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Subj: 2016 Mount Vernon Comprehensive Plan Update – Housing Element

Rebecca,

I have looked through the different documents associated with the land use portion of the update and am quite surprised at the positive move the City of Mount Vernon is making in addressing the housing deficiencies in our community.

That being said, there are a few areas that certainly can use some constant attention on the part of the staff to ensure housing needs are met at periodic times during the upcoming years before the next update is required by statute. This would include continued attention to the buildable lands in the city as well as the demographics involved in determining the amount of deficiency the city has each year in meeting the needs of all levels of housing.

I have focused most of my review on the Housing Element because it is known that if the housing element of a comprehensive plan is aggressive enough, it will drive the zoning in the UGA to accommodate the needed housing over the next few years. It will also require constant attention to the buildable lands inventory and designation of the different parcels to meet the requirements being driven by housing needs.

While data shows Mount Vernon is out in front as far as percentage of housing types, we still have a growing need for more housing. The studies show that Mount Vernon – while certainly meeting percentages that would make the growth look as though everything is being met – is still behind average Washington cities by some 9% as far as multi-family housing is concerned. And given the wage demographic with which we all are familiar, we have a much larger need for both low-income and moderate-income family housing. Yes, we do have a need for very low income housing as well but it looks like the need is in the low-income level that is most severe.

While the American Dream is to “own a home,” it is very clear that not everyone will be able to do so. That is where the rental market plays an important part of the entire housing “need” picture. And rentals that are affordable are the key to this disparity of housing.

For the most part, the proposals are reasonable and have come a long way from the “no” we continued to get in the past when we asked for more density and multi-family opportunities. It is a step in the right direction.

Policy HO-4.1.1 is troublesome because of the intent to evaluate “Inclusionary Zoning” to meet the needs of some of the housing issues. The National Association of Home Builders did a very in-depth study on Inclusionary Zoning and found that it really doesn’t do what it is expected to do. There are numerous articles addressing Inclusionary Zoning and the pitfalls communities have found themselves in once they went down that path. I am including a link to the NAHB webpage where you can search through the group of studies and the 360 page Inclusionary Zoning Primer that has been put together by NAHB. This link is highly recommended for the city to use in an effort to not inadvertently duplicate mistakes that have been made in the past. [here](#)

Policy HO-4.1.2, I would suggest changing the time frame to 40 years instead of 50 since that seems to be the benchmark for lenders and the government when funding subsidized housing for very low income and low income families.

Policy HO-4.1.5, I would suggest taking out the size but keep the design in that particular part of the goals because many times a developer can afford to create a slightly smaller lot and a builder in the development/PUD, etc. could very well put a smaller home of the same design on that piece of property and not affect the cost of the other housing in the development. Many times (especially in Inclusionary Zoning) we find that developers will add the cost of the loss they experience on the house that is required to be included as affordable housing to the other homes in the development, thus driving up the cost of housing in the area. That would result in even worse statistics than what we already have and would put more people in the groups that either cannot afford to purchase a house or even to pay rent. If builders and developers can be incentivized through bonus densities instead of mandates that are part of Inclusionary Zoning, the program will work much smoother and with less cost and headaches on the parts of the builder/developer and city staff.

Once again, change the amount of time to 40 years minimum for Policy HO-4.1.7 for the same reasons listed above.

Finally, while the intent is well taken, the result isn’t perfect but is a huge step in the right direction to help the building industry help the city meet housing needs for the future. We would like to recommend review at least each year to see how the process is working and to make any changes that are allowed by code at that time. This also might need to be written into the code to ensure that when the review is done annually, there aren’t challenges.

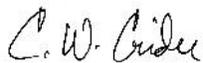
In closing, NAHB has conducted a study of different regulations and code requirements and has found that throughout the United States, an average of \$83,000 is spent complying with the regulations and codes for each house built. That is what a

reasonable home cost in 1986 so it shows how much regulation has caused the increase in the cost and why housing has become unaffordable for many of our citizens.

Something that would help quite a bit overall is fast-tracked permitting and reduction in impact fees where applicable so the process doesn't cost so much money. We do realize that Mount Vernon cannot arbitrarily reduce every impact fee because of their very definition and the perception of fairness but it is something to look at where they can be reduced. Every day a permit is not issued is a day that is costing someone money. And, depending on the project, that amount could very well be quite large.

Overall, the proposed housing element is good and has come a long way in providing flexibility needed to ensure enough housing can be built to meet the demand in the City of Mount Vernon. Now the zoning regulations have to be looked at very closely and every project needs to be evaluated to provide the possibility of meeting the goals of the city. As we have always said; one size doesn't fit all. In this case there is enough left to allow the flexibility for much higher density depending on the site and to provide the buffers needed to transition to a more dense development or even multifamily without impacting single family residential developments next door.

Thank you,

A handwritten signature in cursive script that reads "C. W. Crider".

Charles W. Crider, Executive Officer
Skagit/Island Counties Builders Association
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From: [Charles Crider](#)
To: [Lowell, Rebecca](#); [Hyde, Bob](#)
Cc: [Lindquist, Joe](#); [Quam, Ken](#); [Hulst, Mark](#); [Molenaar, Gary](#); [Fiedler, Bob](#); [Hudson, Mary](#); [Ragan, Dale](#)
Subject: Housing Element Update
Date: Tuesday, June 28, 2016 3:19:34 PM
Attachments: [Housing Element Remarks.pdf](#)

Rebecca,

Attached is the input of the Skagit/Island Counties Builders Association concerning the update to the Mount Vernon Comprehensive Plan Housing Element. We focused our comments to the housing element because that is where most of our members find their employ – building housing for community members and those coming to the community. We have been fairly quiet during this process and have been monitoring input that has been submitted along the way and I must say many areas of concern have been adequately discussed. While I know this is something that is required by Statute, I would like to think this is something we can address on a yearly basis or sooner if necessary to be sure Mount Vernon is able to meet the requirements placed upon the city by OPM and GMA. Please know SICBA is here to help in any way we can and as you already know, if there is something we aren't fond of, we will let you know. As you will see in our remarks, we think this is a step in the right direction but is not perfect – as is the case with every regulation jurisdictions are having to update or implement. It is a work in progress and we look forward to partnering with the City of Mount Vernon in any way we can to be sure housing needs are met in a manner that is reasonable and affordable for all income echelons of our citizens.

I have also sent this to the City Council to be sure they have a chance to review and look at the link I have included in our recommendation that will explain a lot of issues with Inclusionary Zoning prior to the meeting tomorrow evening.

I look forward to seeing you there,

Wayne

Charles W. Crider
Executive Officer
Skagit/Island Counties Builders Association
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www.nahb.org/ma for member savings programs