

From: [Kayla Schott-Bresler](#)
To: [City Council](#)
Cc: [Rachael Markle](#); [Kelly Rider](#); [Kayla Schott-Bresler](#)
Subject: HDC Comment on 185th Street Station Subarea Plan
Date: Thursday, March 12, 2015 2:20:14 PM
Attachments: [HDC Comment on 185th Street Station Subarea Plan 3.12.15.pdf](#)

Dear City Councilors,

Attached, please find HDC's comment letter on the 185th Street Station Subarea Plan and Development Code Regulations. Thank you so much for your continued hard work throughout this process. Please don't hesitate to be in touch in advance of Monday should you have any questions or want to discuss anything further. I am including below contact information for myself and Kelly Rider, HDC's Policy Director.

HDC strongly values our partnership with the City of Shoreline and the Council's commitment to creating safe, healthy, affordable homes for your residents.

Best wishes,

Kayla

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HOUSING
DEVELOPMENT
consortium

March 12, 2015

Shoreline City Council
Shoreline City Hall
17500 Midvale Avenue North
Shoreline, WA 98133

RE: Comments on the proposed Shoreline 185th Street Station Subarea Plan and Development Code Regulations

Dear City Councilors,

On behalf of the Housing Development Consortium of Seattle-King County (HDC), thank you for this opportunity to comment on the proposed Shoreline 185th Street Station Subarea Plan and Development Code Regulations. We applaud the time, energy, and thought that the City's staff, Planning Commission, and Council has put into this planning process. **This plan presents a vision for an equitable and sustainable future, and HDC supports its adoption.**

HDC is a nonprofit membership organization which represents more than 100 private businesses, nonprofit organizations, and public partners who are working to develop affordable housing and provide housing-related services in King County—with many of our members serving the City of Shoreline. HDC's members are dedicated to the vision that *all people should be able to live in a safe, healthy, and affordable home in a community of opportunity*. In other words, we believe all people, regardless of income, deserve the opportunity to thrive in a safe neighborhood with good jobs, quality schools, and strong access to transit.

We applaud Shoreline for its work toward achieving this vision. The City's recent exemption of affordable housing from transportation impact fees, for instance, will make it easier to provide safe,

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

Affording Opportunity

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healthy, affordable homes in Shoreline. We also thank the City for its support of the Ronald Commons project and for its strong partnership with the affordable housing community.

With the development of the light rail station subarea plans, the City has before it an ideal opportunity to honor and implement the commitments it has made to the entire community in the Comprehensive Plan and Housing Strategy Plan. By maximizing tools that leverage the power of the private market to create affordable homes, the 185th Street Station Subarea Plan helps ensure growth benefits people across the income spectrum.

Light rail will increase the demand for housing in Shoreline, and this plan will allow Shoreline to accommodate this demand through density while providing meaningful affordability. This plan takes careful steps to retain affordability in the station area by creating strong affordable housing provisions that require development to create affordable homes. ***We strongly urge the implementation of the affordable housing provisions in your Station Subarea Plan.*** We offer these comments to help guide your work:

❖ **Creating a Mandatory Program**

HDC strongly supports a station area plan that requires development to contribute to solving affordable housing needs. We urge the City Council to approve the proposal to create a mandatory program in the MUR 70+, MUR 70, and MUR 45 zones. Developer agreements with a mandatory affordable housing component will be a necessary component of achieving the Council's affordability goals in the MUR 70+ zone.

❖ **Creating a Broad Program**

HDC supports the City's decision to create a voluntary program in the MUR 35 zone. However, in order to ensure Shoreline is truly planning for the affordability and density that will be needed in the station area, it is critical that the higher density zones remain as expansive as possible. If Council wishes to create a transition zone between MUR 45 and R-6, HDC supports adding MUR 35 back in to the phases. HDC does not support scaling back the MUR 45 zone.

❖ **Fees vs. On-Site Affordable Housing**

There are benefits to on-site provision of affordable housing as well as fee-in-lieu collection to fund affordable housing. On-site provision of affordable housing can help ensure that affordable housing is built in the station area, at the same time as market-rate housing. On the other hand, fee revenue—deposited into the City's Housing Trust Fund—would be a tool to serve lower-income households making between 0 and 60% of Area Median Income, or

approximately \$52,920 for a family of four. While we know that Council is trying to ensure as much on-site affordable housing as possible, it is also our understanding that serving lower-income households is a long-standing Council goal.

It is important to balance these benefits, and we believe the current language achieves that objective by allowing fee-in-lieu only when providing a greater benefit than on-site provision of affordable housing.

HDC will be happy to work with the City going forward to make sure this fee program is structured to maximize affordable housing benefit. Should the Council wish to eliminate a fee-in-lieu program, HDC can work with the City to ensure an appropriately crafted hardship program is put in place in order to allow for those developments that would not be able to move forward but for allowance of a fee-in-lieu.

❖ Homeownership

HDC recognizes that the City is still trying to understand how homeownership could be supported through the affordable housing provisions of this plan, and we strongly support revisiting this issue during the 145th Street Station Subarea Planning Process. Affordable homeownership regulations are especially important in the MUR 45 and MUR 35 zones, where there will be ownership development like townhomes and multiplexes. The City should ensure that these projects are included in a fee-in-lieu program and able to contribute to affordability.

Shoreline's station areas will be rich with opportunity—transit, services, jobs, and other amenities that are important for creating thriving communities. **HDC supports the density and affordability this plan creates, maximizing access to these benefits.**

It is critical that those most in need of access to transit are able to live in the station area. By planning for affordability and density in tandem within the station area, the City will support families of limited incomes, increase ridership of light rail, and create a strong customer base for businesses in the area.

We encourage the City to adopt and implement the 185th Street Station Subarea plan and the strong affordable housing regulations contained therein. We greatly appreciate the intense thought and hard work that has gone into this process. We thank the City of Shoreline staff, the City's Planning Commission, and Shoreline residents for their engagement in and dedication to this process.

We at HDC look forward to working with the Council as this plan moves toward adoption and are happy to be contacted with any questions. You can reach us at (206) 682-9541 or hdc@housingconsortium.org.

Thank you for your consideration, and for all you are doing to help create, safe, healthy, affordable homes in Shoreline.

Kind Regards,



Kayla Schott-Bresler
Policy Manager



Kelly Rider
Policy Director