

Public Comment on Housing Affordability Response Team Recommendations by
Dennis Saxman, a Low Income Resident of Affordable Housing

The HART recommendations start off with great general value statements, including a recognition that the “private market” does not provide adequate affordable housing options for all economic segments and therefore government assistance is needed to offer the full range of affordable housing inventory,” but then in their more specific recommendations, spend substantial energy promoting the removal of so-called regulatory barriers and the promotion of the interests of the “private market” which has failed for decades to provide adequate housing affordable to everyone, and increasingly, even the middle class. I suspect that part of this focus is due to the focus of Governor Insee’s charge to AHAB Leadership, which is heavily focused on the “private market”’s, developers’ and builders’ wish list for regulatory reform, which has been ably represented by Roger Valdez, who has been a paid lobbyist for those interests for a number of years. I do not find any strong resident advocacy present in either the charge or the recommendations for the concerns of residents and seekers of affordable housing.

Comments on recommendation #1:

Parts a. and b. appear to me to be general restatements of GMA policy goals and statutes that are already in place, but which are not having the intended effect, and the requirement of providing adequate housing and infrastructure and amenities as a balance to unbridled growth seems to have fallen by the wayside as the emphasis, especially in Seattle, has been on unbridled growth and unconstrained development regardless of the consequences for the affordable housing supply. The “private market”, as it has for many years, will allege that if only they were unleashed and blocking regulations were removed, that there would be an adequate supply of housing for everyone. That allegation is pure fantasy in the light of facts and history. As the recommendations themselves note, the GMA’s affordable housing goals are not being enforced – goals for which the “private market” has demonstrated remarkable unconcern for decades.

Up zoning will not lead to more affordable housing. It has been practiced for many years in Seattle, and the results are obvious for everyone to see: increased displacement, homelessness and gentrification. Even with Seattle’s minimal inclusionary zoning requirements, the problems have only continued to grow. More of the same failed policies will not address the issue of the lack of affordable housing.

The recommendation to “provide support to local government to address resistance to growth” is a mockery of the GMA’s provision for public input, and is a prime example of how deeply these recommendations have been influenced by the “private market” and its financial interests.

Much of the detailed discussion of these issues could have been written by someone like Roger Valdez who represents the financial interests of private developers. The Governor is hopefully aware of what a narrow range of recommendations these interests result in. If he is not aware, he should be made aware.

Comments on recommendation #2

This recommendation again reflects the interest of the “private market”, one of whose chief motivations has always been to increase the capacity. I agree that the counties need more money to prepare their reports, but I wonder if providing more funds will be sufficient to encourage counties to comply with the statutory requirement of creating buildable land reports, a requirement they have ignored for a number of reporting periods at this point. Any additional funding must be conditioned on it being spent only for the purpose of compiling a buildable lands report.

Comments on recommendation #3

These are laudable goals, but the citizens need affordable housing now. Education is more of a long term goal, and must include information that is broad and inclusive of all existing viewpoints, including radical critiques of the existing system, and not just information that functions as a how-to-do manual that explains and legitimates a system that has failed to provide adequate affordable housing for many decades. Providing more funding is laudable and would enjoy support of the private and non-profit housing sectors, but the goal should be sufficient moneys to provide affordable housing for all income sectors who deserve it, not just more money to serve private interests and nonprofits whose policies have been inadequate to address low income housing needs, which are greatest, as Commerce’s excellent assessment has shown, at 50% and below of area median income.

Comments on Areas for Further Research

As with education, these are laudable goals, however these recommendations are heavily reflective of “private market” interests and indoctrination of “free market” values and concerns. They need to be expanded in scope. The “private market” has failed to provide adequate safe and affordable housing for all income classes for decades, so it would be folly to consider its methods and beliefs as a standard for research. The “private market” expresses concern for affordability only as it enables itself to make more inadequate units more cheaply without any regard for the public interest and need.

Comments on recommendation #4

This again appears to be supported by a group of recommendations that are on the wish list of the “private market”. Seattle has been streamlining its review process for decades and it has not resulted in more affordable housing, even in the absence of

any meaningful impact fees. Again, these recommendations are all about achieving the interests of a small handful of private developers under the cover of the “private market”, and to lessen their costs without regard for the public consequences of a lack of affordable housing. In essence, since this small group has not been able to achieve its goals at the local levels, it is attempting an end run around local jurisdictions and their politics by going to the State Legislature, an institution that is poorly equipped to micromanage the development of affordable housing.

Seattle has effectively gutted SEPA without such action resulting in more affordable housing, indeed such action has helped lead to the current housing affordability crisis, as Seattle has caved to the financial interests of the “private market”.

Prevailing wages must not be undermined, as doing so undermines labor unions, and the benefit they publicly fought for for many years.

The areas for further research again reflect a bias towards the concerns of the “private market”, a market that would not even exist absent extensive public support in the form of favorable building, financial and tax incentives, and a supporting legal system developed and maintained at considerable public expense.

Comments on recommendation #5:

I support these goals, but it must be recognized that they will be insufficient to solve the housing affordability crisis. While both the “private market” and housing nonprofits, and government agencies share the goal of ensuring their funding sources, focusing solely on that goal, especially for entities that have not in any way allowed this State to avoid a housing affordability crisis, would be shortsighted. The State Legislature needs to provide greater direct public funding for and provide a wider range of support for the provision of affordable housing, rather than rely on local levies, which have failed to resolve problems with the educational system, and are unconstitutional in that they result in discrimination based on the extent of a community’s wealth, just as they do in education.

Comments on recommendation #6:

I agree with this recommendation, but do not think it goes far enough. The option for the Federal Government and Transit Authorities to donate station area lands for the development of affordable housing should be further explored and required, recognizing that this will only assist areas along transit corridors, not the vast rural areas of Washington that also face a housing affordability crisis.

I believe the MFTE should be repealed. It provides questionably affordable housing for only a limited time period, and is therefore, not a long-term solution to the affordability crisis. Further, it has been used by both private and nonprofit housing developers to lower their costs of construction, while providing no public benefit

when the property is ultimately flipped into the “private market” at substantial gains.

Funneling public funds to ground level commercial development at TOD sites is questionable in a time of diminishing demand for retail spaces, and what is sure to be a surfeit of commercial spaces once the inevitable bust happens.

Tax increment financing has proved to have many drawbacks in many jurisdictions in which it has been enacted. Indeed, In New York City, it was used to finance the development of luxury condos, not affordable housing.

Comments on recommendation #7:

Where is the voice of low-income renters and other users of affordable housing included in this scheme? It needs to be included, as well as that of policy institutes that represent a broader range of solutions and analyses than the present recommendation suggests.

In a nutshell, enacting the policy recommendations of a small number of groups who have failed repeatedly to adequately address the housing affordability crisis will not solve the problem or lead to an end of the affordability crisis.

A Word on Public Input

Even though I am on the AHAB’s mailing list, I was not made aware, prior to the May meeting of my ability and opportunity to comment on these recommendations. Indeed, had I not attended that meeting, I would have remained unaware. I was not aware of any public meetings regarding these recommendations. The input of surrogates for low income renters and residents is no substitute for the unique voices of low income renters and residents. During the May meeting, it was mentioned that the only public comment that had been received was from Roger Valdez. As I mentioned earlier, he is a paid lobbyist for developers and can hardly be considered as representing public opinion, especially that of individuals such as myself.