheses are equivocal: the imposition of added fees might cause consolidation of growth where housing development profits are more likely to be higher; or, lower fees in some areas conceivably could influence some development choices to be made there rather than in higher fee areas. A probable magnitude of likely impact on growth and land use patterns is also difficult to interpret. In the absence of cause-effect relationships that might be better understood to lead to probable significant adverse land use impacts due to the proposal, a finding of significant adverse housing impacts upon existing lower-income/affordable housing resources cannot be made for any given part of the city. This analysis is unable to identify a likely scenario where the details of the proposal would lead to greater demolition or displacement of existing low-income housing resources.

Echoing conclusions made regarding incentive zoning reforms in the Land Use discussion above: It is likely that details of the recommendations would change the terms and factors that might come into play in formulating housing development plans and associated choices by potential applicants. But, with the intent of increasing consistency of programs and regulations pertaining to housing, increasing the relative consistency of treatment of future development across many

zones, and avoiding options that would create more intensive regulatory and monitoring responsibilities, the incentive zoning recommendations do not appear to generate meaningful potential for significant adverse housing impacts.

Historic Preservation

Future development potentially could affect older buildings through demolition activities. While some of these older non-landmarked buildings might be candidates for new landmarking approvals and related protections, the City would continue to follow policies and procedures for reviewing landmark eligibility and making related decisions, as needed, prior to demolition. Also, existing designated historic landmark structures would continue to be protected by current City codes. This means that regardless of any inferred potential for differences in development pressures or patterns in Seattle related to the proposal, there would not be a reasonable likelihood of increased significant adverse impact threats to historic or potential historic resources as a result of the proposal.

Regionally, if the proposal would result in shifts in broad development patterns toward more growth outside of Seattle, there would either be: no change in the potential for adverse effects on existing or potential historic resources within the city, given the protections afforded by existing policies and practices; or, if there was projected to be a potentially reduced pressure for redevelopment of affected properties in Seattle, the potential pressures to redevelop properties with older historic resources could be lessened.

In addition, there may be a lesser incidence of known or potentially historic buildings and resources outside of Seattle than inside it. This would relate to historic development patterns in the region that focused more on places within Seattle's city limits first (and older portions of places such as Tacoma and Everett), with development spreading outward after that, most notably after World War Two. Thus, a potential spreading of growth to be shared more with locations outside of Seattle might lead to a reduced potential for impacts upon historic landmarks and other potential historic resources.

Noise, Shadows on Open Spaces, Light/Glare, Public View Protection

Because there is no identified difference in the permissible dimensions of future building developments with the proposal, there is no meaningful potential for differential impacts that would be significantly adverse in relation to generation of noise, shadows on open spaces, light/glare, or effects on protected public views. Similarly, while it may be possible to speculate upon differences in distributions of future growth across the city that might have some relationship to fee/performance requirements or financial implications of the proposal, there are no grounds to make conclusions that any particular effect of the proposal might lead to increased potential for significant adverse noise, shadow, light/glare, or public view protection impacts. Also, noise regulations and other existing City policies and codes with respect to these other aspects of the environment would continue to apply within the city, in ways that result in reasonable protections against these kinds of adverse impacts.

Transportation, Parking

Because there is no identified difference in the permissible dimensions of future building developments with the proposal, there is no meaningful potential for differential transportation or parking impacts from future site-by-site development that would be significantly adverse at any given location. Similarly, the proposal under review does not include any provisions that would necessarily change parking required or possible to provide, and therefore no differential parking impact potential is identified.

While it may be possible to speculate upon potential differences in distributions of future growth across the city that might have some relationship to fee/performance requirements or financial implications of the proposal, there are no substantial grounds to make conclusions that any particular effect of the proposal might lead to increased or different potential for significant adverse impacts to transportation or parking within the City of Seattle. However, to discuss a hypothetical future possible condition of different distributions of growth within Seattle induced by the details of the proposal, a comparison to findings of the 2035 Comprehensive Plan Draft EIS suggest a low potential for significant adverse impacts due to the current proposal. In that EIS, differences among the four citywide growth alternatives studied, in future growth patterns within particular urban villages and urban centers, amounted to thousands of dwelling units and thousands of employees in differences through a projected 20 years of growth. Yet, the findings of volume-to-capacity measures throughout the city resulted in typical differences of 1% or 2% in most parts of town, and differences up to 4% in only a few places during the PM peak hour that is the maximum traffic period of the day. These volumes were measured and modeled for groupings of arterials (called screenlines) that represent major travel routes through different sectors of town.

By comparison, the inferred potential for possible differences in distribution of future growth related to this proposal under review would be of a magnitude likely to be considerably less significant in magnitude than what was evaluated in the Comprehensive Plan EIS, translating to a probable difference in peak hour volume patterns that would be considerably less than 1 percent from existing or future traffic conditions. Such changes could not be predicted to occur on a citywide basis, nor in any particular part of the city given a lack of specificity as to how different areas might experience different growth patterns. So, this interpretation of potential magnitude of differential impacts is characterized as only speculative and grossly approximated.

Potential regional traffic implications, if the proposal hypothetically would result in differential growth patterns with more occurring in other jurisdictions, are similarly difficult to predict. It can be speculated, however, that differences in growth patterns could generate added levels of automobile traffic trips and transit trips on major highway commuting routes. This would contribute incrementally to increased congestion and would increase “vehicle miles traveled” levels for people traveling longer distances for their home-work commutes, thus reducing overall regional transportation system efficiency. It would be difficult to further quantify such impacts, and given the hypothetical and non-established nature of the impact scenario, such impacts should be characterized as no more than speculative and minor potential differences in transportation impacts.

Public Services, Utilities

Because there is no identified difference in the permissible dimensions of future building developments with the proposal, there is no meaningful potential for differential impacts from future site-by-site development that would be significantly adverse to public services or utilities. In other words, there are no identified physical factors of development at any given location that are likely to be affected in such a manner as to cause effects upon the operations of the police, fire, or parks departments, Seattle Public Utilities, City Light, school district or other similar public service and utility providers.

While it may be possible to speculate about differences in distributions of future growth across the city that might have some relationship to fee/performance requirements or financial implications of the proposal, it is not likely that such effects of the proposal under review might lead to significant adverse public services or utility impacts. For the hypothetical future possible situation of different distributions of growth within Seattle induced by the details of the proposal, a comparison to findings of the 2035 Comprehensive Plan Draft EIS suggest a low potential for significant adverse impacts due to the current proposal. In that EIS, differences in future growth patterns within particular urban villages and urban centers, which amounted to thousands of dwelling units and thousands of employees differences through a projected 20 years of growth, yielded few findings of potential significant impacts in the ability to provide services and utilities to future growth. (Differences in growth amounts projected for areas outside of urban centers and urban villages were also evaluated in that EIS.) The EIS found that utility service providers are able to serve future citywide growth in a variety of possible patterns without significant adverse impacts to utility systems, and identified public service adverse impacts were largely related to a few existing shortcomings with respect to service providers' facilities or equipment (police, fire) that would be exacerbated depending on the levels of growth evaluated in the Comprehensive Plan EIS. Such places included South Lake Union and Bitter Lake fire station service areas. By comparison, the inferred potential for possible differences in distribution of future growth related to this proposal under review is of a magnitude likely to be minor that would not likely raise significant adverse impact concerns. In part, this also relates to the regulatory/code environment explained more in the next paragraph.

Regulations and other existing City policies and codes with respect to utility provision practices would continue to apply within the city, in ways that result in reasonable protections against adverse environmental impacts. For example, if a given development proposal would generate potentially harmful localized effects upon a utility system due to capacity concerns, or natural systems due to factors such as local surface drainage, it is the City's policy that the developer needs to provide sufficient improvements to remedy or protect against significant adverse damage to the utility systems or the natural drainage environment. This, along with other utility improvement requirements pertaining to new development, would help minimize the chances of significant adverse impacts relating to potential differences in future development patterns.

NATURAL ENVIRONMENT

Earth, Water (Drainage & Water Quality), Plants & Animals, Environmental Health

Because there is no identified difference in the permissible dimensions of future building developments with the proposal, there is no meaningful potential for differential impacts that would be significantly adverse in relation to earth, water, plants and animals, or environmental health elements. This means that on a site-by-site basis, there is not a likelihood that increased development densities or differing configurations would lead to increased potential for earth, water, plant/animal or environmental impacts in any given place.

While it may be possible to speculate upon potential differences in distributions of future growth across the city that might have some relationship to fee/performance requirements or financial implications of the proposal, there are no substantial grounds to make conclusions that any particular effect of the proposal might lead to increased or different potential for significant adverse impacts to earth, water, plants, animals, or environmental health elements within the City of Seattle. Also, the range of existing regulations that apply to potentially sensitive areas would continue to apply and provide protections to resources such as steep slopes, landslide hazards, stream corridors, wetlands, and other shoreline environments.

Regionally, if the proposal potentially resulted in shifts in broad development patterns toward more growth outside of Seattle, there would be only a minor-to-minimal potential that such development would significantly affect natural environment conditions in other jurisdictions. Such potential would relate to other jurisdictions' range of properties available to be redeveloped and the range of policy and regulatory protections that apply there. Namely, the likely presence of steep slope, drainage and wetland protections in those places, and range of other related zoning and development standards, would be able to protect against the possibility of significant adverse impacts on the natural environment.

Air Quality, Energy

Because there is no identified difference in the permissible dimensions of future building developments with the proposal, there is no meaningful potential for differential impacts that would be significantly adverse in relation to air quality or energy.

While it may be possible to speculate about differences in distributions of future growth across the city of Seattle that might have some relationship to fee/performance requirements or financial implications of the proposal, it is not likely that any particular effect of the proposal under review might lead to increased potential for significant adverse air quality or energy impacts. A comparison to findings of the 2035 Comprehensive Plan Draft EIS suggests a low potential for any significant adverse impacts in relation to the current proposal. In that EIS, differences in future growth patterns within particular urban villages and urban centers, which amounted to thousands of dwelling units and thousands of employees differences through a projected 20 years of growth, yielded few if any findings of potential significant impacts, and very little difference among the citywide growth alternatives in future transportation related emissions and greenhouse gas emissions. Future conditions would yield fewer such emissions than existing conditions due to improvements in automobile pollution controls and other practices. The current proposal

under review, by comparison, would have minimal potential to generate meaningful differences in potential adverse impacts relating to air quality or energy.

It can be speculated, however, that if there are differences in growth patterns that might distribute more future growth to locations outside of the City of Seattle, this could generate added levels of energy consumption for transportation to and from residential and employment destinations on a daily basis, and generation of additional air pollutant emissions along major commuting routes. To the extent that some future residents and employees would drive to jobs or residences from further distances, they would contribute to traffic congestion and associated total pollutant emissions and would consume more energy than growth patterns where more residents and jobs would instead occur within the City of Seattle. This could manifest as slight increases in future pollutant emissions as experienced within approximately 500 feet of major commuting routes such as I-5, but it would be difficult to further quantify these and they would likely be characterized as no more than minor-to-minimal differences in potential air quality impacts. Differences in energy consumption would also be similarly concluded to be minor adverse impacts in relation to the citywide and regional contexts.

DECISION

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(c).
- [] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).

Signature: on file Date: June 8, 2015
Gordon Clowers, Senior Planning and Development Specialist
Department of Planning and Development

Solutions to Seattle's Housing Emergency

An 'immediate action' agenda for presentation to the Mayor, City Council, and the Housing Affordability and Livability Advisory Committee (HALA)



Community Housing Caucus Recommendations

3/16/2015

Statement of Purpose

Seattle is facing unprecedented market pressures, pushing rents beyond affordability for many working families, the disabled and seniors. We are increasingly losing portions of the city's primary source of affordable housing—privately owned older buildings with modest rents—as they are sold to new owners that either demolish them for expensive housing or increase rents beyond the capacity of current tenants. Escalating cost of land and construction are making it almost impossible for nonprofit housing developers to acquire property for affordable housing and build new housing within the limited amounts of available public financing and subsidies.

By any standard the continuing accelerated loss of low cost housing is an emergency. We have found that the weight of this emergency falls disproportionately on people of color. The impact of the housing crisis is in direct conflict with the City's "Race and Social Justice Initiative," which is to eliminate race based disparities in our community. Homelessness in Seattle continues to climb, with 2,813 men, women and children sleeping unsheltered on the streets. Today Seattle/King County has the fourth largest homeless population in the nation, following the metro areas of New York City, Los Angeles and Las Vegas.

We call on city leaders to move forward expeditiously under its defined emergency powers and take immediate action, both to stem these housing losses, and to identify new sources of revenue to dramatically expand our stock of nonprofit owned and managed housing.

A group of Seattle housing advocates has developed the following white paper offering their recommendations for consideration and immediate adoption by the Mayor, City Council, and the Housing Affordable and Livability Advisory Committee.

4 Community Housing Caucus

Community Housing Caucus Members

Special thanks to Speaker of the House Frank Chopp for his support and the impetus he provided in bringing our group and these recommendations together. Thank you to Councilmembers Nick Licata and Kshama Sawant for sponsoring the press event.

Participants developing these strategies include the following community leaders – (organizational affiliations here are for identification purposes only):

Ishbel Dickens, Executive Director, National Manufactured Home Owners Association
Sarajane Siegfriedt, 46th Democrats, Puget Sound Advocates for Retirement Action
Lisa Herbold, Staff, Councilmember Nick Licata's Office
David Bloom, Former Associate Director, Church Council of Greater Seattle
Sharon Lee, Executive Director, Low Income Housing Institute
Bill Kirlin-Hackett, Director, Interfaith Task Force on Homelessness
Jonathan Grant, Executive Director, Tenants Union
John V. Fox, Coordinator, Seattle Displacement Coalition
Alice Woldt, Former Co-director, Faith Action Network & Executive Director, Fix Democracy First!
Gary Clark, former Housing Planner Seattle Office of Housing
Neil Powers
Alex Becker, Advocacy Program Manager, Real Change
Darel Grothaus, former Director City Dept. of Community Development, Housing Consultant
Hailey Badger, Students of University of Washington (ASUW)
Kira Zylstra, Stabilization Services Director, Solid Ground
Ted Virdone, Staff, Councilmember Kshama Sawant's office

For a list of organizations endorsing these recommendations see last page.

Table of Contents

1. Financing	7
<i>Housing Bond Program:</i>	8
<i>Growth Related Housing Fund:</i>	8
<i>REET Homeless Fund:</i>	9
<i>Dedicate an amount from the City’s General Fund</i>	9
<i>Millionaires’ Tax:</i>	9
<i>Launch a new private sector initiative to raise \$50 million to end homelessness:</i>	9
<i>Housing Linkage Fees and Renewed Housing Levy</i>	9
<i>Limited equity cooperatives:</i>	9
<i>Acquisition of significant units:</i>	9
<i>Bridge financing:</i>	9
<i>Prioritize serving the city’s poorest households:</i>	9
<i>Options for production of affordable housing:</i>	9
<i>Establish a Loan and Bond Guarantee Pool:</i>	10
<i>Seattle Housing Impact Note Program:</i>	10
2. Zoning and Housing Types	10
<i>1-for-1 replacement:</i>	10
<i>Place a hold on up-zones where low income housing is threatened:</i>	10
<i>Zoning manufactured housing:</i>	10
<i>Geographic spread of housing for all income levels throughout City:</i>	10
<i>Expand Housing TDR Program:</i>	11
3. Tenant Access/Protections	11
<i>Rent stabilization:</i>	11
<i>Tenant eligibility for receiving relocation assistance:</i>	11
<i>Restore Just Cause Eviction Ordinance:</i>	11
<i>Deposit & Fee Reform</i>	11
<i>Right to Organize (RTO) enforcement:</i>	12
4. Preservation of Existing Subsidized Housing	12
<i>Preserving subsidized units</i>	12
5. Preservation/Creation of Affordability in existing Market-Rate Housing	12
<i>Pass a "Right of First Notice" ordinance:</i>	12
<i>Housing Preservation:</i>	12
<i>Amend the City's Multi-Family Tax Exemption (MFTE):</i>	12
<i>Future condominium conversions:</i>	13
<i>City authority over SHA:</i>	13
6. New Affordable Housing Resources	13
<i>Public land availability:</i>	13
<i>Inventory low-income housing:</i>	13
<i>Develop strategy to identify and make use of suitable land and resources for low income housing:</i>	13
<i>Annual low-income housing targets:</i>	13
<i>Land for encampments:</i>	14
<i>Vehicle residency:</i>	14
7. Place Based Strategies (OH and DPD)	14

6 Community Housing Caucus

<i>Special Review Districts:</i>	14
<i>Advisory groups:</i>	14
<i>Take action to address “Student Housing Needs:”</i>	14
8. Sustainable Homeownership – OH	14
<i>A principal reduction program:</i>	14
9. Additional Strategy Focus	14
<i>Work to End Homelessness:</i>	14
<i>Homeless Families:</i>	15
<i>Homeless Youth and Young Adults:</i>	15
<i>Expand Shelter Capacity:</i>	15
<i>Purchase Hotels for Voucher Program:</i>	15
<i>Shared housing:</i>	15
<i>Size of units:</i>	15
<i>Small houses:</i>	15
<i>Companion congregations:</i>	15
10. State Issues for Advocacy	16
<i>Housing Finance Reform:</i>	16
<i>Utilize land at Fircrest:</i>	16
<i>Basic standard for cities in developing homelessness remedies:</i>	16
<i>Regional housing plans:</i>	16
Early endorsing organizations:	17

Introduction

Our goal is to ensure Seattle is a place where people of all income levels can live and work. In order to achieve this, the City's emphasis must continue to be focused on serving those in greatest need: households with incomes are between 0-30% of area median income (\$26,900 annually) and secondarily for households between 30%-50% of AMI (\$44,800 annually). The emphasis must not shift to higher income groups as some within HALA and in city government suggest.

Displacement was the number one concern of 70% of the attendees at all the three HALA and city sponsored community meetings. The recommendations in this report are designed to combat displacement. This includes ideas for additional capital funding to dramatically increase the supply of low-income housing, measures to shorten the time that persons and families are homeless, increased tenant protections, policies to preserve or replace existing privately owned low-income housing, plans to house families in all parts of the city, and a comprehensive new strategy to inventory and utilize public land for low income housing production.

Our recommendations are purposely organized into categories identical to those chosen by the Mayor's Housing Advisory Task Force. Solutions are prioritized in descending order under each section

1. Financing

This is an emergency and it is prudent and reasonable to dedicate a share of the city's bonding capacity and other assets for low income housing. It is city policy to use those assets in times of emergency, and a portion of the City's financing capacity has been set aside explicitly for emergency purposes. City policy also establishes that advancing social policy may "take precedence" over other financial objectives with respect to its assets when expressly authorized by the Council, so long as the city's reserves remain above legal limits "provided by law or trust principles" (City Council Resolution 31525).

An examination of the city's balance sheet reveals a number of additional types of short, medium, and long term assets that can be made available or readily leveraged while maintaining other fiduciary obligations. Upon declaration of that emergency, the city's leaders must move immediately to tap these resources in order to finance a dramatic and significant increase in the construction, acquisition, and renovation of low income housing in our city. Upon a declaration of emergency, the city must move immediately to launch the following:

Housing Bond Program: The City of Seattle should issue at least \$500 million in long term bonds; staying within the current bond cap for low income housing and housing for homeless families and individuals, at 0-30% and 30%-50% of the area median income. The bonds can be issued in increments over multiple years and take advantage of low interest rates. The housing will be built on city-owned land and private property acquired by nonprofits.

The city is obligated to hold a minimum of \$100 million of its general obligation debt capacity in reserve "for emergencies." The city's "emergency reserve" now contains about \$228 million or \$128 million above the minimum. Declare an emergency and authorize immediate issuance of \$128 million for low income housing.

The city has \$1.437 billion in City Treasury Investments. Some portion of these investments can be sold and returned to the General Fund for the council to appropriate for low income housing in 2015. This can be done without impairing reasonable liquidity needs and without significantly diminishing interest income for the General Fund. These investments earned less than half of one percent of the total General Fund revenues in 2013-2014 and are projected at the same low level for 2015-2016.

Thoroughly examine the rest of the city's 'balance sheet' to determine what other types of short, medium, and long term city assets for low income housing production could be made available: It could be that more than \$500 million spread over 5 years when this is done, drawing from numerous other available revenue pools.

Growth Related Housing Fund: Reestablish Seattle's Growth Related Housing Fund. Dedicate a portion of the incremental increase in property tax revenue from new construction annually for the development of low income housing. This creates a nexus between development and the pressures on housing affordability. The original Growth Fund captured new tax revenue related to growth in downtown Seattle. Given the unprecedented level of development in many neighborhoods, expand the Growth Fund citywide.

9 Community Housing Caucus

REET Homeless Fund: The Real Estate Excise Tax generates approximately \$50 million in revenue for Seattle and is expected to increase in the next four years. The city should dedicate 20% of REET revenue (\$10M/annum) to the production of housing for people who are homeless.

Dedicate an amount from the City's General Fund: Annually set aside funds from the general fund for low income housing. This would be in addition to the housing levy. Currently, the city does not allocate any of its general fund money for the production of low income housing.

Millionaires' Tax: During the last budget process, the City Council approved a statement of legislative intent to research and possibly develop a "millionaires' tax". Expedite this process and bring a proposal back to the council this summer and well before next year's budget process. Allocate a large portion of this new revenue to homeless and low income housing.

Launch a new private sector initiative to raise \$50 million to end homelessness: Under the Mayor's leadership, the city should bring together key corporate leaders, private sector employers, foundations and businesses with the goal of launching a new private sector initiative – to raise an additional \$50 million to jump start new programs aimed at putting an end to homelessness.

Housing Linkage Fees and Renewed Housing Levy: We are aware of important discussions and timelines already established to address these issues. By resolution, the council has committed to addressing linkage fees soon, and development of our next housing levy is now underway. Our caucus is dedicated to ensuring the housing levy prioritizes housing for our poorest households and that linkage fees are maximized to serve this purpose as well.

Other Ideas:

Limited equity cooperatives: Dedicate a significant amount of existing and new sources of revenue for the production of limited equity cooperatives – acquisition and/or renovation or new construction. The 2016 Housing Levy should include such a dedicated source for co-ops and community land trusts.

Acquisition of significant units: Use existing and new sources of revenue including from any future housing levy specifically for acquisition of older existing lower income apartment buildings that are at risk of being sold, repositioned, demolished or converted.

Bridge financing: Earmark an expanded amount (from existing and new sources of revenue including those identified above) and from any future housing levy specifically for the purpose of bridge financing. This will be a source of shorter term financing that is readily available to nonprofits.

Prioritize serving the city's poorest households: Target those most in need of low income housing. The city's housing policies first and foremost must remain focused on production of units serving those whose incomes are at or below 30% of area median income.

Options for production of affordable housing: Local non-profit housing agencies are currently locked into a system of developing housing of 50+ units that does not accommodate other

10 Community Housing Caucus

creative approaches to building housing. Develop options that stretch capital funds to build more housing.

Establish a Loan and Bond Guarantee Pool: This will enable nonprofits to obtain the lowest cost financing possible. The guarantees would be available for new projects for an initial time period. As loans get seasoned and individual project reserves are built up, the guarantees would revolve and help guarantee new projects.

Seattle Housing Impact Note Program: Set up a housing impact investment program for Seattle residents to vote with their feet and invest their funds in low income housing notes and gain a return. Funds would be used to further the construction and preservation of low income housing. Model this after the Enterprise Community Partner's Community Impact Note, see enterprisecommunities.com.

2. Zoning and Housing Types

1-for-1 replacement: Expand the city's authority to require developers who demolish low income housing to replace 1 for 1 the housing they remove and at comparable price. Apply this in every case involving a discretionary land use decision, and where a developer (including SHA) seeks an up-zone, master plan permit, alley vacation, air rights, acquisition of public land, etc. Amend the city's SEPA housing policy to require this for all developments demolishing four or more units of low income housing priced at/or below 80% of median. Add this requirement into the proposed housing linkage fee.

Place a hold on up-zones where low income housing is threatened: The city should place a hold on considering further up-zones at this time in areas where existing low income housing is threatened. Such changes in land use that cause demolition, speculation, and rent increases should be placed on hold until specific 'no net loss' measures are first put in place that either prevent these losses or guarantee 1 for 1 replacement at comparable price of all units lost.

Zoning manufactured housing: Zone the five manufactured housing communities/mobile home parks in Seattle as “mobile home parks” to help preserve this affordable homeownership opportunity for 270 low income families and seniors. There is no cost to the city and similar zoning ordinances have already been enacted in the cities of Tumwater, Lynnwood, Marysville and Snohomish County and are currently on the Comprehensive Plan amendment processes in Spokane and Federal Way.

Geographic spread of housing for all income levels throughout City: Proactively plan to house families of all income levels in all parts of the city. The current market is producing few-to-zero units with three bedrooms or more. Options include:

- Change all low-rise L2-L3 zones to Family Housing zones with the same density and height requirements but with goal of encouraging family type units in these zones.
- As a buffer between Single-Family and midrise NC and Commercial zones, this zoning would allow stacked 3+ bedroom apartments or row houses. This was one of the recommendations given to the City Council last year by a consulting firm hired by the council. It would be a major step forward in making Seattle more family-friendly.

11 Community Housing Caucus

- Within this Family Housing transitional zone, funding sources suggested above would allow more family housing to be built by non-profits to house large families, multi-generational households, immigrant families, and people with disabilities.

Expand Housing TDR Program: Allow sponsors of low-income housing in all zones to sell or Transfer Development Rights (TDR) to preserve existing low-income housing. Program currently is restrict to only a few limited zones. The ability to sell unused development rights should be expanded to preserve existing housing in the Cascade neighborhood, S. Lake Union and elsewhere. Also ensure that purchasers (receiving sites) of the added air rights (and density) are required to replace, 1 for 1 at comparable price, any existing low income housing that may be lost on those receiving sites when they are redeveloped.

3. Tenant Access/Protections

Rent stabilization: Pass a resolution affirming the City’s interest to enact a Rent Stabilization ordinance. Actively pursue a repeal of the state’s ban on regulating rent hikes. Explore and develop interim rent stabilization options available to the city. Until that is done, establish a policy requiring rent stabilization as a condition for granting discretionary land use decisions or other concessions from the City to private developers.

Tenant eligibility for receiving relocation assistance: Close loopholes in the Tenant Relocation Assistance Ordinance (TRAO) to allow administrative hearings for tenants, and penalize those who economic eviction tenants prior to providing qualified tenants with assistance. Seek authority from the state to increase the eligibility to 80% area median income for assistance, for head of household.

Support and seek State passage of a 90-day notice for all rent increases.

Restore Just Cause Eviction Ordinance: Require 90-days termination notice for no-fault terminations. The ordinance will cover term leases, contract expirations, and a tenant’s defense against an eviction from unregistered landlords. Currently, real estate transactions fall under a just cause for evictions, remove this language in order to curb displacement from speculation in the housing market.

Deposit & Fee Reform: Enact an ordinance requiring language in all rental agreements that:

- Give tenants the option of receiving interest on their deposit or directing it to a tenant protection fund for legal aid and tenants’ rights outreach
- Limit deposits to one month’s rent
- Cap total fees in a rental contract
- Require a landlord to provide the tenant with all related invoices for deposit amounts withheld along with the specific damage statement
- Entitle tenants to three times the deposit for illegal withholdings
- Limit costs on screening reports

Right to Organize (RTO) enforcement: The city protects the right to organize in apartment buildings, but does not enforce the ordinance. Stronger enforcement mechanisms should be adopted and enforced by the City Attorney’s office and the Seattle Police Department as needed.

4. Preservation of Existing Subsidized Housing

Preserving subsidized units: Improve strategies to ensure current subsidized units, such as privately owned Section 8 and Section 202 senior housing, are preserved when contracts expire.

- Inventory the city’s stock of these units
- Commit an amount of new and existing sources to assist nonprofits to acquire these buildings so they can remain as low income housing in perpetuity
- Emphasize acquisition for land trusts, limited equity cooperatives, or other tenant ownership

5. Preservation/Creation of Affordability in existing Market-Rate Housing

(Preserve affordability and quality of existing housing stock)

Pass a "Right of First Notice" ordinance: Require all owners of existing low and low-moderate income apartment buildings (affordable up to those earning up to 80% of area median income) to first offer them for sale to non-profits representing the affected low income tenants who occupy the building prior to putting the property up for sale to speculators and developers. Funds from sources identified in section 1, would be dedicated to assist the nonprofits making offers for these buildings. The first priority would be to acquire and place these buildings under some form of land trust, limited equity cooperatives, or other tenant ownership arrangements.

Housing Preservation: Create a special Housing Preservation Commission (HPC) to inventory and preserve Seattle’s remaining stock of privately-owned, unsubsidized low and moderate income buildings at-risk of being lost. The HPC would recommend strategies for quick acquisition of these buildings. This dovetails with passage of a right of first notice law to facilitate acquisition of these at-risk buildings. Consider selective use of the city's condemnation authority to acquire at-risk buildings the HPC has prioritized as ripe for sale.

Amend the City's Multi-Family Tax Exemption (MFTE): The current program is not achieving the goal of incentivizing production of truly low income units nor is it accomplishing the goal of stimulating construction in areas that are otherwise not seeing growth. Nearly \$200 million in tax breaks have gone to market rate developers building in high growth areas. The small portion of “set asides” we’ve gotten in return are not priced at low income levels. Currently developers are allowed to set aside 20 percent of their units for to those earning between 65% and 80% of median income, higher than what most workers can afford.

We recommend either:

1. Restrict use of MFTE to only nonprofits doing innovative new projects not already eligible for state tax breaks under existing state programs. Allow use of MFTE only for nonprofits to assist in acquiring existing privately owned low income buildings, so long as rents on all units acquired are not raised above current low income rates;

OR

13 Community Housing Caucus

2. If for-profits are allowed to continue to use MFTE, limit its use to only those few areas of the city not experiencing high rates of growth--where the stimulus is needed. Require all for-profit's tapping MFTE to include at least 30% of their units offered at rents at/or below what's affordable to those earning 50% of median income. A one for one replacement requirement, as an additional obligation, for developers receiving MFTE who tear down existing low income units.

Future condominium conversions: Develop new laws to prevent or limit future condominium conversions. Research city authority to limit conversions under existing state law such as use of moratoria and amending state law as needed.

City authority over SHA: Consider and approve an ordinance to affirm and expand the city's authority over the Seattle Housing Authority. Require SHA to get explicit approval from the City Council prior to taking any action affecting their stock of public housing units, vouchers in their inventory or policies that would affect eligibility and access to those units by the city's poorest households. Currently SHA has 5,000 units and 9,000 vouchers under its discretion. The ordinance would authorize the Office of Housing to draft a Memorandum of Agreement to be signed by SHA and the city, and making release of future city funding for SHA projects, or future consideration of rezones for SHA contingent on SHA's cooperation in drafting such an agreement giving the city a say in SHA actions.

6. New Affordable Housing Resources

Public land availability: Initiate immediately a thorough and comprehensive strategy to acquire and develop unused, underdeveloped, and available public land for a dramatic expansion of the city's low income housing stock.

- Inventory the City's available public land
- Inventory land owned by other public entities including King County, Sound Transit, WSDOT, Port, and other state and county agencies
- Prioritize sites that are readily available

Inventory low-income housing: Thoroughly assess and monitor the city's existing stock of low income housing, where it is located, and how much we have. Identify how much we spend from all sources annually. Identify the number of units in each price range we create annually and identify how much we lose each year to demolition, speculative sale, rent increases, condominium conversion, and other market forces.

Develop strategy to identify and make use of suitable land and resources for low income housing: This includes land that is held by unions, churches, educational institutions and other entities. This would involve committing city staff to work in cooperation with these entities to encourage use of their resources (and land) for low income housing. Prioritize use of some city housing funds so that partnerships to provide housing can be encouraged.

Annual low-income housing targets: Set an ambitious new annual low income housing target that not only guarantees no net loss but allows us to increase our inventory of units serving our poorest households.

Land for encampments: Set aside public property or purchase land and provide operating support for Nickelsville and tent cities. Keep people who are homeless safe.

Vehicle residency: Provide public land for parking of RVs, trucks, vans, and autos that people are currently using for housing. Include provision of basic needs such as toilets.

7. Place Based Strategies (OH and DPD)

Special Review Districts: Consider the creation of area-or-neighborhood specific “Special Review Districts” to preserve existing low-income housing in that area, guaranteeing no net loss of units, as an overlay to the existing zoning code. In these areas, a board of citizens and advocates assisted by city staff would monitor the low income stock and make policy recommendations to maintaining the affordability. New developments would be evaluated based on standards set by the board. The board would be given the power to deny or condition permits, and can request the city to exercise its condemnation authority in order to meet no net loss goals.

Advisory groups: In lieu of the above suggestion, create a system of neighborhood/tenant based advisory groups to review the status of low-income housing (net losses/gains over time) and to make recommendations for new legislation specific to their community's needs. The goal is to recoup any net loss in the supply of low income housing in their area of the city.

Take action to address “Student Housing Needs:” The City should commit Office of Housing staff time to assess and develop a set of strategies aimed at addressing the unmet need for low-price student housing in the Seattle area. OH would bring together representatives from the Department of Education and Early Learning, each of the relevant higher education institutions, and their respective student governments to assess the current need. Together, they would identify and recommend specific strategies to better coordinate the shared responsibility between the city and educational institutions in providing housing options for students in the affected neighborhoods.

8. Sustainable Homeownership – OH

A principal reduction program: Implement a program to identify and underwrite homeowners on the brink of or already in foreclosure, to purchase the home from the willing lenders and sell them back to the original homeowner at an affordable market value.

9. Additional Strategy Focus

Work to End Homelessness: Implement the full recommendations of the Emergency Task Force on Unsheltered Homelessness, including operating costs for tent encampments and the use of city properties for shelters. Extend the life of the Task Force. Align post-HALA recommendations regionally, integrated with the Committee to End Homelessness Strategic Plan.

15 Community Housing Caucus

We agree with the Mayor's resolution that HALA's charge and recommendations should include the housing needs of homeless and formerly homeless people. Sufficient housing, operating and supportive services funding by Seattle and King County must be put in place so that homeless and housing service needs are met on a regional county-wide basis. Seattle should help staff this regional effort.

Homeless Families: Three years ago, the Seattle City Council adopted a policy that no homeless families should be living unsheltered on the streets. To ensure that this goal is reached, Seattle must build out this policy regionally, fund its efforts as noted above, and sustain this priority with clear leadership. There is an inadequate crisis response system. Homeless families, many who are people of color or immigrant/refugees, are woefully and inadequately served. As stated in a recent consultant report by Focus Strategies, the region-wide Family Housing Connection needs "significant reworking" and improvement. Make the goal of ending homelessness for families by 2020 a reality.

Homeless Youth and Young Adults: Significantly enhance resources and target prevention, early intervention and street outreach. Expand shelters and supportive housing so vulnerable youth and young adults can successfully make the transition out of homelessness.

Expand Shelter Capacity: Provide \$1.5 million in funding for new shelter capacity through the Seattle Human Services Department in order to serve vulnerable families, youth, and singles living in places not fit for human habitation. Such funds or partial funding could also be for services and/or one-time capital for facility modifications. Such funding would be provided by the city to faith-based and nonprofit organizations to leverage their resources and volunteers to enable more crisis response shelters and winter warming centers to open up.

Purchase Hotels for Voucher Program: Provide acquisition funds for nonprofits to purchase several hotels/motels to be used for a voucher program for homeless families and pregnant women. These should be located both in Seattle and outside Seattle in King County. Savings will be achieved on the operating side instead of paying private hotel operators. The nonprofit hotels will be centrally located, well managed and safe, compared to the dilapidated and crime ridden motels that homeless families are now placed in.

Shared housing: Consider shared housing for people moving out of homelessness.

Size of units: Given that there is a large portion of Seattle residents living alone, mostly renting; promote more studio apartments and preserve more existing buildings with studios.

Small houses: Consider construction of small footprint homes, like those being developed nationally, with some built for mobility. Flexibility is needed by city DPD to allow for tiny houses. OH should fund a few pilot projects for homeless people, seniors and low wage workers.

Companion congregations: Advance a partnership with landlords and their associations. Link a sponsoring congregation, a household needing an apartment, and a cooperative landlord, for one year or less in a companioned partnership.

10. State Issues for Advocacy

Housing Finance Reform: Establish additional dedicated streams of revenue for the state and local housing trust funds that produce affordable housing and support innovation.

Utilize land at Fircrest: Develop housing for populations appropriate for being neighbors on the site, such as low-income seniors.

Basic standard for cities in developing homelessness remedies: Raise the bar higher legislatively on cities who impose barriers and restrictions on the location of privately funded homeless shelters, day centers, services and housing. Incentivize by reward, or impose restrictions. Recent examples are: KentHOPE currently blocked by the City of Kent. The City of Everett is precluding social service agencies from being at street level within its business core.

Regional housing plans: Require existing Metropolitan Planning Organizations (MPOs) to produce regional housing plans in conjunction with their already-mandated transportation plans. This would begin the process of linking regional housing and transportation and could encourage some metropolitan regions to begin addressing regulatory barriers and other rental housing supply constraints.

17 Community Housing Caucus

Early endorsing organizations:

Association of Manufactured Home Owners (AMHO)

Belltown Apex Co-op

Church Council of Greater Seattle

Faith Action Network

Interfaith Task Force on Homelessness

Low Income Housing Institute (LIHI)

Real Change

Seattle Displacement Coalition

Solid Ground

WHEEL (Women's Housing, Equality and Enhancement League)

SHARE (Seattle Housing and Resource Effort)

Nickelsville