



HOUSING  
DEVELOPMENT  
*consortium*

Miranda Redinger  
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City of Shoreline  
17500 Midvale Avenue N  
Shoreline, WA 98133

July 10, 2014

**RE: 185<sup>th</sup> Street Station Subarea Planned Action Draft Environmental Impact Statement**

Dear Ms. Redinger:

On behalf of the Housing Development Consortium of Seattle-King County (HDC), thank you for the opportunity to comment on Shoreline's 185<sup>th</sup> Street Station Subarea Planned Action Draft Environmental Impact Statement (DEIS). **When drafting the final EIS, we urge you to thoroughly analyze the impact each alternative's proposed growth type will have on housing affordability and to fully explore policies to effectively mitigate these impacts.**

HDC is a coalition of more than 100 nonprofit organizations, private companies, and public partners committed to the vision that all people should have the opportunity to live in safe, healthy, affordable homes in communities of opportunity. HDC is pleased that Shoreline's DEIS expresses a commitment to encourage and promote a variety of housing types and affordability levels. Low and moderate income families are frequent riders on transit; planning for affordable housing near light rail can provide increases in trips and ridership, in addition to meeting the needs of these families.

In setting forth the pattern of residential growth around the 185<sup>th</sup> light rail station, this planned action plays a tremendous role in determining whether Shoreline residents of all incomes can find affordable homes near their work, school, transit, and other services. Therefore, it is vitally important that the City analyze in detail the effect each alternative would have on housing affordability and plan mitigation strategies to ensure Shoreline meets the housing needs of low and moderate income households.

**HDC's Affordable Housing Members:**

- Low-income Housing Organizations
- Community Development Corporations
- Special Needs Housing Organizations
- Public Housing Authorities
- Community Action Agencies
- Workforce Housing Organizations
- Public Development Authorities
- Government Agencies and Commissions
- Architects and Designers
- Development Specialists
- Certified Public Accountants
- Regional Funders and Lenders
- National Funders and Lenders
- Community Investment Specialists
- Property Managers
- Law Firms
- Contractors

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Specifically, HDC urges you to analyze these different alternatives based on: the type of construction that will result and the impact of different scenarios on land costs. We then ask you to consider an array of development incentives and other tools that could help mitigate upward pressure on the cost of housing for Shoreline's low and moderate income families as the City grows and welcomes light rail.

❖ Construction Type

The type of construction, which varies based on building size, can have a significant impact on the cost of new housing. For example, wood frame construction (4-6 stories tall) is often more affordable to produce than steel and concrete construction (6 or more stories tall). **When comparing the alternatives for growth, the City should consider these factors.**

❖ Land Costs & Transit Access

Aligning residential growth with transit access has tremendous environmental and social benefits. However, this form of growth can also place extreme upward pressure on housing costs. Across the country, and here in King County, light rail stations have led to exponential increases in land costs. While smart housing policies can, and should, overcome this barrier to affordable housing, it is nevertheless worth close analysis. **When comparing and analyzing alternatives for growth, the City should consider how land prices will change in order to plan effective mitigation strategies for affordable housing.**

❖ Mitigating Impact

With the right level of incentives, Shoreline can attract residential development affordable to a range of incomes, including those most in need. A variety of tools can help Shoreline meet the needs of low and moderate income households as the City plans for growth around light rail stations, including:

- Density Bonuses
- Incentive/Inclusionary Zoning
- Development Agreements
- Reductions in fees and other regulations
- Permitting priority, streamlining, or flexibility
- Reduced parking requirements
- Multifamily Tax Exemption (MFTE)
- Transfer of Development Rights for Affordable Housing (TDR)

Many of these incentives allow nonprofit housing providers, in addition to market-rate developers, to provide affordable housing for Shoreline's low and modest-wage workers and families. Appropriately crafted incentives harness the power of the marketplace to produce affordable homes with very limited public investments. Development incentives are proven to stimulate affordable homes in a mixed-income setting, and, when implemented well, they allow communities to increase the supply of affordable homes, support workforce and economic development and reduce sprawl, traffic congestion, and pollution. The resulting homes enable residents to benefit from urban reinvestment and connect to emerging job centers, transit stations, and opportunity networks.



A strong incentive zoning policy is one extremely important tool for addressing affordability near light rail stations and a recommendation of PSRC's Growing Transit Communities Strategy. As a signatory of the Growing Transit Communities Compact, Shoreline should consider incentive zoning in its high-capacity transit station areas. **When drafting your final EIS and other guiding documents pertaining to the 185<sup>th</sup> light rail subarea station, we urge you to emphasize the importance of applying a strong affordable housing incentive zoning program and other development incentives concurrently with any proposed zoning changes.** A lack of concurrency between growth and development incentives can lead to missed opportunities for public benefit.

Acknowledgment of affordability impacts and specific discussion of mitigation strategies will make your final EIS a strong document. It should be possible for working people in Shoreline to afford housing and still have enough money left over for the basics like groceries, transit, and child care. Planning for affordable housing near your 185<sup>th</sup> light rail station will help make this vision a reality.

We look forward to continuing to work with you as more clarity is developed for affordable housing strategies in the final EIS. HDC will continue to closely monitor this process and provide public comment as it progresses. If you have any questions about our comments, please feel free to contact me at [kayla@housingconsortium.org](mailto:kayla@housingconsortium.org) or call (206) 682-9541.

Best,



Kayla Schott-Bresler  
Policy Manager