

June 25, 2015

Dear Tukwila Planning Commission and City of Tukwila Planning Staff,

Thank you for the opportunity to comment on Tukwila's 2015 Comprehensive Plan Housing and Residential Neighborhood Elements updates. As you know, Forterra and Global to Local worked with the City of Tukwila and six Community Connectors engaging the Somali, Burmese and Latino communities for the City's Comprehensive Plan update. Housing and neighborhoods were consistently raised in our discussions particularly with regards to housing stability, diversity, quality and affordability.

Based on our conversations with community members, we offer additional recommendations to further emphasize housing stability, diversity, quality and affordability by:

- Preventing and mitigating displacement
- Maintaining affordability and quality of current multi-family units
- Encouraging apartment construction with more than two bedrooms
- Enforcing codes in current multi-family and mobile home units to ensure health and safety

We want to thank the City for the work already completed to include Policies and Strategies that address the needs of its diverse residents. We believe the following recommendations support the City's goal to create "thriving, equitable neighborhoods and homes where all people have the opportunity to live in a safe, healthy, affordable home". We appreciate your consideration.

Housing and Residential Neighborhoods Elements

Homelessness and Displacement

Neither element addresses the issues of homelessness and displacement. Homelessness exists in the city and— in light of growth anticipated by this comprehensive plan amongst other regional trends— economic displacement of existing residents is a growing concern for the future.

We encourage the City to highlight the importance of addressing these citywide concerns within the "Issues" section of the housing element by adding the following language:

- According to the U.S. Department of Housing and Urban Development (HUD), from 2008 – 2013 85% of Tukwila's very-low income renters paid over half of their income on housing, putting them at serious risk of homelessness.
- Homelessness is a major issue in Tukwila. The 2013 OSPI Student-level Database reported that 255 or 8.2% of students were experiencing homelessness in the Tukwila School District, the highest percentage in South King County.
- With redevelopment, the chance for displacement of low-income communities, particularly those below 30% AMI, will increase.

Additionally, we recommend that the City include two new policies in Housing Element Goal 3.2 and/or Residential Neighborhoods Goal 7.3:

- Policy: Prioritize development affordable to households at less than 30% AMI.
- Policy: Encourage strategies that prevent displacement of low-income populations and mitigate the impact of displacement as redevelopment occurs, particularly in proximity to transit and opportunity-rich neighborhoods.

Diversity of Housing Stock

An issue we heard often is a need for larger apartment units--namely, units with more than two bedrooms. Many Tukwila families need affordable, larger spaces that can accommodate children and extended families. We suggest the following addition in Housing Element, Goal 3.2 AND/OR

Residential Neighborhoods, Goal 7.4 Neighborhood Development: Multi-Family Residential Development Policies:

- Encourage the development of affordable apartment units in a variety of sizes, including a percentage with more than two bedrooms.

Open Space

Having safe, healthy places to be outside is important for neighborhood quality. We encourage the city prioritize this need by adding an Implementation Strategy to Residential Neighborhoods, Goal 7.2 Neighborhood Quality:

- Support the development of neighborhood parks with places for kids and families to walk, play and spend time outside.

Code Enforcement

We heard from many community members their apartments are currently not well taken care of by the apartment managers or owners and many attempts to have repairs result in retaliation or even eviction. More City support is needed to ensure families in multi-family units are healthy and safe. We suggest the following in addition in Residential Neighborhoods, Goal 7.4 Neighborhood Development, Multi-Family Residential Development Policies, Implementation Strategy 5:

- Support and enhance Code Enforcement efforts to ensure new development meets City standards and current multi-family units are brought up to standard.

Thank you again for the opportunity to comment. We are committed to building a strong and healthy Tukwila community.

Sincerely,



Aurora Abrajan
Community Connector



Reina Blandon
Community Connector



Monica Davalos
Community Connector



Osman Egal
Community Connector



Helber Moo
Community Connector



Becca Meredith
Policy Program Manager
Forterra



Adam Taylor
Executive Director
Global to Local

From: [Graydon Manning](#)
To: [CompPlanUpdate](#)
Cc: [Laura Benjamin](#)
Subject: Comments for 6.25 public hearing
Date: Tuesday, June 23, 2015 8:33:32 AM

Hello,

I am submitting these comments on behalf of Homestead Community Land Trust. Homestead is a non-profit affordable housing developer that provides opportunities for homeownership for low and moderate-income families. The homes that we build & rehabilitate stay in our trust and are passed-down to low and moderate-income families for generations to come. Homeownership is a vital part of the affordable housing continuum- it gives families of little means the opportunity to build equity in real estate, our construction efforts revitalize neighborhoods and produce jobs, and most importantly, programs like Homestead combat decades of institutionalized racism in housing policies that historical gave preference to the white middle-class and that still linger today.

Homestead is in the midst of a feasibility study for development of affordable homes on the Riverton Park United Methodist Church grounds. There was a project designed in 2007-2009 for 30 cottage-style units, utilizing the then-existing housing options program for cottage developments in LDR zones. This option is no longer available, and without some options, lots like this will be very challenging to rehabilitate or develop. While we are allowed 35 units on the site in theory, the LDR zoning designation contains two requirements that prevent us from moving forward with the project. The first is a 6500' minimum lot size requirement, the second is a 50' minimum lot width. These two requirements combined hamstring the number of units we could build, and in turn render the economics of the project non-viable. If we had options to reduce lot size & lot dimensions, we could build the number of units required to pay for development, and we could do so in 'clusters' with community space (pocket park, community garden, etc.) between clusters. Further, with these options we would be in a better position to pursue green certification on the project, as options for community space and density are critical for certification.

In conclusion, Homestead suggests the City of Tukwila consider re-introducing the housing options program, or to consider a new set of allowances in residential zones that reward the kind of development the City wishes to see. Our project at Riverton Park UMC could potentially be a case-study for this proposal.

Thank you for your time and consideration.

--
Graydon Manning
Owner
Net-0 Consulting
(360)-480-0058

From: [Rebecca Fox](#)
To: [Laura Benjamin](#)
Subject: FW: meeting June 25, 2015
Date: Monday, June 29, 2015 2:19:24 PM

Laura,

FYI, and for your response.

Rebecca

From: mokapc@aol.com [mailto:mokapc@aol.com]
Sent: Friday, June 26, 2015 8:05 PM
To: CompPlanUpdate
Subject: meeting June 25, 2015

Hello~

My name is Paula Cabunoc. I attended the meeting last night & after not signing up to speak, I did so at the end following those who did. Since this was impromptu on my part, I would like to submit some written opinions concerning the proposed changes.

I firmly believe changing lot sizes & allowing smaller sub-platting is a detriment to our established neighborhoods. These big, box houses, using a single access road do not "blend in" with the current neighborhood. They tower over & dwarf the surrounding houses. Occasionally, there are 2-3 families living in these huge houses with 4-6 cars per residence. This severely impacts congestion, noise issues & vehicle emissions in our area. We have seen emergency vehicles/personnel not be able to reach a residence, or get lost & have to come in another way. Our neighborhood is zoned for "low density", single, family housing, not these types of housing situations. Stacking these houses in so closely, many with very little yard space, definitely impacts any "open" space there might be.

We experienced an unpleasant situation a year ago with a developer coming in, clear cutting almost all of the trees, which damaged our fence as well as our neighbor's fence. We were in contact with the City over all of this. For some unknown reason, he was penalized by the City for not doing something right, I don't recall the exact problem. We found out he could cut all the trees down with no repercussion; a permit was not required. After the City visited him on numerous occasions, he had to get a permit of some kind. He did put in a short retaining wall with drainage but the damage was done. Our back yard "fell" off, our fence is catywhompus & crooked; the stability is no longer there. He replaced the 2 sections of fence of our neighbor's that a tree fell on but we both developed "sink holes" along our back yards. I personally spoke with the City inspector (Dave?) who came out; he said he would put his recommendations in writing but we've never heard anything back. Then, to top it off, the developer sold the property to someone else & whatever permit he had expired & he's off the hook. He assured us the new owners would "take care of

us"...yeah, right, like that's going to happen. He also told us the new owners were going to build a "family compound"...he wasn't sure if there would be 3 or 4 houses built.

Myself, as well as several other neighbors, have been in contact with Code Enforcement on numerous occasions regarding parking issues on 46th Ave. 160th is a very busy street, it is the only thru street to access all the houses from 42nd Ave to 51st Ave. The south thru street is 164th, so you can imagine the amount of traffic in this area already. 42nd Ave is also very busy, especially with the Tukwila Light Rail station at the bottom of the hill. There have been quite a few accidents at 42nd & 160th, & also several near misses. People speed on 42nd as well as 160th, safety is a definite issue. As I stated last night, many of the houses have 3+ vehicles with many parked on the street, not in driveways. Some residents were parking commercial vehicles on the street but after a 2-3 month battle, that seems to have resolved.

I sincerely hope the planning commission sees fit to keep & restore the integrity of long time, well established housing developments. My husband bought our house in 1972, I've lived here since 1974. We are long time residents & value our neighborhood.

Thank you,

Paula M Cabunoc

16312 45th Pl S
Tukwila, WA 98188



HOUSING
DEVELOPMENT
consortium

25^{YEARS} futurewise
Building Communities & Protecting the Land

June 23, 2015

Tukwila Planning Commission
City of Tukwila
6300 Southcenter Blvd., #100
Tukwila, WA 98188

RE: Comprehensive Plan Housing Element Update

Dear Planning Commissioners,

Thank you for this opportunity to comment on the Housing Element update to your Comprehensive Plan.

The Housing Development Consortium of King County (HDC) and Futurewise are committed to working with cities across King County to create equitable communities where people of all incomes can thrive in safe neighborhoods with good jobs, healthy affordable housing, quality schools, a healthy built environment, and strong access to transit.

We very much appreciate Tukwila's work toward achieving this vision through the City's Residential Rental Licensing and Inspection Program, Minor Home Repair Program, economic development activities, and community outreach efforts. This Comprehensive Plan update process provides you an ideal opportunity to explore what other policies are necessary to create an inclusive and affordable community for all of Tukwila's residents. To that end, we would like to provide the following comments to help guide your work on the issues of: deeper affordability, preservation, development incentives, regional partnerships, and implementation.

❖ Deeper Affordability: Preventing Homelessness

Everyone deserves the opportunity to live in a safe, healthy, affordable home. Unfortunately, the most recent data from the U.S. Department of Housing and Urban Development (HUD) shows that 83% of Tukwila's very-low income renters are paying over half of their income in housing costs, putting them at serious risk of homelessness.

We can see by the 338 children experiencing homelessness in the Tukwila School District that more needs to be done to create housing stability in Tukwila. This will help reduce residential transiency and improve educational outcomes in the school district. One of the best ways to prevent and address homelessness is to ensure that quality, permanently affordable housing is available for these households.

We therefore ask that the City add a policy under Goal 3 to “work to address the need for housing affordable to households at less than 30% AMI.” This reflects the conclusions of your background report and adds specific policy language around the City’s most dire affordable housing need.

Preventing homelessness and addressing this housing need will take a range of implementation strategies, and we are pleased the City has focused on a host of tools that will help meet your goals. In particular, HDC wants to express its ongoing support and commitment to working with South King County cities on a Housing and Neighborhood Planner position, as outlined in the implementation strategy under Goal 3.2.

❖ Preservation: Healthy Housing and Preventing Displacement

We greatly appreciate Tukwila’s commitment to preserving and improving existing housing stock. Given limited public dollars for the construction of new affordable housing, it is critical that Tukwila maintain the affordability of existing homes. Preserving the quality and affordability of existing homes is one of the best ways to ensure that Tukwila families can afford a decent place to live.

Housing rehabilitation supports vibrant neighborhoods and healthy living situations, making it easier for Tukwila’s families to thrive. If rental property owners and homeowners lack the funding necessary to maintain their homes, residents’ health may be severely impacted by housing health and safety hazards. These include mold, pests, injury hazards, and poor indoor air quality.

As Tukwila grows and redevelops, it will be critical that the City preserve its existing affordable housing stock. It will also be critical that the City implements proactive policies to prevent and mitigate displacement as redevelopment occurs and to help Tukwila families relocate as affordable housing opportunities are lost to redevelopment. **We therefore ask that you add a policy or strategy under Goal 3.2 to “work to prevent displacement of low-income populations and mitigate the impact of displacement as redevelopment occurs, particularly in proximity to transit and opportunity-rich neighborhoods.”**

❖ Development Incentives: Promoting Economic Development and Opportunity

Development incentives are a powerful, dual-purpose tool to create affordability while advancing the City’s economic development objectives. Tools like incentive zoning, density bonuses, reduced parking standards, permit expediting, fee waivers, tax exemptions, and impact fee exemptions can leverage the power of the private market to create affordable homes and catalyze redevelopment with very limited public investment. It is critical that when the City offers incentives like density bonuses that these tools are tied directly to public benefit in order for the city to achieve the most for its dollar. When implementing incentives tied to affordability, we urge the city to structure public benefits to create meaningful and long-lasting affordability.

We ask that the City add more tools to the “explore and develop” implementation strategy in the Draft Housing Element under goal 3.2, such as: density bonuses, reduced parking requirements, multi-family tax exemptions, fee waivers, impact fee exemptions, and permit expediting in order to encourage the development of housing affordable at below market-rate. We strongly support the exploration of a housing trust fund to complement these strategies.

When Tukwila provides incentives or cost reductions for preserving and maintaining affordable housing, this housing should remain affordable for the longest possible term and be provided at below market rate. **We ask that the City add a policy to ensure that affordable housing created or preserved using local public resources or by regulation retains its affordability for the longest possible term and be created at below-market rate.** We encourage 50 year affordability of city-supported housing.

❖ Partnerships: Working Regionally to Support Affordable Housing

We appreciate the attention Tukwila has paid in its Housing Element Draft to collaboration with other jurisdictions, nonprofits, and regional partners. We also applaud your attention to working collaboratively to enhance resources for housing programs. As poverty becomes increasingly concentrated in the suburban areas of the Puget Sound, inter-jurisdictional collaboration will become increasingly important for addressing regional housing needs and increasing funding. We strongly support the implementation strategies in the Draft Housing Element that promote working collaboratively to increase resources for affordable housing.

❖ Implementation: Meeting Tukwila's Housing Goals

Meeting Tukwila's housing goals will require strong implementation and monitoring mechanisms to ensure success. We strongly support Policy 3.3.2 to review progress toward reaching affordable housing goals and look forward to working with the City as you continue to update your Comprehensive Plan and implement the policies and strategies contained therein.

We would be happy to discuss these comments with you further and hope you will contact us with any questions.

Sincerely,



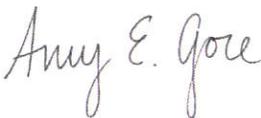
Kayla Schott-Bresler

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Amy Gore

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June 21, 2015

Dear Planning Commission,

I would like to express my support for the Draft Housing and Draft Residential Neighborhood Elements of the Comp Plan.

I support the Vision and the Goals, Policies, and Implementation Strategies that are being proposed. However, I do have a few specific comments: *(Page numbers refer to the draft included in your June 18 meeting agenda packet.)*

Housing

Pages 2 & 3 — Homeownership Option

The last sentence states that the current range of housing options does not accommodate older adults hoping to “age in place.” I would add that the current range doesn’t accommodate older adults who would like to remain in Tukwila but no longer want to live in a large house with a big yard. Some seniors would like to downsize to a small house with a small yard or even a townhouse.

Page 3 — Policy 3.1.2

I would insert the word “especially” or “particularly” so that it reads: “...sizes particularly in neighborhoods where...”

Page 3 — Implementation Strategies

I would delete the first strategy as it sounds like the neighborhood will be deciding the minimum lots sizes. It makes sense to meet with the neighborhood but their wishes should not be the controlling factor.

Page 4 — Policies 3.2.2 and 3.2.3

I support these policies that would enable a greater variety of housing types than currently exist in Tukwila.

Page 4 — Implementation Strategies

I strongly support the first strategy.

I would remove the word “limited” in the second strategy so it reads: “...reinstate the demonstration projects for clustered or cottage housing and allow demonstration projects for...” If we continue to be overly cautious and restrictive, we will have the same result, no cottage housing, etc. I would prefer that the City develop codes for these housing types rather than limit them to demonstration projects. Many other cities have managed to adopt realistic, workable regulations, why not Tukwila?

Page 7 — Goal 3.4 Implementation Strategies, last bullet

Would this fund assist all low-income homeowners or only those connecting to City of Tukwila sewers?

Page 8 — Policy 3.6.2

I support this policy but feel it needs an additional Implementation Strategy. I would suggest: Develop regulations for small houses, cottage housing, and other innovative housing types appropriate for seniors so they may remain in the community.

Residential Neighborhoods

Page 6 — Noise Abatement

This title does not seem to match the text under it. The topic seems to be about protecting neighborhoods.

Page 8 — Implementation Strategies

4th bullet — It's difficult to comment on this without knowing where the specified areas are. Is it a particular neighborhood?

Last bullet — The Goal 1 C should be written out as someone reading the Comp Plan may not be familiar with the Strategic Plan.

Page 9 — Implementation Strategies

Since the policy deals with promoting a mix of uses, there should be a strategy dealing with housing other than new single-family homes. I would suggest: Development of a variety of housing types including townhomes, small houses, accessory dwelling units, duplexes, etc.

Page 10 — Goal 7.3 Implementation Strategies, 2nd and 4th bullets

I don't know what a landscape planter is. If it is what I call a parking strip, a planting area between the curb and the sidewalk, then I do not support these strategies. I really like parking strips but would not require them.

Page 11 — Implementation Strategies, 3rd bullet

This doesn't match the language in the draft Housing Element's Policy 3.1.2 and its Implementation Strategies.

Page 13 — Goal 7.4 Implementation Strategies

2nd bullet — Once again I would caution that any right-size parking standards need to recognize that lower income workers may not be able to use transit if they perform shift work or work in areas not served by transit, particularly industrial areas.

I would add another strategy: Revise recreation space requirements for multi-family housing and townhomes.

Page 13 — Policy 7.5.1

I don't understand the meaning; it needs to be reworded to be clearer.

Page 14 — Goal 7.6

These policies are not appropriate for the entire length of Southcenter Blvd. They appear to be written for just the section of the roadway east of I-5.

Page 15

There needs to be an additional Goal addressing the protection of residential neighborhoods from noxious odors. I say this because last year I suffered from illegal marijuana grow house in my

neighborhood. The skunk smell was so strong that I had to close all windows while the plants were in flower. A police officer told me that he knew of an instance when a condo owner had to vacate his unit every time his neighbor's marijuana crop was flowering. Current City regulations only prohibit home occupations from impacting the neighborhood by emitting noxious odors. Odors from garbage, dead animals, or manure can be addressed by code enforcement, but not marijuana. I realize that odor regulations are difficult to enforce, but Denver has an interesting regulation. The city has an instrument to measure the odor but they can also write a citation if 5 individuals register complaints within a 12 hour period.

Goal 7.8 Odor Abatement

Residential neighborhoods are protected from undue odor impacts, in order to ensure for all residents the continued use, enjoyment, and value of the homes, public facilities and recreation, and the outdoors.

Policies

7.8.1 Prevent community degradation by prohibiting noxious odors.

Implementation Strategy

Strengthen odor regulations

In conclusion, overall I am very pleased with the proposed Draft Housing Element and Residential Neighborhood Element and encourage you to send it to the City Council with your endorsement.

Sincerely,

A handwritten signature in cursive script that reads "Pam Carter". The signature is written in black ink on a light blue rectangular background.

Pam Carter
4115 S 139th St.
Tukwila, WA 98168



afford more than rent

June 25, 2015

Tukwila Planning Commission
City of Tukwila
6300 Southcenter Blvd., #100
Tukwila, WA 98188

Dear Planning Commissioners,

On behalf of Bellwether Housing, thank you for this opportunity to comment on the Housing Element of your Comprehensive Plan. Tukwila is seeing heightened development opportunities in connection with its rapid growth and the light rail. This is a critical time to promote and incentivize the development of permanent affordable housing along transit lines in Tukwila, in order to improve the quality of housing options and secure the long-term stability and affordability of future housing stock.

Affordable housing is a catalyst for economic development because it reduces the housing rent burden to allow local dollars to flow back into community goods and services. Well-built and solidly managed affordable housing reinforces neighborhood stability and community strength. We are motivated by your proactive approach to address affordable housing development in Tukwila through the appropriate housing policy elements in this Plan.

Bellwether Housing is among the region's largest private non-profit affordable housing providers. Over our 35 year history, we have developed 1,903 apartments that we own and operate, and 9,745 apartments for other non-profits throughout the state. Our ability to develop is constrained by the exponentially rising land and construction costs, which deepen the financing gap for affordable housing projects.

Tukwila has the opportunity now to alleviate some of these costs in order to attract high quality affordable housing development. We encourage you to explore development incentives for affordable housing such as reduced parking requirements, smaller housing units, and reduced impact fees. These changes could make a difference in achieving the financial feasibility of affordable homes to ensure that Tukwila remains a sustainable and stable place to live for years to come. We offer the following comments on the Housing Element of your Comprehensive Plan to help guide your approach toward affordable housing development.

I. Comprehensive Plan Goal 3.6: Increase Long-Term Residency in the City.

Neighborhood Stabilization through Affordable Housing: We understand that neighborhood stability is important to Tukwila. Low turnover rates lead to the long-term residency that anchors neighborhoods and stabilizes families so that adults can thrive and children can stay in school.

According to the National Apartment Association 2013 report, “The turnover rate for individually metered subsidized units was 28% versus 54% for market-rent units.”¹

At Bellwether Housing, we compiled affordable housing occupancy data from 8 Bellwether-operated buildings in Seattle. This data reflects an even lower turnover rate of 10% for tenants with restricted rent (see Appendix A).

As the demand for housing rises in Tukwila, we urge the Comprehensive Plan to emphasize the prioritization of permanent affordable housing development to create long-term stability so that equity and diversity remain an integral part of Tukwila’s core.²

II. Comprehensive Plan Goal 3.2: The City of Tukwila has Safe, Healthy, and Affordable Homes for all Residents in Tukwila.

Zoning and Development Code Requirements: Policy 3.2.3 encourages a full range of housing opportunities for all population segments and suggests meeting this through appropriate revisions to Tukwila’s development codes.

In order for Bellwether Housing to evaluate the current development codes in Tukwila, we conducted a development feasibility study for a cluster of combined parcels along Tukwila International Boulevard. The development capacity of the site was limited by two code requirements: parking stall requirements and studio unit size requirements.

- A. **Parking stall requirements:** The housing unit count capacity of multi-family residential projects is controlled by the required parking ratio. High parking ratio requirements exponentially increase the total development cost of projects, reducing the funds available to provide housing to meet the needs of the city.

We used the King County Multi-Family Residential Parking Calculator (<http://www.rightsizeparking.org/>) to evaluate the estimated need for parking on this site. For a 75 unit building at an average 50% AMI along Tukwila International Boulevard, the results show a parking unit ratio demand of 0.83 parking stalls per unit, a number that is lower than the current Tukwila code allows.

Other jurisdictions are supporting reduced parking for affordable housing development, including the City of Shoreline, which recently adopted it into their municipal code: *“Reductions of up to 50 percent may be approved by Director for the portion of housing providing low-income housing units that are 60 percent of AMI or less as defined by the U.S. Department of Housing and Urban Development.” (SMC 20.50.400.D).*

We ask that the City include a strategy in the Comprehensive Plan to explore development incentives to reduce parking ratio requirements for affordable housing development near transit areas.

¹ Lee, Christopher. “Executive Summary: 2013 Survey of Operating Income & Expenses In Rental Apartment Communities.” *National Apartment Association* Sept. 2013: 67.

² For more data, see the “Seattle Family-Sized Housing” white paper, a report from the Seattle Planning Commission: <http://buildingconnections.seattle.gov/2014/02/04/family-sized-housing-white-paper-released-by-seattle-planning-commission/>

- B. Studio unit size: The current zoning code requires studio units to be an average of 500 sf and no smaller than 450 sf. Jurisdictions like Seattle allow for housing units less than 400 sf because it provides more housing to meet the increased demand. If the required square footage of the studio units is reduced to less than 400 sf, it would increase the housing unit count and reduce the cost of the development fees and sewer capacity fees.

Current King County sewer capacity fees are \$6,500 per residential unit. These fees can be reduced for units less than 400 sf. According to King County Wastewater, affordable housing projects that prepay 15-years of sewer capacity charges at the time of development are eligible for a 50% discount for the following unit types & sizes:

- Studio apartments less than 400sf, at 80% AMI or less per regulation agreement.
- Studio and 1BDs of any size restricted to ages 55 or older, no income restriction.

We ask that the City include a strategy in the Comprehensive Plan to consider amending the development code requirements to allow for smaller studio housing units.

III. **Comprehensive Plan Goal 3.2: The City of Tukwila has Safe, Healthy, and Affordable Homes for all Residents in Tukwila.**

Impact and Municipal Fee Reduction: Goal 3.2 lists a series of supportive implementation strategies to develop and maintain affordable housing to meet the needs of the community. These potential strategies include the exploration of incentive zoning, tax credits, tax-exempt bonds, tax-exempt impact fees, and a housing trust fund.

Current impact fees, permit fees, and municipal fees in Tukwila are substantial for a mixed-use multi-family housing development project. Partial exemption of these fees is one change that could make a difference in achieving financial feasibility for a high quality affordable housing development in Tukwila.

Reduced and partially exempt impact fees for affordable housing were recently adopted by the City of Shoreline and the City of Bellingham:

- On January 1, 2015, The City of Shoreline adopted transportation impact fees (\$3,607 per housing unit) by Ordinance No. 690. SMC Chapter 12.40 waives these transportation impact fees for affordable housing.
- On Monday, June 15th, the Bellingham City Council unanimously approved an ordinance that amends Title 15 and 19 of the Bellingham Municipal Code to partially exempt impact fees and reduce utility system development charges for qualified low-income housing projects.

We ask that the City include a strategy in the Comprehensive Plan to consider development incentives that reduce impact fees for qualified low-income housing projects to encourage affordable housing development.

The current housing stock in Tukwila can be considered relatively affordable today, but it is not permanent affordable housing that will be preserved for long-term affordability in the future. We support your efforts to proactively address permanent affordable housing through the policies and strategies in this Comprehensive Plan and we ask that you consider additional strategies to further incentivize affordable housing development that will secure neighborhood stability, maintain diversity, and create community.

Thank you for your consideration. We look forward to further discussion with you on these comments to this Comprehensive Plan. Please feel free to contact us with any questions that you might have. We can be reached at 206-588-4808 or amehl@bellwetherhousing.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Doug Daley", is written over the printed name.

Doug Daley

Executive Director

Bellwether Housing

Appendix A:

Bellwether Housing Tenant Occupancy Duration Data:

Bellwether Housing compiled affordable housing occupancy data from 8 Bellwether-operated buildings in Seattle that serve small and large families with children. These 8 buildings total 472 apartment units, of which 292 are 2 bedroom units or larger. The data below indicates a low turnover rate for low-income tenants

- Over 50% of the residents in these apartment units are between 50-60% AMI.
- Over 50% (244 units) of the total households (472 units) have lived in their apartments for 5 years or more.
- Over 20% (94 units) of the total households (472 units) have lived in their apartments for 10 years or more.
- With 48 households that have tenancies of 1 year or less, the turnover rate at these buildings is roughly 10%. According to the National Apartment Association 2013 report, "The turnover rate for individually metered subsidized units was 28% versus 54% for market-rent units."¹
- For more data about family housing, see the "Seattle Family-Sized Housing" white paper, a report from the Seattle Planning Commission:
<http://buildingconnections.seattle.gov/2014/02/04/family-sized-housing-white-paper-released-by-seattle-planning-commission/>

¹ Lee, Christopher. "Executive Summary: 2013 Survey of Operating Income & Expenses In Rental Apartment Communities." *National Apartment Association* Sept. 2013: 67.