

January 21, 2017

To: HALA Team: (Jesseca Brand jesseca.brand@seattle.gov, Brennon Staley Brennon.Staley@seattle.gov, Nick Welch Nicolas.Welch@seattle.gov, Geoff Wentlandt Geoffrey.Wentlandt@seattle.gov)
Via E-mail

RE: Review of Mandatory Housing Affordability Proposal for the Morgan Junction Urban Village

Dear HALA Team:

The Morgan Community Association (MoCA) is the steward of the Morgan Junction Neighborhood Plan. Consistent with our role as stewards, we perform a review of any new, major City proposals which would affect the Morgan Junction Urban Village (MJUV).

MoCA recognizes that there is a crisis of affordable housing and the need for new solutions. However, our review finds that the current proposed Mandatory Housing Affordability (MHA) solution is in conflict with our Neighborhood Plan goals and policies. [We believe that the conflict must be addressed before another ordinance can be](#) adopted if that new ordinance would also be in conflict with our adopted Goals and Policies.

The following review of the City's November 2016 proposed Mandatory Housing Affordability zoning changes and strategy was prepared by the MoCA board and presented at the January 18, 2017 MoCA quarterly meeting. Consistent with our bylaws, MoCA meeting participants approved this review for submission to the applicable departments and the Seattle City Council.

The MoCA review contains three sections, summarized as:

1. Review of the applicable Land Use and Housing dictates/discussions from the Morgan Junction Neighborhood Plan
2. Analysis of the major changes in the Mandatory Housing Affordability draft zoning and zoning guide proposals and whether the proposed change is consistent or inconsistent with our Neighborhood Plan Adopted Goals and Policies in the 2035 Comprehensive Plan.
3. Analysis of the major changes with additional goals, policies and recommendations in the text portion of the Morgan Junction Neighborhood Plan.

In general, the City's proposed MHA Strategy conflicts with the Morgan Junction Neighborhood Plan. The Land Use polices of the Neighborhood Plan recommend that no changes in zone boundaries, development standards, or permitted uses for any zones within the Morgan Junction community be approved, regardless of whether the zone is located inside or outside of the urban village boundaries. These policies were intended to give the Morgan Junction community influence over changes which would affect the intent and purpose of the Morgan Junction Neighborhood Plan through formal neighborhood plan updates. As proposed by the City, the changes would adversely affect the character and stock of housing inside the Morgan Junction Urban Village, especially since 53% of the MJUV is currently zoned Single Family. ¹

¹ Note that we do NOT provide specific comments about block by block zoning changes; those should be collected from our entire stakeholder group after the inconsistencies with our Neighborhood Plan are resolved.

We are aware that Urban Villages were established to accommodate growth. However, the Morgan Junction Neighborhood Plan was developed with the expectation that the existing mix of housing would be protected. That existing mix of housing and zoning already supported the capacity needed to accommodate Morgan Junction's role in accepting growth and is also projected to support the additional growth estimated in the 2035 Comprehensive Plan.

We recognize that the City may not be aware that the MHA upzone proposal is in conflict with the Morgan Junction Neighborhood Plan Goals and Policies. To resolve this existing conflict, we would welcome discussion - but only if it is done at a neighborhood planning level. This means that the whole Morgan Junction community is thoughtfully and inclusively involved in the neighborhood planning process. MoCA supports the creation of Affordable Housing, and we look forward to the city engaging with our community to properly address this conflict.

Respectfully,
The Morgan Community Association Board

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Section I. Land Use in the Morgan Junction Urban Village

Discussion points on Zoning and Land Use excerpted from the Morgan Junction Neighborhood Plan.

During development of the Morgan Junction Neighborhood Plan, "there has been much discussion and disagreement on the Morgan Planning Committee regarding the impact of the urban village on zoning, especially on the single-family zones.

- Some members of the committee see the urban village as offering protection for single-family zones by stipulating in the Neighborhood Plan exactly what zoning changes can and cannot occur. The majority of the Administrative Committee subscribes to this view,
- Other members of the committee view the urban village as an overlay zone which will lead to changes in the permitted uses and development standards of the underlying" zoning, Rezones and variances may also be easier to obtain within the village than outside, These changes, in turn, would allow the City to increase allowable densities and building size (see the diagram below), possibly accelerating the rate of development in the Morgan area, The majority of the Housing and Land-Use Subcommittee holds this opinion

It was the general opinion of the community, the Housing and Land-Use Subcommittee, and the Administrative Committee that zoning in the neighborhood not be changed and that there should be no difference between permitted uses, development standards, and rezoning/variance criteria within and outside of the urban village. One issue that garnered special attention was Residential Small Lot zoning."

Discussion points on Residential Small Lot Zoning (RSL) excerpted from the Morgan Junction Neighborhood Plan.

“The RSL zones allow for development of smaller detached homes built on lots that are one-half to one-quarter the size of a standard single-family lot. The idea behind small-lot housing is that, because the houses and lots are smaller, they would be more affordable than conventional single-family homes. There is no guarantee, however, that this will actually happen under market conditions that may exist in the Morgan Junction neighborhood over the next 20 years.

Community Response

A segment of the community felt that some form of RSL zoning could be adopted in specific areas, subject to strict design guidelines, to perhaps create more affordable housing (especially for seniors) and to provide a “buffer” zone between the single-family areas and the taller buildings in the multifamily and commercial zones. Other members of the community expressed a number of concerns about RSL zoning, including:

- Further increased density in the neighborhood
- Adding even more traffic to an already overtaxed system
- Adding to off-street parking problems
- The architectural appearance of cottage and “skinny” housing

There also was uncertainty in the community about how the size of lots was measured, especially for cottage housing. Does the area of the lot consist of the actual parcel, or can the area to the centerline of the adjoining alley (if any) be included when calculating lot area, The total number of lots potentially large enough to accommodate cottage housing is considerably larger if a portion of the alley can be included.

The total of all input received throughout the Phase I and Phase II process indicates that the broader community does not fully understand and/or support RSL zoning. There were some mixed signals received during the Phase I and Phase II outreach, for example:

- Comments received during meetings and a survey administered by the Housing and Land-Use Subcommittee in early 1998 indicated that a majority of the community was opposed to using any form of small-lot zoning.
- In another survey, which was administered at the May 16, 1998 Community Check-In, about 2/3 of the respondents felt that some form of small-lot zoning was appropriate, but there was no agreement about which type(s) of RSL zone should be used.

Therefore, “the Housing and Land-Use Subcommittee recommended against adopting RSL zoning anywhere in the neighborhood as part of the Morgan Junction Plan. The Administrative Committee decided not to adopt any RSL zoning at the present time, but that the use of RSL zones could be considered at an unspecified future date. The [sic] were two main reasons for this decision:

- The above-described lack of consensus within the community about RSL zoning.
- A lack of time to fully explore this complex issue, educate the community, discuss the pros and cons, and get feedback. After spending more than two years doing outreach, visioning, and “getting ready to plan” the time available for actually doing the planning was less than eight months. This was insufficient time to conduct the kind of wide-ranging, in-depth analysis and community discussion needed to deal with a brand-new zoning and housing type which the community had never seen before (while still allowing time to cover all the other issues addressed in neighborhood planning).”

Section 2a. Analysis of MHA Recommendations and MJNP Goals and Policies – Land Use

<p align="center">Nov 2016 Mayor’s MHA recommendations</p>	<p align="center">How this supports or does not support Morgan Neighborhood Plan Goals and Policies</p>
<p>Rezone all Single Family zoned land inside the Urban Village to something greater (RSL, LR)</p>	<p>Some inconsistency with MJ-G1 - An attractive community where the buildings, streets, and sidewalks form a comfortable human-scale setting for daily activities and where views and community character are protected. <i>Board comment - Views will not be protected.</i></p> <p>Partially Inconsistent with MJ-G5 - A community with strong single-family neighborhoods and compatible multifamily buildings offering a wide range of housing types for all people. <i>Board comment -The program would remove the single family zoning, which is inconsistent with this goal. But it could add a wider range of housing types to the MJ UV.</i></p> <p>Inconsistent with MJ-P13 - Maintain the character and integrity of the existing single-family designated areas by maintaining current single-family zoning both inside and outside the urban village on properties meeting the locational criteria for single-family zones, except where, as part of a development proposal, a long-standing neighborhood institution is maintained and existing adjacent community gathering places are activated, helping to meet MJ-P6.</p> <p>Inconsistent with MJ-P14 - Ensure that use and development regulations are the same for single-family zones within the Morgan Junction Urban Village as those in corresponding single-family zones in the remainder of the Morgan Junction Planning Area.</p>
<p>Rezone existing Multi-family and Neighborhood Commercial to add height in return for affordable housing requirements</p>	<p>Inconsistent with MJ-G1 - An attractive community where the buildings, streets, and sidewalks form a comfortable human-scale</p>

	<p>setting for daily activities and where views and community character are protected. <i>Board comment - Views will not be protected, and it our opinion that NC-55 is not a “comfortable human-scale setting” for a Residential Urban Village.</i></p> <p>Inconsistent with MJ-P19 - Explore methods to discourage increasing height limits in the commercial and multifamily zones above the currently existing levels and encourage developers of new multifamily and commercial buildings to locate mechanical, heating, ventilation, and air conditioning equipment within the envelope of the building structure.</p>
<p>Modify LR-1 Standards to remove density limits (this would then apply to any SF changing to LR-1)</p>	<p>Inconsistent with MJ-P13 - Maintain the character and integrity of the existing single-family designated areas by maintaining current single-family zoning both inside and outside the urban village on properties meeting the locational criteria for single-family zones, except where, as part of a development proposal, a long-standing neighborhood institution is maintained and existing adjacent community gathering places are activated, helping to meet MJ-P6.</p> <p><i>Board comment - The current proposed new density limit for LR-1 is in essence a change to the existing LR-2 designation because it changes from a specific unit limit” to limited by FAR and the requirement for family sized housing is now called the “density limit”</i> http://www.seattle.gov/Documents/Departments/HALA/Policy/MHA%20Urban%20Design%20Summary.pdf</p>

Section 2b. Analysis of MHA Recommendations and MJNP Goals and Policies - Housing

Nov 2016 Mayor’s MHA recommendations	How this supports or does not support Morgan Neighborhood Plan Goals and Policies
Rezone all Single Family zoned land inside the Urban Village to something greater (RSL, LR) in return for affordable housing requirements	<p>Possibly supports MJ-P20 Support and promote existing programs and policies that help low- and fixed-income people, especially seniors, retain ownership of their homes.</p> <p><i>Board comment - This would apply where an existing homeowner could create rentable units on their property with RSL or LR rezone, but we are not sure how many people could really do that.</i></p>
Require a percentage of on site units to be Affordable Housing	<p>Supports MJ-P21 Encourage the preservation of well-managed low-income housing both inside and outside the urban village.</p>

Section 3. Additional Morgan Junction Neighborhood Plan Recommendations

In addition to the Comp Plan 2035 Adopted Neighborhood Plan Goals and Policies cited above, the Morgan Junction Neighborhood Plan contains additional specific Goals and Policies and Recommendations we wish to bring to your attention, and which are now applicable per the Comp Plan 2035 definition of “Community Plan”

Nov 2016 Mayor’s MHA recommendations	How this supports or does not support Morgan Neighborhood Plan
Rezone all Single Family zoned land inside the Urban Village to something greater (RSL, LR) in return for affordable housing requirements	<p>Inconsistent with the following:</p> <p>Land Use Policy 1.1 Retain all existing single family zoning in the Neighborhood.</p> <p>Recommendations: Protect the character and integrity of the existing Single Family areas through City adoption of the following policies:</p> <ul style="list-style-type: none"> ◦ Do not approve changes in zoning from single-family zone (all zones with SF prefix) to multi-family or commercial

	<p>zoning in the Morgan Junction Planning Area.</p> <ul style="list-style-type: none"> ◦ Do not approve changes in zone boundaries, development standards, or permitted uses for any zones within the Morgan Junction community regardless of whether the that zone is located inside or outside the urban village boundaries. ◦ Permit new multifamily housing only in areas zoned for multi-family and commercial use as of April 1, 1998. ◦ Permit new commercial uses only in areas zoned for commercial and mixed-use as of April 1, 1998. ◦ <p>Land Use Goal 2: Preserve the character of the urban village by focusing new commercial and multifamily development into a well-planned and cohesive core.</p> <p>Land Use Policy 2.1: Allow new commercial and multi-family development in areas currently zoned for such uses.</p> <p>Land Use Policy 2.2: Concentrate commercial development in the village in the vicinity of the intersection of Fauntleroy Way SW and California Avenue SW,</p> <p>Land Use Policy 2.3: Concentrate multi-family residential development in the existing low-density multi-family zones and in the neighborhood commercial zones along California Avenue</p>
<p>Rezoning existing Multi-family and Neighborhood Commercial to add height in return for affordable housing requirements</p>	<p>Inconsistent with the following:</p> <p>Land Use Goal 3: Protect neighborhood character by limiting building heights.</p> <p>Policy 3.1: Retain existing height limits in the commercial and multi-family zones.</p>