

June 24, 2016

Comments on Comprehensive Plan Housing Element

Dear Mayor Boudreau, Mount Vernon City Council, Planning Commission and Staff,

Thank you for the opportunity to comment on the comprehensive plan's draft Housing Element (Planning Commission Review Draft). I am a Mount Vernon resident with a strong interest in the evolving housing needs in our community, including the need for affordable housing for all segments of the community. I am a member of the Mount Vernon Comprehensive Plan Citizen's Advisory Committee, but these comments are entirely my own.

I am also a professional land use planner who has coordinated the 2016 Comprehensive Plan Update process for another local jurisdiction. A periodic update is a major undertaking, even without the intense interest that (justifiably) has been focused on the Mount Vernon Housing Element. Many jurisdictions hire consultants to help their planning staff with the numerous state-mandated update requirements. Staff from your Community and Economic Development Department should be commended for their hard work on this and other aspects of the city's comprehensive plan update.

Mount Vernon's Housing Share

First, Mount Vernon should be recognized for accepting a large share of Skagit County's projected population and housing growth over the next 20 years. Mount Vernon's population allocation of 12,434 new residents amounts to a 35% increase in the size of the city's current population. This number also represents 35% of all projected growth in Skagit County, and 43% of all projected urban growth in Skagit County, over the coming 20 years.

- Mount Vernon's projected population and housing growth is greater than that projected for Anacortes and Sedro-Woolley combined.

Those who suggest that Mount Vernon is not willing to accommodate its share of residential growth must not be familiar with these numbers.

This amount of residential development, while admirable, presents a special challenge for Mount Vernon. The city has a limited land base for commercial and industrial development and no logical options for commercial expansion due to the floodplain and surrounding agricultural lands. Commercial and industrial development typically generates more revenue than it requires in city services and therefore helps provide for the costly services typically required by residential development. I believe this is why your Community and Economic Development Department is reluctant to embrace residential development in the city's C-2 zone without explicit policy direction from the City Council.

Changing Demographics Create Changing Housing Needs

Population demographics and housing economics are changing. Those changes have hit central Puget Sound communities first and they're starting to be seen and felt here as well: There are more single person households, more empty nesters, and many young people are taking longer to settle down. Housing costs are growing (everywhere) faster than incomes.

As a result, a growing share of the housing market is looking for options other than detached single-family residences in exclusively residential neighborhoods on quarter-acre lots. Demand is growing for alternative housing types including apartments, condos, townhomes, duplex/triplex/fourplex units, cottage housing, courtyard apartments, and other multi-family housing types.

I see this in the various multi-family housing types developed as part of the Maddox Creek PUD where I live. Many coworkers, friends and acquaintances live in the condos, apartments, townhomes, and multiplex units located there. It tells me there is a strong need for more of this type of housing in the community as a whole.

The Missing Middle

I strongly support bringing back the "missing middle" housing types discussed on p. 83 of the draft Housing Element. (Also see the visual examples at the end of this comment letter.) This means integrating a greater diversity of housing types into and throughout the Mount Vernon community, particularly filling the gap between detached single family neighborhoods and areas of larger multi-family apartment buildings. The draft Housing Element includes several policies supportive of these diverse housing types, including:

Policy HO-1.1.4 Continue to promote plans and policies that encourage in-fill residential projects in close proximity to neighborhood centers, shopping and retail facilities, parks, transit routes and other service uses.

(The Haggen grocery store on Division Street was originally approved through a residential PUD, yet the residential development has never materialized. This would be an ideal place for a variety of small to mid-sized multi-family housing units.)

Policy HO-1.1.5 Plans and regulations should allow incentives such as bonus densities and flexible design standards that support and promote the construction of new innovative or affordable housing styles, compatible with the planned uses of surrounding sites. Ground related housing types such as cottages, townhouses, zero lot line developments and other types are examples of housing choices that promote individuality and ownership opportunities.

Mixed Use (Commercial and Residential) Development

There is also growing interest in housing located within walking distance of shops, dining, services, recreational amenities, etc. The Mount Vernon Downtown Redevelopment Plan and the C-1 zone fully embrace this, encouraging multi-family residential development in the downtown core mixed-in with commercial and office uses. The C-1 zone allows up to 75 residential units outright; more than 75 units

can be built with a conditional use permit. I have frequently thought about the attractions of living in a downtown condo with a river view and easy access to shops, restaurants, businesses and the river—and can't wait for such options to become available.

The City should consider allowing the same type of residential mixed-use development in the C-2 zone south of downtown, which is already in fact a mixed commercial and residential area. This is supported by the second sentence of the following draft policy:

Policy HO-1.1.7 Continue to promote high density development and re-development in the Central Business District (C-1 zone). Analyze ways to allow housing that steps-down, or transitions, in density immediately surrounding the Central Business District.

Mixed Use in C-2

The housing and development communities have expressed interest in opening the C-2 zone to mixed residential/commercial development. That idea has some appeal, because there appears to be a great deal of underutilized land in parts of this zone, along with growing market acceptance of mixed residential and commercial development.

At same time, Mount Vernon has been rightfully protective of its prime commercial lands in the C-2 zone because of the city's inability to expand outward for such development, and its desire to maintain or improve on its jobs-to-housing balance.

One win-win option would be to allow vertical mixed use in the C-2 zone, with residential units allowed over first-floor commercial. I have heard mixed opinions about whether this type of development would be economically feasible in Mount Vernon and would be interested in a better understanding of the obstacles and opportunities.

The city should also consider conditions under which "horizontal mixed use" (where residential and commercial are located side-by-side, rather than stacked vertically) could be permitted in the C-2 zone.

- One such condition might be where the inclusion of residential units in a commercial development would be instrumental in bringing a commercial business to the city that otherwise would not locate here.
- A second condition might be the development of affordable housing for residents with low, very low, or extremely low incomes, coupled with guarantees that the housing will remain affordable for a significant period of time.

I have long thought the area around Parker Way and Roosevelt Avenue would make a logical urban village, with residential development (some of which already exists) mixing well with moderate-scale commercial uses. The area already features a pedestrian friendly environment, which is critical to the success and livability of mixed use development.

Focus on Affordable Housing for Low Income Residents

I appreciate the Housing Element's acknowledgement that providing affordable housing to low, very low, and extremely low income residents will take a special commitment from the city and area housing providers.

Tables 6.2 and 6.3 of the draft Housing Element indicate that more than 50% of Mount Vernon residents (owners and renters) qualify as low, very low or extremely low income *and* pay more than 30% of their income on housing—the threshold for determining whether housing is affordable or unaffordable. This is significantly higher than the percentages in Skagit County as a whole (39%) or the United States (39.8%).

Providing affordable housing for these residents will require extra efforts beyond what can be accomplished by private sector developers on their own. These extra efforts can include direct financial support from the local, state or federal governments, and housing partnerships with non-profit and mission driven housing organizations. The city can also provide support in the form of incentives that grant additional development opportunities to developers (public or private) who guarantee the long-term provision of affordable housing.

Following are some of the objectives and policies in the draft Housing Element that would help address the needs of low to extremely low income residents:

Objective HO-4.1 Encourage the creation of ownership and rental housing that is affordable for all households within the City, with a particular emphasis on low, very-low, and extremely low income households.

Policy HO-4.1.1 Evaluate the adoption of inclusionary zoning regulations targeted at otherwise market-rate developments that require *or* incentivize a minimum percentage of new dwelling units and/or lots that are created (whether multi-family or single-family) be income restricted.

Policy HO-4.1.4 Encourage affordable housing to be dispersed throughout the City, within each Census tract, rather than overly concentrated in a few locations.

Policy HO-4.1.6 Maintain and explore enhancing regulatory incentives to encourage the production and preservation of affordable ownership and rental housing such as through density bonuses, impact fee reductions, permit fast-tracking, or other methods.

Policy HO-4.1.7 Ensure during development review processes that all affordable housing created in the city with public funds or by regulatory incentives remains affordable for the longest possible term; at a minimum 50 years.

Policy HO-4.1.8 Identify and catalogue real property owned by the City that is no longer required for its purposes and is suitable for the development of affordable housing for very-low to moderate income households. The inventory should be provided to the State Office of Community Development in accordance with state law.

Regional Collaboration, Partnerships, and Monitoring

Finally, I support objectives and policies that encourage the city to 1) participate in regional efforts to address affordable housing; 2) form strong working partnerships with organizations that develop affordable housing; and 3) monitor progress toward meeting established affordable housing goals over time, including:

Objective HO-4.3 Work collaboratively with other jurisdictions, agencies and stakeholders to promote the preservation and creation of local and regional affordable housing strategies.

Policy HO-4.3.1 Be an active participant in the multi-jurisdictional affordable housing program and cooperative efforts that will be guided by the Skagit County of Governments in 2016/2017 that will identify strategies to promote an adequate and diversified supply of countywide housing for all residents.

Policy HO-4.3.2 Encourage, assist, and partner with non-profit organizations that can construct, manage, and provide affordable housing during all stages of siting and project planning and when applying for county, state and federal funding.

Policy HO-4.3.3 Work regionally and with other jurisdictions to jointly fund affordable housing.

Objective HO-4.4 Create an evidence based system for collecting and analyzing data and plan adaptive strategies that will assist the City in proactively encouraging the preservation and creation of affordable housing in the City.

Policy HO-4.4.3 Continue to periodically assess the existing and projected affordable housing needs of the City. Determine if the Comprehensive land use plan and zoning can accommodate future housing needs and make adjustments to plans and regulations as needed.

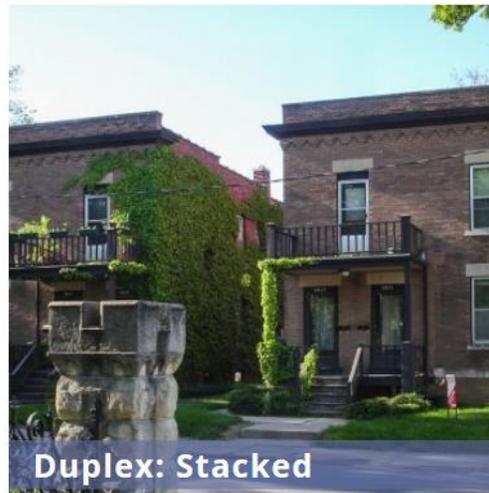
Conclusion

I applaud the city, staff, and community members who are participating in the Comprehensive Plan Update process for focusing particular attention on the Housing Element as part of this update. It is one of the most significant planning issues facing Mount Vernon and Skagit County at this time.

Sincerely,

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Images of "The Missing Middle Housing" (<http://missingmiddlehousing.com>)





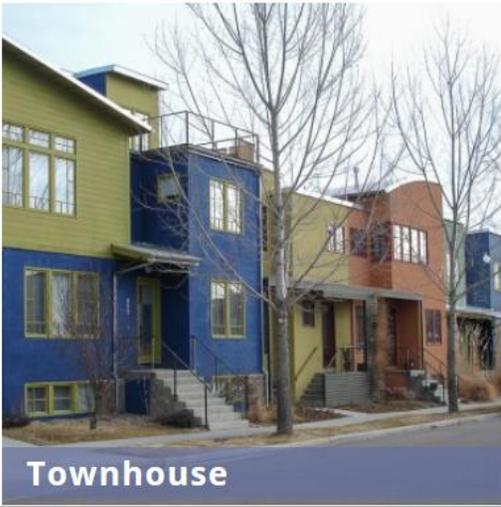
Carriage House



Fourplex



Multiplex: Small



Townhouse



Live/Work



Courtyard Apartments