



March 31, 2017

City of Seattle
Ed Murray, Mayor
Sam Assefa, Director OPCD

Re: Fremont Neighborhood Council Position on City Proposed MHA Zoning Changes

The Fremont Neighborhood Council (FNC) has spent the past year considering the implications of the HALA driven MHA zoning proposals while actively engaging, and listening to, Fremont residents who will be most directly impacted by them. We offer the following comments on both systemic and Fremont-specific concerns as the City considers these substantial changes to the way we live together in this urban setting.

Land use planning, and especially zoning, is a very site-specific process with site-specific impacts. Wholesale changes in zones throughout the city such as are proposed under the MHA program can create significant unintended consequences. To avoid these consequences neighborhood-specific needs and impacts need consideration. Because the Wallingford Urban Village overlaps the Fremont neighborhood east of Aurora and west of Stone Way N., we have heard many concerns voiced by residents of East Fremont/West Wallingford (many of whom are FNC members). We attach the document prepared by them after several community meetings and intense research on the MHA proposals and their potential impacts, and ask that their comments be given serious consideration as the views of Fremont residents most dramatically impacted by the City's current proposals.

FNC supports livability, diversity, inclusion and affordable housing for all.

The FNC supports HALA's goal of addressing the housing affordability crisis in Seattle. For decades the FNC has supported efforts to increase the ability of moderate and low income people to live in Fremont while also working to further diversify our neighborhood in order to enrich the community. Numerous reports and studies indicate that to accomplish this goal multiple policies need to be used: construction of both new market rate and subsidized housing, and conservation of existing "naturally affordable" housing.¹

FNC has pursued these goals by actively participating in many land use decision-making processes, including:

- Negotiations over zoning in the 1980s that provided significantly greater development capacity below 39th/Bowdoin/40th (the area that later became the Fremont Hub Urban Village)
- Participation in neighborhood plan development in the 1990s
- Facilitation and financial support for a low-income housing project in East Fremont in collaboration with Capitol Hill Housing in the 2000s
- Engagement in design review board review of specific projects

¹ E.g., "Housing Production, Filtering and Displacement: Untangling the Relationships," Zuk and Chapple, 2016. http://www.urbandisplacement.org/sites/default/files/images/udp_research_brief_052316.pdf

- Negotiation with developers of specific changes to improve projects in Fremont, sometimes leading to active support for high-quality development projects, particularly those that are aligned with our residents' values including Living Building Pilot Program projects such as Stone 34 and the Watershed Building at Troll Ave N and N 34th.

In addition, in order to maintain and improve the quality of life in our neighborhood, we consistently advocate for inclusion of infrastructure to accommodate the resulting growth in population; we advocate for and put resources into improved pedestrian and bike safety, P-Patches and parks, open space, public safety improvements, neighborhood art, and improved transit access, routes and capacity.

FNC shares the doubts of many Fremont residents that the MHA zoning proposal will bring promised diversity and affordability

Residents of Fremont have repeatedly expressed doubts that the City's MHA zoning plans will add diversity or affordability within our neighborhood. Those doubts are based on several factors:

1. FNC's experience that the City's support for broad and inclusive engagement in major decisions affecting both affordability and livability ("quality of life") in Fremont has significantly diminished over the past few years. This troubling trend culminated in the appointment of the HALA committee with inadequate inclusion of residents' interests.
2. The HALA report includes numerous provisions that are intended to promote the goal of "housing affordability and livability," but in application will not actually accomplish those goals. Worst of all, the report contained an allusion to traditional single family zoning (SF) as a construct of past racism that needs to be eliminated from Seattle's zoning code. This action has led to a highly polarized dialogue throughout the city over the past year; that dialogue has not contributed to the identification of solutions acceptable to all communities of interest.
3. The HALA "focus group" process allowed very limited meeting time, and lack of participation meant that neighborhood-specific impacts were not well vetted. Fremont had five representatives selected by OPCD, but only two attended after the first two meetings—both are now members of the FNC board. Our selected representatives as non-participants have not been heard from since but took places in the focus group, and the City did not replace them from the long list of eager Fremont residents wishing to participate. In comparison to the validation process that accompanied the mid-1990s neighborhood plans, the 2016 HALA focus group process only succeeded in informing a very few people from around the City who were not already engaged.
4. The actual financial estimates for payments by developers under MHA do not promise either enough affordable units within new Fremont buildings nor enough resources to build separate affordable and low income units in our neighborhood. Neighborhood-specific data raises concerns about the definitions of "affordability" in the HALA plan:
 - a) Median household income (for 98103 per City-Data.com adjusted for 2015) is \$80,349
 - b) The median home value for 98103 is \$662,000 (per Zillow); based on median household income, the average 98103 household could qualify for a \$241,000 home loan (using 3x income rule of thumb)
 - c) Zillow's rent index for 98103 is \$2,716, which is \$32,592 or 40.5% of the median household income
 - d) Single family houses in Lowrise (LR) zones are being replaced with multi-unit condos or rowhouses or townhouses at a much higher cost to buyers. Case study: 3653 Albion Place N was sold by long-term residents (1987-2014) for \$420,000 (8/2014). The home was acquired by MRN Homes, a local developer, who tore down the existing SF home and replaced it with three condos, which sold for \$772,000 (3651a 8/2016 sale); \$769,950 (3651b 9/2016 sale); and \$870,000 (3653 7/2016 sale). All three units sold at well above the current median. LR zoning enabled greater density but not affordability.

As a result of increased awareness of the monumental impact of the city-wide zoning changes proposed to implement the MHA program, the City appears to be increasing its engagement with impacted neighborhoods. We do appreciate the efforts made so far, and as the City proceeds with this process, we invite more direct engagement with the FNC, other neighborhood and community councils, impacted residents in Fremont and every other affected community.

FNC is concerned that city-wide zoning actions ignore neighborhood specific issues

To avoid impacts on specific neighborhoods such as Fremont, consideration of highly localized effects must be part of the process.

Under the proposed MHA proposal all of Fremont's Lowrise zones (LR), Neighborhood Commercial (NC), and Commercial (C) zones will see increases in allowed height, scale, and bulk. Since the 2010 up-zones of numerous blocks in our LR zones we have experienced significant changes including considerable loss of tree canopy and existing affordable housing. While the MHA program proposes to produce revenue to help pay for new subsidized affordable housing, the existing community is experiencing significant physical and economic displacement right now. Moreover, most of the new affordable housing is not likely to be built in Fremont; resulting in the neighborhood being further gentrified into a less diverse community. The affordable housing mitigation is likely to be sited elsewhere and not close to replacement in either quantity or quality.

FNC offers the following location-specific comments on behalf of Fremont residents

1. Many new residents do appreciate their apartment dwellings and, like those here much longer, appreciate the opportunity to live in such a vibrant neighborhood close to many of Seattle's best attractions. FNC works hard to enhance the livability and vibrancy of the neighborhood.
2. Neighbors express great concern about a loss of livability as density increases while infrastructure is not improved. Transit is currently at or over capacity. Fremont's sewage and drainage systems are a century old and the center of the SF zone in East Fremont sits only a few feet above the water table.
3. There is no plan in HALA for more schools, more parks or open space, or more walkable access to parks north and east of Fremont which are currently cut off by dangerous arterials in all directions. HALA lacks any provision for funding these needs.
4. The specific level of up-zoning proposed for the SF zones in East Fremont, located west of Stone Way in the Wallingford urban village is inappropriate. The upzoning of numerous blocks of SF to LR 2 and LR 3 on Midvale and Woodland Park Avenues is in direct contradiction of the specific principles vetted in the focus group process. Our experience has been that the proposed changes will lead to dramatic design, construction and gentrification impacts. In addition, continued block-busting and rapid redevelopment are significant concerns, as the neighborhood has already experienced on Linden, Woodland Park, Albion, and Stone Way south of Bridge Way as a result of rezoning in the 1990s and again in 2010. The loss of the SF zone will result in the decimation of much of the tree canopy and the gardens that afford the entire neighborhood of East Fremont its "breathing space."
5. The MHA driven redefinition of LR zones in East Fremont will add significant height, bulk, and scale where there is now light, air and tree canopy to soften the experience of added density. Much of the building in these zones to date has not added dwelling units but has subtracted affordability and even destroyed the charm of the streetscape.
6. The MHA program cannot possibly replace the existing affordable housing stock in East Fremont.

7. Even though MHA rezones are limited to urban villages, a large part of Fremont outside the urban village but zoned for multi-family and commercial development will also be affected. The area called "Upper Fremont," from North 40th up to North 50th, is proposed for additional density as part of the MHA program. Outreach to, and City engagement with, the impacted residents and others in this area has been close to nonexistent.

FNC offers the following specific suggestions to add density to Fremont while enhancing livability, diversity, inclusion, and even affordability.

We recommend the following changes and improvements to the MHA program in order to ensure affordability and improve livability in Fremont:

1. Zoning changes of the proposed scope and magnitude must be done with far more direct involvement and engagement by the people who live in directly impacted communities.
2. Release projections for MHA performance and payment amounts and affordable housing gain in every urban village. The "Affordable Housing Production Model Summary" that the city has released is inadequate—it does not break down MHA performance and payment generation and affordable housing unit production by neighborhood. As part of the Seattle 2035 Comprehensive Plan the city released a Development Capacity Report that measured development capacity in each urban village, but the city has not released development estimates on a per-parcel basis. We urge the city to release all of its data so that neighbors can better understand where and how much affordable housing will likely be built in their neighborhoods.
3. Add density and even affordability by changing the Commercial (C) zoning designation on Aurora Avenue N to Neighborhood Commercial (NC). After years of active participation by Fremont and Wallingford Neighbors (F.A.W.N.), we have come to the conclusion that Aurora between the ship canal and Woodland Park needs an urban planning solution to reduce crime and improve livability and walkability along Aurora and adjacent streets (particularly Linden and Winslow). A change in zoning from C (which encourages car-oriented development) to NC will provide a better connection between both Fremont proper and East Fremont; it will extend through Fremont the positive changes already occurring along this corridor. Aurora has split Fremont since it was constructed in the early 1930s. Aurora is currently slated for 15 more feet of height; residential density offering great views and the same neighborhood amenities as in the SF zones would be possible where existing land is underutilized by empty lots, a car lot, and single-story buildings. Eventually the Fremont portion of Aurora could take on more of a "boulevard character" like that immediately north between the zoo and Winona Ave. N. The redevelopment of Aurora in East Queen Anne demonstrates that 99 and residential development can co-exist.
4. We support the proposed change of the C zone along North and Northwest 36th/Leary Way to NC. However, the zone boundary follows lot lines on its north side and the change should be accompanied by provisions to reduce impacts on adjacent housing especially in the LR 1 and SF zones west of Phinney.
5. To obtain buy-in from Fremont residents, it will be important to prepare a realistic projection of the number of affordable units that will be built in or near Fremont as a result of revenue generated from the MHA program. This analysis should include work-force/middle income housing, MHA percentages and assess the lack of replacement of housing affordable to households making less than 60% AMI. Other critical issues for Fremont residents that will need to be studied and resolved include:
 - a. Impact on quality of life
 - b. Imposition of "edge" lot by lot with blocks in East Fremont that are 100% SF to avoid allowing lots to be blocked by large buildings without setbacks erected next door
 - c. Mitigating ongoing construction and disruption, including by elimination of Saturday construction in residential zones.

- d. Inadequate infrastructure for all forms of travel and for stormwater/drainage
- e. Provision for light, air, trees and greenscape: include setbacks that provide vegetation/gardens that enhance the street-level experience for all residents.

In conclusion, the Fremont Neighborhood Council finds that the failure by the City to conduct appropriate engagement with this community is clear and that zoning changes of the proposed scope and magnitude must be done with far more direct involvement by, and collaboration with, the FNC and residents who live in the directly impacted communities.

We look forward to the City's meaningful engagement with Fremont so that together we can develop a more thoughtful plan that will yield a better outcome when applying HALA (and/or rezoning) to our neighborhood both east and west of Aurora.

Thank you for considering our comments arrived at after much discussion.

Sincerely,



Toby Thaler on behalf of the Fremont Neighborhood Council
Vice-President and Chair, Land Use and Transportation Committee

Cc: City Council

Attachment: Statement from East Fremont/ West Wallingford residents on proposed rezoning inside Wallingford Urban Village

EAST FREMONT/WEST WALLINGFORD (EF/WW) RESIDENTS on the proposed rezoning of Wallingford Urban Village between Stone Way and Aurora

HALA and MHA-driven up-zones have a laudable purpose: to add badly needed low income housing in Seattle. However, no data has shown that the up -zones will produce any significant stream of revenue or actual housing, but the data we do have shows that displacement will be MORE than the amount of new housing.

Our neighborhood meetings, discussions and survey revealed broad agreement on the following response to the City's proposed up-zoning under HALA:

1. **The “L” in HALA – Livability – is missing from the proposal.** The proposed up-zones sacrifice livability by bringing significant increases in the bulk and height of buildings in every part of our neighborhood. We want to keep the front-porch character of our neighborhood, with greenery, yards, access to sunlight, etc.
2. **Slow Down!** Quality planning is being sacrificed for speed. Several once-in-a-generation, interconnected efforts are going on in parallel: HALA, 2035 Comprehensive Plan, rezoning of urban villages, overhauling the design review process. This is too complex for citizens or City officials to navigate thoughtfully. Slow down!
3. **Put neighborhood plans and design review procedures in place to guide development inside urban villages** — to ensure HALA principle of urban design quality, and assure quality construction and harmonious transitions between existing and new buildings. No plan, no design review, no HALA!
4. **Limit up-zones in Single Family zones.** Maintain lower heights by keeping SF as Single Family or Residential Small Lot. These family homes provide a greenbelt buffer from our main transit and commercial corridors, offering tranquility, relief from concrete, greenery, yards for families, sunlight, and homes for birds and wildlife.
5. **Keep Lowrise 1 and Lowrise 2 zones at currently defined limits and heights.** Redefining these zones to add 10+ feet in height without changing their name is the same as creating “hidden up-zones” that are unnecessary and undesirable in our neighborhood. Also, scrap the proposal to change LR1 to allow developers to cram in as many units as possible (like LR2 and 3); doing so will mean each unit is tiny -- the opposite of family-friendly.
6. **Require concurrent infrastructure and transit improvements, preservation of tree canopy and green space, park improvements and other infrastructure support** where up-zones happen. Added density must have commensurate investment; City assurances that these improvements will come along later are insufficient; tie plans for housing growth together with plans for needed infrastructure improvement.
7. **Incentivize density on Aurora and appropriate arterials**--Stone Way N, 45th Street east of Stone Way N, Bridge Way. Development should go on underutilized arterials before sprawling into adjacent parts of the neighborhoods. Require this development to meet *minimum* density requirements to make the most of valuable space along our main pedestrian and transit corridors.
8. **Preserve affordability and encourage diversity in Wallingford.** The proposed rezoning is accelerating the loss of affordable housing already, driving down diversity and affordability for homeowners and renters with low or fixed incomes. Preserving single family zoning will help as many people even now share their homes by renting out rooms, ADUs and DADUs. Catalogue and protect currently affordable rentals.
9. **Require off-street parking as part of new multi-family and commercial development** to support the added cars and drivers development brings, especially since Wallingford will not be on either planned light rail line.
10. **Consider rezoning in phases to offer a stepped process** that prioritizes up-zoning first along the main transit and commercial corridors, and only later on adjacent blocks if needed to meet actual growth.
11. **Encourage commercial spaces to be designed, built and leased to support, rather than displace, small, locally owned businesses.** Keep what makes our business district attractive and unique.
12. **Be transparent with the data and citizen dialogue.** Provide a concrete, realistic target for how much housing the City wants to add here; measure affordable housing loss/gain in Wallingford; notify people in a professional way that you will be changing their property; be honest about public feedback you're hearing.
13. **Impact Fees – Where are they?** Other cities impose impact fees to fund improvements in parks/open space, schools, transportation, and public safety that are associated with new development. Seattle should do the same.

EF/WW faces the most dramatic up-zones in the urban village. The most drastic changes in the Wallingford Urban Village will hit EF/WW, by proposing complete conversion to multifamily, forcing our main SF streets to up-zone to LR2 and LR3 and adding height increases in our LR 1 and LR2 zones as well. These changes turn EF/WW into a high-density area, despite its designation as a “low density residential urban village.” Yet EF/WW lies furthest from the center of the urban village near QFC & Wallingford Center on N 45th, where new housing should be prioritized. We maintain we offer ample density already, with capacity under current zoning in SF and LR to meet growth targets.

The proposed rezone of EF/WW violates the “Principles for MHA Implementation:”

- 1. Housing Options. Encourage a wide variety of housing sizes including family-friendly units;** EF/WW has this now! We would lose family-friendly SF housing under the proposed rezoning.
- 2. “Urban Design Quality: Encourage publicly visible green space and landscaping at street level.”** Up-zoning and lack of design guidelines such as required setbacks will cause loss of green space and landscaping, especially in SF areas but even in multifamily areas that now include SF-style structures that would get redeveloped or overshadowed by 55’ neighbors.
- 3. “Transitions. Plan for transitions between higher- and lower-scale zones...”** This calls for stepping down from higher to lower zones, but the City has turned this principle on its head by instead calling for all EF/WW low zones to dramatically rise to meet taller buildings in nearby NC zones!
- 5. “Assets and Infrastructure: Locate more housing near assets and infrastructure such as parks, schools and transit.”** Compared to the rest of Wallingford, EF/WW has no parks, no schools and overcrowded transit, lies farthest from the true heart of the urban village at N 45th and Wallingford Avenue N, but is seeing the biggest up-zones and complete conversion to multifamily (no SF or RSL).
- 8. “Neighborhood Urban Design: Consider local urban design priorities when zoning changes are made.”** Wallingford has detailed urban design priorities in its current Neighborhood Plan and that should be honored, including its priority to preserve SF zones, including in EF/WW.

EF/WW residents offer 3 specific recommendations:

- 1. Preserve Single Family Zones OR remove them from the urban village.** It is not appropriate to eliminate the most family-friendly, green part of our neighborhood in exchange for concrete-dense up-zones that will turn our streets into a patchwork of small homes and large apartment buildings. At most we would accept RSL in SF areas. We emphasize that Midvale Ave., a narrow street lined with small one-story craftsman homes, situated at the lowest elevation of our neighborhood with an underground creek a few feet below, is completely unsuited to be up-zoned to LR3.
- 2. Adjust the commercial zoning on Aurora Ave between 39th Street and 46th Street to allow for tall apartment buildings that will add significant density in East Fremont in its most transit-friendly location where there is ample housing capacity and easy connection to Fremont.** This is prime territory for additional housing density, and it’s currently being wasted. Up-zoning here will further improve the Aurora streetscape which has been getting better for a number of years; witness the new Staybridge Suites hotel there.
- 3. Cancel Hidden Up-zones.** Areas already designated as multi-family Lowrise 1 and 2 should not be forced to accept higher heights, bigger footprints and smaller setbacks through the City’s proposed redefinition of zoning terms. These hidden up-zones are not needed to achieve growth targets. Hidden up-zoning here compromises livability unnecessarily, in an area of Wallingford that already lacks the amenities of the rest of the neighborhood.