

Morgan Community Association
MOCA

TO: oneseattleplan.zoning@seattle.gov
DT: December 20, 2024
FM: The Board of the Morgan Community Association (MoCA)
RE: **COMMENTS ON THE ONE SEATTLE PLAN ZONING UPDATE (OCTOBER 2024)**

The Morgan Community Association or MoCA was established in 1999 following creation of the Morgan Junction Residential Urban Village along with the corresponding Morgan Junction Neighborhood Plan Area. MoCA is a grassroots association of residents, business persons, property owners and other people who have a stake in the future Morgan Junction. These stakeholders are the heart of MoCA. Our primary purpose is to make Morgan Junction a better place to live, work, shop and enjoy”.
<https://www.morganjunction.org>.

As stakeholders, MoCA continues to advocate on behalf of Morgan Junction topics in the City. To this end, MoCA provided feedback to the City regarding the draft proposed comprehensive plan changes in a May 6, 2024 comment letter.

Following are comments on the proposed zoning plan updates for Morgan Junction, as well as the new Fairmount and High Point Neighborhood Centers, as depicted in the October 2024 One Seattle Plan Zoning Update documents. (The December 2024 comments are depicted in *italics*).

A. Proposed Map Comments

Consolidation or Creation of Urban Centers - MoCA recommended consolidating and enlarging the Morgan Junction Urban (Village) Centers to ensure that the Rapid Ride locations are firmly affiliated with Urban Centers and that opportunities for increased density and development around the transit stops are not squandered. However, the City has opted to create the Fairmount and High Point Neighborhood Centers.

December 2024 Comment: *With the creation of a new Fairmount Neighborhood Center, the NC Zoning established in the Morgan Junction Urban Center (former Urban Village) continues along the spine of California Ave SW. However, the creation of the Fairmount Neighborhood Center eliminates 8 blocks of the Morgan Junction Neighborhood Plan Area while the High Point Neighborhood Center removes 4 blocks of the Morgan Junction Neighborhood Plan area as established in the 1999 Morgan Junction Neighborhood Plan. (See Exhibit A). Morgan Community Association requests that in conjunction with the One Seattle Zoning Update the City determine how overlapping neighborhood jurisdictions will function. The redrawing and resulting reduction of the Morgan Junction Neighborhood Plan Area without due process is not helpful to this volunteer organization.*

Morgan Junction to High Point - MOCA recommended that the key transportation spines of 35th Avenue SW and SW Morgan Street be reinforced in the growth strategy map. In response, the City created the

High Point Neighborhood Center which is appropriate (except for the aforementioned “neighborhood area land grab”).

December 2024 Comment: MoCA and many others recommend that the northern boundary of the High Point Neighborhood Center be expanded northward to SW Raymond Street to incorporate both the High Point Public Library and High Point Neighborhood Clinic within the Neighborhood Center.

B. Critical Areas and Substandard Infrastructure

Repeated from MoCA’s May 6th letter: Morgan Junction Urban Center is proposed to expand west of the California Ave SW and Fauntleroy Way SW borders. This expansion appears to encompass some or all of the portions of the dense impassable Eddy Street ravine, the Pelly Place Natural Area within the Pelly Place ravine, and other environmentally sensitive areas. Additionally, some of the areas lack sidewalks, adequate water lines and fire hydrants. MoCA recommends that the Urban Center expansion not include critical areas or substandard features.

December 2024 Comment: Our recommendation to avoid critical areas was ignored. This is unfortunate since LR2 or LR3 development corresponding on or adjacent to critical areas will be problematic and any proposed mitigation expensive and incompatible. The table below lists those areas that are adjacent to or include properties with critical areas including steep slopes and streams, excessive uncontrolled water runoff, geologically unstable soils, and substandard infrastructure. The only logical mitigation available is to remove these areas from the proposed upzone.

Zoning Update Map Location	Critical area/Substandard infrastructure	Existing	Proposed
<i>Beveridge Place - Holly-Fauntleroy Bend</i>	<i>Eddy Street Ravine - Steep slopes, no sidewalks</i>	<i>NR3</i>	<i>LR2</i>
<i>Fauntleroy Bend to 44th westside</i>	<i>Pelly Place Ravine Natural Area, stream that daylights to Puget Sound, steep slopes, missing sidewalks, challenged water lines</i>	<i>NR3</i>	<i>LR3</i>
<i>Westside of Fauntleroy to Frontenac</i>	<i>Pelly Place Ravine Natural Area, stream that daylights to Puget Sound, steep slopes, challenged water lines, substandard roadways</i>	<i>NR3</i>	<i>LR2</i>
<i>47th to Frontenac, Myrtle to 46th</i>	<i>Pelly Place Park with stream that daylights to Puget Sound, steep slopes, challenged water lines, substandard roadways</i>	<i>NR3</i>	<i>LR2</i>

Further, adding density to areas with older overburdened water and sewer systems, accessed only by narrow roads that lack curbs, gutters and sidewalks, and which constrain city utility and emergency services is not smart UNLESS overarching upgrades are mandated.

MoCA repeats that the specific areas listed above are inappropriate for the proposed upzone.

C. AFFORDABILITY AND MORGAN JUNCTION

Repeated from MoCA's May 6th letter:

Return MHA density dollars to Morgan Junction - Since 2016, Morgan Community Association has a track record of advocating that MHA dollars be returned to the community in which they were generated. We will continue to fight against the removal of existing affordable Morgan Junction housing. We will continue to agitate for affordable housing bonus to be **granted ONLY to a development when that development contains affordable housing**. More height in Morgan Junction should translate to More affordability in Morgan Junction!

December 2024 Comment: *According to Gov. Inslee, half of all new housing needs to be affordable housing. In HB 1110, the State defined "affordable" as <60% of AMI for renters and <80% of AMI for owner-occupied. OPCD says they've complied with HB 1110, yet there is no definition of "affordable" in the One Seattle Plan.*

In that case, Morgan Junction is never going to get any affordable housing without an affordable housing definition and a goal.

Much of the One Seattle plan for affordability rests on the assumption that simply building more housing will increase affordable units - 'the trickle down' principle. It will do that, but it will take 40 years. Morgan Junction does not have 40 years to replace our affordable housing trickle-down housing myth to solve our housing crisis. Seattle's hot market is causing older housing in Morgan Junction to be demolished and replaced with townhouses that are unaffordable. Unless they are subsidized, all new housing units are unaffordable, especially to renters.

While the CompPlan's implementation of HB 1110 allows such housing types as duplexes, triplexes, quads, sixflats, cottage and courtyard housing and townhouses, it doesn't require any of these more affordable types. In fact, the Builders only build what is most profitable, that is, townhouses. In effect, we are zoning to be a city of townhouses. Because infill Builders only build for sale, any "affordable" sixflats will be sold as condos, not rented. Infill Builders will never build rentals because it is not in their business plan. Therefore all new housing created by HB 1110 will be unaffordable—unless it's built by nonprofits or by homeowners themselves.

Sure there is Mandatory HOusing Affordability, which offers an increased floor of height in exchange for a contribution to affordable housing, either by including low-income units or by paying a fee in lieu of it. But the new upzones in the CompPlan increase potential capacity for square footage and profit without requiring any contribution. Sure, MHA is broken. Rather than half of all new units being included in their buildings, as the City Council was told to expect, developers are paying an "in-lieu fee" on 88% of units, avoiding mixed-income buildings and mixed-income communities. The MHA fees only cover about ¼ of the cost of a unit, leaving most of the balance to be made up by taxpayers.

MoCA requests that the City require affordable housing units on site in multifamily projects in addition to returning MHA fees to the community that lost the affordable housing in the first place.

D. MORGAN JUNCTION RESPONDS TO THE PAUCITY OF ONE SEATTLE PLAN OUTREACH

In response to a perceived lack of OPCD outreach, the Board of Morgan Community Association hosted a community-led meeting to review the One Seattle Plan. Over 50 persons signed in to the free in-person event on December 12, 2024 titled *Morgan Junction Reviews One Seattle Zoning Plan*. The following comments and observations are from this and other community events:

- 1) *The questions at the Q&A session at the end of the meeting highlighted the lack of City outreach on the proposed rezoning plan. The general theme was “this is a lot of detail and we haven’t been brought along in the process” transcended most of the specific comments and opinions.*
- 2) *Notification about the meeting was via Morgan Community Association Bulletin, West Seattle Blog article and phone pole flyers. The phone pole flyers attracted the most attendance. Attendees decried the City’s lack of outreach and specifically CM Saka’s absence. Over half of attendees expressed anxiety due to lack of understanding how the process works and the perceived complexities of the issue which the lack of City outreach did not alleviate.*
- 3) *The entire West Seattle peninsula is proposed to receive growth and density commensurate with other Seattle districts and neighborhoods that DO contain medical uses, and where access is not encumbered by tidal action (ie: a river). The following basic services need to be ensured in West Seattle in conjunction with the proposed density: 24/7 medical facility (Doc-in-the Box does not count), an indoor **public** community gathering place for each urban neighborhood and urban center such as library, community center, or school. The peninsula is surrounded by water on three sides and most of the developed shoreline is susceptible to erosion and extreme tidal actions. Escape routes from shorelines impacted by tsunamis should be identified with each development plan.*
- 4) *Upzoning transitions should not be abrupt. There are too many examples of NR3 adjacent to LR3. Transitions between zones should be achieved through intermediate zoning and should NOT be dependent on design.*
- 5) *Many expressed concern about loss of tree canopy and green space that would come with the proposed density. The City’s goal is 30% tree canopy. Since seventy percent of Seattle’s trees are in residential neighborhoods, Seattle’s tree canopy went from 28% to 26%, primarily because of development just in the last five years! Street trees are different from trees in private yards that shade and cool houses. Replacement stock trees planted by developers are starkly different from mature trees that create shade, hold soil and filter water and pollutants.*
- 6) *The existing and proposed Morgan Junction Urban Center contains numerous small lots that are less than 4,000 square feet in area. These lots do not appear suitable for NR3 development under the HB-1100 rules. As multiple lots are acquired to create a large enough parcel, developers ‘playing the waiting game’ must not adversely impact occupied properties using the “demolition by neglect” practice.*

- 7) *Many pointed out that it did not make sense to establish new upzoning with so many undeveloped lots and recommended that action be taken to encourage development at these locations in lieu of inappropriate upzones.*
- 8) *The community perceived a disconnect between proposed upzoning levels and proposed school closures proposed by the Seattle School District. This disconnect is not appreciated given how unsettling the recent school closure challenges have been.*
- 9) *Along with school closure impacts to families is the elimination of aging-in-place opportunities. To achieve the density requirements listed in the Zoning Update, large numbers of townhouses would be permitted within the ever expanding Morgan Junction Urban Center. These housing types displace seniors, people with mobility issues and families with small children. Also, since new townhouses are sold, never rented, they are exclusionary--not useful to over half of Seattle's population. Without specific city requirements in place, the Plan concepts of 'more housing choices' and 'encouraging affordable housing' will not help Morgan Junction residents live in their community.*

SUMMARY

The Morgan Community Association requests the following be addressed before the One Seattle Plan Zoning Update and Plan is forwarded to the Mayor:

- In conjunction with the One Seattle Zoning Update, the City shall determine how the overlapping neighborhood-based jurisdictions of Fairmount Park, High Point and Morgan Junction will function;
- Eliminate upzones from specific identified critical areas and substandard infrastructure areas in Morgan Junction;
- In conjunction with the One Seattle Zoning Update, the City shall require affordable housing units on site in multifamily projects in addition to returning MHA fees to the community that lost the affordable housing in the first place.

Sincerely -

The Board of the Morgan Community Association (MoCA)

CC: Seattle City Council Member Rob Saka
Seattle City Council Members
Michael Hubner
King County Council Member Teresa Mosquesda
Mayor Bruce Harrell
West Seattle Blog
WestSide News

Exhibit A - Morgan Junction Planning Area