

## 4.5 COMMENT E-MAILS, LETTERS, AND FORMS AND VERBAL PUBLIC HEARING TRANSCRIPT

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**From:** vernon abelsen  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Eugenia Woo](#)  
**Subject:** OPCD draft MHA Environmental review - comments on Chapter 3.5 Historic Resources  
**Date:** Monday, August 07, 2017 8:24:22 AM

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Hello, please see my comments below:

It is interesting that, in the first full paragraph under this chapter refers to older structures as “character structures” per the Seattle Municipal Code. What does that mean? Why use such a term in a document in which you refer to a review process that includes the Seattle Landmarks Preservation Board, which refers to the Secretary of Interior's Standards and not SMC?

1. Clearly, HALA has linked itself to Seattle's plan to expand Urban Villages and Urban Centers. Thus, impacts to historic and cultural resources in the City will result from future development. Stating otherwise would be disingenuous. The question is how much, and where. The EIS does nothing to address that except to state the obvious of typical development requirements of following established rules and regulations.

What is different, and questionable about this EIS, are the potential zoning changes. This not very well explained, and should be.

2. Please provide a clear and distinct explanation of the gerrymandered outline of each "village" and "center" in the City. Without that information clearly stated, it seems impossible to understand why the City would need, at this point to expand bounded areas of "villages" tat this point in their young lives. Who will benefit? Developers or citizens?

3. The Steinbrueck report on HALA noted housing density was proceeding in a positive way as intended, but commercial success was far from reality. How does the expansion address that factor?

4. In sub-chapter 3.5.1 Affected Environment

I would ask what this title means, as it seems too vague and suggests something much more organic than the reality of urban villages.

The chapter is specific to historic and cultural resources, and the first paragraph quickly shifts reference to existing neighborhoods, but by focusing on urban villages – with no reference to why that is important to historic and cultural resources. It should be the historic and cultural resources that are critical to the success of urban village development that benefits the community.

In the second paragraph, a rather disingenuous reference to “urban Village”, when the writer refers to “In 1907 eleven more urban villages . . .”. It should be noted that the term urban villages was devised long after 1907.

It is not until the third paragraph that historic districts or properties are cited. It is in this paragraph that an overlap of historic districts (pre-existing prior to the emergence of urban villages) by urban villages. That expansion to any historic district, in a report that already favors urban villages, suggests prejudice toward historic properties being

expendable.

At the end of the fourth paragraph the writer references “the distribution of” historic properties as being “among urban villages”, not that the outline drawn for the urban village included historic properties.

What is very obvious is that, when contours of urban villages and urban centers were gerrymandered, our elected officials, and employees of Seattle did not include consideration of historic (or cultural) properties at the time these were drawn.

#### 5. Sub-chapter 3.5.2 Impacts

The first sentence in the first paragraph is confusing, or at least the words used seem manipulative, where it states MHA would not “directly impact” Seattle’s historic and cultural, but its program could. What? This issue should be reviewed and reconsidered.

The language used does not refer to a discussion, but more a matter-of-fact statement about impacts to historic and cultural resources that will occur. Yet, at the bottom of page 3.250, rezoning is introduced as a potential impact, in addition to expansion of urban villages areas shown on the map (Exhibit 3.5-4).

Is it true that “Systematic inventories have been conducted for four of the 10 urban villages”? Or, is it more correct that of the building surveyed for potential historic status are found in 4 of 10 urban villages?

Thank you for reading and considering my comments as you proceed toward making appropriate revisions to the EIA statement.

Regards,

Vernon Abelsen, Architect

**From:** Adams, Scott  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Feedback  
**Date:** Thursday, August 03, 2017 11:42:29 AM  
**Attachments:** [image002.jpg](#)

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Hello,

- 1 A quick note to voice my concern that Seattle Public Schools and those involved with Parks are not involved in the planning meetings. Currently in neighborhoods such as Magnolia and Queen Anne, there are serious capacity issues. At the same time, sports fields and other athletic facilities are not sufficient to support the current population. (As a youth coach, I have experienced frequently the effects of a lack of adequate field space.)

It is crucial that any planning that would increase density also involve Seattle Public Schools and others as appropriate to ensure that school and athletic facilities are included in the plans to support the growth.

- 2 As one example, a plan has been put forth for Fort Lawton. This well intentioned, but poorly thought out plan would increase the density of Magnolia without any regard to the current crisis with school capacity and athletic field capacity in the neighborhood, resulting in further exacerbation of the crisis.
- 3 When you increase density, there are consequences that need to be considered and planned for accordingly. Please involve appropriate officials involved with parks and schools to ensure that the planning is effective and not like the current Fort Lawton fiasco.

Best regards,

**Scott Adams** | Davis Wright Tremaine LLP  
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Email Signature



**Disclaimer:** This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

<b>Name</b>	Lisa Alado
<b>Email address</b>	
<b>Comment Form</b>	
<b>1 Description of the Proposed Action and Alternatives</b>	I do NOT support MHA in the Green Lake neighborhood!! It would negatively alter the tone of our neighborhood.
<b>2 Housing and Socioeconomics</b>	I do NOT support MHA in the Green Lake neighborhood!! It would negatively alter the tone of our neighborhood.
<b>3 Land Use</b>	I do NOT support MHA in the Green Lake neighborhood!! It would negatively alter the tone of our neighborhood.
<b>4 Aesthetics</b>	I do NOT support MHA in the Green Lake neighborhood!! It would negatively alter the tone of our neighborhood.
<b>5 Transportation</b>	Implementing MHA would make traffic and parking in greenlake even worse than it is already! No MHA in Greenlake!!!!
<b>6 Historic Resources</b>	Again. MHA will destroy historic resources in the name of "progress". No MHA in Greenlake!!!afain.
<b>7 Biological Resources</b>	MHA will have a negative impact on biological resources!! No no no to MHA!!!
<b>8 Open Space &amp; Recreation</b>	I believe MHA will have a negative impact on recreational resources ! No no no to MHA in Greenlake!!
<b>9 Public Services &amp; Utilities</b>	MHA will have a negative impact on public utilities and resources!! No no no to MHA!!!
<b>10 Air Quality &amp; Green House Gas Emissions</b>	I believe MHA will have a negative impact on Greenlake's micro environment. No no no to MHA!!!
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**From:** amalalfaiz@juno.com  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Response to DEIS for Madison-Miller Urban Village  
**Date:** Tuesday, August 01, 2017 11:13:20 AM  
**Attachments:** [MMRUV-MAP-073117.pdf](#)

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As members of the Madison-Miller Park Community Group, we want to personally submit and show our support for the formal response and map prepared by our community group in response to the DEIS and HALA/MHA proposals for our neighborhood.

These comments have been compiled, reviewed, and agreed upon by our community group, comprised of 200 members who have been involved in our meetings over the past nine months, and close to 300 households who participated in additional community outreach efforts and survey.

#### Overall Comments on MHA Alternatives 1, 2, and 3

Our neighborhood prefers Alternative 1 (With Modifications). We recommend that MHA (Mandatory Housing Affordability) requirements be implemented into the existing zoning in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (Accessory Dwelling Unit) and DADU's, (Detached Accessory Dwelling Unit) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units. These recommendations are based on the following:

- **Flawed typology:** We are deeply concerned that the DEIS falsely represents Madison-Miller as "Low Displacement Risk/High Access to Opportunity". This misrepresentation will result in significant negative impacts if Alternatives 2 or 3 are adopted. Please see our detailed comments below.
- **Density increases not equitable:** Our current zoning in Madison-Miller will exceed HALA density goals without additional proposed zoning changes. Indeed, based on current development and permitted housing units, Madison-Miller density will exceed MHA goals by the end of 2017 with our current zoning. Other urban villages, such as West Seattle Junction and Ballard, categorized as "Low Displacement Risk and High Access to Opportunity" have 10 – 30% less proposed increases than MMRUV (Madison Miller Residential Urban Village), despite being designated for more density as Hub Urban Villages and identified as locations for future light rail extensions.
- **MHA process not inclusive:** We do not feel the area-wide zoning changes outlined in Alternatives 2 and 3 reflect adequate neighborhood and stakeholder input. The current zoning, established by the 2035 Comprehensive Zoning Plan, was developed with a more inclusive process and was more responsive to neighborhood input.
- **Concerns for significant negative impacts:** Our request for MHA implementation with Alternative 1 zoning map should not be understood as a resistance to increased density. As we've said in previous correspondence, we embrace increased density in our neighborhood but feel Alternatives 2 and 3 (as written):
  - a) do not adequately mitigate for displacement of low and middle income residents;
  - b) do not equitably distribute the density and cost of MHA city-wide;
  - c) will increase racial and economic segregation;
  - d) do not match increased density with increased access to green space and recreational opportunities;
  - e) will burden our already fragile infrastructure; and,
  - f) pose significant public safety hazards with increased traffic on our narrow streets and heavy pedestrian and bicycle usage (with Meany Middle School and the pedestrian/bike greenway).

The Madison-Miller Park Community could support Alternative 2 with modifications noted in comments below (and is opposed to DEIS proposed zoning shown in Alternative 3). Please see our attached Alternate Proposal Zoning Map for specific zoning modifications. As noted in the DEIS, Alternative 2 generates more housing, jobs, and affordable housing than Alternative 3. The allocation of growth in Alternative 2 better reflects the existing character of our neighborhood, and has fewer significant negative impacts on current stakeholders than Alternative 3.

Summary of our detailed comments to follow:

1. **Housing and Socioeconomics:** Both the "Low Displacement Risk" and the "High Access to Opportunity" designations misrepresent our neighborhood and need further analysis and mitigation. We are concerned about the

displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents, (for example, a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.

2. Transportation: Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk.
3. Transportation: The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
4. Open Space: We have very little neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional playfield for league sports and summer sports camps and is not available for public or neighborhood use. This playfield will also be used as the sole recreational field for Meany Middle School starting this fall.
5. Public Services: Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded powerlines are already compromised due to their age and condition. Garbage pickup on our historic and narrow streets creates traffic backups now, and additional volume of apartment buildings will increase that problem.
6. Historic Resources: MMRUV (Madison Miller Residential Urban Village) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS does not address the impact of losing this historic housing stock.
7. Aesthetics: Alternatives 2 and 3 propose dramatic changes to the character of the neighborhood (in some cases as extreme as SF (Single Family) changing to LR3(Low-Rise3)). This is in direct conflict with the stated MHA principle to maintain and create appropriate transitions (“between higher and lower scale zones as additional development capacity is accommodated”). The only proposed DEIS mitigation measures for aesthetic changes to the character of the neighborhood is the Design Review process. HALA has requested from OPCD (Office of Planning and Community Development) a determination of non-significance for proposed changes to the Design Review process. The HALA proposed changes to modify the Design Review process will further erode safeguards already in place to mitigate these adverse impacts.

#### Detailed Comments:

#1: Housing and Socioeconomics: “Low Displacement Risk/High Access to Opportunity” determination is flawed and warrants further analysis of impacts and needed mitigation:

- Based on the DEIS Figure 1., Exhibit 2.1 and 2.2 the Madison-Miller Residential Urban Village clearly has a Moderate to High Risk of Displacement and Vulnerability and has been misrepresented.
- Although Alternative 3 aims to distribute the growth based on the displacement potential and access to opportunity, the location of future affordable housing within this or any particular neighborhood is highly improbable as indicated in the DEIS.
- The DEIS notes that the increase in units for each unit demolished greatly increases displacement as established in the 2035 Seattle Comprehensive Plan. This displacement further serves to segregate the displaced population as documented in the 7/2/2017 New York Times article, Program to Spur Low-Income Housing is Keeping Cities Segregated, by John Eregon, Yamich Alcindor and Agustin Armendariz.

Specific existing Madison Miller Residential Urban Village assets that have been overlooked in the DEIS “low displacement” determination include the following:

- o SHA (Seattle Housing Authority) and CHIP (Capitol Hill Housing) low income housing complexes;
- o affordable senior housing apartments;
- o housing for people with physical and developmental disabilities;
- o existing, historic, affordable apartment buildings;
- o a secondary treatment housing (half-way house);
- o a transitional longer term housing for low income women;
- o the hidden density of many large old single family homes inhabited by multiple tenants.

The proposed up-zones threaten the diversity and affordability of every one of these housing sites. This greatly adds to the High Displacement Risk in Madison Miller.

- The designation of “High Opportunity” is flawed, and warrants further analysis:
  - o Madison Miller has no direct access to light rail within a quarter mile or 10 minute walk shed (see detailed comments below regarding transportation).
  - o Madison Miller has woefully inadequate park or open space available for use by the community; this park should not add to the “high opportunity” rating (see comment #4 below).

- Specific Requests:
  - o Madison-Miller Residential Urban Village should be categorized as Moderate to High Displacement Risk based on the Seattle Comprehensive Plan 2035 Growth and Equity Analysis.
  - o Further data gathering, analysis, and impact mitigation studies should be conducted to accurately understand the scale and negative impacts of displacement.
  - o Existing low income and affordable housing listed above should be protected and designated for affordable housing development exclusively.
  - o The blanket labeling our residential urban village as “High Opportunity” should be reconsidered – we believe we have at most a “moderate access to opportunity” residential urban village, and density increases and mitigation actions should reflect that.

#2: Transportation: Link Light Rail is not within a 10 minute walk.

- No direct access to a Link light rail station within a quarter mile or 10 minute walk-shed. From Madison Miller the shortest walk to the Capitol Hill Link Station is .8 miles or a 17 minute walk and the longest walk is 1.3 miles, or a 27 minute walk.
- The future Madison rapid transit line might improve access into downtown, however two buses are still required to reach the nearest Link light rail station.
- In our community outreach survey 95% of respondents agreed that, “increased transit and transportation options”, are among most important needs – this is an indicator that while we are well situated for local transit connections, faster, more direct options are still required.
- Specific Request:
  - o Madison-Miller Residential Urban Village should be categorized as “Low to moderate-Access to Opportunity” with appropriate density increases for a non-Hub residential urban village.

#3: Transportation: The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3.

- We believe this will result in unacceptable public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
- Meany Middle School will reopen in the fall of 2017 with a population of up to 1,000 students, and no designated parking lot for parents, volunteers, or staff. School buses will park and travel on our narrow streets. At lunchtime, throngs of students meander through the streets on their way to Safeway and other lunch destinations on Madison and 19th.
- In our community outreach survey at least 72% of respondents indicated they require on street parking. Included inside our urban village or within a few blocks of its borders are 4 schools: Meany Middle, Holy Names Academy, St. Josephs k-8th, and Stevens Elementary, which makes this neighborhood very family friendly. In this family-centric neighborhood, it is unrealistic to think that all new residents, particularly families, will manage without a car.
- Miller Playfield is a regional park used almost exclusively for league play. People from all over the city travel to our neighborhood to utilize the park, and current parking challenges in the neighborhood indicate that many playfield users drive and park in the neighborhood.
- The pedestrian/bike greenway travels along 21st and 22nd, and, along with 19th, is a major bicycle thoroughfare for families and students biking to the four area schools. Increased traffic and construction vehicles would pose significant safety hazards, particularly on 21st Ave East, as it is a one-way street adjacent to the playfield and the primary entrance for Meany, as well as the school bus loading zone. Maximized and illegal parking on the narrow streets causes blind turns at intersections and traffic circles.

- Specific Requests:
  - o Further data gathering, analysis, and impact mitigation studies should be conducted to accurately understand the negative impacts to traffic, parking, and public safety.
  - o Within Madison Miller all new development must include onsite parking to mitigate the impacts of higher density on the functionality and livability of this neighborhood.

#4: Open Space: We have very little neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional play field for league sports and is not available for public use. This “park” will also be used as Meany Middle School’s sole recreational outdoor facilities starting this fall.

- Madison Miller currently has approximate 1.6 acres of open space per 1000 residents, which is below the Parks Plan standard of 9.34 acres per 1000 residents. Alternatives 2 and 3 further decrease by Madison Miller parks and open space level of service to 1.2 and 1.1 acres per 1000 people, respectively.
- In our community outreach survey 86% of respondents agreed that, “accessible public green spaces”, are highly important.
- The DEIS assumes the entire acreage of Miller Park and Playfield is our open green space. However, the

majority of this park is utilized as a very popular regional playfield, used almost exclusively for league play. The playfield is NOT a community asset and league games are often utilizing the playfield until 10 pm most days of the week, year-round.

- In addition, much of the park space is associated with Meany Middle School. Meany does not meet Washington State minimum school requirements for on-site outdoor recreational area or on-site parking. Instead it uses Miller Park for school activities and the neighborhood for staff and parent parking.
- The DEIS does not take any of these factors into consideration. Mitigation is not provided, only suggested as potentially addressed under future City planning and analysis efforts.
- Given the lot sizes in the area, it is unlikely that developers will be incentivized to provide open space within their projects.
- Specific Requests:
  - o The DEIS should be required to calculate the actual acreage of the park that will be open to the public (and neighborhood) with consideration of Meany Middle School's use of the park.
  - o Before up-zoning the MMRUV the City of Seattle needs to procure additional open space within the MMRUV and future development must pay impact fees to cover those costs.

#5: Public Services: Existing infrastructure, including storm sewers, sanitary sewers, and road ways are already compromised due to their age, overused condition and our narrow streets. Garbage pick-up causes traffic backups, and these will increase with the volume of multifamily units in Alternatives 2 and 3.

- The Madison-Miller area regularly has flooded street intersections and alleys that will be exacerbated by dramatic increases in impervious surface. SDOT (Seattle Department of Transportation) and the City of Seattle provides little to no street cleaning services.
- Garbage, recycling, and compost pick-up is not discussed in the Draft EIS. Because of the small lots and extremely narrow alleys that do not allow for garbage truck access, collection for larger buildings will be forced to the street edge, creating unsightly and unhealthy dumpsters, blocking traffic and parking, and obscuring sight lines.
- In our community outreach survey 83% of respondents agreed that, "infrastructure improvements and additions should be made concurrent with increases in density." e.g. upgrade road surfaces, sewer lines, power lines and storm drainage.
- Specific Requests:
  - o To mitigate the infrastructure impacts from up zones in both Alternative 2 and 3 development impact fees need to be incorporated into any up-zones to improve existing infrastructure that is in poor condition. Without fees to mitigate these impacts the functionality and livability of neighborhoods are sacrificed.

#6: Historic Resources: Madison Miller is one of the two oldest urban villages which has experienced some of the greatest growth by percentage and number of households in the past 20 years and will have over 50% growth increase under proposed changes. However, the DEIS does not address the impact of losing this historic housing stock to the changing character of this Urban Village.

- The Draft EIS notes the potential for development to indirectly impact the setting of historic areas and the historic fabric of neighborhoods. Madison Miller is not a formal historic district, so no context statement has been prepared for this area, which is at the edge of what was known as "Catholic Hill." In the DEIS Section 3.3 the Madison Miller Urban Village is stated "as one of the two oldest Urban Villages that is proposed to have over 50% growth increase". It is further noted that MMUV will have a 50% density increase in Alternative 1, and higher than 50% in Alternative 2 and 3.
- According to the Preservation Green Lab study "Older, Smaller, Better: measuring how the character of buildings and blocks influences urban vitality," neighborhoods with a smaller – scaled mix of old and new buildings draw a higher proportion of non-chain shops, restaurants, women and minority owned business than new neighborhoods. The MMRUV has this variety.
- The vast majority of the homes and apartment buildings within this urban village were built before 1930, with several built in the 1890's. There is nothing in the DEIS that addresses the impact of losing this historic housing stock.
- Alternative 3 would have the highest potential for detrimental change to its historic character. DEIS proposed mitigation measures consist of policies in the comprehensive plan regarding consistency of new development within an existing setting. These measures are vague and not supported by regulations. In fact, the recently proposed changes submitted to OPCD to modify the Design Review process will further reduce safeguards currently in place to mitigate these adverse impacts.
- Furthermore, most of the projects that would impact the existing SF zones under new MHA zoning changes would be under Design Review thresholds due to lot sizes and not subject to formal design review. If HALA proposed changes to Design Review Process are implemented, this effect will be more widespread.

- RSL (Residential Small Lot) up-zones proposed in Alternative 2 would provide the opportunity for increased density and infill while also allowing for less actual demolition of existing historic era housing.
  - Specific Requests:
    - o Single Family up zones in Residential Urban Villages should be retained as shown in Alternative 1 or limited to Residential Small Lot, as shown in Alternative 2, to assist in preserving the historic character and architectural diversity of this neighborhood.
    - o Standards should be proposed that require more not less Design Review for more Development Projects in Residential Urban Villages.
- #7: Aesthetics: Alternatives 2 and 3 would result in dramatic changes to the character of the neighborhood, are not in alignment with MHA stated principles, and would result in loss of character and livability.
- Exhibits 3.3-14 and 15 show a dramatic change in character even though they minimize the true effect of Alternative 3 on Madison-Miller, because the added units are shown adjacent to much bulkier structures than are currently allowed within the single family areas. Comparable examples for Alternative 2 also have aesthetic impacts, but to a lesser degree than Alternative 3.
  - Alternatives 2 and 3 propose dramatic changes to the character of the neighborhood (in some cases as extreme as SF changing to L3). These are not in alignment with the stated principles of the MHA to maintain and create appropriate transitions between higher and lower scale zones.
  - “Privacy Standards” would “address the placement of windows”, but this is vague and does not address overall aesthetics or privacy.
  - Upper level setbacks and side modulation provide limited relief from a dramatic increase in bulk adjacent to one and two story homes with pitched roofs and large windows and small side setbacks.
  - The impact of these changes represent a “substantial” change, but as disclosed by the DEIS is considered not a significant impact due to the “urban context of a rapidly growing city.” “Urban Context of Rapidly Growing City” is the cause of this significant impact. This explanation does not make the impact go away and should not release the preparers of their responsibility to address this significant impact and do they offer any effective solutions to develop effective mitigation measures. There are methods to limit, block by block, the total density that can be constructed or to implement greater requirements for open space to offset density increases. This substantial change is not justified or necessary to implement the MHA program. Under the current zoning, as represented in Alternative 1, density goals will be accommodated. The massive increase in units proposed by Alternative’s 2 and 3 will likely displace existing low income and affordable units and new affordable units are extremely unlikely to be built in the Madison Miller Residential Urban Village.
  - Proposed DEIS mitigations for aesthetic changes to the character of the neighborhood are vague and inadequate. Modifications to design review and “Other Potential Mitigation Measures” are not required or guaranteed to occur. Instead the Draft EIS couches the mitigation in very non-committal terms such as, “for example, design review could include.” The recently proposed changes submitted to OPCD to modify the Design Review process will further erode safeguards currently in place to mitigate adverse impacts.
  - Under the current requirements included in the MHA DEIS proposal many of the developments would be below the threshold for formal design review and do not require SEPA review.
  - We strongly disagree with the conclusion in Section 3-3 that “aesthetic impacts should be reduced to less than significant levels”. This is an untrue misrepresentation that is in fact contradicted by the DEIS Growth & Equity Composite Vulnerability Indicators Figure 4, and Displacement Risk Index Figure 5.
- Specific Requests:
    - o Neighborhood Community Councils need to be reinstated with Architectural Review Panels that create design standards consistent with the character of each neighborhood, All development on lots that represent a change in scale will be required to be reviewed by these neighborhood Architectural Review Panels for compliance with neighborhood design standards.

#### Conclusions:

The MHA DEIS reads more as promotional material for the MHA program. It is not an objective evaluation of the significant impacts of the programs implementation, nor a fair attempt to provide measures to mitigate the adverse impacts of the program. The Madison-Miller Residential Urban Village community has responded to MHA DEIS proposals by investing a large amount of time and consideration to provide the most constructive feedback possible to both preserve that which makes it livable, unique, and a part of what makes Seattle great and at the same time add density and MHA contribution. After extensive review of the MHA DEIS we have concluded that:

- The Madison Miller Residential Urban Village is and will continue to be highly impacted by a growing Seattle. Both Alternative’s 2 and 3 in the MHA DEIS will put at risk this functional, livable, and unique neighborhood;

- As a community we support Alternative 1, with the modifications stated previously, which could better meet both density and affordability goals without sacrificing the fabric of this community;
- Residents in the Madison Miller Urban Village have been displaced and will continue to be at risk in the future. Residents will be at an even higher risk for displacement with the proposed future development shown in Alternative's 2 and 3;
- Given the over burdened and narrow streets within the Madison-Miller Residential Urban Village on site parking must be required for all single family and multifamily housing development;
- Current low income and affordable housing options are at risk for demolition without replacement under the MHA Alternative's 2 and 3 rezones. If affordability is not a false promise of MHA then these complexes, within the Madison-Miller Residential Urban Village, need to be protected;
- MHA would be most fairly, equitably, and effectively implemented as a citywide program and as a fee applied to all development in the city;
- All development within areas that are rezoned must include developer impact fees to help pay for infrastructure impacts;
- MHA should be implemented to all development throughout the city. MHA should also be implemented without citywide rezones as proposed in Alternative's 2 & 3 and without the changes to existing land use zoning i.e. LR1 throughout the city should become LR1(M);
- The MHA contribution or percentage of affordable housing should be significantly higher than the current proposed levels;
- For these reasons, we prefer implementation of MHA with zoning map of Alternative 1.

Sincerely,

Amal Al Faiz and Stephen Retz in conjunction with all the other members of our community who helped draft this response.



MADISON -  
MILLER PARK  
COMMUNITY

# ALTERNATE PROPOSAL

## Mandatory Housing Affordability (MHA) in the MADISON MILLER RESIDENTIAL URBAN VILLAGE

DEVELOPED BY  
MADISON-MILLER PARK COMMUNITY

### SPECIFIC CONCERNS

### PROPOSED CHANGES

**1** **Equitability Concern** - HALA Draft Proposal lacks density increase near Community Assets: Louisa Boren Park, Volunteer Park, Interlaken Park and Stevens School. (Extend RUV North to E. Galer St.)

**2** **Traffic Concern** - E. Aloha St. provides local access to 15th & 23rd, connection to 520 and I-5; Overload concern with no ability to widen due to Heritage Trees.

**3** **Equitability Concern** - Double & Triple upzones create disproportionate burden on stakeholders.

**4** **Safety Concern** - Meany Middle School Main Entrance on Narrow 21st Ave. E.; School Bus Loading Zone; One way vehicular traffic; SDOT Greenway; North and South Bike Lanes.

**5** **Infrastructure Concern** - Community Resource is limited to Community Center, Tennis Court and Playground all are used near capacity.

**6** **Infrastructure Concern** - Playfields are a Regional Resource and not typically available for community use.

**7** **Infrastructure Concern** - Greenspace preserved as community resource.

**8** **Equitability Concern** - Triple upzone from SF to LR3 creates disproportionate impact on existing stakeholders.

**9** **Character Concern** - 19th Century houses, Three of the oldest surviving in Seattle.

**10** **Character Concern** - Award winning Pine Street Cottages, Unique RSL/Tandem home Development

**1** **NC1-40(M)** - Maintain lower height NC appropriate for lower density urban village.

**2** **RSL(M)** - Currently provides variety of family friendly housing, RSL(M) maintains the existing scale and character of Neighborhood, & scale transition to SF.

**3** **LR2(M)** - 19th Ave. E Appropriate for street with Bus Service, adjacent to community park resources.

**4** **RSL(M)** - NE edge of RUV is 1 mile from light rail and over 1/2 mile from Rapid Transit Bus lines. Family Sized housing appropriate for adjacency to middle school and neighborhood.

**5** **RSL(M)** - 18th Ave. E. Currently provides variety of family friendly housing, RSL(M) is appropriate transition to SF on West side of Street.

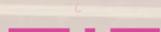
**6** **RSL(M)** - Scale Transition to Neighborhood and Park. Playfield is not normally available for community use. John Frontage has historic neighborhood home.

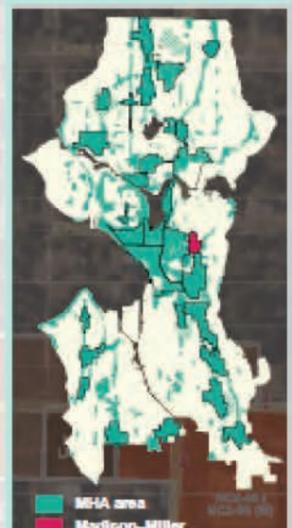
**7** **LR1(M)** - Address scale transition and adjacency to Greenspace.

**8** **LR2(M)** - Provides increase of one story and maintains transition from adjacent LR3(M).

**9** **LR1(M)** - Transition in scale and Frontage on E. 23rd St.

**10** **RSL(M)** - Example of successful density, providing variety of affordable family friendly housing. Serve as a model for current upzone.

-  **Streets with Bus Service**
-  **Proposed - Rapid Transit Bus Service**
-  **SDOT Greenway, Bike Lanes - North & South**
-  **SDOT Proposed - Greenway, Bike Lanes - North & South**



**From:** amalalfaiz@juno.com  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Response the MHA DEIS for the Madison-Miller Urban Village  
**Date:** Tuesday, August 01, 2017 12:03:29 PM

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### Personal Response to MHA DEIS for the Madison-Miller Urban Village

My name is Amal Al Faiz. My husband, Stephen Retz, and I are teachers. We have lived in the general Madison-Miller-Capitol Hill neighborhood for almost 30 years, first as renters and then as homeowners. We have seen the neighborhood change greatly during this time. We are very concerned about the potential impacts caused by the zoning changes proposed by MHA/ HALA (not sure which acronym to use) for the Madison-Miller urban village, especially Alternative 2 (bad) or Alternative 3 (worse) as outlined in the DEIS. We believe that these 2 proposed alternatives of zoning changes will strongly contribute to the displacement of a vibrant ethnically and socio-economically diverse community without greatly improving the affordability of housing for low and mid-income families in the center of Seattle.

We understand that the general goal of MHA/HALA is to create more affordable housing by incentivizing developers to redevelop an area more densely by increasing the height and density limits at which they can build on each lot and by requiring these developers to include some affordable housing units dedicated for low-income people (earning 60% of the median income) in the new development or pay a fine into a fund that would be dedicated to the creation of affordable housing elsewhere in the city. Although we are in favor of the general goal of improving housing affordability, we would like to see mid-income earners, especially families, being considered in the proposals as we know that very few of us mid-income earners can afford housing at market price in Seattle today, yet what will Seattle do without its teachers, plumbers, accountants, and so on? Not enough attention is being paid to maintaining housing for mid-income earners who are quickly being priced out of Seattle. This is the major flaw of the MHA/HALA proposal as it applies to the Madison-Miller Urban Village.

The first problem with MHA/HALA's alternatives 2 and 3 proposals for the Madison-Miller Urban Village is that they will not bring about a lot more affordable housing in the urban core of the area or generate a lot of funds to support more affordable housing in Seattle because the areas along Madison and between Olive and John have recently been and are currently being extensively redeveloped. The urban core of the Madison-Miller Urban Villages area has gone through a tremendous period of redevelopment in the past 15 years, with most of it occurring in the past 5 years. Many new buildings have been built, are currently being built, or are in the permitting process (Safeway Building at 23rd and Madison, the Sessions on Madison and 21st, the "podments" on Olive, numerous buildings between Madison and John on 20th, 21st, and 22nd, a future building where the old Firestone on 21st and Madison used to be,....). All of these sites constitute the majority of this urban core and are not likely to be redeveloped any time soon as there isn't enough incentive for a developer to redevelop a site that has just been developed. Because of all this redevelopment, MHA/HALA's goal of incentivizing developers to redevelop and contribute to the creation of more affordable housing will not be achieved in this urban core. In fact, the current increase in development has resulted in the fact that the Madison-Miller Urban Village is already well on its way to meet MHA/HALA targets for 2035 with its current zoning designation. Since 2015, 578 units have been or are being built, and 543 are expected to be built and occupied before 2018. That is a total of 1121 new units in 3 years under the current zoning. Clearly, upzoning the whole area does not seem necessary to achieve the desired density for the Madison-Miller Urban Village by MHA/HALA standards. Furthermore, given all the recent development of this urban core, its upzoning will not bring about the creation of more affordable housing or generate significant funds toward affordable housing from new developments in this area.

The second problem with the MHA/HALA alternative 2 and 3 proposals is that upzoning in the Madison-Miller Urban Village will have the unintended effect of focusing all new future development in the areas adjacent to the urban core, putting great pressure on the residential areas, with the negative effect of displacing an ethnically and socio-economically diverse community and limiting housing options for mid-income residents and families. Since the majority of the urban core of the area is well on its way to being fully redeveloped as we speak, all future new developments under MHA/HALA's proposal (alternatives 2 and 3) will not occur there, but rather in the areas adjacent to this urban core. MHA/HALA's proposal for these areas is to change from RSL/Tandem Cottages or SF5000 to LR-1 or LR-2. This is not a gradual transition in height and density limits from what currently exists. The heights and density of future new developments will be significantly greater than those of the existing structures. This will put great pressure on the residents of these areas.

As residents of these areas, we know that the rezoning from RSL/ Tandem Cottages or SF5000 to LR-1(bad) or LR-

2 (worse) puts our investment of time and money into purchasing, rehabbing, and maintaining our homes in jeopardy. Our homes will no longer be attractive with looming buildings towering over them and thus they will lose emotional value to us as our homes but also resale value as individual homes. Rather, developers will buy properties as they come up for sale with the aim of buying many contiguous smaller lots (very few of these homes are on 5000 sq/ft lots) until they can create a big enough lot to redevelop it as LR-1 or LR-2. This, in turn, will displace many of us with families and with low to moderate incomes through higher taxes and general unlivability. Because a zoning change to LR-1/LR-2 allows developers to build significantly higher in height and density than the heights and density of our existing properties, this will very much stress the livability of our neighborhood as it brings with it a decrease in the amount of natural light and green spaces available for all to enjoy. The loss of natural light- something that allows us to turn on fewer lamps- and the loss of plants and trees- which clean the air and cool our homes- are not without negative environmental impact. Currently we have green streets that people walk along and enjoy. The proposed plan would replace all of this with taller buildings covering a greater percentage of each lot. It is ironic that 22nd and 21st were just named a Greenway and signed as such last year by city planners. If the rezone is approved as currently outlined by MHA/ HALA in alternatives 2 or 3, the Greenway that goes along 22nd and 21st Avenue will need a new name, for it will not be green any longer.

It is also clear that a rezone to LR-1 or LR-2 will not generate a lot of housing that encourages long term communities. Nor will it generate a lot of housing that is appropriate for families. A rezone to LR-1 or LR-2 will bring about the creation of even more small units (averaging 600 sq ft). Such small units are more appropriate for single people and will likely be rental units that change hands regularly. In fact, in the current development occurring in the Madison-Miller urban core, of the 1121 new units, fewer than 30 are or will be family-sized with 2 or more bedrooms. Is the goal of MHA/HALA to push out long term communities made up of a mix of homeowners, renters, single residents, families with children, young, middle aged, and older residents in favor of new more temporary communities of single renters? We hope not, but the current proposals in Alternative 2 and 3 are very likely to bring this about unless they are significantly amended.

If MHA/HALA wants to be true to its goal of not discriminating or displacing communities while encouraging more density and affordability as well as maintaining livability and diversity, it should reconsider the zoning change in Alternatives 2 and 3 that it proposes for these residential areas. There are other less disruptive ways to bring about more density and affordability in the residential areas of the Madison-Miller Urban Village and beyond. In fact, we are in favor of Alternative 1 with some modifications to promote density and affordability in addition to sustainability, diversity, and livability.

First, the current RSL-tandem cottages zone needs to remain unchanged rather than being upzoned to LR-1 or LR-2, for it promotes density and affordability as well as sustainability, diversity and livability. In fact, the specific rezoning to LR-1 or LR-2 of the area where we live (the 1600 block of 22nd Avenue, which now is zoned RSL-tandem cottages in honor of the award-winning Pine Street cottages redevelopment) does not significantly improve the housing situation in this zone. Its RSL-Tandem/Cottages zone was adopted in order to increase density while maintaining livability and affordability in the heart of Seattle. We are currently the only area of Seattle zoned RSL/Tandem Cottages, and we are proof that such zoning works at increasing density without decreasing diversity, affordability, and livability or displacing the existing community. In the time my husband and I have lived here, this small approximately 2-block area has added 24 new individual free-standing tandem cottages. This has allowed more people of various socio-economic backgrounds to move in the neighborhood without totally displacing older residents. Our block is an example of the diversity that can be achieved and maintained with this type of zoning. Our 1600 block of 22nd Avenue has residents of diverse races, ethnicities, socio-economic backgrounds, ages, marital status, sexual orientation, and the list goes on. Our oldest resident for many years was Ms. Tatum at 1644 22nd Avenue, who was over 100 years old when she passed away a few years ago, and whose small home was then purchased by a young mixed-race couple for a modest price. Our youngest resident is almost a year old. On our block, there are same-sex couples, heterosexual couples with elementary-school-aged children, young couples new to home ownership as well as older residents who have lived on the block for 30 years or longer as well as renters. Even the buildings in this small area represent diversity. There is a diversity of architectural styles with many well-maintained structures built around the turn of the 20th century (our home was built in 1900) interspersed with newer structures built between the late 90s and now. However, what all these structures have in common is that they are all individual free-standing residences that have similar heights and setbacks and many of which are large enough for a small family yet on small enough lots to remain affordable in today's housing market. Clearly, being zoned RSL/tandem cottages has helped the 1600 blocks of 23rd, 22nd and 21st Avenue keep the general character of the neighborhood intact while gradually increasing its density without totally sacrificing its affordability, livability, or diversity.

In the 1600 blocks of 21st, 22nd, and 23rd Avenue, we have been in favor of density and affordability, which is why we were in favor of our rezoning from single-family to RSL-tandem cottages in the late 90s. We have absorbed

a great deal of increased density with the subdivision of many bigger lots into smaller ones with many new tandem cottages. These smaller cottages have made it possible for more families of moderate income to afford homes in our neighborhood while maintaining the livability and character of the neighborhood. In an area zoned RSL/ Tandem Cottages, homes average 1,500 sq. feet, large enough for a small family to live comfortably. We are a neighborhood of long term residents who know each other. Changing to LR1 Or LR2 simply means more small rental units (averaging 600 sq ft) that are more appropriate for single people and that change hands regularly. Rezoning this area from RSL/Tandem cottages to LR-1 or LR-2 will bring about the death of our well-established, diverse, and affordable community.

In fact, at the February 28th , 2017 HALA meeting, we were told that RSL- tandem cottages was one zoning strategy that MHA/HALA was supporting to increase density, affordability, and livability. When asked why then there was a proposal to alter the only existing RSL-tandem cottages zoning in the whole city of Seattle which happens to be located in the Madison -Miller area, the people representing MHA/HALA stated that state law required an upzone for the city to be able to require the inclusion of affordable housing in future new development in this area and for the city to have the ability to impose fines on developers for not doing so. This is a very unsatisfactory and unconvincing argument for the need for an upzone to LR-1 or LR-2 from a successful zoning of RSL-tandem cottage in a small area that has already created and continues to support the creation of affordable, livable housing in a dense residential environment. Are the funds for affordable housing that could be generated from developers in a few future developments in this small area worth the displacement of a vibrant sustainable community? If MHA/HALA is true to its goal of increasing density, affordability, and livability while avoiding displacing existing communities, it will correct its current proposals in Alternatives 2 and 3 and maintain RSL/ tandem cottages as a zoning designation for the 1600 blocks of 23rd, 22nd and 21st Avenue as it is in keeping with MHA/HALA in that it increases density and affordability while maintaining livability and diversity without displacing existing communities.

Second, MHA/HALA should consider expanding the RSL/Tandem Cottages zone in the SF5000 residential areas of the Madison-Miller Urban Village instead of upzoning these areas to LR-1 or LR-2. It should also consider expanding this zoning option into other SF5000 areas bordering the Madison-Miller Urban Village to spread out the density over a greater area. Extending the RSL/ Tandem Cottages designation to other areas currently zoned SF-5000 to increase density and affordability promotes all that MHA/HALA aspires to and more: density and affordability but also diversity and livability without displacing the community. For instance the plans in Alternatives 2 and 3 to upzone the area of the Madison-Miller Urban Village currently zoned as SF5000 to LR1, LR2, or LR3 is too big of a jump in height and density, so any new development will be a great stress on the existing properties and their owners/residents due to the difference in scale of height and lot density. A better, more-gradual plan would be to upzone from SF500 to RSL/Tandem Cottages. This is mainly a well-established residential neighborhood of individual homes that could absorb more density and enhance its affordability while still maintaining its character by being rezoned RSL/Tandem cottages. Likewise, why is there an island in the MHA/HALA plan of a SF500 zone in the 1500 block of 21st Avenue? That block between Pine and Union on 21st could be changed to RSL/Tandem Cottages without stressing the area greatly. Furthermore, why are all the areas adjacent to Madison as we move East toward Lake Washington exempt from being upzoned? All these areas are near an NC zone of greater density as well as transportation, including the future rapid bus that will move east-west on Madison. Rezoning all these areas as RSL/Tandem Cottages will have the added benefit of not only increasing housing affordability for low-income people through MHA/HALA's plan over a greater area than simply the Madison-Miller Urban Village, but also of maintaining and expanding housing options for mid-income earners and families. Expanding the RSL-Tandem Cottages zone to this greater area will also demonstrate that the MHA/HALA plan is not discriminatory in that it does not increase density and affordability only in low- mid-income areas but also in more affluent areas of the city around the Madison-Miller Urban Village, which are currently exempt of much of this increase in density in the MHA/HALA plan.

MHA/HALA's current rezoning proposal ( all alternatives) for the Madison-Miller Urban village should be amended so as not to have the unintended consequence of discriminating against and displacing an existing well-established diverse community. The Madison-Miller urban core has absorbed a great deal of density in the past few years with the addition of numerous taller buildings-many on Madison and Union or between Madison and John. This increased housing stock has not come with more affordable prices and is not friendly to families, older people, or Americans with disabilities. The best value continues to be the older smaller homes on smaller lots, which allow people, including families, of low to moderate incomes with diverse ethnic backgrounds to still be able to live in the heart of the city where they work. The new developments being built are plentiful yet not affordable. MHA/HALA

aims to incentivize developers to create more affordable housing by allowing them to build more densely and higher, but it has a clause that allows the developer an out from including affordable housing by paying what amounts to a fine into a fund dedicated to affordable housing creation. In the Madison-Miller area, there is little room for a lot more redevelopment in the central urban core of the area given that so much redevelopment has already occurred, so redevelopment will be pushed into the residential areas of SF 5000 and RSL-tandem cottages. If those areas are upzoned to LR-1, LR-2, or LR-3, developers will very likely opt to pay the fine and build only market value properties. This means that low and moderate income people will be pushed out of the Madison-Miller area for good, and it will be the end of an ethnically socio-economically diverse community and neighborhood. If the purpose of MHA/HALA is to create more affordable housing while avoiding discrimination or displacing people, the current proposals under alternatives 2 and 3 for the Madison-Miller urban village will not achieve this goal. We strongly urge you to not approve the rezoning of the Madison-Miller urban village as currently proposed by MHA/HALA in Alternatives 2 and 3. While we are in favor of the goals of MHA/HALA, the solution they have proposed for the Madison-Miller area will not work because it does not take into account all the development and redevelopment that has already occurred and is currently occurring as we speak. What could work in terms of zoning changes is the proposed Alternative 1 with some changes: maintaining current height limits in the urban core of the neighborhood but extending the RSL/tandem cottage zoning designation to a larger residential portion of the residential area of the neighborhood and beyond. This would allow more density and affordability while avoiding discriminating against a low-mid-income diverse community and while maintaining livability, diversity, and character of a great neighborhood.

We hope you will seriously consider these concerns and comments. As residents who will be directly impacted by what gets decided, we hope that we have demonstrated that we are not against the goals of HALA/MHA, but we are greatly concerned by the proposals put forth by HALA for our community. In particular, we believe that both Alternatives 2 and 3 as outlined in the DEIS will bring about the death of our community. We believe that there is another way. It is not to do nothing, but rather to extend the RSL designation to residential areas greater than just the urban village. This should allow for greater density and affordability while keeping Seattle green, diverse, livable, attractive, family-friendly, and the list goes on.

Sincerely,

Amal Al Faiz and Stephen Retz  
1636 22nd Avenue  
Seattle, WA 98122

PS: The whole process for residents who will be directly affected by HALA/MHA to learn about it, its proposals, timeline, ...etc has not been easy. As a community, we have been extremely lucky to have residents well-versed in city-procedures who have helped the rest of us keep abreast of what is going on as well as important deadlines. I hope that a hard look be taken as to how the city communicates with its residents to ensure that all citizens can really participate and have an impact on the plans that shape the future of our city.

**From:** ryan alger  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** DEIS comment period to West Seattle neighborhood  
**Date:** Tuesday, June 20, 2017 9:59:54 PM

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Hi

I urge you to consider an extension to the comment period regarding the DEIS statement issued for the Alaska Junction neighborhood slated to end July 23. Many of us have summer commitments including spending time with our children and families and making these deadlines for entire neighborhoods is unrealistic.

[Ryan Alger](#)  
[206 734 6691](#)  
[5050 42nd Ave SW](#)

Office of Housing Affordability and Livability -

My understanding is the Seattle Public Schools is looking to secure a location for a new high school. Please use the land at Fort Lawton for a high school instead of additional housing. The majority of households in Magnolia are families. Our student population is growing rapidly. Families in surrounding neighborhoods like Queen Anne, Ballard, Fremont and even downtown would benefit from this use as well. Please work with Seattle Public Schools and include them in all future discussions/meetings pertaining to the land use at Fort Lawton. Additionally, I encourage you to transfer the land to SPS at no cost. This would be a win for the currently underfunded schools and our children.

Thank you,

Craig



*Seattle Magazine Best in Client Satisfaction Recipient*

<b>Name</b>	Demi Allen
<b>Email address</b>	
<b>Comment Form</b>	
<b>Housing and Socioeconomics</b>	<p>1 This is by far the most important aspect of the analysis, and it should be expanded. Impacts on people and housing choices should be the driver of this analysis. There's a "wildfire" of displacement happening in Seattle, and we need to act fast to address it. I want people to be able to stay in the neighborhoods where their cultural and historic connections exist. Upzones and urban village expansion will help slow the wildfire, but they aren't enough. I disagree with the notion that upzones should be limited in areas with high risk of displacement. I'd like to see upzones and urban village expansion throughout the city.</p>
<b>Land Use</b>	<p>2 It seems flat out wrong to suggest that upzones will increase the risk of displacement - the opposites seems to be true. Yes, there will be more physical displacement, but people may be able to stay in their chosen neighborhoods.</p>
<b>Aesthetics</b>	<p>3 This should not even be part of the analysis. The pain people are suffering from displacement is far more significant than someone's view of what is aesthetically pleasing. We can deal with aesthetics through design review, etc.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Eric Andersen
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 As a homeowner, living in a single family neighbourhood, and near an Urban Village, I oppose any action that would implement MHA in the study.</p> <p>Until you address how the DEIS affects each individual Urban Village and how the Urban Village affects the adjoining single family neighbourhoods, you need to stop and analyze the neighborhoods surrounding these Urban Villages and establish their own ESI.</p>

<b>Name</b>	Kim Anderson
<b>Email address</b>	
<b>Comment Form</b>	
<b>Transportation</b>	<p>1 While the Draft EIS mentions a lack of sidewalks in some areas, and discusses parking increases that will result from the proposed rezoning, there is no discussion of how the increased parking demand in areas without sidewalks might impact residents on nearby blocks. We have seen parking demand increase in our neighborhood (Crown Hill) as a result of new developments in the Urban Village. This issue in and of itself is manageable. However, without sidewalks, we still have mail delivery by postal truck (the mailman drives to our mailbox, puts the mail in, and drives away). Many of our mailboxes are located at or near the fence line. This type of mail delivery service is not compatible with increased parking demand, as mailboxes (or their access routes) take up parking spots (or cars park in front of them and mail is not delivered). I have called the post office and asked about moving my mailbox and was told that I could not. The only option given to me was to ask my neighbors to pitch in for a mailbox cluster (paid for by us). If we are truly going to have high density on-street parking in neighborhoods without sidewalks, it should not be at the expense of mail being delivered to residents. The City must plan a better solution (either by providing mailbox clusters or addressing the problem some other way).</p> <p>2 The EIS should also discuss the pedestrian safety issues associated with on-street parking in residential neighborhoods without sidewalks. If all of the road shoulder is taken up by cars, pedestrians who currently walk on the road shoulder will be pushed into the road, increasing the risk of being struck by a car. This issue should be addressed along with other safety impacts. While the EIS looks at issues singly, it does not do a good job discussing the way that these issues compound one another. Lack of sidewalks is one issue, increased parking is another. However, there is a synergistic effect when both issues are considered together.</p>

<b>Name</b>	Anonymous
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<ol style="list-style-type: none"><li>1 Upzones are ruining neighborhoods and the livability of Seattle. We should not aspire to be like SF or NYC.</li><li>2 Existing affordable housing is not being preserved. Developers are controlling the situation - knocking down a small house on a large lot to build 2 McMansions. Creating micro-housing (people pens) to maximize profit.</li><li>3 Developers should be required to pay impact fees. Developers should be required to put in parking. Limiting parking availability does not make the problem go away.</li><li>4 HALA was supposed to require every building to build affordable housing onsite, but developers got that removed. If it is not built onsite, where are you going to put the affordable housing? On what land?</li><li>5 Creating the density without putting in infrastructure does not make our problems go away- how do you manage the traffic? where are the kids going to go to school? I disagree with HALA and cannot support it.</li></ol>

**If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.**

CID-based community and advocacy group

## **Comment Form**

**Description of the Proposed Action and Alternatives**

- 1** Where is the CID listed on Exhibit 2-4 on page 2.10 in the Alternatives section of the report?

## **Demographic Survey (optional)**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

## Comment Form

### Transportation

- 1 Please require these buildings to add parking!! Replacing a single home with multiple (up to 14?!) units will GREATLY increase the number of cars needing to park even if public transit is nearby. In the real world few people can actually go carless. Parking is already a nightmare in Seattle. Raising rates will not increase availability; it will just hurt people with the least money. Please don't add to the already terrible parking problem.

## Demographic Survey (optional)

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you  
resided in the city of  
Seattle? (total  
number of years)**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your  
gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person  
with a disability?**

**Are you a U.S.  
Military veteran?**

**Comment Form**

**Description of the Proposed Action and Alternatives**

1 Please adopt Alternative 3 not Alternative 2 in all south seattle neighborhoods. Don't drive us out! Only developers will own the land. The Residential Small Lot zoning should be used MORE. Poorer and lower middle class people like me can make that work and hold onto our properties. Don't concentrate all the wealth of ownership in the hands of developers!

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

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**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

## Comment Form

### Description of the Proposed Action and Alternatives

- 1 A proper range of alternatives was not considered. Existing zoning and urban village boundaries allows for extensive development as evidenced by all of the units under construction now. Developers are profiting wildly under existing conditions. Alternatives that include no zoning changes but add requirements and/or fees for developers (with the goal of creating affordable housing) need to be considered.

### Aesthetics

- 2 Seattle's single-family neighborhoods need to be preserved and cherished. They make our City desirable. Alternatives 2 and 3 destroy more single family residential neighborhoods. This is completely unnecessary. Existing zoning allows ample new development. Alternative 3 creates the worse adverse effects in neighborhoods north of downtown.

### Historic Resources

- 3 Alternatives 2 and 3 destroy historic single-family structures and the character of their neighborhoods in urban village expansion areas. The EIS does not clearly summarize the number of single family homes that will be lost or the acreage of neighborhoods that will have fundamental and adverse changes caused by the expansion and other zoning changes under alternatives 2 and 3

### Demographic Survey (optional)

Have you been or are you at risk of being displaced from your neighborhood?

Have you been or are you at risk of being displaced from Seattle entirely?

Are you now or have you ever experienced homelessness?

Do you live in rent- and income-restricted affordable housing?

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

## Comment Form

### Description of the Proposed Action and Alternatives

- 1 I prefer Alternative #3 as I feel it best captures the intent of the MHA that was originally laid out by providing the most affordable housing options in high density areas/Urban Villages but also addresses displacement risks which is a large concern.

### Demographic Survey (optional)

Have you been or are you at risk of being displaced from your neighborhood?

Have you been or are you at risk of being displaced from Seattle entirely?

Are you now or have you ever experienced homelessness?

Do you live in rent- and income-restricted affordable housing?

How many people are in your household?

Are there children under the age of 18 in your household?

What is your household income?

Do you own or rent your residence?

How long have you

**resided in the city of  
Seattle? (total  
number of years)**

**Do you work in  
Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your  
gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person  
with a disability?**

**Are you a U.S.  
Military veteran?**

## Comment Form

### Description of the Proposed Action and Alternatives

- 1 The DEIS is not sufficient, as each Urban Village is unique and should have its own EIS. It is irresponsible (and in my opinion unlawful) for the DEIS to be city-wide.

### Demographic Survey (optional)

Have you been or are you at risk of being displaced from your neighborhood?

Have you been or are you at risk of being displaced from Seattle entirely?

Are you now or have you ever experienced homelessness?

Do you live in rent- and income-restricted affordable housing?

How many people are in your household?

Are there children under the age of 18 in your household?

What is your household income?

Do you own or rent your residence?

How long have you resided in the city of Seattle? (total

**number of years)**

**Do you work in  
Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your  
gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person  
with a disability?**

**Are you a U.S.  
Military veteran?**

## Comment Form

### Description of the Proposed Action and Alternatives

- 1 Neither Alternative 2 or 3 is acceptable to me, so at this point in time the only answer would be No Action. Trying to foist off all growth into the artificial boundaries of the "urban villages" is completely unfair to the people who live and especially to those who own homes in those areas. Given that proposals were made to allow growth in all areas of the city and so roundly rejected by voters I can only see this a play by city officials to save their votes by pushing all the growth onto the fewest number of voters possible... You want me to believe you have the best interests of the city in mind and not your own? Upzone your own neighborhoods first....

### Demographic Survey (optional)

Have you been or are you at risk of being displaced from your neighborhood?

Have you been or are you at risk of being displaced from Seattle entirely?

Are you now or have you ever experienced homelessness?

Do you live in rent- and income-restricted affordable housing?

How many people are in your household?

Are there children under the age of 18 in your household?

Do you own or rent your residence?

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.**

Self/Resident

## **Comment Form**

### **Description of the Proposed Action and Alternatives**

- 1** I support the No Action Alternative. Furthermore, I am not pleased that Uptown is not included in this EIS. Despite being included in the HALA/MHA community forum, Uptown has been eliminated from this zoning plan. This is unacceptable. The City has misled the residents in Uptown by suggesting that they would be a "Medium Density" region and then, without sufficient notice, removed Uptown from the study and slated it for increased density. This inequitable conduct on the part of the City draws into question all other administrative decisions the City has undertaken regarding the scope of this EIS project

### **Housing and Socioeconomics**

- 2** The City has proposed increasing density and through upzoning and other methods for the purpose of increasing community diversity and providing low-income residents with homes closer to their places of work in the more urban regions of the city. However, the City has COMPLETELY and TOTALLY undercut this goal by allowing developers to pay a fee to opt out of providing low-income housing in their buildings. The City argues that the fees obtained in this way will allow for federal and state matching of funds, thus increasing the total utility of the fees by allowing for more units to be built. The City seems to be actively hiding the fact that new housing paid for in this way will be entirely or almost entirely low-income units and that the new housing will be located further from the urban centers and jobs that the City purports it will help low-income residents reach. Thus, the City is promising more opportunity, socioeconomic integration, and access to jobs and is INSTEAD allowing developers to build even more expensive units in the urban regions of Seattle, pricing out even more residents from those areas and shoving the displaced middle- and low-income residents even further from the services and resources that they need in the city. The upshot is that the developers make a lot of money and then move on to the next city, while we are left with a gentrified city and even more problems with racial and socioeconomic integration in the city. Lastly, there is no guarantee that prices for units in the city will relax with increased inventory. We cannot know how demand for housing will be in the future, as Seattle's high-tech industry grows, so there's no guarantee that wealthy young professionals won't continue to drive prices

2 upward, no matter how many new units are built.

**Land Use**

3 The fact that Uptown was invited to take part in the HALA discussions as a Medium Density region and then was suddenly, and without sufficient warning, reclassified as an Urban Center. This is totally unacceptable. At worst, this is evidence that the City has lied to the public in order to circumvent public discourse, and, if this is the case, the City and its officers should be held corporately and individually accountable.

**Aesthetics**

4 I support gradual transitions from regions of tall buildings to regions of low buildings.

**Transportation**

5 The increased traffic flow into Uptown from increased density and the arrival of Expedia will be an absolute catastrophe for the region. The City has already made a debacle of the Mercer Street renovations and is planning to compound this problem by failing to sufficiently prepare Mercer Place for the increased traffic. As part of this EIS, it is absolutely imperative to rebuild Mercer Place. As a resident in the area, I can feel my building shaking from even small trucks driving up and down Mercer Place from 15th/Elliott to Mercer Street. There is a major dip in the surface of Mercer Place below Kinnear Park that contributes to these vibrations and may be indicative of structural deficiencies beneath Mercer Place. Mercer Place was never meant to take the traffic that it is asked to bear at the present time, and the traffic will only increase in the future. I know that the sewers under the street have already failed this year, and it is entirely possible that the heavy traffic on Mercer Place is responsible for that failure. Furthermore, the dip/pothole in Mercer Place exacts a great deal of wear on the cars and trucks travelling from 15th/Elliott to I-5 and Seattle Center. Should the sewers, streets, or structures along Mercer Place fail, I would imagine that lawyers will not have to work too hard to put together convincing cases of culpable negligence against the City.

**Historic Resources**

6 The City is leaving open the possibility that developers will be able to knock down historic structures and facades that provide Seattle's neighborhoods with their distinct charms. If developers are allowed to proceed in this fashion, Seattle will lose aspects of its history forever. I propose that developers only be allowed to increase height in historic buildings if the developer preserves the facade of the existing building and pays for all preservation, permitting, and inspection of the facade preservation.

7 As mentioned in the Transportation section, Mercer Place is not designed to handle the heavy traffic that it is currently tasked with carrying. Mercer Place comprises an Environmentally Critical Area, as it has a steep slope that

**Biological Resources**

7 could slide onto the roadway. The poor condition of Mercer Place and the heavy traffic on the road, which causes tremendous vibration through the slope in and below Kinnear Park, is likely to cause the slope to fail at some point. It may not be difficult to show that the City is negligent and liable for such an occurrence if Mercer Place is not fixed and the slopes are not reinforced by the City.

**Open Space & Recreation**

8 The City is not doing enough to provide parks for areas of low-income residents and minorities. I was in Magnolia the other day, and I ran across three parks with a total of six baseball fields, several tennis courts, and a children's playground in about thirty minutes. This is not the case in other regions of the City. It is the City's responsibility to provide these resources in all neighborhoods.

**Public Services & Utilities**

9 As mentioned above, the plan proposed by the City aims to leverage developer opt-out fees and federal and state matching to build low-income units strewn far from the services and resources that low-income residents need, which are largely located in the more urban regions of the city. By opting-out, developers will be free to build more and more luxurious units, driving housing prices even higher. This is not equitable. This is not compassionate. If the City proceeds with its current plan, it will have committed a grave injustice against the most vulnerable people it was created to protect.

**Air Quality & Green House Gas Emissions**

10 Increased greenery on ground level and on tiered buildings are a good way to improve air quality. This approach should be implemented.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent-  
and income-  
restricted affordable  
housing?**

**How many people  
are in your  
household?**

**Are there children  
under the age of 18  
in your household?**

**What is your  
household income?**

**Do you own or rent  
your residence?**

**How long have you  
resided in the city of  
Seattle? (total  
number of years)**

**Do you work in  
Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
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**What is your  
gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person  
with a disability?**

**Are you a U.S.  
Military veteran?**



**Comment Form**

**Description of the  
Proposed Action and  
Alternatives** 1 No to Alt 3

<b>Comment Form</b>	
<b>Land Use</b>	1 I hope that whatever you decide to do, you will consider implementing "people friendly" street level corridors that maintain enough space for lots of landscaping and wide walkways, bike paths, seating, etc. to minimize the impact of tall "faceless" buildings.
<b>Aesthetics</b>	2 I hope that whatever you decide to do, you will consider implementing "people friendly" street level corridors that maintain enough space for lots of landscaping and wide walkways, bike paths, seating, etc. to minimize the impact of tall "faceless" buildings.
<b>Open Space &amp; Recreation</b>	3 I hope that whatever you decide to do, you will consider implementing "people friendly" street level corridors that maintain enough space for lots of landscaping and wide walkways, bike paths, seating, etc. to minimize the impact of tall "faceless" buildings.
<b>Air Quality &amp; Green House Gas Emissions</b>	4 I hope that whatever you decide to do, you will consider implementing "people friendly" street level corridors that maintain enough space for lots of landscaping and wide walkways, bike paths, seating, etc. to minimize the impact of tall "faceless" buildings.
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

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## Comment Form

### Description of the Proposed Action and Alternatives

1 My proposals (below) are a lot more radical, and I guess impractical. The proposed alternatives don't seem to me like they will accomplish any of the goals of either environment or affordability.

### Housing and Socioeconomics

2 When you displace affordable housing you ought to have to put it back in essentially the same place. Admittedly this may mean that its economically unfeasible to redevelop older buildings, but that might be a good thing.  
Alternatively maybe asking developers to build affordable units is the wrong solution, but if they don't then their impact fees have to be much higher than proposed. Consider also that when the city does an upzone, the existing landowners get a windfall in that the land value goes up. Really this windfall ought to belong to the city. However it does seem like it makes more sense to have builders that know how to do affordability do it, rather than rely on builders who don't.  
The crisis here is really driven by a change in attitude about city living: young people in particular are finding it appealing and companies (particularly tech) are responding by building office here. Building lots of office space without building corresponding housing it like building in areas where there is no water, ie it makes no sense, unless you accept widespread displacement, but that makes no sense because you need diversity, ie you need housing for lower wage earners. To me this implies that the impact fees need to be highest on office buildings, although clearly they can't be too high or none get built at all (which in the short term could be a good thing--I don't have enough data). In any case its not possible to build enough housing to keep costs down if office building (or whatever the connection to high wage job creation is) are built at an equally high rate. While off topic, I fear that having such a concentration of jobs in one industry is a bad thing economically. We need more of something besides tech.  
While we're not looking at single family neighborhoods in terms of affordable housing, we're essentially losing large quantities of "affordable" single family housing to developers who buy small houses, destroy them, build mansions and don't include an ADU/DADU. My thought here is to change zoning to substantially downsize the footprint in single family zones unless the unit also includes an ADU/DADU.

3 As you increase the number of people, the demand for parks goes up. While we often ignore parks as being non-essential (and in some sense they are), without parks, people disconnect from nature and it has a negative health consequence. So for every big dense building we build, we need to plan for green space somewhere, even if all we do is narrow the street and make a wide green park along it (say take 10' or so out of the street by making it one way if necessary and using it as a planting strip.)  
Also, if we're so worried about stormwater, buildings that cover

## Land Use

- 3 the entire lot are clearly a bigger problem than single family which is limited to 35% lot coverage. Clearly they can do retention ponds, but those are horrible environments usually surrounded by a big fence. Better to do some kind of constructed wet land. We need to be creative here.  
BTW, it seems to me that rather than (or maybe in addition to) doing rain gardens, the big impact on storm water is having very porous soil, ie the kind that used to be here when the land was forested--12-18" of soil with high organic content. Give people incentive to add 6+ inches of compost to their yards. It hold a lot more water than the glacial sand/clay mix that is all that is left in most places.

## Aesthetics

- 4 Tall (more than 3-4 stories) buildings cast long shadows and are hence undesirable to their neighbors, although this can be offset somewhat by setting the upper stories back (as in Vancouver BC eg). While it can make sense to cover the entire lot, doing so removes all green space, creates heat island effects and increases runoff...and is often too imposing on the street level. We often talk about creating a vibrant street level environment, but it seems like it rarely gets accomplished. The reality is that its very hard to dictate aesthetics when the builder is not interested (ie doesn't see financial benefit or fit in their personal belief system)...and it seems like builders are rarely interested. There is certainly a question here of what we want the city to look like in the future given that there are multiple ways to add density, and that we as a country need to figure out how to balance the economics of prosperous cities with shrinking ones. In looking for a better density model, old European cities seem like a better model than NYC--focus on lowrise, pedestrian friendly , but admittedly this is hard given our grid of city streets constrains what we do.  
The other issue with big boxes is that they have lousy daylight--ideally every room should have light coming from two sides.

## Transportation

- 5 While I like mass transit and bicycling as alternative, currently they don't seem like they'll ever represent a majority of trips. The big fix is to make neighborhoods more self contained, but given that our country's economic model favors big stores and big employers this is hard. Also, any transition away from cars will be difficult. Lack of parking, for example can kill a small business.

As a regular bicyclist, the main barrier to using my bike is the risk of having it stolen. The second barrier is weather/hills, although that can be solved by good gear and an e-bike. Still its not clear to me that we'd ever get beyond maybe 15% of total trips on bike.

Needless to say while BRT is good, its only "rapid" if it doesn't end up sitting in traffic.

## Historic Resources

- 6 I love old buildings, but admit they are often hard to re-purpose and without upgrades are often energy pigs. Still we need to preserve some sizeable chunk of them.

- 7 Its hard to have much bio diversity in parks when there really

**Biological Resources**

7 isn't enough green space in the city in the first place. its a problem for all cities. The denser you get the more city-like you become and the more separated from habitat. Trees are wonderful, but they also interfere with solar and daylight and many tall trees are not adapted to live along both in terms of wind and soil conditions. Really the emphasis should be away from turf grass in single family neighborhoods, but that does have a summer water demand impact unless one is extremely careful in plant selection and or have rainwater storage on site. The focus needs to be on how we can get nature and people to coexist--not just confine nature to natural areas in parks. Nature needs to be everywhere, even if much of it isn't all that natural--it still potentially sequesters carbon, creates oxygen and reduces the heat-island.

**Open Space & Recreation**

8 I'd like to see a greater focus on open space and less on sports fields. I once played sports, and they are certainly a good outlet for some, but the percentage of the population that participate is just too small to justify how much space they occupy. A huge percentage of the population walks or is capable of walking and so we need to make place for that, and certainly there is still room for sports.  
I'd like to look at converting the greenways into actual greenways--ie very narrow streets with a lot more green that control speed by being narrow and curvy rather than speed bumps that rattle my bones when I bike over them.

**Public Services & Utilities**

9 While its easier for large buildings to reduce their energy demand for heating, sometimes they need additional cooling and its far harder to be net-zero with on-site generation (although I'm not sure I think on-site energy production is all that critical). Alas, they still have the same or greater plug loads and sometimes greater lighting loads due to lousy daylighting, although LED technology reduces that impact significantly. Still there seems to be a sweet spot where its possible to cover a substantial part of a buildings energy use on site.  
Hydro is great, but there really isn't any more of it and its not without impacts. Wind is great, but its all external--the resource is far away. We don't have great solar, but its pretty much all we have on the local generation side unless we're going to start putting wind turbines out in the sound. So really conservation is our best friend.

**Air Quality & Green House Gas Emissions**

10 Build energy efficient. Don't use crappy materials that off gas. Put services and jobs near where people live to reduce transport demand. We've known all this for many years.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are**

**you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

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**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

## Comment Form

**Description of the Proposed Action and Alternatives**      **1** What about people who make just enough not to be able to rent income restricted housing, but can't afford "market rate." Because developers have shown they are not going to offer low-income options in new developments.

**Land Use**      **2** Too little, too late.

### Demographic Survey (optional)

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

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**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

## Comment Form

### Land Use

- 1 Prefer Alternate 1, but if required to upzone, Alternative 3 map is more appropriately zoned. A hybrid approach between these two would be best. For both alternates 2 and 3, especially in many named "High impact low access areas", the zoning is too aggressive and risks putting out the younger generations moving out of nearby more expensive neighborhoods. This is due to drastic increase in encroachment on single family neighborhoods where younger families have already started investing in their properties and a neighborhood resurgence is taking place. This would negatively impact these families who could risk significant displacement or financial loss due to decreases in the value of homes from to encroachment and lack of privacy created by larger scaled neighboring buildings and increased pedestrian traffic. This would harm the most significant group investing directly in the neighborhood core.

### Demographic Survey (optional)

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

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**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**Comment Form**

**Description of the Proposed Action and Alternatives**    **1** Please implement MHA.

**Transportation**    **2** Please encourage transit use.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

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**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

7/19/2017 19:30:00

#### Description of the Proposed Action and Alternatives

- 1 I think that mha doesn't go far enough in increasing the supply of affordable housing. Developers don't include affordable housing options, so make the fines greater to encourage them to include affordable units. The current system is creating a stratification and eliminating mixed income housing in the city

## Comment Form

- 1 Comment 2-1: Seattle 2035 Comp Plan Assumptions and Growth estimates that serve as a basis for planning are underestimated; Growth assumptions in CHUV exclude current development in the pipeline, and therefore are unrealistically low.

  - Seattle 2035 Comp Plan Assumptions that are applied to Alt 1 conclude that CHUV will grow by 700 new housing units by 2035. In June of 2017 the City of Seattle Permitting process identified 21 development projects already under permit that include over 600 new housing units. Planning estimates improperly omit projects under permit now and produce inaccurate growth estimates.
- 2 Comment 2-2: DEIS Growth Projections in Alt 2 and Alt 3 in CHUV, and potentially other Urban Villages, are unrealistically low; planning assumptions that they are based on exclude current development in the pipeline, and therefore are unrealistically low.

  - Alt 1, Alt 2 and Alt 3 scenarios should be re-assessed with growth projections that are in line with the development occurring now and readjusted throughout the DEIS for their impact.
- 3 Comment 2-3: The DEIS Underestimates the mobility challenges and the limitation of Urban Villages that will get light rail investments and those that will not.

  - Urban Village Expansion Areas are defined as a 10-minute walkshed from high frequency transit, yet there is no delineation between Urban Villages that will get light rail compared to those that will not. Urban Villages without light rail should not be expanded beyond the capacity of current or funded infrastructure to keep residents mobile.
  - MHA zoning within urban villages with no light rail should reflect the limits of future mobility due to lack of multi-modal transit.
- 4 Comment 2-4: All maps in Appendix A should show boundaries of urban villages and expansion areas to properly assess data and Displacement/ Opportunity designations.
- 5 Comment 2-5: The final EIS should include data to explain where the "line was drawn" between High and Low Displacement Risk and High and Low Access to Opportunity. The final EIS should better classify "borderline" Urban villages in the Displacement Risk analysis to reflect realities and better protect residents. The current analysis is a broad oversimplification.
- 6 Comment 2-6: Crown Hill Urban Village is deemed High Opportunity in the DEIS, but Appendix A Figure 7 shows Crown Hill almost exactly at the mid-point of the Access to Opportunity axis, and as only slightly higher than Morgan Junction, which is categorized as low opportunity.

- 7 Comment 2-7: The DEIS relies on the Growth and Equity Analysis as its primary parameter to group and apply broad rezoning principles and evaluate MHA, yet the topology maps in Appendix A do not show specific, numerical figures or the weighting of each category. This makes it impossible to truly weight each Urban village and the impacts within the Urban Village.
- No data is provided as to how each “score” affects the overall designation.
  - As noted under Limitations "The indices and maps in the Growth & Equity Analysis should be used with caution. This is a first attempt to understand equity effects of broad City policies, and results of the analysis depend on the selection and weighting of indicators." and "Greater historical and qualitative context is needed to avoid simplistic conclusions." By designating urban villages only high/low, the analysis is drawing “simplistic conclusions,” and thus being improperly applied throughout the DEIS.
- 8 Comment 2-8: Conclusions drawn in the context of the Growth and Equity Analysis simplistically characterize Crown Hill Urban Village. Applying broad, simplistic assumptions over a large, diverse area with several demographic and economic areas yields inaccurate assumptions and assessments of impacts applied throughout the DEIS.
- CHUV is assigned as a High Opportunity/Low Displacement urban village; however, the composition of CHUV varies greatly; CHUV includes low-income areas with a high proportion of housing costs mixed in with single-family areas. Areas lacking in basic infrastructure like sidewalks and drainage are intermingled with established areas with typical amenities.
  - CHUV is borderline in all the classifications used to define High Opportunity and Low Displacement, making this definition unsuitable and undercutting meaningful displacement analysis, impacts and potential future infrastructure mitigations and investments.
- 9 Comment 2-9: Displacement Risk Analysis Indicator People of Color: Per Attachment A, POC in Crown Hill Urban Village increased from 12% to 26% of the population from 1990 to 2010, or growth of 14%. CHUV is colored on the heat map [Figure 5] the same as neighborhoods with as low as 5% growth. CHUV growth of POC is closest to Aurora/Licton Springs with a 17% increase, which was heat-mapped with the hottest colors. Per Figure 2, the cut-off was set at 15%. CHUV is "borderline."
- 10 Comment 2-10: Displacement Risk Analysis Indicator Educational Attainment: Crown Hill shows multiple degrees of "heat," depending on the quadrant within the UV. In some areas of CHUV, up to 60% of residents do not have a Bachelor's degree. It is unclear how this data affects the overall evaluation of displacement risk for CHUV.
- 11 Comment 2-11: Displacement Risk Analysis Indicator Housing Tenancy: Crown Hill shows multiple degrees of "heat," depending on the quadrant. In some areas of CHUV, up to 70%

**Description of the  
Proposed Action and  
Alternatives**

- 11 of the population are renters. It is unclear how this data affects the overall evaluation of displacement risk for CHUV.
- 12 Comment 2-12: Displacement Risk Analysis Indicator Severely Housing Cost-Burdened Households: Crown Hill shows multiple degrees of "heat," depending on the quadrant. In some areas of CHUV, up to 15% of households are severely cost-burdened. It is unclear how this data affects the overall evaluation of displacement risk for CHUV.
- 11
- 13 Comment 2-13: Displacement Risk Analysis Indicator Household Income: Crown Hill shows multiple degrees of "heat," depending on the quadrant. In some areas of CHUV, up to 35% of the population has income below 200% of the Federal poverty level. It is unclear how this data affects the overall evaluation of displacement risk for CHUV.
- 14 Comment 2-14: Displacement Risk Analysis Indicator Proximity to Light Rail: It is unclear in the rendering of the map whether lack of access to light rail is included in the evaluation of Displacement Risk.
- 15 Comment 2-15: Displacement Risk Analysis Indicator Proximity to regional job center: The heat map shows travel time from Crown Hill to a "regional job center" between 5 and 15 minutes. Provide criteria for definition "regional job center." Crown Hill transit to downtown is in excess of thirty minutes, and adjacent neighborhoods (e.g. Ballard, Greenwood) should not be considered regional job centers as they do not provide adequate employment opportunity for residents of multiple urban villages.
- 16 Comment 2-16: Displacement Risk Analysis Indicator Development Capacity: The heat map appears to show only current zoning in analysis of parcels that allow residential uses as likely to develop. Most of the area of CHUV is not colored as likely to develop, which is not an accurate representation of displacement risk under rezone Alternatives 2 or 3. The final EIS should re-analyze development of parcels that are currently omitted.
- 17 Comment 2-17: Displacement Risk Analysis Indicator Median Rent and Housing Tenancy: The DEIS only considers rental properties with apartment complexes of 20+ units when analyzing rentals at risk of displacement. Smaller buildings and single-family housing rentals (housing multiple individuals in a family or sharing a house) are more typical in Urban Villages like Crown Hill UV. The threshold of 20 or more units ignores this common type of housing and minimizes displacement impacts. The Final EIS should consider smaller buildings and single family rental homes in analysis.
- 18 Comment 2-18: The Displacement Risk Index, Exhibit 2.2 illustrates that CHUV has a varying degree of risk, including hot spots of substantial risk, which clearly compromises the validity of categorizing CHUV as "low displacement risk."  
• Note that based on this map, CHUV looks to have a higher displacement risk than Queen Anne, West Seattle Junction and

- 18 Ballard, yet Appendix A, Figure 7 places CHUV at lower risk of displacement.
- 19 Comment 2-19: The Access to Opportunity Index, Exhibit 2.3 illustrates that CHUV has a varying degree of access to opportunity and substantial differences North or South of 85th Street; it appears that much of the area in CHUV is colored mid-to low-access. From this graphic, it is clear that CHUV should be designated with “medium” Access to Opportunity, not high. The final EIS should consider “medium” in its assessments of displacement risk and environmental impacts.
- 20 Comment 2-20: Access to Opportunity Analysis Indicator Proximity to Transit: It is unclear in the rendering of the map whether lack of access to light rail is included in the evaluation of Access to Opportunity. For the four urban villages without light rail, dependence on bus-only transit creates clear differences. The City should evaluate the difference in transit quality and capacity in the final EIS.
- 21 Comment 2-21: Access to Opportunity Analysis Indicator Sidewalk Completeness: Completeness in this index is defined as "percentage of block faces within a quarter mile of sidewalk," which is an inaccurate definition of completeness, and does not take into account the ability of the disabled, children, or the elderly to travel safely and without obstacles to their mobility within their neighborhoods. The City should evaluate pedestrian mobility criteria for communities with and without sidewalks in the final EIS. Analysis should include expectations of additional residents moving to the neighborhood without cars who will be dependent on safe pedestrian mobility and proximity on foot to services.
- 22 Comment 2-22: Access to Opportunity Analysis Indicator Proximity to Healthcare Facility: The map indicates that much of CHUV is within a mile of a healthcare facility; this is not accurate. The Ballard Swedish Hospital is approximately 2 miles from the center of CHUV, and Northwest Hospital is 3 miles from the center of CHUV; there are no other major health care institutions in the area.
- 23 Comment 2-23: Access to Opportunity Analysis Indicator Proximity to a Library: Crown Hill is one of only a few urban villages without proximity to a library. It is unclear how this data affects the overall evaluation of access to opportunity for CHUV.
- 24 Comment 2-24: Access to Opportunity Analysis Indicator Property Appreciation: Crown Hill shows multiple degrees of "heat," depending on the quadrant. The NE quadrant of Crown Hill shows substantial area substantial below city average home value. It is unclear how this data affects the overall evaluation of displacement risk for CHUV and other urban villages where income, housing value, and other economic indicators vary greatly within urban village boundaries.
- 25 Comment 2-25: Access to Opportunity Analysis Indicator Proximity to a Community Center: The majority of Crown Hill is

- 25 not proximal to a Community Center, particularly north of NW 85th Street. It is unclear how this data affects the overall evaluation of access to opportunity for CHUV and similar urban villages that have no planned urban center.
- 26 Comment 2-26: Seattle 2035 Comp Plan (page 30 of Growth Strategy) estimates a 50% growth in CHUV, which is lower than the projected growth in Alternative 2 of 61%. Given the Growth Strategy, Alternative 2 meets the criteria of an "over-estimated" option. Alternative 3 vastly exceeds the Comp Plan estimated growth with 155% growth in Crown Hill, and should not be considered a viable alternative.
- 27 Comment 2-27: Appendix G: Technical Memorandum. DEIS Growth Estimates. This memorandum describes how growth estimates were calculated, the modeling method and the assumptions, but does not provide specific data for each urban village. The number of homes estimated to be demolished was based on historical demolition trends, averaged across the city, and all UV's appear to be estimated using the same, averaged trends. The final EIS should establish growth estimates specific to each urban village.
- 28 Comment 2-28: The Growth and Equity Analysis was conducted based on existing status of each Urban Village (UV) within the study area per the four typologies. This model is used to inform how and where to distribute additional housing growth to bring about more equity across the city. The limitation of this model is that it does not track the progress toward equity. For example, the proposed upzone or expansion of a given UV may result in the UV transitioning from the Low Displacement Risk/High Opportunity quadrant to High Displacement Risk/Medium-Low Opportunity quadrant after full implementation. The final EIS should include analysis of the impact upzoning on Equity categories.
- 29 Comment 2-29: MHA dis-incentivizes preservation of existing affordable housing and incentivizes tear-down to build new rental housing units. The result of this strategy would be displacement of households currently living in existing housing units to make way for new multi-family rental housing. The final EIS should account for this result in assessment of Equity categories.
- 30 Comment 2-30: Zoning suffixes should indicate the same level of impact in all affected areas; e.g. as noted on page 3.127, in "higher-intensity zones, height increases associated with (M) zoning changes exceed a single story (30 feet or more)." Over-simplification of these designations bely the significance of zoning changes. Zoning suffixes should be revised or a separate nomenclature developed to accurately and transparently communicate what the changes will be:
- "M" category changes in many instances allow one or more additional stories, with height changes of 15' or even 30' or more. This is not a "no-change" definition.
  - Zoning suffixes should be expanded to provide additional categories for rezones that allow additional stories, or for

- 30 changes of more than 2 category levels (additional “M” designations – M3, M4 etc., or a separate naming convention from the payment structure system).
- 31 Comment 2-31: The DEIS should analyze the Current M classifications that impose higher fees on higher growth areas to evaluate whether higher fees for higher capacity will serve to suppress development in the NC areas, where there is a bigger capacity for growth that needs to be incentivized, not suppressed by the MHA policies.
- 32 Comment 2-32: Maps and tables should more clearly differentiate between M1 and M2 zoning changes. Hatched pattern is the same for both categories and therefore does not adequately communicate significance of change.
- 33 Comment 2-33: Exhibits 2.11-2.14 are misleading, in that they show areas of more intense development in a lighter color. Data analysis should be shown for each Urban Village, not by Displacement/ Opportunity category.
- 34 Comment 2-34: Data analysis should differentiate between Hub Urban Villages and Residential Urban Villages when assessing impact on infrastructure and support services, and determining the area’s ability to accommodate growth.
  - Crown Hill Urban Village is designated a Residential Urban Village, but per annotations on Appendix H maps, CHUV is assigned more M2 zoning changes under Alternative 2 than all but one of the six Hub Urban Villages.
  - Per annotations on Appendix H maps, CHUV is assigned more M2 zoning changes under Alternative 3 than all but two of the six Hub Urban Villages.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

## Comment Form

### Housing and Socioeconomics

- 1 Comment 3.1-1: CHUV is classified in the DEIS as High Opportunity/Low Displacement risk. Per the City's classification, CHUV is "borderline." The analysis in the DEIS is misleading and treats disparate areas within the urban village as a single entity.
  - The overly simplistic classification of CHUV as High Opportunity/Low Displacement risk masks displacement risk in the urban village, and exaggerates opportunity and the capacity to handle increased growth. CHUV needs to be reclassified, or the DEIS needs to break out analysis for Urban Villages like CHUV to better represent the reality of Displacement and Opportunity.
- 2 Comment 3.1-3: Appendix G: Technical Memorandum. DEIS Growth Estimates. This memorandum describes how growth estimates were calculated, the modeling method and the assumptions, but does not provide specific data for each urban village. The number of homes estimated to be demolished was based on historical demolition trends, averaged across the city, and all UV's appear to be estimated using the same, averaged trends.
- 3 Comment 3.1-4: Data in Exhibit 3.1-20 cannot be used to properly assess affordability specific to each Urban Village, as the real estate market areas studied do not align with the Urban Villages included in the DEIS study area. For example, CHUV is partly in the Ballard area and partly in the North Seattle area; while Ballard's average rents are 4% higher than the overall Seattle rents, North Seattle's average rents are 23% lower. Thus, the information in this study is not applicable to CHUV. The Final EIS should more accurately represent Urban villages that span multiple traditional evaluation boundaries, rather than rely on assumptions.
- 4 Comment 3.1-5: In general, studies in this section should be broken down per Urban Village, not per displacement/opportunity category. The information is not communicated in such a way as to be able to determine accuracy of which units/ areas are at an elevated risk of demolition.

## Comment Form

- 1 Comment 3.2-1: Seattle 2035 Comp Plan Assumptions and Growth estimates that serve as a basis for planning are underestimated; growth assumptions in CHUV exclude current development in the pipeline, and therefore are unrealistically low.

  - Seattle 2035 Comp Plan Assumptions that are applied to Alt 1 conclude that CHUV will grow by 700 new housing units by 2035. In June of 2017 the City of Seattle Permitting process identified 21 development projects already under permit that include over 600 new housing units. Planning estimates improperly omit projects under permit now and produce inaccurate growth estimates.
- 2 Comment 3.2-2: DEIS Growth Projections in Alt 2 and Alt 3 in CHUV, and potentially other Urban Villages, are unrealistically low; planning assumptions that they are based on exclude current development in the pipeline, and therefore are unrealistically low.

  - Alt 1, Alt 2 and Alt 3 scenarios should be re-assessed with growth projections that are in line with the development occurring now and readjusted throughout the DEIS for their impact.
- 3 Comment 3.2-3: Page 3.81 references Seattle 2035 Comprehensive Plan goal LUG9, which states that “successful commercial/mixed-use areas [shall]... promote neighborhood vitality, while also accommodating residential development in livable environments.” Current development does not support this goal; ground-floor requirements for retail/ pedestrian-friendly commercial in NC zones are not enforced.

  - Along arterials in CHUV and adjacent areas, most sites zoned for “mixed-use” are occupied by residential tenants on the ground floor. Residential spaces with windows covered at all times create an unwelcoming pedestrian experience that discourages foot transit and provide no destinations. Regulations must be enforced for “vitality” and “livability” to be promoted in our neighborhoods.
- 4 Comment 3.2-4: Page 3.85 references Seattle 2035 Comprehensive Plan goal LU1.3, which states that residential urban villages shall have a low to moderate density and scale of development. Alternative 3 does not support this goal.

  - Alt 3 indicates that CHUV will have zoning limits of up to 75’, which is just short of the definition of a high-rise.
  - Without light rail, this scale of development is inappropriate and inadequately supported. MHA zoning within urban villages with no light rail should reflect the limits of future mobility due to lack of multi-modal transit.
- 5 Comment 3.2-5: Page 3.86 references Seattle 2035 Comprehensive Plan goal LU1.4, which is to “Provide gradual transition in building height and scale inside urban centers and urban villages where they border lower-scale residential areas.”

- 5 Alternative 3 does not support this goal.
  - In Alternative 3 for CHUV, M2 category zones abut M category zones, sometimes on the same block.
  - In Alternative 3 for CHUV, M2/M transitions create height differences of up to 45', separated by only an alley or narrow street.
  - In Alternative 3 for CHUV, M2/M1 transitions create height differences of up to 45', separated by only an alley or narrow street.
  
- 6 Comment 3.2-6: Page 3.86 references Seattle 2035 Comprehensive Plan goal LU8.4, which states that the urban village strategy shall be to “create desirable multifamily residential neighborhoods, maintain compatible scale, respect views, enhance the streetscape and pedestrian environment, and achieve an efficient use of the land without major impact on the natural environment.” Alternative 3 does not support this goal.
  - In CHUV, Alt 3 shows M2 category zones abutting M category zones, in particular NC-75 abutting LR1 or LR2 zones, sometimes on the same block. This does not maintain compatible scale nor does it respect views. Without clear policy and enforcement, the pedestrian and natural environments will have major impact.
  
- 7 Comment 3.2-7: Seattle 2035 Comprehensive Plan goal CH/B-P9 is to “strive to overcome [15th Avenue NW] as a barrier that isolates the neighborhood areas to the east and west from each other and to improve its contribution to the visual character of Crown Hill ....” Alternative 3 does not support this goal. M2/M transitions create height differences of up to 45' from 15th Avenue NW to adjacent neighborhood access streets 16th Ave NW and Mary Ave NW. This height differential means that buildings along 15th Ave NW will be a physical and visual barrier from the arterial to the neighborhoods.
  
- 8 Comment 3.2-8: Exhibit 3.2-6 should be broken down per Urban Village, not per displacement/ opportunity category. The information is not communicated in such a way as to be able to determine equity amongst urban villages.
  
- 9 Comment 3.2-9: Exhibit 3.2-7 should be broken down per Urban Village, not per displacement/ opportunity category. The information is not communicated in such a way as to be able to determine equity amongst urban villages.
  
- 10 Comment 3.2-10: The EIS does not study the economic displacement risk of rezoning from residential to commercial.
  - The EIS should consider the following criteria specifically as they relate to changing from residential to commercial/ mixed use: tax increases, traffic patterns, increased cost of and reduced access to parking, utilities, street access/width, garbage collection, noise, licensing associated with the establishment of new commercial district.
  
- 11 Comment 3.2-11: On page 3.114/3.115, the following description is included regarding Crown Hill UV:

- 11 "Where commercial zones are extended, density, use, and scale impacts could occur, creating significant land use impact. The potential for use impact is notable here, as commercial uses would be allowed to abut streets with existing residential character and use patterns. Additionally, all areas of existing single family zoning in the urban village would be changed to various Lowrise multifamily zones, creating potential for use, density and scale impacts. ... More intense impacts, including significant impacts, would occur along 16th Ave NW. and Mary Ave. NW."

The changes in these areas are acknowledged to be "significant" and "notable" but are not addressed with an appropriate level of gravity elsewhere in the DEIS, and are downplayed in all displacement risk analyses.

Specifically, the change from SF to NC-55 or NC-75 along 16th and Mary would affect over 120 single family parcels and some existing low-rise. (59) single family parcels along the East side of 16th and the West side of Mary would change from SF to NC in Alternative 3. (64) additional single family parcels on the West side of 16th and East side of Mary would be directly affected by having commercial zoning on the street.

- 12 Comment 3.2-12: Mitigation measures indicate that Seattle 2035 Comprehensive Plan goals LU1.3 and LU1.4 are incorporated in MHA and will be implemented upon its adoption. Alternative 3 does not support either of these goals.

- Zoning in CHUV will have limits up to 75', which does not constitute a "low to moderate density and scale of development."
- Zoning in CHUV includes M2 category zones abutting M category zones, sometimes on the same block, and height transitions may be up to 45', separated only by an alley or 25' wide street. This does not provide "gradual transition in building height and scale inside urban centers and urban villages where they border lower-scale residential areas."

- 13 Comment 3.2-13: Intensity of development and building scale should be consistent with street scale. Development should be planned so that roadways can accommodate passenger vehicles, pedestrian traffic, and emergency/ services vehicles, all while maintaining safety for residents and protecting the character of neighborhoods. Development needs to comply with City of Seattle Right of Way requirements. Neither DEIS Action Alternative complies with minimum pavement widths for moderate-to-high levels of development at non-arterials streets.

- Seattle 2012 Right-of-Way improvement plan article 4.6.2 table indicates minimum pavement width of non-arterial streets at L2, L3, L4, and NC2-30-65 zones is 32'.

a. 16th Ave NW is 25' wide; Alt 2 locates LR2 zoning on this street; Alt 3 locates LR2, NC2-55, and NC3-75 zoning on this street.

b. Mary Ave NW is 25' wide; Alt 2 locates LR2 and NC2-55 zoning on this street; Alt 3 locates LR2, NC2-55, and NC2-75 zoning on this street.

c. 17th Ave NW is 25' wide; Alt 3 locates LR2 zoning on this street.

d. 14th Ave NW is 25' wide; Alt 2 locates LR2 zoning on this street; Alt 3 locates LR2 and NC2-75 zoning on this street.

## Land Use

- 13 • Seattle 2012 Right-of-Way improvement plan article 4.6.2 table indicates minimum pavement width of non-arterial streets at NC3 and higher zones is 36'.
  - a. 16th Ave NW is 25' wide; Alt 2 locates NC3-55 zoning on this street; Alt 3 locates NC3-75 zoning on this street.
  - b. Mary Ave NW is 25' wide; Alt 2 locates NC3-55 zoning on this street; Alt 3 locates NC3-40 zoning on this street
- 14 Comment 3.2-14: Upzoning in Alternatives 2 and 3 assumes that increasing capacity in residential and commercial land uses by increasing allowed intensity, bulk, and scale of new developments, and expanding the Urban Village areas, will provide greater quantity of affordable housing within the study area. Using this one method of increasing development capacity in housing and commercial uses in all UVs, without thorough and detailed analysis of its impact on other land uses, without analysis of its contribution toward appropriate quantity and quality mix of uses, and without assessment of infrastructure and services required to support the new growth in each individual UV will reduce the effectiveness of the mitigation measures included in the Draft EIS.
- 15 Comment 3.2-15: The majority of the mitigation measures intended to address land-use impacts under Alt 2 and Alt 3 look at the land use impacts in isolation. More subtle cumulative land-use impacts from Alt 2 and Alt 3 over time have not been examined, such as impact on neighborhood cohesion, identity, and character, displacement rate of current residents, price of housing, availability and price of commercial rental space - especially for neighborhood-level small businesses - and other land uses that in combination with housing and commercial space create synergy for successful UVs.
- 16 Comment 3.2-16: It is premature to expand the Crown Hill UV boundary before successfully building out the original Comprehensive Plan vision within the current UV boundary. Within the current Crown Hill UV boundary, there is significant development capacity remaining, particularly along arterials and within the change from Commercial to Neighborhood Commercial, to meet the adopted Seattle 2035 Comprehensive Plan growth estimate for the village.
- 17 Comment 3.2-17: Seattle 2035 Comprehensive Plan anticipates that urban centers and villages function as “compact, pedestrian-friendly areas... at scales that respect Seattle’s character and development pattern.” Expansion of Crown Hill UV into well-established single-family residential blocks would counter this vision residential UV by dispersing the development and abruptly changing the well-established neighborhood character.
- 18 Comment 3.2-18: In Crown Hill UV, Alt 2 would increase residential growth/development capacity by 60% (428 units) and Alt 3 would increase residential development capacity by 154% (1,084 units) more over the next 20 years than the planned residential development capacity of 700 units in Seattle 2035 Comprehensive Plan. Analyses of displacement risk and access to opportunity are based on current conditions, and even now

CHUV has an incomplete sidewalk network, crowded transit, schools operating at full capacity, and severe storm water drainage problems in some areas. Full utilization of housing growth/development capacity plus the MHA increase - without funding and programmatic commitment to address infrastructure and transportation deficiencies - would result in lowering access to opportunity for newcomers and current residents, and significantly increase displacement risk for existing residents.

- 19 Comment 3.2-19: A detailed Crown Hill Neighborhood Plan and Crown Hill neighborhood-specific urban design framework and guidelines are needed to address and mitigate land-use impacts on neighborhood- specific character under all Alternatives.
- 20 Comment 3.2-20: Outcome-based analysis is needed to track the success of this MHA program, to monitor progress toward the goal of providing good and equitable quality of life for all residents and businesses within the study area.
- 21 Comment 3.2-21: Appendix F: Summary of Changes to Land Use Code: Proposed changes to the Municipal Code including removing the requirement to implement a neighborhood plan prior to rezoning SF and LR zones. However, suggested mitigation measures in DEIS Chapter 3.2 include “create and codify neighborhood design guidelines [to] mitigate localized aesthetic impacts for urban villages that do not currently have them.” The final EIS should present mitigation suggestions that comply and are coordinated with city ordinances.
- 22 Comment 3.2-22: The Final EIS should address and comply with the SEPA Cumulative Effects Policy, which addresses the phenomenon that “a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment.”
  - SMC 25.05.670.B.1 directs that “analysis of cumulative effects shall include a reasonable assessment of ... the present and planned capacity of such public facilities as ... streets... to serve the area affected by the proposal; ... [and] The demand upon ... facilities ... of present, simultaneous and known future development in the area of the project or action.”
  - Per SMC 25.05.670. B.2., "a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:
    - a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or
    - b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned ... facilities...."
- 23 Comment 3.2-23: The HALA agenda includes preservation as well as construction of new affordable housing units. Various measures to incentivize preservation of existing housing stock should be implemented with MHA. Incentives may include tax

- 23 provisions and others, and should also include increased options for property owners to add affordable housing units (detached or attached) on the property, while keeping the existing housing on site without being penalized for doing so.
- 24 Comment 3.2-24: Action Alternatives 2 and 3 are inconsistent with the following Comprehensive Plan goals and policies:
- LU 7.2 Use range of single-family zones to:
    - o Maintain the current low-height and low bulk character of designated single-family areas;
    - o Limit development in single-family areas or that have environmental or infrastructure constraints;
    - o Allow different densities that reflect historical development patterns; and
    - o Respond to neighborhood plans calling for redevelopment or infill development that maintains the single-family character of the area but also allows for a a greater range of housing types.
  - H 2.3 Consider Land Use Code and Building Code regulations that allow for flexible reuse of existing structures in order to maintain or increase housing supply, while maintaining life-safety standards.
  - H 2.6 Seek to identify affordable housing at risk of demolition and work to mitigate the displacement of residents ahead of planned upzones.

## Comment Form

- 1 Comment 3.3-1: Exhibit 3.3-1 should be expanded to provide comparative maps of allowed heights under each Action Alternative. The map shows current maximums in CHUV being mostly less than 30'. Under either alternative, significant portions of CHUV will increase by two category levels to 51-85'.
- 2 Comment 3.3-2: Page 3.126 notes that a comprehensive summary of building form is not possible due to the extensive study area. Seattle is a city of diverse neighborhoods with unique character. To evaluate all neighborhoods under the same criteria using "common built form conditions" and to discuss impacts to aesthetics and urban design "in a qualitative and generalized manner" is inappropriate.
- 3 Comment 3.3-3: Page 3.126 incorrectly characterizes proposed action as primarily concerning "infill development of new buildings in already-developed neighborhoods."
  - Alternative 3 indicates that CHUV will have zoning limits of up to 75', which is just short of the definition of a high-rise. A zoning increase of this magnitude will not read as "infill."
  - In Alternative 3 for CHUV, M2/M transitions create height differences of up to 45', separated by only an alley or narrow street. A transition of this magnitude will not read as "infill."
  - In Alternative 3 for CHUV, M2/M1 transitions create height differences of up to 45', separated by only an alley or narrow street. A transition of this magnitude will not read as "infill."
- 4 Comment 3.3-4: Seattle 2035 Comprehensive Plan goal CH/B-P5 is to "Accommodate the majority of new housing units and increases in density in the central areas of the Ballard and Crown Hill urban villages." Alternative 3 does not support this goal, as significant "upzoning" is indicated throughout CHUV – not just in the central area – and stretches of the main arterial NW 85th Street are zoned less intensely than neighborhood access streets 16th Ave NW and Mary Ave NW.
- 5 Comment 3.3-5: Seattle 2035 Comprehensive Plan goal CH/B-P6 is to "Maintain the physical character of the single-family-zoned areas in the Crown Hill/ Ballard plan area." Alternative 3 does not support this goal, as all existing single-family zones in the current CHUV boundary are upzoned to LR or higher zones; this will effectively eradicate all single-family character within the UV boundary.
- 6 Comment 3.3-6: Seattle 2035 Comprehensive Plan goal CH/B-G2 is to create "A community with housing types that range from single-family to moderate-density multifamily." Alternative 3 does not support this goal, as all existing single-family zones in the current CHUV boundary are upzoned to LR or higher zones.
- 7 Comment 3.3-7: Exhibits 3.3-2, 3, 4, and 5. Imagery of existing conditions is selective and not representative of the full range of scale of existing single-family and low-rise multi-family buildings.

- 7 The photographs and 3D illustrations overestimate the height of single family homes in CHUV. Illustrations exclude examples of LR2 units being built right next to single story cottages, and other adjacencies that are already being seen in CHUV and other developing neighborhoods.
- 8 Comment 3.3-8: Pages 3.128-130 reference the current City of Seattle Design Review Process. The study should be revised to include pending changes to the Design Review Process that are currently under consideration.
- 9 Comment 3.3-9: If the proposed revised thresholds for Design Review are accepted as noted on page 3.120, significant portions of Urban Villages being rezoned to Lowrise would no longer require Design Review. The study needs to address the aesthetic impact of decreased design oversight for LR development in each individual Urban Village.
- 10 Comment 3.3-10: Seattle Municipal Code should mandate Neighborhood-specific guidelines for all Urban Villages prior to implementation of any MHA Action; as noted they “identify priority design issues and seek to ensure that new development is compatible with specific local neighborhood character,” and thus are crucial to support Seattle 2035 Comp Plan Land Use Goals. Only roughly half of the urban villages in the study area currently have neighborhood design guidelines.
- 11 Comment 3.3-11: Impacts of increased “building bulk and visual prominence due to greater height” and the “[reduction of] the amount of direct sunlight reaching ground level” should not be underestimated. Design standards will be crucial to maintaining and supporting Comp Plan Land Use Goals.
- 12 Comment 3.3-12: Impact to neighborhood character by M2 development should not be underestimated, as noted on Page 3.139 “(M2) zoning changes would enable new development types that could differ from existing development and could mark a transition to a different neighborhood character where applied.” Individual neighborhood impacts must be studied in order to assess the risk of loss of character.
- 13 Comment 3.3-13: Exhibits 3.3-9-14, and 3.3-16-17 are misleading. All existing housing stock is shown as 1 ½ or 2 stories, which overestimates the scale of existing SF development in many areas and minimizes the impact of larger scale infill development. Images should accurately represent the full range of existing conditions in the study area.
- 14 Comment 3.3-14: Exhibits 3.3-9-14 and 3.3-16-17 are misleading. They do not show the full range of development scenarios based on proposed upzoning. Conditions such as RSL on one side of a street and LR on the other, and LR on one side with NC on the other should be represented to accurately represent the aesthetic impact.
- 15 Comment 3.3-15: Page 3.142 references “privacy standards” as a potential mitigation of the effects of increased bulk and height

## Aesthetics

- 15 on neighborhood character. Privacy standards should be defined and their specific impacts assessed, since privacy measures (closed window treatments, lack of transparent openings) often have a negative impact on aesthetics (blank facades or ones with obscured glass are unwelcoming and difficult to incorporate into a neighborhood identity), interior air quality and environment (no windows or windows that cannot open increase the need for mechanical cooling and ventilation), and quality of life (spaces without daylight/ views can be damaging to wellness).
- 16 Comment 3.3-16: Page 3.144 notes that as infill development is built, streets would become more “urban” in character. A standardized definition of “urban” should be developed. Many areas in CHUV indicated to be upzoned currently do not have sidewalks, municipal storm drainage, or adequate transit support. These are essential components for any “urban” environment that will support this level of growth.
- 17 Comment 3.3-17: Narrative description of Exhibits 3.3-16 and 17 is limited to a singular condition, in which “due to the width of the right-of-way [shadows from buildings] extend only a short distance into the public [open] space.” Crown Hill is listed as a relevant urban village, but it is not clear where in CHUV this would apply. The impacts on open space should be studied at conditions where ROW is not wide enough to negate shadow impacts, as well as those with wide ROW’s.
- 18 Comment 3.3-20: Per Exhibits 3.3-22 and 3.3-23, no areas of M2 are applied to Eastlake, Upper Queen Anne, or Fremont UV’s under Alternative 2. No explanation is included of why these UV’s have not been determined to be able to support M2 increases, though they have more comprehensive transit support than Urban Villages such as Crown Hill, and Fremont is designated as a Hub Urban Village.
- 19 Comment 3.3-21: It is noted on page 3.160 that “overall, height increases would be lower under Alternative 3 than under Alternative 2.” The averaging of height increases is misleading and inaccurate; in CHUV, the greatest height increase under Alternative 2 is 15’; under Alternative 3, the greatest height increase in CHUV is 35’. This difference is not insignificant in a Residential Urban Village currently zoned primarily single-family residential and mid-rise NC, and should be assessed separately from Hub Urban Villages which have higher transit and infrastructure support.
- 20 Comment 3.3-22: Suggested mitigation measures for aesthetic impacts include modifying design review thresholds to “require design review for more types of development in the study area,” specifically “multi-family developments in areas rezoned from single family.” The proposed revisions to the Design Review process currently under consideration would lower thresholds for Design Review, and require design review for fewer types of development. Significant portions of Urban Villages being rezoned to Lowrise would no longer require Design Review, thus this mitigation is moot as it is in direct conflict with the proposed revisions.

- 21 Comment 3.3-23: Suggested mitigation measures for aesthetic impacts include “create and codify neighborhood design guidelines [to] mitigate localized aesthetic impacts for urban villages that do not currently have them.” This is crucial and should be included as mandatory under MHA.
- 22 Comment 3.3-24: Suggested mitigation measures for aesthetic impacts include “require detailed shading/ shadow and view studies for new development in areas where the proposed MHA height limit increase is 30 feet or more to protect streetscapes and public open spaces from excessive shading.”  
Shade/shadow and view studies should be required for all height increases of one story or more, as even a single-story increase coupled with decreased setbacks from adjacent structures could cause significant shading.

## Comment Form

- 1 Comment 3.4-1: The DEIS omits analysis and mitigation of impacts to mobility and safety due to lack of sidewalks in areas of concentrated growth.
  - Ten-minute walksheds may not be the same as in urban villages with safe pedestrian walkways.
  - Seattle 2035 Comprehensive Plan goal CH/B-P7 is to “Improve mobility for people using all modes of transportation to, within, and around the Crown Hill Urban Village to serve the residents and businesses there.” This goal will not be supported without adequate sidewalk infrastructure.
- 2 Comment 3.4-2: The DEIS omits analysis and mitigation of impacts due to storm-water flooding that hampers pedestrian mobility and safety during rains.
- 3 Comment 3.4-3: The DEIS omits analysis of the impact on pedestrian and bike safety and mobility for greenway users in areas that lack sidewalks and have narrow streets.
- 4 Comment 3.4-4: The DEIS omits analysis of the impact of growth on greenway routes, and omits consideration for additional mechanical signaling for pedestrian and bicycle safety.
- 5 Comment 3.4-5: Pedestrian Crossing of Arterials: The DEIS omits impact analysis and mitigation on pedestrian safety on Urban Villages bisected by highways and major freight routes.
- 6 Comment 3.4-6: Transit: The DEIS omits from its analysis differences in mobility needs and bus dependency between Urban Villages that will get access to Light Rail and Urban Villages that will be dependent on bus transit only.
  - The Final DEIS should apply measures to differentiate between this access to public transportation and adjust the final zoning maps or the realistic mitigations required to handle transit needs.
- 7 Comment 3.4-7: TDM requirements: DEIS omits analysis of this suggested mitigation applied to CHUV and its impact on the already over-capacity transit system and the mobility of busses on 15th Avenue NW north of Market Street at Peak Hours.
  - The DEIS omits analysis on the impact of this mitigation on available parking and the impact on seniors and those with disabilities, and their ability to live unassisted in their homes, and associated displacement risks. The DEIS omits analysis of the impacts on those needing a car for work where overstretched transit is either not feasible or not available.
- 8 Comment 3.4-8: Page 3.187 references Seattle’s Performance-Based Parking Program; among the Program’s goals are to make available “adequate street parking” and encourage “efficient use of off-street parking facilities,” as well as “enhanced use of transit and other transportation alternatives.”
  - Mitigation strategies on page 3.239 address only ways to

decrease parking availability, and do not promote any of the goals of the Performance-Based Parking Program. The mitigations all operate under the apparent assumption that people will forgo buying or using cars if parking availability is decreased; this is invalid if an increase in transit service is not provided concurrently.

- 9 Comment 3.4-9: The DEIS omits Crown Hill from analysis of on-street parking occupancy in Exhibit 3.4-17.

  - The DEIS notes that in 2016, 75% of surveyed locations experienced parking occupancy above the 85% target. The assessment of impact on residents' ability to park is incomplete and inaccurate without individual analysis of every Urban Village.
- 10 Comment 3.4-10: The DEIS omits 15th Avenue NW north of NW Market Street from analysis in Exhibit 3.4-22 and subsequent exhibits on Travel Corridors.

  - 15th Avenue / Holman Road is the primary arterial and freight route providing access to and through Crown Hill Urban Village, as well as a major freight corridor, therefore analysis of impacts on travel time to Crown Hill Urban Village is incomplete and inaccurate.
- 11 Comment 3.4-11: Appendix J Exhibit J-5 shows that the Metro D line boarding was studied at Ballard, but NOT at transit stops serving CHUV. Information in this figure for the D line is misleading, as the figures show NO difference in the Passenger Load to Crowd Threshold ratio between Alternatives 1, 2 and 3 on the D, apparently relying on the assumption that SDOT will have the resources to increase bus service to alleviate crowding.
- 12 Comment 3.4-12: The DEIS omits the 15 Express Metro Bus from analysis in Exhibit 3.4-26 and subsequent exhibits on transit crowding.

  - The Seattle 2035 Comprehensive Plan defines "very good transit" as provided with either a light rail station or a RapidRide stop plus at least one other frequent bus route. Crown Hill and Ballard Urban Villages do not have light rail service. Access is provided by the RapidRide "D" line and the 15X. As noted on page 3.196, "Overcrowding ... is an indicator of whether or not adequate transit service is provided to support the planned growth." The 15X is currently overcapacity, so analysis of impacts on access to Crown Hill and Ballard Urban Villages is incomplete and inaccurate.
- 13 Comment 3.4-13: The DEIS omits 15th Avenue NW north of NW Market Street from analysis in Exhibit 3.4-27/28 and subsequent exhibits on travel times.

  - 15th Avenue is the primary arterial route providing access to Crown Hill Urban Village, as well as a major freight corridor, therefore analysis of impacts on travel time to Crown Hill Urban Village is incomplete and inaccurate.
- 14 Comment 3.4-14: Appendix J Exhibit J-8: Auto Corridor Travel Times. 85th between 32nd NW and Greenwood indicates that in

## Transportation

Alternatives 1, 2 and 3, travel time increases by only 30 seconds. The final EIS should provide a clear explanation for why the 3 versions would produce the same results, and why this increase is so small.

- 15 Comment 3.4-15: The Seattle 2035 Comprehensive Plan defines “very good transit” as provided with either a light rail station or a RapidRide stop plus at least one other frequent bus route.
  - The DEIS omits from its analysis the length and efficiency of trips, therefore ignoring the fact that transit from Northwest Seattle to Downtown Seattle often takes longer than transit from Renton to Downtown or Lynnwood to Downtown.
- 16 Comment 3.4-16: The Growth and Equity analysis includes proximity to transit as an indicator both of Displacement Risk and Access to Opportunity, but omits length and efficiency of trips; therefore, the accuracy of this indicator is compromised since it considers only one component of access.
- 17 Comment 3.4-17: The DEIS neglects to acknowledge that existing transit from CHUV to downtown during rush hour takes 50 min to move 7 miles on average, and therefore people are unlikely to choose public transportation over personal vehicles that are faster.
  - Per King County Metro Transit 2016 System Evaluation Table 8, the D Line (serving Crown Hill/Ballard/Seattle Center/Seattle CBD weekdays) is the route with the highest need, requiring 1,050 additional hours.  
<http://metro.kingcounty.gov/planning/pdf/2011-21/2016/service-guidelines-full-report.pdf>
  - Per King County Metro Transit 2016 System Evaluation Table 8, the 15EX (serving Blue Ridge/Ballard/Seattle CBD weekdays) requires 400 additional hours.  
<http://metro.kingcounty.gov/planning/pdf/2011-21/2016/service-guidelines-full-report.pdf>
  - Per King County Metro Transit 2016 System Evaluation Table 8, the 18EX (serving North Beach/Ballard/Seattle CBD weekdays) requires 350 additional hours.  
<http://metro.kingcounty.gov/planning/pdf/2011-21/2016/service-guidelines-full-report.pdf>
  - These three routes that provide service to CHUC have a combined need of 1,800 hours, or 14% of all needs identified for Metro’s service area, just to accommodate current demand.
- 18 Comment 3.4-18: The suggested mitigation measure to complete a feasibility study of a Ballard Bridge replacement must be accompanied by a proposal for how to fund both the study the potential implementation.
- 19 Comment 3.4-19: The suggested mitigation measure to “purchase additional bus service from King County Metro along the 15th Ave NW corridor” is necessary but insufficient.
  - It does not address the congestion and basic inability for more busses to travel North and South on 15th at peak travel times.
  - No proposal is made as to how this would be funded.
- 20 Comment 3.4-20: Capital Improvement Plan: The DEIS

highlights Complete Streets and Capital Improvement program as addressing safe and efficient movement of people; yet Greenways which the Plan invests in do not offer Complete Streets because of their failure to provide safe pedestrian walkways (i.e. complete sidewalks and crossings).

- 21 Comment 3.4-21: Although the DEIS references Move Seattle, Transportation Strategic Plan, Transit Master Plan, Pedestrian Master Plan, Seattle Bicycle Master Plan, and the Seattle Freight Master Plan, it appears that the DEIS has not aligned these planning processes with the growth goals within the urban villages which are impacted by the MHA and Seattle 2035.
- 22 Comment 3.4-22: The DEIS grossly underestimates the impact of the action alternatives on vehicle trips, suggesting that a 2% increase in vehicle trips will occur. This suggested increase is utilized to indicate a minor uptick in vehicle collisions and decrease in vehicular safety.
  - In June 2017, Crown Hill Urban Village had 21 development projects in the pipeline that include over 600 housing units, and is on track to exceed the 700 total new units the City has projected over the next 20 years through 2035 in a fraction of the time. If only half of the new residents have vehicles, growth in trips by vehicle in CHUV will be well over the estimated 2%. <http://crownhillurbanvillage.org/wp-content/uploads/2016/04/QA-from-Nov-5th-Community-meeting.pdf>
- 23 Comment 3.4-23: The DEIS fails to acknowledge the SEPA Cumulative Effects Policy, which addresses the phenomenon that “a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment.”
  - SMC 25.05.670.B.1 directs that “analysis of cumulative effects shall include a reasonable assessment of ... present and planned capacity of such public facilities as ... parking areas to serve the area affected by the proposal ... [and] The demand upon facilities ... of present, simultaneous and known future development in the area of the project or action.”
  - Per SMC 25.05.670. B.2., “a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:
    - a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or
    - b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned facilities ....”
- 24 Comment 3.4-24: The DEIS does not address impacts on safety and congestion due to increased cut-through traffic on side-streets and alleys as a result of increasing density.

## Comment Form

### Historic Resources

- 1 Systematic historical inventories should be conducted for all individual urban villages. Per Exhibit 3.5-6, only 4 of the 10 urban villages anticipated to have growth greater than 50% under Alternate 2 have systematic inventories; per Exhibit 3.5-7 only 3 of the 8 urban villages anticipated to have growth greater than 50% under Alternate 3 have systematic inventories done. Furthermore, Crown Hill, Green Lake, Morgan Junction, and Wallingford are anticipated to have growth greater than 100% under Alternate 3, and only one – Wallingford – has had a systematic inventory conducted. All urban villages included in these exhibits contain properties listed in historic resources survey databases.

## Comment Form

### Biological Resources

- 1 Comment 3.6-1: Tree impact assessment for CHUV is inadequate.
  - There is no specific analysis of the impact on the tree canopy in Alt 2 or Alt 3 scenarios beyond application of the general citywide assumption. CHUV has an 80-acre boundary expansion to existing single family, and significant additional rezoning of single family within the Urban Village Boundary. Given acknowledged existing storm water drainage issues and ROW work that will be required to mitigate those issues (necessitating removal of trees), the current DEIS analysis of tree canopy loss given the expansion and extensive redevelopment under Alt 3 and Alt 2 are inadequate.
- 2 Comment 3.6-2: The DEIS fails to provide information for properties shifting from single family to RSL.
  - Most of these properties are categorized as 5,000 feet by MHA. Tree removal for lots under 5,000 square feet is exempt from the city's tree ordinance. <http://invw.org/2017/06/27/as-more-buildings-go-up-how-many-of-seattles-trees-will-come-down/>.
- 3 Comment 3.6-3: The DEIS analysis does not adequately address the impact on the tree canopy when converting residential neighborhoods to multi-family, particularly when looking at Alternative 3.
  - Current single-family zones contribute 63% of Seattle's tree canopy, while multifamily residential areas contribute only 9%. The tree canopy will be significantly impacted under both Action Alternatives. <http://www.seattle.gov/trees/docs/Seattle2016CCAFinalReportFINAL.pdf>
- 4 Comment 3.6-4: The DEIS does not account for the impact on Piper's Creek watershed, which is Seattle's third largest watershed and which drains a total of 1,835 acres into the Puget Sound at Carkeek Park.
  - In Exhibit 3.6-3, the watershed, which surfaces on Holman Road at the base of CHUV, is not well demarcated. <http://www.seattle.gov/util/EnvironmentConservation/Education/UrbanWatersheds/PugetSound/PipersCreek/index.htm>
- 5 Comment 3.6-5: There is no mitigation suggested in the DEIS for managing increased runoff into major watersheds and consequently into the Puget Sound.
- 6 Comment 3.6-6: The DEIS does not evaluate the impact of tree removal and replacement with impermeable surfaces in areas that will experience rezoning from single family to RSL zones. Currently RSL has no requirements for storm water management.
- 7 Comment 3.6-7: The final EIS should acknowledge and comply with the SEPA Cumulative Effects Policy, which addresses the phenomenon that "a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment."
  - SMC 25.05.670.B.1 directs that "analysis of cumulative effects shall include a reasonable assessment of ... the capacity of natural systems-such as air, water, light, and land-to absorb the direct and reasonably anticipated indirect impacts of the proposal; ... [and] The demand upon ... natural systems ... of present, simultaneous and known future development in the area of the project or action."
  - Per SMC 25.05.670. B.2., "a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:
    - a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or
    - b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned ... natural systems."

## Comment Form

### Open Space & Recreation

- 1 Comment 3.7-1: According to Seattle Parks Department maps, Greenways are, by definition, walking corridors. Greenways developed in areas without sidewalks are not providing any mitigation for pedestrians.  
[http://www.seattle.gov/ArcGIS/SMSeries\\_GapAnalysisUpdate2017/index.html](http://www.seattle.gov/ArcGIS/SMSeries_GapAnalysisUpdate2017/index.html)
- 2 Comment 3.7-2: The DEIS fails to acknowledge the SEPA Cumulative Effects Policy, which addresses the phenomenon that “a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment.”
  - SMC 25.05.670.B.1 directs that “analysis of cumulative effects shall include a reasonable assessment of ... the present and planned capacity of such public facilities as ... parks ... to serve the area affected by the proposal; ... [and] The demand upon facilities ... of present, simultaneous and known future development in the area of the project or action.”
  - Per SMC 25.05.670. B.2., "a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:
    - a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or
    - b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned ... facilities...."
- 3 Comment 3.7-3: The DEIS does not address how policy will be implemented that will be necessary to comply with Seattle 2035 Comprehensive Plan Goal CH/B-P2, to “Improve the attractiveness of the business areas in the Ballard Hub Urban Village and the Crown Hill Residential Urban Village to businesses, residents, and shoppers through creation of pleasant streetscapes and public spaces.”
- 4 Comment 3.7-4: Seattle 2035 Comprehensive Plan goals CH/B-P13, 14, and 15 address increasing the range of and access to recreation opportunities, open spaces, and views. Alternative 3 does not support these goals, as all existing single-family zones in the current CHUV boundary are upzoned to LR or higher zones; this will greatly reduce the opportunity and requirement for providing open spaces and maintaining views.
- 5 Comment 3.7-5: Seattle 2035 Comprehensive Plan goal CH/B-P18 is to “Encourage the development of indoor and outdoor facilities in which cultural activities can take place.” Alternative 3 does not support this goal, as all existing single-family zones in the current CHUV boundary are upzoned to LR or higher zones; this will greatly reduce the opportunity and requirement for providing cultural facilities and spaces.

## Comment Form

- 1 Comment 3.8-1: Page 3.297: Alternative 2 has the potential to add a total of 4,465 housing units (965 more than under Alternative 1) to urban villages that Fire Station 31 serves. Fire Station 31 is the second busiest engine company in the city, and additional fire resources may be necessary to address current and projected growth (City of Seattle, 2015). The report notes that the Seattle Fire Department currently is not meeting its goals of complying with NFPA standards 90% of the time. With increased demand, more service will need to be provided to maintain a standard of service. The DEIS omits mitigation measures to accommodate this burden.
- 2 Comment 3.8-2: The DEIS omits impact analysis on EMS ability to access properties on narrow streets with parallel street parking on both sides.
- 3 Comment 3.8-3: The DEIS analysis is not specific enough to address mitigations for current slow response times, or the impacts increased development will have on response times. The North Precinct has the lowest recorded response times in Seattle.
- 4 Comment 3.8-4: The DEIS analysis relies on the outdated assumption that increased staffing in the North Precinct over the next 20 years will be accommodated at a new facility at N 130th Street and Aurora Ave N, and that this station will provide sufficient building area to meet the needs of both existing and future staff. The DEIS should be updated to reflect that this project is on hold indefinitely and that its increased capacity for service cannot be relied upon.
- 5 Comment 3.8-5: The DEIS omits analysis and mitigation of impacts to mobility and safety due to lack of sidewalks in areas of concentrated growth and storm-water flooding that hampers pedestrian mobility during rains.
- 6 Comment 3.8-6: Page 3.298 includes a list of sectors analyzed in the Comprehensive Plan. Crown Hill Urban Village is omitted from that study list.
- 7 Comment 3.8-7: Page 3.299 includes a list of public schools in Urban Villages that lack full sidewalk infrastructure and therefore are out of compliance with the Safe Routes to School program. The list is incomplete, since Whitman Middle School in CHUV is omitted from this list, as are safe walking paths from Whitman down connecting Greenways on 17th and the proposed N. Seattle Greenway.
- 8 Comment 3.8-8: The DEIS does not offer sufficient mitigations on the impact of rezoning on Seattle Public Schools in terms of capacity. Marcus Whitman Middle School in CHUV already requires 16 portable classrooms to meet current needs.

## Public Services & Utilities

- 9 Comment 3.8-9: The DEIS mitigation recommendations are inadequate to address the current flooding and drainage problems in Crown Hill Urban Village.
- The informal drainage system cannot withstand increased demand anticipated under Action alternatives. The City must consider additional mitigation measures to address storm water drainage impacts in areas of informal drainage. Specific policies to improve storm water systems in CHUV should be implemented with MHA.
  - The suggestion of a “latecomer agreement mechanism” whereby homeowners will pay for sidewalk / drainage improvements over and above city taxes is inappropriate, as it is the City’s duty and policy to provide basic infrastructure that will protect the health, safety, and welfare of the public.
- 10 Comment 3.8-10: The DEIS fails to acknowledge the SEPA Cumulative Effects Policy, which addresses the phenomenon that “a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment.”
- SMC 25.05.670.B.1 directs that analysis of cumulative effects shall include a reasonable assessment of ... present and planned capacity of such public facilities as ... sewers, storm drains, solid waste disposal, parks, schools, and parking areas; ... public services such as transit, health, police and fire protection and social services to serve the area affected by the proposal. ... [and] The demand upon facilities [and] services ... of present, simultaneous and known future development in the area of the project or action.
  - Per SMC 25.05.670. B.2., "a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:
    - a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or
    - b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned facilities ...."
- 11 Comment 3.8-11: The final EIS should include how the City will commit to and implement specific steps to mitigate overcrowding and increase school capacity under MHA.

<b>Comment Form</b>	
<b>1</b>	<p><b>Description of the Proposed Action and Alternatives</b></p> <p>There are better areas to allow for upzoning in Ballard with 40' - 75' tall buildings. Allowing this to merge into residential neighborhoods destroys the sense of neighbors and community. Other areas of the city would be a better use of the space and with the structures already in existence. Tearing down run-down buildings on main streets to revitalize the area. Allowing these proposed buildings on a nice, quiet residential street is a bad idea for community.</p>
<b>2</b>	<p><b>Housing and Socioeconomics</b></p> <p>Allowing the upzoning to come into the Crown Hill area to add multiple affordable housing options is not beneficial to the neighborhood and its security. Build affordable housing in a more dense, commercial area (U-District, Interbay, even off Market Street in Ballard or off Leary) and not in residential areas.</p>
<b>3</b>	<p><b>Aesthetics</b></p> <p>I do not want to walk out my back door to enjoy my yard and be surrounded by tall buildings. I want to walk down the street and see a neighborhood with homes and activity and not feel like I live downtown.</p>
<b>4</b>	<p><b>Transportation</b></p> <p>The majority of people have personal vehicles. I do not see that changing, even if public transportation is more prevalent and easier for all to use. Our street already feels the effects of two low-rise condominiums built one block away. Parking was either not incorporated into these new condos or only one spot per unit is provided. Those tenants need to park somewhere and that is on our residential streets, taking parking from the homeowners on that street. Bigger buildings with more units will just increase the difficulty in parking for everyone. Just because parking is hard to find does not mean someone is going to give up their car and take the bus. People are not giving up their cars.</p>
<b>5</b>	<p><b>Public Services &amp; Utilities</b></p> <p>There was an article recently discussing the dire need of the waste management plant on Magnolia. It needs urgent repairs/fixes and is going to have difficulty handling the waste provided by all of the current plumbing in the city. Building more and more units is only increases the amount of waste and run-off that the plant cannot handle.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.**

Sierra Club

## Comment Form

- |   |  |   |
|---|--|---|
| 1 | <b>Description of the Proposed Action and Alternatives</b> | i am glad to see Alternative 3, with development focused on stable urban areas that have good infrastructure and relatively low displacement risk.  |
| 2 | <b>Housing and Socioeconomics</b>                          | Housing costs are at an unsustainable high level in Seattle, leading to displacement of long-term residents of areas such as the Central District.  |
| 3 | <b>Aesthetics</b>  | The city forester's lack of support for retention of exceptional trees is lamentable. The fines for landowners or developers to log their property are infinitesimal (\$300) and unenforced. There is currently very little opportunity for the public to weigh in on proposed removal of large shade trees. This loss of large trees is negatively impacting quality of life and carbon sequestration. |
| 4 | <b>Biological Resources</b>                                | Fines for landowners or developers to log their property are infinitesimal (\$300) and unenforced. There is currently very little opportunity for the public to weigh in on proposed removal of large shade trees. This loss of large trees is negatively impacting quality of life and carbon sequestration.   |
| 5 | <b>Open Space &amp; Recreation</b>                         | There is currently very little opportunity for the public to weigh in on proposed removal of large shade trees. This loss of large trees is negatively impacting quality of life and carbon sequestration.  |
| 6 | <b>Air Quality &amp; Green House Gas Emissions</b>         | Loss of large trees is negatively impacting quality of life and carbon sequestration. Fines for landowners or developers to log their property are currently infinitesimal (\$300) and unenforced.  |

## Demographic Survey (optional)

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Comment Form</b>	
<b>1</b>	<b>Description of the Proposed Action and Alternatives</b> Alternative 2 for Northgate Alternative 2 for Capitol Hill Alternative 3 for Wallingford, Fremont, Ballard, and Crown Hill Alternative 3 for West Seattle Junction and Morgan Junction
<b>2</b>	<b>Aesthetics</b> <p>Can we please do something to limit the hideous apartment buildings that have a hodgepodge of random materials and colors smattered all over them, and that will look wildly outdated five years after being built, thus creating terrible eyesores in our neighborhoods for decades to come? (E.g. Rubix Apartments 515 Harvard Ave E.) This isn't a "style" we should tolerate, just because it somehow made it through the permitting process. There are some styles that are timeless, and if we are trying to build for the future, we should learn a lesson from our most architecturally beautiful neighborhood Pioneer Square.</p>
<b>3</b>	<b>Transportation</b> More woonerfs for pedestrians, please.
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**Comment Form**

1

**Land Use**

I am against the expansion of the North Ranier hub into the Mt Baker neighborhood. There is still a lot of underdeveloped areas closer to Ranier Ave and doesn't need to be expanded into a historic neighborhood.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Comment Form</b>	
<b>1</b>	<p><b>Description of the Proposed Action and Alternatives</b></p> <p>No action should be taken until the empty contaminated lots are cleaned and built on Rainier Ave</p>
<b>2</b>	<p><b>Housing and Socioeconomics</b></p> <p>It seems the area around Mt Baker light rail is only getting new low income housing. I think new apartment buildings near it should be more inclusive of all incomes. It's not just low income people who like to take light rail.</p>
<b>3</b>	<p><b>Land Use</b></p> <p>I'm against expansion of N Rainier HUB into historic Mt Baker neighborhood. There is plenty of undeveloped space on and around Rainier Ave already</p>
<b>4</b>	<p><b>Aesthetics</b></p> <p>Tearing down historic houses to build large box homes is detrimental to aesthetics of some neighborhoods</p>
<b>Demographic Survey (optional)</b>	
<p><b>Have you been or are you at risk of being displaced from your neighborhood?</b></p>	
<p><b>Have you been or are you at risk of being displaced from Seattle entirely?</b></p>	
<p><b>Are you now or have you ever experienced homelessness?</b></p>	
<p><b>Do you live in rent- and income-restricted affordable housing?</b></p>	
<p><b>How many people are in your household?</b></p>	
<p><b>Are there children under the age of 18 in your household?</b></p>	
<p><b>What is your household income?</b></p>	
<p><b>Do you own or rent your residence?</b></p>	
<p><b>How long have you</b></p>	

**resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**Comment Form**

1

**Description of the Proposed Action and Alternatives**

This reads like a justification and statistical back up of what the city's agenda for money making without addressing the concern of how HALA seriously impacts the Admiral neighborhood.

2

**Housing and Socioeconomics**

People who live in Admiral dish out the money to live in our quaint neighborhood. This does not address the hard change from neighborhood into metropolitan center that this HALA impact is creating. The big bucks people here pay is for the quaint neighborhood and if you bothered to look the census there are lots of kids living here. The walk-ability is the drive for many of our families to live here. Multi-unit housing would seriously detriment the ability to have kids and families walking, biking, and living in a quaint environment here. Too many accidents have already taken place after and around the Safeway remodel. Cars are crunched in and people are already busting at the seams here. These statistics the city is citing is just another justification in the cog to roll over everyone here into living in urban city which is not what our neighborhood is here.

3

**Land Use**

Policy 1.4 provides insight into what is already happening in the Admiral neighborhood. Cars are crunched, people are being hit on Admiral Way and California. A busy and active schools are already having to deal with security in our present neighborhood changes where more security is having been placed at Lafayette Elementary. Zoning upgrades are going to fall downward into a slippery slope where more developers are going to develop more and more without taking into account on the harsh reality here that during the summer months the crazy frenetic and hectic happens here in Admiral from the Alki traffic during the summer months here. This is is not properly assessing how to create more public safety where old people, children and adults alike to be afraid of being hit or run off the road with cars who are muscling around in our neighborhood. Bigger in going to turn to more bigger without finding solutions but keeping to the agenda of bigger without addressing the large public safety impact of the public safety of so many children and walking neighborhood that is what makes this neighborhood so great. The city would be destroying forever what draws us into this neighborhood and forcing people out. The people who are being forced out would be the people who could not afford to come back into this neighborhood whereby the city just wants to turn around and house more and more people just vertically without the concern of anyone's live-ability. Residential urban is the ultimate oxy moron here. No residential has a chance as the city's already enforced laws to protect developers and not residential land owners in Seattle. This here is all City coffers and City urbanization all the way. Metropolitan is not what makes this this area livable. City is destroying everything that makes Admiral livable here. People here choose to live here to get away from the city and not to bring Metro Seattle downtown in here. Once we start this the whole area is going to be urban and we cannot go back to what is great here already.

4

	<p><b>Aesthetics</b></p>	<p>5 Yes, you take this zip code 98116 and look the census you will find people here are healthy. But, no longer with HALA upzoning here. Less trees and green space will directly affect the health and lives here. Either we will run over by the car or die from the adverse affects of towering building over trees. City has already set into affect for developers to chop down anything in place to put tinder box housing. Developers come here to build and build because they know this is attractive financially. What you are not taking into to regard is the City will in effect destroy what is the essentially special and wonderful here by creating HALA Admiral here. There is not turning back in the health effects of population density clear regard to the public safety by crunching people and cars into a tight space not taking into the increased traffic during summer months here. It an aggregate recipe for disaster. Residential blocks are being encroached by developers already and the City is turning blind to what is really happening. People cannot live healthy being squeezed in without being able to breathe or cross a street. Traffic is a huge problem already here. A lot the residences here have people parking in the street events at Hiawatha have more people parking in the streets. The aggregate is just tip of the iceberg here. How are kids supposed to walk to school here? How ugly does the City want it? Why do you think the Olmstead brothers were called into Seattle to create parks? No, it is sad that the City is not taking the health of our neighborhood into consideration here or for that matter the health of our children.</p> <p>6</p>
<p>7</p>	<p><b>Transportation</b></p>	<p>This is a justification of what is happening all around Seattle too many cars and lack of public transportation and huge push for more population density. A recipe for disaster that is all around us. Buses in Admiral only run in high commute times. Not enough buses which are packed already. You want more people here? Also, no regard to understanding how Admiral is deal physically with more cars when meter maids already run around here trying to ticket cars parked on streets here in neighborhoods and so you want to have it more difficult to find parking in residential neighborhoods by making it URBAN thereby be able to ticket more cars? It is just illogical but the greatest money making schemes with developers working with the city. Where is the impact on how much Admiral can actually take?</p>
<p>8</p>	<p><b>Historic Resources</b></p>	<p>A clear rationalization for how development can protect the cultural and historic. How is this again? Once the urban is allowed in then all we have is urban and no longer historical or cultural. Big ugly Vancouver, BC.</p>
<p>9</p>	<p><b>Biological Resources</b></p>	<p>Once again the trees in Admiral are over a hundred years old and the canopy is being taken over by tall, taller, and tallest buildings. Also, the tree's roots filter the water that spill downward to the sound. Lots of animals here are affected as well which is not stated. Please keep Admiral green.</p>
<p>10</p>	<p><b>Open Space &amp;</b></p>	<p>Please keep our Admiral neighborhood quaint. Once upzoning is allowed then everything will keep going that way and there is no</p>

**Recreation**

turning back.

11

**Air Quality & Green House Gas Emissions**

Once again, our air in Admiral is impacted by Airplanes which fly over to Boeing field increasingly and the Steel Mill here pumping out steel particles . So why not add more people in the mixture with cars. Yes, the health of the people here and why we choose to be is just going to decline that take much. Let's cut all the trees down and build the biggest tallest buildings to cram more and more people with cars here as soon as possible. Are you kidding? I don't think money can any way beat the actual healthy and safety of the people here now.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your**

**employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

Email address

Comment Form

Description of the Proposed Action and Alternatives

The costs of the two alternatives you have presented are greatly understated and will act contrary to many of your stated goals and indeed even to some of your stated findings through out the report. Major flaws include:

- 1 -No protection for existing persons who will be displaced (these displaced people have to live somewhere and will put upward pressure on affordable rentals as they seek to relocate)  
-A gross understatement of significant cost impacts for utilities  
-No protection for elderly or retirees who own but are forced to relocate due to property tax evictions  
-Allowing developers to pay out of affordable housing  
-Not equitably applying the upzone to all areas of the city (this largely benefits the wealthy)  
-Not having developers pay their share of the new infrastructure which ends up getting spread upon rate payers unfairly
- 2 -Lack of investigations of other alternatives and in many cases lacking proposed solutions to the problems created by your plan.
- 3 -No consideration of existing areas being upzoned and what has and has not worked in those areas
- 4 -Inadequate studies/analysis for infrastructure requirements and costs

5 These are just the things I see. I feel like there are much more problems here in a plan that appears to largely benefit developers, pass costs for their growth and their development on to (us) little people (unfairly), a pattern of continued mismanagement and a largely glossing over of flaws with this plan. As a long time resident of the area, this pains me.

Alternative strategies like rent control should be considered and are not mentioned. Allowing developers to build higher and pay their way out of low income housing is a fatal flaw in your plan. When developers opt for the buy out, what happens then? There is no detail or commitment in this plan that says how these funds will be used. There is no commitment to use the funds to provide affordable housing in these same areas. Without this safety net here is what will happen:

- 6 -Existing affordable housing will be the first to be bought by developers for large scale development displacing present residents who will go where?  
-Developers buy out to increase their profit  
-The City builds affordable housing in some area where it can build more housing for less funding to help address the need.  
-The result is the City becomes an overt player in the forced gentrification and discrimination of disadvantage persons by fostering the elimination of affordable housing in these areas and thus forcing people to be displaced and move to lower cost areas

## Housing and Socioeconomics

Where is the social justice in this? I did not see where your displacement analysis indicates what happens to the unfortunate people who will be displaced for these large new developments. These new developments make more money for developers and destroy our vibrant neighborhoods - look at how sterile SLU was and still is. The existing zoning can be implemented with more limited displacement (but with improved protections) but there are other tools that would protect social justice:

- Rent control
- Incentives for small time land lords as opposed to big developers
- 6 -Protection for all people who are displaced by developers
- Eliminating the buyout for developers
- Increasing the affordable requirements for new development
- Implementing the upzone in all parts of the city so that it is equitable and fair
- Adding late comer agreements to SCL and upping those of SPU to cover the true costs of increased development

Your report even finds that older housing is more affordable than newer housing. So why encourage new building on a large scale - this is contrary to your stated purposes.

## Aesthetics

7

Increasing building heights and bulk and allowing destruction of older buildings sterilize our neighborhoods. These things combine to make Seattle a less desirable place to live. Allowing highrises around parks destroys the benefit they provide to the public.

Is it fair that long time owners or renters will have their daylight or views blocked by new tall and bulky buildings allowed by the upzone? My two story town house which is what your report claims to be desirable to add is being upzoned to high rise. Even if our community holds out, we will be surrounded by monster buildings. Who will want to live there anymore.

8

"Water System, Sewer, and Drainage—Seattle City Light Future development under any of the alternatives would likely result in greater demands on localized areas of the water supply, sewer system, distribution system, and electric power. However, SPU and SPL have methods in place that ensure development is not endorsed without identification of demand and availability of utilities, including meeting fire code requirements for new developments and redevelopments. Some development is required to improve stormwater and drainage systems. However, small scale development in areas of informal drainage could have an impact on localized stormwater drainage. All projects

must  
comply with the minimum requirements in the Seattle  
Stormwater Code  
(SMC 28.805), even where drainage control review is not  
required."

Your finding is significantly flawed. SPU have been raising rates  
at alarming levels

As reported by KING 5 on April 25, 2017: "Seattle Public Utilities  
wants to raise rates by more than 30 percent in the next six  
years.

That was one of the headlines from a presentation of the  
Strategic Business Plan pitched to Seattle Council members on  
Tuesday.

SPU says the increases are needed in order to pay for a multi-  
million dollar mandated project on the North Queen Anne Ship  
Canal, to prevent storm water from getting to Lake Union, as  
well as important transportation and infrastructure  
improvements."

8

In Strategic Business Plan 2015-2020 the projected growth rate  
for 2015-2020 is much lower than (4.6%) than the past ten years  
up to 2014 (6.8%). Doing nothing with this growth and low  
inflation rates should result in a 4.1% increase in rates per year  
according to the report. The report also says that even if there is  
no growth costs will still rise by this amount. But what happens  
when there is more growth than forecasted? Enter the significant  
30% projected rate increase over the next six years reported by  
King 5 in April 2017 that sites several major capital projects  
(many mentioned in the 2015 report) and "infrastructure  
improvements" as drivers for the increase. While it is fully  
unclear for the reason for the increase and to sift through the  
political speak, it is very possible that the aforementioned 2015  
forecast under-represented the impacts of growth which  
accelerates infrastructure improvements is a significant driver in  
the extra increases are necessary.

Someone outside the City that is fully independent with expertise  
needs to investigate this and correct the findings of this draft  
EIS. The work in the draft EIS is poor as it does not even  
mention these issues and consider that localized growth will tax  
the local and larger systems. Increases in growth cause higher  
costs - both operation and maintenance and capital improvements  
Look at South Lake Union - dumping storm water into the lake is  
aggravated by growth as areas that would absorb water now  
become paved and provide more run off into the system (along  
with the significant increase in water use and waste water  
caused by the recent upzoning there). The report makes no  
mention of how SPU has done with its late comer agreements in  
having the late comers truly pick up the cost for the extra  
demand for water and sewer increased usage. The lack of  
attention in this area leads me to consider strongly an  
ommission of this data from the draft EIS because it does not  
support the mayor's goal. I don't think the City council is much

**Public Services & Utilities**

more on the ball - I feel that the City Council believes it can manage utilities but the reality appears to be otherwise with cost over runs on major projects and poor oversight by council subcommittees that appear more interested in REI unionizing than oversight on hundred's of millions of dollars of infrastructure improvements ongoing in SLU.

8 I'm just a little guy with some expertise in utilities and the things I have mentioned above do not pass the sniff test for a finding of no significant avoidable impacts to utilities. The impacts will be higher rates for the growth to handle the over all volume and quite possibly significant regional improvements would be necessary to handle the growth in the targeted areas for upzoning. The draft EIS basically agrees with me that there will be some problems but then turns around and says that there will be no significant unavoidable impacts - these things do not add up or make sense. If SPU is behind in these improvement projects they will be forced to accelerate these improvements resulting in much higher rates. Sounds like where we are now mirrors where we were not that long ago... and SPU will be back for more money and higher rates.

The report mentions SPL, what is that? seattle public library? Do they mean SCL?

9 The report fails to mention that SCL does not in fact have a latecomer agreement and that capital improvements at the substation evenly are spread across the entire rate base. So the roughly \$250M plus that the Denny substation and its associated projects(I find it very difficult to determine the true cost of the substation as there are multiple capital projects that appear to be going on at the same time but are ambiguously worded in public documents which appears to hide the true cost - look at the transmission line project for a future Denny line which includes all transmission related costs for teh construction of Denny and has significant cash flows that are concurrent with substation construction - this is obvious as the line was deferred. A regional project also appears to be a contributing funding source as do a few other projects at some level or another as best as can be told from the public documents. So where is the oversight? The talking heads at SCL say the substation cost basically matches the single project budget of roughly \$210M but what about these other items? Where is the oversight - more interested in REI unionizing? it looks like another in a long line of city projects - north precinct, NCIS...) - I digress as the main point is the cost for Denny will be spread across the entire service area. Eventhough the substation is primarily supporting growth caused by late comers that wee encouraged by the slu upzone. The council makes noise that these latecomers should pay - which would be fair and is how most utilities operate but makes no move to update SMC to make this happen. So expect more of the same. That is - no oversight, you the individual Seattle-ite paying for this growth that is a sweet deal for developers. I don't see how it can be possible that the maximum upzone being considered will not lead to additional infrastructure costs for SCL. This upzone looks like the SLU up zone and the results will be the same or worse for all utility rates. Don't be fooled - the

9 developers are the ones who will win with this upzone and the impacts to the individual who will have to unfairly bear these costs are not even close to being accurately reported by a team of high priced consultants and the very people who pro-plot to watch out for the little guy. If you look at all the Denny related projects funding must be somewhere between \$350-\$500M. How much does this capital funding hit rates? This will all be spread across all network customers and all utility customers and the late comers not have to pay. Further the late comers bring additional electrical load that must be served by SCL. Just as with water and sewer, the additional unit of power is the most expensive. So even if the load increase can be avoided due to conservation or other initiatives, this is again unfair to the rest of the utility as that savings of energy should be used to hold all our rates down. So we the little guys get the double hit. So again the report by not referencing impacts fro the SLU upzone and how they have been handled by the council and SCL is a serious omission by the draft EIS prepares and City reviewers. I suspect this is not included in the report because the costs make the mayor's plan look much more rosier than it is.

In my opinion this portion of the draft EIS is so seriously flawed that it is fatal. At the very least real costs are not accurately reported. I'm just a little guy with some expertise. I would be happy to work with someone who could really provide a detailed and accurate report in these areas.

10 It would be some work but a detailed study of the load growth and the existing power distribution system (as well as sewer water and SPL?) could be analyzed and cost for small and large capital improvements estimated. This is not rocket science but is the sort of thing that should be studied. Would new substation(s) need to be built? Another Denny substation? More distribution improvements? How much of the system would go underground? Would there need to be a network? How much rate pressure would another \$250M to \$450M investment in any utility infrastructure cost the rate payer? If you have driven in SLU in the past few years, get ready for that to come in your upzoned area.

To summarize the following finding (as detailed above) is fatally flawed:

11 "3.8.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS  
No significant unavoidable impacts to public services or utilities are anticipated at this time for any of the proposed alternatives. Existing local or statewide regulatory framework would apply at the time of development that would identify any specific project-level impacts and would be addressed on a project-by-project analysis."

12 More traffic in areas that are already extremely congested like

**Air Quality & Green House Gas Emissions** <sup>12</sup>

Capitol Hill will result in more delays, more carbon emissions and/or capitol costs to improve roads and traffic flow. The air quality will deteriorate. Public transportation in Seattle is so poor (in reach, schedule and cost performance) when compared to other world class cities that Seattle like to think it is.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

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**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person with  
a disability?**

**Are you a U.S. Military  
veteran?**

## Comment Form

### Transportation

- 1 The DEIS did not study or even acknowledge the inequity between urban villages that are slated to have light rail by 2035, and those with only bus service. It is unreasonable to equate the convenience and aesthetics of a light rail system with the limitations of bus service. Comments similar to this were repeatedly raised during the HALA Focus Group process, but they appear to have been ignored in the DEIS. The EIS should individually study neighborhoods without light rail and target them with less density than neighborhoods with light rail.

## Comment Form

### **Housing and Socioeconomics**

- 1 The DEIS is built on a insufficient Growth and Equity Analysis which categorizes Urban Villages as either and only Low or High Risk of Displacement and Low or High Access to Opportunity. Specific rankings and numerical figures are not provided to show the weighting of each category used in the Analysis or the rating of each village. The composite heat maps subjectively assign "high" or "low" status to Villages. The DEIS should include the specific numerical weightings for categories AND offer an appropriate sliding scale of density for Villages that are better categorized as "medium".

## Comment Form

### Housing and Socioeconomics

- 1 The DEIS did not study the true displacement risk of each, discreet urban village related to the the action alternatives proposed in the rezoning maps. Action alternatives will result in differing amounts of physical, economic and cultural displacement within each urban village. The displacement risk within each urban village should be based upon the rezones proposed in each action alternative and be presented separately for each urban village.

## Comment Form

### **Housing and Socioeconomics**

- 1 In the displacement risk analysis, the median rent and housing tenancy category was based on multi-family buildings of 20 or more units. This does not include duplexes, town houses, single family houses, or accessory dwelling units, which could comprise the majority of rental units in some neighborhoods, particularly Crown Hill where currently small, older and naturally affordable apartment buildings and duplexes comprise most of the rentals. This is an enormous oversight that deserves special attention. The DEIS should include a broad and thorough analysis of actual rental units for each urban village, including duplexes, town houses, single family homes, and accessory dwelling units.

## Comment Form

### Description of the Proposed Action and Alternatives

- 1 The DEIS does not present a broad range of action alternatives. Alternatives 2 and 3 consist of approximately the same volume of rezoning across the city and thus produce the same average impacts. They are not discreet action alternatives; they are simply re-arranging the proposed density.
- 2 The DEIS then presents the overall studies as a whole, which diminishes the impacts in individual neighborhoods. The lesser and greater volumes of density should be such that in every village, one alternative presents less density than another village. The EIS should present the impacts consistently, and specifically by neighborhood.

## Comment Form

### Land Use

- 1 On page 3.114/3.115, The rezoning from SF to NC-55/75 in Crown Hill is acknowledged to be “significant” and “notable” but is not addressed thoroughly elsewhere in the DEIS. The change from SF to NC-55 or NC-75 along 16th Ave and Mary Ave in Crown Hill would affect over 120 single family parcels and some existing low-rise. The EIS should consider tax increases, traffic patterns, increased cost of and reduced access to parking, utilities, street access/width, garbage collection, noise, and licensing associated with the establishment of a commercial district. The EIS should also specifically present the economic displacement risk of rezoning from residential to commercial, such as is proposed in Alt 3 in Crown Hill.

## Comment Form

### Public Services & Utilities

- 1 Public schools are significant enough to warrant their own category, and should not be lumped with utilities.
- 2 But also, the mitigations offered regarding potential capacity increases in Seattle Public Schools is entirely inadequate. Section 3.8 page 15 reads: "SPS would respond to the exceedance of capacity as it has done in the past, by adjusting school boundaries and/or geographic zones, adding or removing portables, adding/renovating buildings, reopening closed buildings or schools, and/or pursuing future capital programs." These are NOT viable mitigations. Changing boundaries does not add classroom space or funding. Portables are not a permanent solution and fail to address overcrowding in common areas such as lunchrooms, playgrounds and gyms. All available SPS schools and buildings are in the process of being opened to manage the districts CURRENT capacity crisis.
- 3 The EIS should study exactly if and where there is room for growth at the elementary, middle school AND high school levels. The EIS should then consider which neighborhoods are suitable for enrollment growth and NOT rezone for more density until appropriate locations and funds for new buildings are secured in those neighborhoods.

## Comment Form

### Aesthetics

- 1 The DEIS fails to provide examples of the typical development that is currently taking place in LR zones in Crown Hill, and that we can assume will occur with rezones. One specific example is that of residences, either single family or LR being built in the backyards of existing structures with alley access. Along 90th St. and 85th St. NW in Crown Hill, there are numerous examples of 3 story town homes with added height via roof decks being built in the backyard of existing 1 and 1.5 story houses. The result is not aesthetically cohesive, and arguably undesirable. The EIS should provide examples of extreme and likely juxtapositions, not just the idealistic scenarios that were presented.

## Comment Form

### Description of the Proposed Action and Alternatives

- 1 We are generally more supportive of the zoning changes proposed in Alternative 3 for the Madison-Miller Urban Village.
- 2 As identified in the DEIS, Madison-Miller is a very high opportunity Urban Village. It has great transit service to Downtown (bus routes 11 and 12), South Lake Union (8) and the U District (48). Madison-Miller is close to great schools (Meany, Stevens, St Joes, Holy Names), parks and open space (Miller Playfield, Volunteer Park, Interlaken, Washington Park Arboretum), and a fantastic community center. This neighborhood provides a welcoming home for many families with kids and the added lowrise zoning will allow townhouses that can provide more moderate-cost family housing options. As fewer households have large yards, the city should mitigate the loss of these play spaces by finding ways to slow traffic and create more play streets.
- 3 Madison-Miller is already home to several affordable housing properties that help keep this part of our neighborhood economically and racially diverse. These buildings are a great asset for our community because they protect their residents from the risk of displacement. Alternative 3 would result in 177 new affordable units rather than only 133 under Alternative 2, and far more than Alternative 1. This is true not only because increased development capacity will allow for more on-site performance of affordable housing, but also because it will create more zoning under which the Seattle Office of Housing can make cost-effective investments leveraging federal low income housing tax credits.
- 4 As our infrastructure ages, some of it will need to be replaced and repaired. Increasing the number of households in urban villages like Madison-Miller can help lower the cost per household of these expensive investments. Alternative 3 will provide the best opportunity for achieving infrastructure investments with lower per household costs.
- 5 New residents spur concerns about insufficient off-street parking. We believe that Madison-Miller deserves its own restricted parking zone (RPZ) to better manage on-street parking. We also hope that the Seattle Department of Transportation will continue to look at reforms to the RPZ system that address oversubscription, which can make the zones ineffective.
- 6 Finally, we do not support the M2 changes from single family to LR3 just east of Miller Park. We believe an M1 change to LR2 would be more appropriate given the location adjacent to the edge of the urban village.
- 7 We are disappointed that an urban village boundary expansion is not being considered for the areas immediately north, west, and south.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3
<b>Housing and Socioeconomics</b>	2 DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.
<b>Aesthetics</b>	3 DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings and fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.
<b>Transportation</b>	4 DEIS analysis is flawed; Fails to utilize meaningful data. DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.
<b>Open Space &amp; Recreation</b>	5 DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.
<b>Public Services &amp; Utilities</b>	6 DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc. DEIS fails to note existing lack of school capacity and impact of increased density thereon.
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in</b>	

**your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

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**What is your age?**

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**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

## Comment Form

### Description of the Proposed Action and Alternatives

- 1 First, I don't see an analysis of the impacts to schools that HALA would have. This seems to me to be an important criteria to be considered and properly funded. The school district can ill afford additional financial impacts in serving a larger community without proper planning and capital funding.
- 2 Secondly, the DEIS is not sufficient to represent all Urban Villages and the City overall. Each Urban Village is unique, with different housing types, cultural traditions, businesses, resources, and growth needs. This DEIS fails to recognize and examine these differences.
- 3 Each Urban Village and Surrounding Area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.
- 4 Additionally, the DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined. Seattle residents live in both their own neighborhoods and in the City at large, yet this DEIS has failed to analyze the impacts to both thoroughly and accurately.

### Demographic Survey (optional)

Have you been or are you at risk of being displaced from your neighborhood?

Have you been or are you at risk of being displaced from Seattle entirely?

Are you now or have you ever experienced homelessness?

Do you live in rent- and income-restricted affordable housing?

How many people are in your household?

Are there children under the age of 18 in your household?

What is your household income?

**Do you own or rent your residence?**

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**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

Anonymous-48

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

I am a resident of South Park and request that your office complete an Environmental Impact Statement pertaining to just the South Park Neighborhood addressing MHA. The EIS you have released does not study the impacts to South Park. South Park has serious environmental issues that can't be overlooked.

Furthermore we request the new South Park EIS be sent to all the residents and businesses in the community. Very few people have access to the internet in their homes in South Park.  
Thank you.

South Park needs to know how widening will affect  
our air quality with increased traffic.  
Our previous free canopy.  
Our tiny library + underfunded community center  
our stressed sewer system with overflow issues  
our lack of infrastructure: greenery, drug store, post office  
our isolation (lacking large group of residents)  
our neighborhood plan

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

George Ford

I am a resident of South Park and request that your office complete an Environmental Impact Statement pertaining to just the South Park Neighborhood addressing MHA. The EIS you have released does not study the impacts to South Park. South Park has serious environmental issues that can't be overlooked.

Furthermore we request the new South Park EIS be sent to all the residents and businesses in the community. Very few people have access to the internet in their homes in South Park.

Thank you.

I have comments about the infrastructure  
we sewage, water, water.

Parking - lack of Privacy

Flag in increased growing good at home

air quality home ownership

8/7/2017 23:58:48

Artemis Antipas, Ph.D. Environmental Scientist

**Description of the Proposed Action and Alternatives**

I have lived at my current Wallingford home for 28 years and before that at a location less than 2 miles from my current address for 16 years thus a total of 44 years in the inner Seattle. I am an environmental scientist, Ph.D. from University of Washington again in the same area. Due to the time constraint ( we had requested for an extension from the City) my two limited comments are as follows:

1. The EIS does not meet EPA requirements
2. The EIS is carried out in general and does not address neighborhood specifics.

**From:** EastlakeFairGrowth  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comments on Mandatory Housing Affordability Draft Environmental Impact Statement (MHA-DEIS)  
**Date:** Monday, August 07, 2017 1:34:37 PM  
**Attachments:** [Eastlake Fair Growth Response to MHA-DEIS.docx](#)

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Geoff Wentlandt  
City of Seattle Office of Planning and Community Development  
600 4th Avenue, Floor 5  
PO Box 94788  
Seattle, WA 98124-7088  
206.684.3586  
MHA.EIS@Seattle.gov

Dear Mr. Wentlandt:

Please find attached the comments of Eastlake Fair Growth, a neighborhood group, on the Mandatory Housing Affordability Draft Environmental Impact Statement (MHA-DEIS). These comments are timely filed on August 7, 2017 before the 5PM deadline.

If you have any questions about our comments, please contact me at the following email address, street address, or phone number.

Sincerely,

Ira B. Appelman for  
Eastlake Fair Growth  
2226 Eastlake Avenue East, #304  
Seattle, WA 98102  
[eastlakefairgrowth@gmail.com](mailto:eastlakefairgrowth@gmail.com)  
206-235-4953

Response to:

# CITYWIDE IMPLEMENTATION OF MANDATORY HOUSING AFFORDABILITY (MHA) Draft Environmental Impact Statement (DEIS)

June 8, 2017

## 3.4 Transportation:

The DEIS does not seriously address or mitigate the current neighborhood **parking crisis** that is exacerbated by MHA upzoning.

### **1. The City admits that in many neighborhoods street parking demand is above 100%.**

DEIS, p. 3-188

“In 2016 three-quarters of the 32 surveyed locations experienced parking occupancy above the 85 percent target during either the daytime or evening periods. A quarter of the total locations experienced occupancy of 100 percent or more in at least one of the studied time periods.

“The eight locations in which parking demand currently exceeds supply (i.e. occupancy of 100 percent or more) are:

- 12<sup>th</sup> Ave (evening)
- Ballard (evening)
- Capitol Hill—South (evening)
- Green Lake (daytime and evening)
- Pioneer Square—Core and Edge (evening)
- Uptown—Core and Edge (evening)”

The DEIS goes on to describe the “significant adverse parking impacts” caused by the studied projects:

DEIS, p. 3-213

“As stated in the Affected Environment section, there are currently some areas of the city where on-street parking demand exceeds parking supply. Given the projected growth in the city and the fact that the supply of on-street parking is unlikely to increase by 2035, a parking deficiency is expected under the no action alternative. With the increase in development

expected under Alternatives 2 and 3, particularly in urban villages which already tend to have high on-street parking utilization, parking demand will be higher than the no action alternative. Therefore, significant adverse parking impacts are expected under Alternatives 2 and 3.

“The location and severity of impacts would vary by alternative depending on the concentrations of land use. The degree of the parking supply deficiency and impacts experienced in any given neighborhood would depend on factors including how much off-street parking is provided by future development projects, as well as varying conditions related to on-street parking patterns, city regulations (e.g. how many RPZ permits are issued, enforcement, etc.) within each neighborhood.”

**Response:** Of course, with all the construction going on in Seattle, it’s likely parking has gotten worse since this City parking study.

## **2. Proposed “mitigation” will make the parking crisis worse, providing no mitigation.**

DEIS p. 3-239

“The specific measures described below are all potential projects that the City could consider to modify or expand current strategies:

- Parking maximums that would limit the number of parking spaces which can be built with new development.
- Review the parking minimums currently in place for possible revisions.
- Unbundling of parking to separate parking costs from total property cost, allowing buyers or tenants to forgo buying or leasing parking spaces.
- Increased parking taxes/fees.
- Review and revise transit pass provision programs for employees.
- Encourage or require transit pass provision programs for resident—King County Metro has a Passport program for multifamily housing that is similar to its employer-based Passport program. The program discounts transit passes purchased in bulk for residences of multifamily properties.”

**Response:** The City admits the parking crisis, including a number of neighborhoods where parking demand is ABOVE 100% even before the proposed projects are built! The projects will only make the crisis worse.

Reducing parking maximums for developers who elect to provide parking in their developments will exacerbate the parking crisis, reducing the number of parking spaces available in the neighborhoods.

Reviewing parking minimums will NOT create any additional neighborhood parking. In 2012, the City Council removed the parking requirements for new development in the urban

villages. **The answer is to increase, not review, the parking minimums, which the City Council has steadfastly refused to do.**

Tenants are NOT currently required to lease parking spaces so unbundling has no affect. A major problem caused by the City Council's decision to eliminate parking requirements for new development in the urban villages, is small efficiency dwelling unit developments (SEDUs) with no parking to unbundle.

The City has no evidence that its failed "transit pass" program will increase available parking in the neighborhoods. This "mitigation" doubles down on the failed theory behind the SEDUs that in neighborhoods with adequate transit, residents of SEDUs wouldn't need cars. But, in fact, studies have shown that 30-40% of SEDU residents have cars, greatly increasing the demand for on-street parking compared to the single-family residences the SEDUs usually replace.

**3. Instead of specifically showing the level of parking demand the City must mitigate, the City claims that magically there will be no significant parking impacts. The claim of no significant parking impacts is totally inaccurate.**

DEIS p. 3-242

"The parking impacts are anticipated to be brought to a less-than-significant level by implementing a range of possible mitigation strategies such as those discussed in 3.4.3 Mitigation Measures. While there may be short-term impacts as individual developments are completed (causing on-street parking demand to exceed supply), it is expected that over the long term with expanded paid parking zones, revised RPZ permitting, more sophisticated parking availability metrics, and continued expansion of non-auto travel options, the on-street parking situation will reach a new equilibrium. Therefore, no significant unavoidable adverse impacts to parking are expected."

**Response:** The City has NOT seriously considered the parking crisis and the effects of upzoning on that parking crisis. Here are the question that need to be studied and answered: What is the current excess demand for parking spaces in the neighborhoods? What additional excess parking space demand will be created by the upzoning projects? Which neighborhoods will the upzone projects add to the listed category of neighborhoods with over 100% demand for parking? How many parking spaces will each of the City's proposed "mitigations" create (or eliminate)? In short, this DEIS is a superficial look at the parking crisis that the City Council continues to exacerbate with policies like eliminating the parking requirements for new development in the urban villages

**4. By exacerbating the parking crisis, MHA upzoning creates a safety problem because those coming in late will have the most difficulty and have to walk in the dark.**

So far, the practical effect of the parking crisis is that residents spend more and more time trying to find parking and end up parking farther and farther away from their residences. Especially in the autumn and winter months, that means that later-arriving residents, after parking, must walk farther and farther to their residences alone IN THE DARK. This creates a safety problem for women and for men.

Ira B. Appelman for  
Eastlake Fair Growth  
2226 Eastlake Avenue East, #304  
Seattle, WA 98102  
[eastlakefairgrowth@gmail.com](mailto:eastlakefairgrowth@gmail.com)  
206-235-4953

**From:** Bill Arnett  
**To:** [PCD\\_MHAEIS](#)  
**Date:** Sunday, July 02, 2017 9:17:38 AM

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PLEASE EXTEND THE DRAFT EIS COMMENT PERIOD TO 90 DAYS. THE EIS IS MASSIVE. THE CITY TOOK MONTHS TO PREPARE IT. WE NEED MORE TIME TO REVIEW AND COMMENT ON THE CONTENT. EXPECTING RESIDENTS TO REVIEW THIS IN 45 DAYS IS RIDICULOUS AND ESSENTIALLY SHUTS US OUT OF WHAT IS SUPPOSED TO BE A PUBLIC PROCESS.

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<b>Name</b>	Ofer Avnery
<b>Email address</b>	
<b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b>	Ballard P1 LLC
<b>Comment Form</b>	
<b>Land Use</b>	<ol style="list-style-type: none"> <li>1 We fully support HALA and encourage creation of as many units in Seattle. We would like to recommend considering zoning the entire eastern Market St in Ballard to the NC-85 ft to allow more mixed use and justify the steep construction costs,</li> <li>2 and to extend the urban village as much as possible to the east.</li> </ol>
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you resided in the city of</b>	

**Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Ofer Avnery
<b>Email address</b>	
<b>Comment Form</b>	
<b>Land Use</b>	<p>1 Up-zone from 85ft to 95ft next to light rail not enough. I own two parcels zoned NC3-85 just next to the Othello light rail. The current plans are to build 7 story (70ft) apartment building as it is not feasible financially speaking to go above 70ft - unless you go up to 120ft+. the suggested up-zone to 95ft is not enough to justify going higher so my development will still have to be 70ft. This is a missed opportunity, there aren't that many parcels just next to light rail station and going 120ft instead of 70ft will allow adding 50-70 more units easily.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you resided in the city of Seattle? (total number of years)</b>	

**Do you work in  
Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person with  
a disability?**

**Are you a U.S. Military  
veteran?**

<b>Name</b>	Ofer Avnery
<b>Email address</b>	
<b>Comment Form</b>	
<b>Land Use</b>	<p>1 I'm the owner of 2608 S Delappe Place and 3302 Cheasty Blvd S, Seattle, WA 98144, two adjacent lots in Rainier Valley urban village right next to the light rail station.</p> <p>The lots, a 16,000 sqft lot combined, although minutes walk from transit and right next to LR3 and commercial zones, are being considered for RSL.</p> <p>If it is up zoned to RSL I will be only able to develop 6-8 units. But if it goes as little as LR1 I could do almost 45 units. I strongly encourage considering going higher to LR3 or LR2 the least – and I think it is in a perfect place to do so.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you</b>	

**resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**From:** Ofer Avnery  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** DEIS feedback - Central and Jackson  
**Date:** Sunday, August 06, 2017 5:10:07 PM  
**Attachments:** [Zoning Comments 23rd and Jackson.pdf](#)

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Hi.

My name is Ofer Avnery, the owner of 2026 S Lane St in Central – 23<sup>rd</sup> & Jackson urban village, and I strongly support HALA!

The property I own, a 6600 sqft lot, although minutes walk from transit and right next to LR3 and commercial zones, is being considered for RSL.

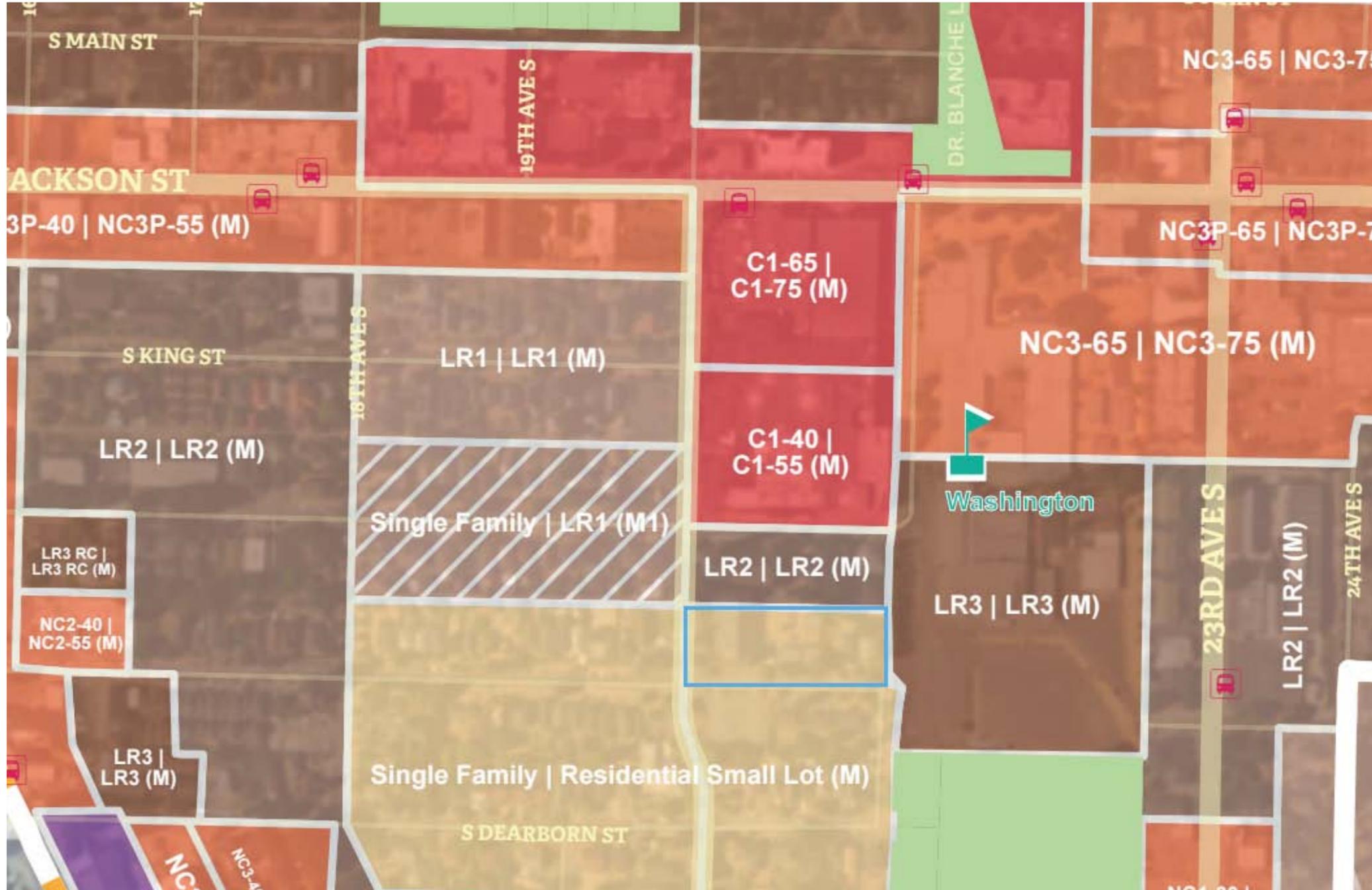
If it is up zoned to RSL I will be only able to develop 3 units. But if it goes as little as LR1 I could do almost 22 apartments.

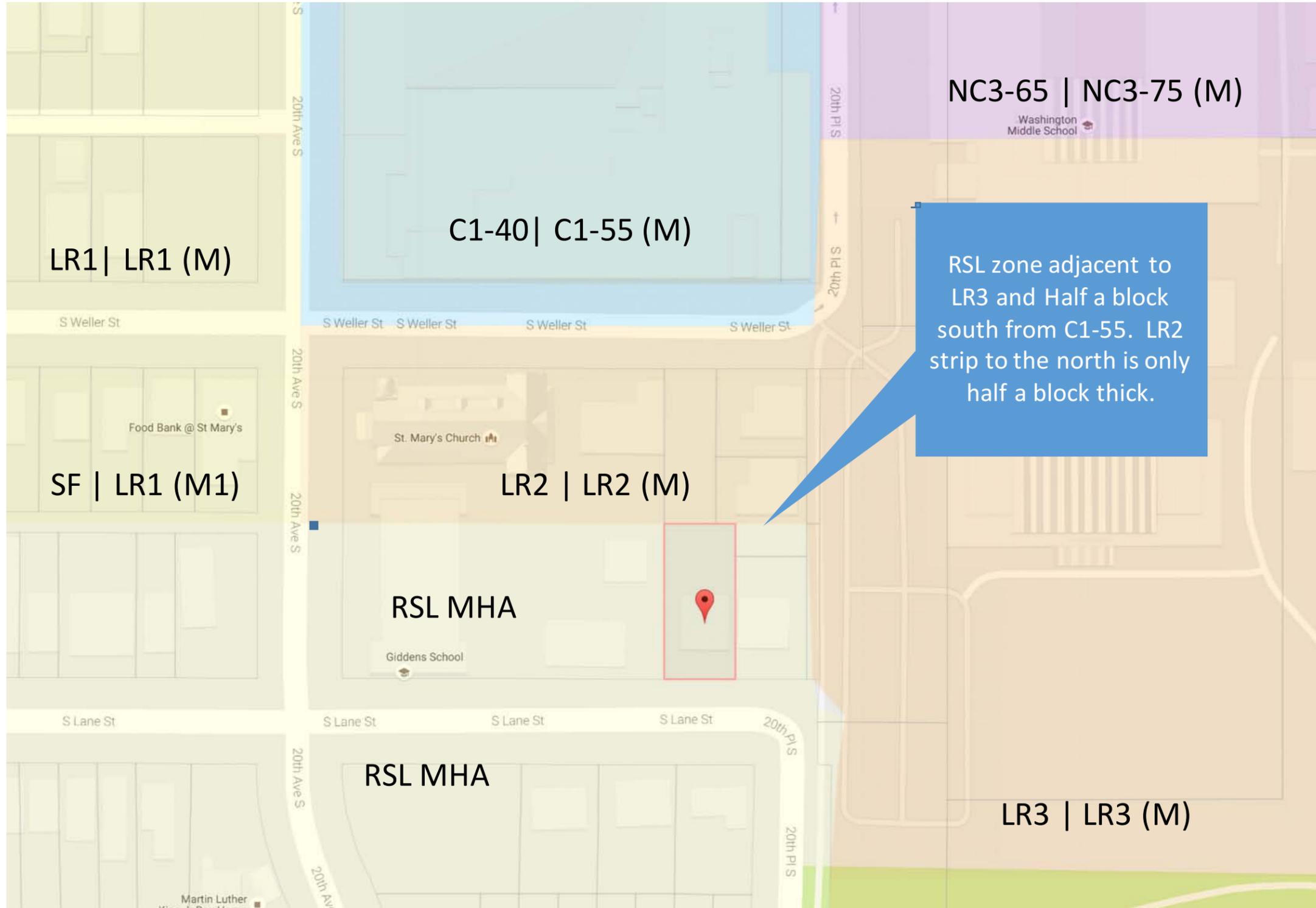
I strongly encourage considering going higher to LR2 or LR1 the least – and I think it is in the right place to do so.

Please find attached the research I've done to support my suggestion.

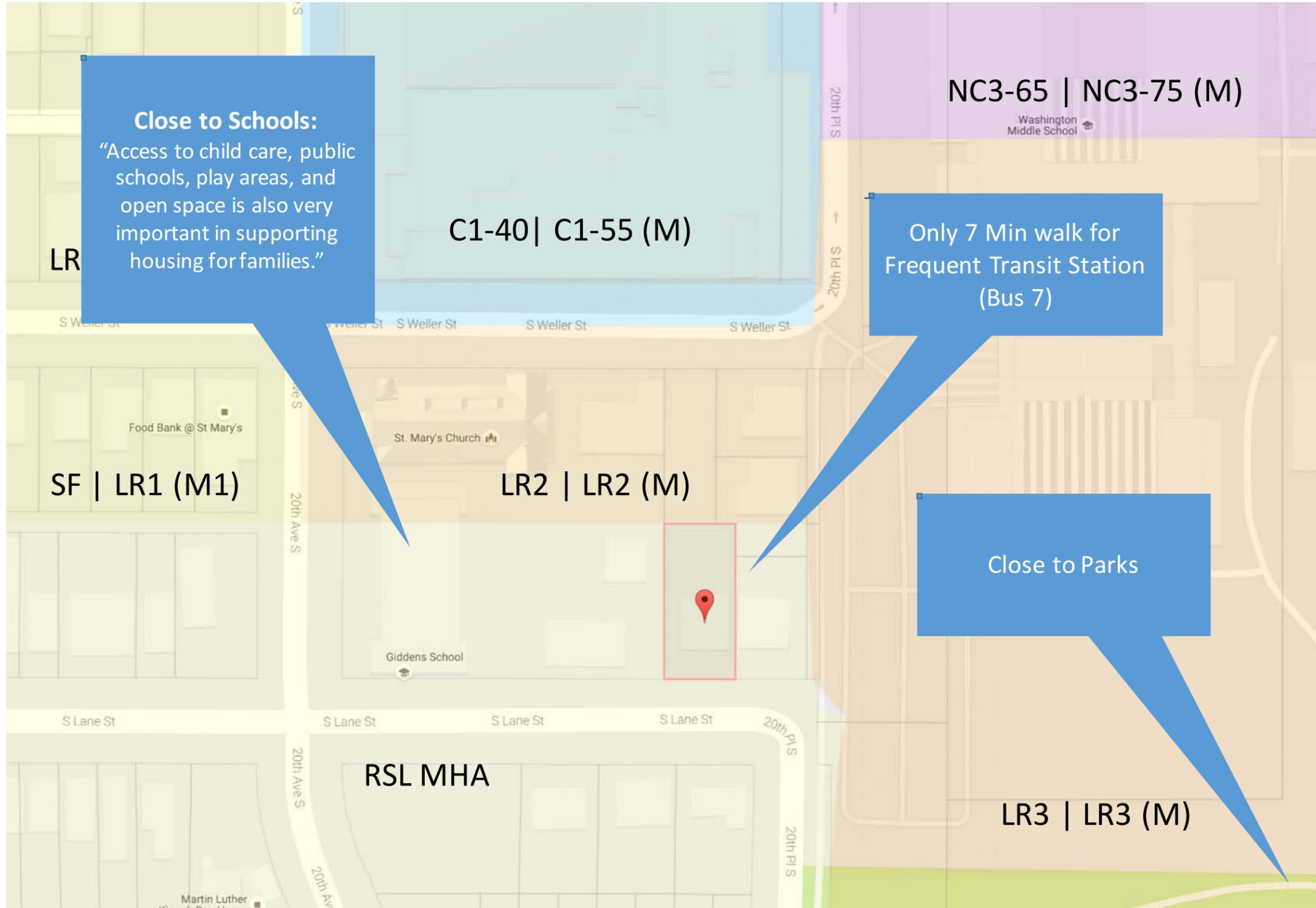
Thank you,  
Ofer

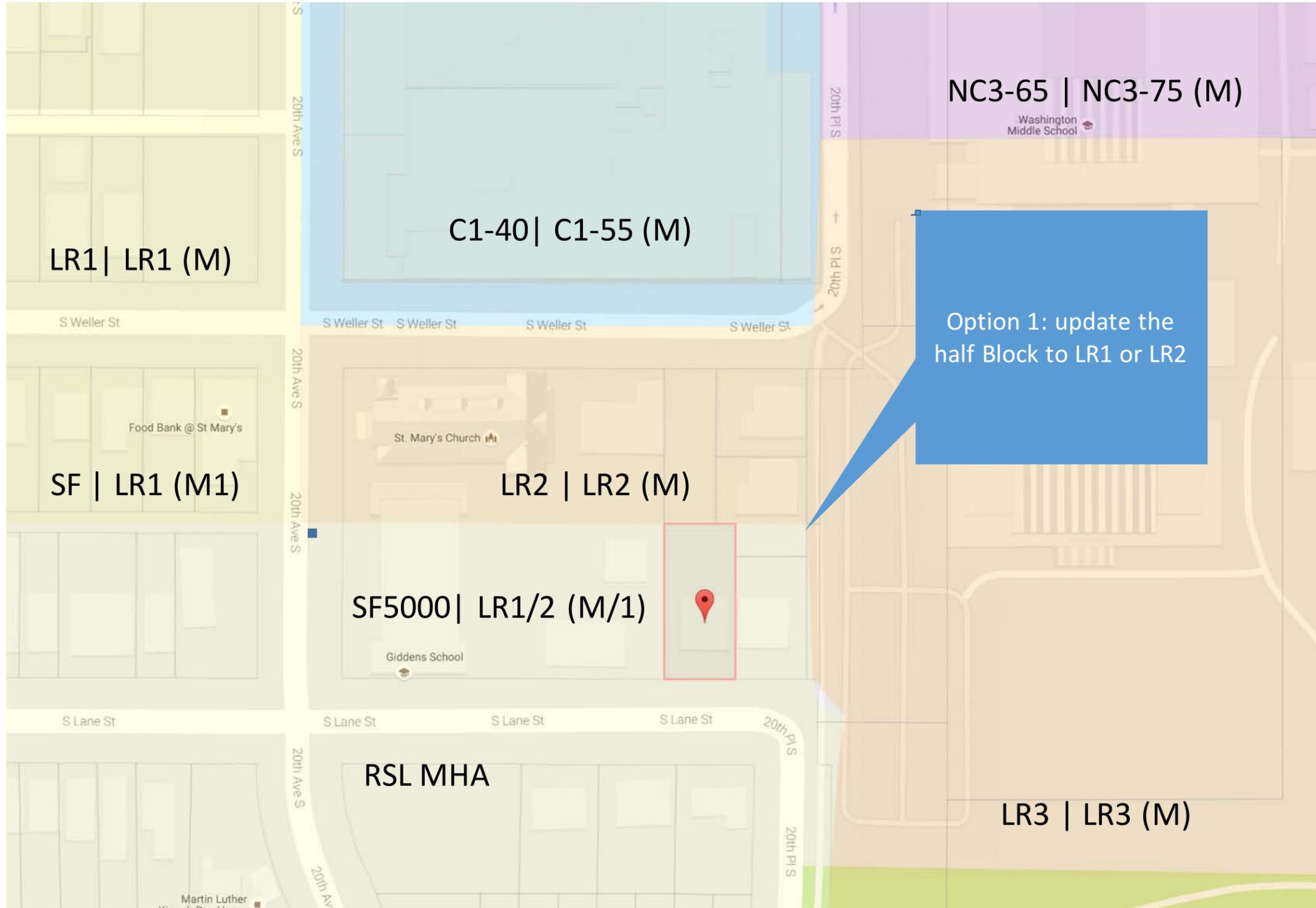
### The Location – 23<sup>rd</sup> & Jackson

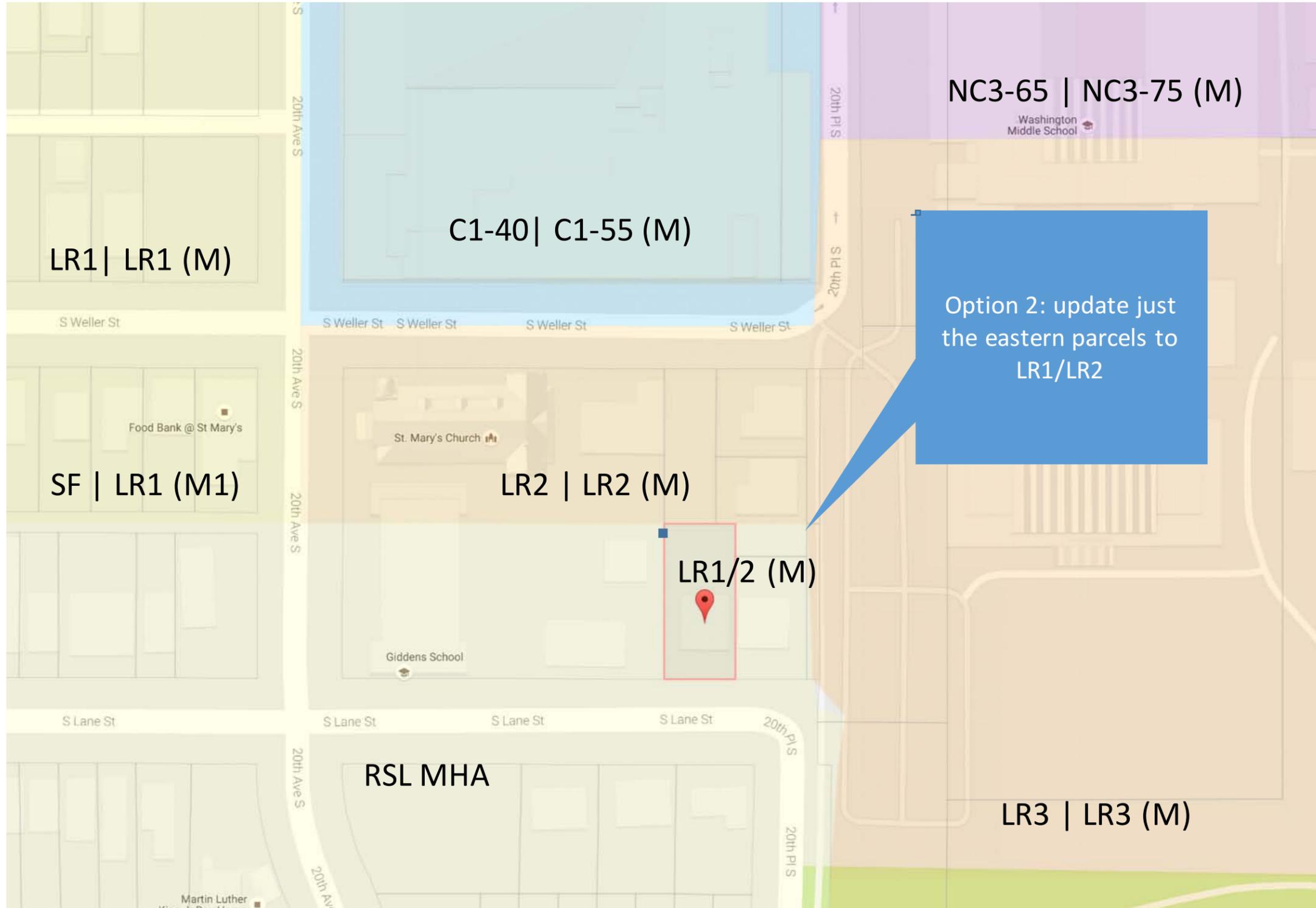












<b>Name</b>	Dara Ayres
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>I have helped the Madison-Miller Park Community Group develop their group response to the DEIS, and I respectfully submit similar comments as my own personal response to the DEIS.</p> <ol style="list-style-type: none"> <li>1 My neighborhood prefers Alternative 1 (With Modifications). We recommend that MHA (Mandatory Housing Affordability) requirements be implemented into the existing zoning in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (Accessory Dwelling Unit) and DADU's, (Detached Accessory Dwelling Unit) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units. These recommendations are based on the following:       <ol style="list-style-type: none"> <li>2 • Flawed typology: We are deeply concerned that the DEIS falsely represents Madison-Miller as "Low Displacement Risk/High Access to Opportunity". This misrepresentation will result in significant negative impacts if Alternatives 2 or 3 are adopted. Please see our detailed comments below.</li> <li>3 • Density increases not equitable: Our current zoning in Madison-Miller will exceed HALA density goals without additional proposed zoning changes. Indeed, based on current development and permitted housing units, Madison-Miller density will exceed MHA goals by the end of 2017 with our current zoning. Other urban villages, such as West Seattle Junction and Ballard, categorized as "Low Displacement Risk and High Access to Opportunity" have 10 – 30% less proposed increases than MMRUV (Madison Miller Residential Urban Village), despite being designated for more density as Hub Urban Villages and identified as locations for future light rail extensions.</li> <li>4 • MHA process not inclusive: We do not feel the area-wide zoning changes outlined in Alternatives 2 and 3 reflect adequate neighborhood and stakeholder input. The current zoning, established by the 2035 Comprehensive Zoning Plan, was developed with a more inclusive process and was more responsive to neighborhood input.</li> <li>5 • Concerns for significant negative impacts: Our request for MHA implementation with Alternative 1 zoning map should not be understood as a resistance to increased density. As we've said in previous correspondence, we embrace increased density in our neighborhood but feel Alternatives 2 and 3 (as written):           <ol style="list-style-type: none"> <li>a) do not adequately mitigate for displacement of low and middle income residents;</li> <li>b) do not equitably distribute the density and cost of MHA city-</li> </ol> </li> </ol> </li> </ol>

wide;

- c) will increase racial and economic segregation;
- d) do not match increased density with increased access to green space and recreational opportunities;
- e) will burden our already fragile infrastructure; and,
- f) pose significant public safety hazards with increased traffic on our narrow streets and heavy pedestrian and bicycle usage (with Meany Middle School and the pedestrian/bike greenway).

The Madison-Miller Park Community could support Alternative 2 with modifications noted in comments below (and is opposed to DEIS proposed zoning shown in Alternative 3). Please see our attached Alternate Proposal Zoning Map for specific zoning modifications. As noted in the DEIS, Alternative 2 generates more housing, jobs, and affordable housing than Alternative 3. The allocation of growth in Alternative 2 better reflects the existing character of our neighborhood, and has fewer significant negative impacts on current stakeholders than Alternative 3.

- 6** Housing and Socioeconomics: “Low Displacement Risk/High Access to Opportunity” determination is flawed and warrants further analysis of impacts and needed mitigation:
- Based on the DEIS Figure 1., Exhibit 2.1 and 2.2 the Madison-Miller Residential Urban Village clearly has a Moderate to High Risk of Displacement and Vulnerability and has been misrepresented.
  - Although Alternative 3 aims to distribute the growth based on the displacement potential and access to opportunity, the location of future affordable housing within this or any particular neighborhood is highly improbable as indicated in the DEIS.
  - The DEIS notes that the increase in units for each unit demolished greatly increases displacement as established in the 2035 Seattle Comprehensive Plan. This displacement further serves to segregate the displaced population as documented in the 7/2/2017 New York Times article, Program to Spur Low-Income Housing is Keeping Cities Segregated, by John Elegen, Yamich Alcindor and Agustin Armendariz.

Specific existing Madison Miller Residential Urban Village assets that have been overlooked in the DEIS “low displacement” determination include the following:

- o SHA (Seattle Housing Authority) and CHIP (Capitol Hill Housing) low income housing complexes;
- o affordable senior housing apartments;
- o housing for people with physical and developmental disabilities;
- o existing, historic, affordable apartment buildings;
- o a secondary treatment housing (half-way house);
- o a transitional longer term housing for low income women;
- o the hidden density of many large old single family homes inhabited by multiple tenants.

The proposed up-zones threaten the diversity and affordability of every one of these housing sites. This greatly adds to the High Displacement Risk in Madison Miller.

- The designation of “High Opportunity” is flawed, and warrants further analysis:
  - o Madison Miller has no direct access to light rail within a quarter

**Housing and Socioeconomics**

mile or 10 minute walk shed (see detailed comments below regarding transportation).

o Madison Miller has woefully inadequate park or open space available for use by the community; this park should not add to the “high opportunity” rating (see comment #4 below).

• Specific Requests:

o Madison-Miller Residential Urban Village should be categorized as Moderate to High Displacement Risk based on the Seattle Comprehensive Plan 2035 Growth and Equity Analysis.

o Further data gathering, analysis, and impact mitigation studies should be conducted to accurately understand the scale and negative impacts of displacement.

o Existing low income and affordable housing listed above should be protected and designated for affordable housing development exclusively.

o The blanket labeling our residential urban village as “High Opportunity” should be reconsidered – we believe we have at most a “moderate access to opportunity” residential urban village, and density increases and mitigation actions should reflect that.

**Land Use**

7 My block (21st Avenue E between John and Thomas streets) is currently all single-family structures which are two stories high. Alternative Three would allow LR 3; a 5 story structure next to my two story single family home (which currently has two units, so two households). As per the DEIS (under 3.2.2 Impacts) large-scale changes that alter building form in a more fundamental manner could create land use impacts. These scale impacts would decreased access to light and air at ground level, reduce privacy, and create public safety hazards with increased traffic on our street, which is adjacent to a play field, park, and school, and is currently a one way street that also doubles as a two-way bicycle and pedestrian greenway.

This block has been identified as "high opportunity" because it is adjacent to Miller Park, but the DEIS analysis of the impacts or proposed mitigations do not adequately address the impacts of up zoning from a block that currently has only two story structures with front and back yards, to L3 or L2 zoning. Further analysis needs to be conducted, and allowable heights need to be lower.

8 Aesthetics: Alternatives 2 and 3 would result in dramatic changes to the character of the neighborhood, are not in alignment with MHA stated principles, and would result in loss of character and livability.

• Exhibits 3.3-14 and 15 show a dramatic change in character even though they minimize the true effect of Alternative 3 on Madison-Miller, because the added units are shown adjacent to much bulkier structures than are currently allowed within the single family areas. Comparable examples for Alternative 2 also have aesthetic impacts, but to a lesser degree than Alternative 3.

## Aesthetics

- Alternatives 2 and 3 propose dramatic changes to the character of the neighborhood (in some cases as extreme as SF changing to L3). These are not in alignment with the stated principles of the MHA to maintain and create appropriate transitions between higher and lower scale zones.
- “Privacy Standards” would “address the placement of windows”, but this is vague and does not address overall aesthetics or privacy.
- Upper level setbacks and side modulation provide limited relief from a dramatic increase in bulk adjacent to one and two story homes with pitched roofs and large windows and small side setbacks.
- The impact of these changes represent a “substantial” change, but as disclosed by the DEIS is considered not a significant impact due to the “urban context of a rapidly growing city.” “Urban Context of Rapidly Growing City” is the cause of this significant impact. This explanation does not make the impact go away and should not release the preparers of their responsibility to address this significant impact and do they offer any effective solutions to develop effective mitigation measures. There are methods to limit, block by block, the total density that can be constructed or to implement greater requirements for open space to offset density increases. This substantial change is not justified or necessary to implement the MHA program. Under the current zoning, as represented in Alternative 1, density goals will be accommodated. The massive increase in units proposed by Alternative’s 2 and 3 will likely displace existing low income and affordable units and new affordable units are extremely unlikely to be built in the Madison Miller Residential Urban Village.
- Proposed DEIS mitigations for aesthetic changes to the character of the neighborhood are vague and inadequate. Modifications to design review and “Other Potential Mitigation Measures” are not required or guaranteed to occur. Instead the Draft EIS couches the mitigation in very non-committal terms such as, “for example, design review could include.” The recently proposed changes submitted to OPCD to modify the Design Review process will further erode safeguards currently in place to mitigate adverse impacts.
- Under the current requirements included in the MHA DEIS proposal many of the developments would be below the threshold for formal design review and do not require SEPA review.
- We strongly disagree with the conclusion in Section 3-3 that “aesthetic impacts should be reduced to less than significant levels”. This is an untrue misrepresentation that is in fact contradicted by the DEIS Growth & Equity Composite Vulnerability Indicators Figure 4, and Displacement Risk Index Figure 5.
- Specific Requests:
  - o Neighborhood Community Councils need to be reinstated with Architectural Review Panels that create design standards consistent with the character of each neighborhood, All development on lots that represent a change in scale will be required to be reviewed by these neighborhood Architectural Review Panels for compliance with neighborhood design standards.

- 9 Transportation: Link Light Rail is not within a 10 minute walk.
- No direct access to a Link light rail station within a quarter mile or 10 minute walk-shed. From Madison Miller the shortest walk to the Capitol Hill Link Station is .8 miles or a 17 minute walk and the longest walk is 1.3 miles, or a 27 minute walk.
  - The future Madison rapid transit line might improve access into downtown, however two buses are still required to reach the nearest Link light rail station.
  - In our community outreach survey 95% of respondents agreed that, “increased transit and transportation options”, are among most important needs – this is an indicator that while we are well situated for local transit connections, faster, more direct options are still required.
  - Specific Request:
    - o Madison-Miller Residential Urban Village should be categorized as “Low to moderate-Access to Opportunity” with appropriate density increases for a non-Hub residential urban village.

Transportation: The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3.

- We believe this will result in unacceptable public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
- Meany Middle School will reopen in the fall of 2017 with a population of up to 1,000 students, and no designated parking lot for parents, volunteers, or staff. School buses will park and travel on our narrow streets. At lunchtime, throngs of students meander through the streets on their way to Safeway and other lunch destinations on Madison and 19th.
- In our community outreach survey at least 72% of respondents indicated they require on street parking. Included inside our urban village or within a few blocks of its borders are 4 schools: Meany Middle, Holy Names Academy, St. Josephs k-8th, and Stevens Elementary, which makes this neighborhood very family friendly. In this family-centric neighborhood, it is unrealistic to think that all new residents, particularly families, will manage without a car.
- Miller Playfield is a regional park used almost exclusively for league play. People from all over the city travel to our neighborhood to utilize the park, and current parking challenges in the neighborhood indicate that many playfield users drive and park in the neighborhood.
- The pedestrian/bike greenway travels along 21st and 22nd, and, along with 19th, is a major bicycle thoroughfare for families and students biking to the four area schools. Increased traffic and construction vehicles would pose significant safety hazards, particularly on 21st Ave East, as it is a one-way street adjacent to the playfield and the primary entrance for Meany, as well as the school bus loading zone. Maximized and illegal parking on the narrow streets causes blind turns at intersections and traffic circles.
- Specific Requests:
  - o Further data gathering, analysis, and impact mitigation studies should be conducted to accurately understand the negative

## Transportation

impacts to traffic, parking, and public safety.

o Within Madison Miller all new development must include onsite parking to mitigate the impacts of higher density on the functionality and livability of this neighborhood.

Madison Miller is one of the two oldest urban villages which has experienced some of the greatest growth by percentage and number of households in the past 20 years and will have over 50% growth increase under proposed changes. However, the DEIS does not address the impact of losing this historic housing stock to the changing character of this Urban Village.

- The Draft EIS notes the potential for development to indirectly impact the setting of historic areas and the historic fabric of neighborhoods. Madison Miller is not a formal historic district, so no context statement has been prepared for this area, which is at the edge of what was known as “Catholic Hill.” In the DEIS Section 3.3 the Madison Miller Urban Village is stated “as one of the two oldest Urban Villages that is proposed to have over 50% growth increase”. It is further noted that MMUV will have a 50% density increase in Alternative 1, and higher than 50% in Alternative 2 and 3.

- According to the Preservation Green Lab study “Older, Smaller, Better: measuring how the character of buildings and blocks influences urban vitality,” neighborhoods with a smaller – scaled mix of old and new buildings draw a higher proportion of non-chain shops, restaurants, women and minority owned business than new neighborhoods. The MMRUV has this variety.

- The vast majority of the homes and apartment buildings within this urban village were built before 1930, with several built in the 1890’s. There is nothing in the DEIS that addresses the impact of losing this historic housing stock.

- Alternative 3 would have the highest potential for detrimental change to its historic character. DEIS proposed mitigation measures consist of policies in the comprehensive plan regarding consistency of new development within an existing setting. These measures are vague and not supported by regulations. In fact, the recently proposed changes submitted to OPCD to modify the Design Review process will further reduce safeguards currently in place to mitigate these adverse impacts.

- Furthermore, most of the projects that would impact the existing SF zones under new MHA zoning changes would be under Design Review thresholds due to lot sizes and not subject to formal design review. If HALA proposed changes to Design Review Process are implemented, this effect will be more widespread.

- RSL (Residential Small Lot) up-zones proposed in Alternative 2 would provide the opportunity for increased density and infill while also allowing for less actual demolition of existing historic era housing.

- Specific Requests:

- o Single Family up zones in Residential Urban Villages should be retained as shown in Alternative 1 or limited to Residential Small Lot, as shown in Alternative 2, to assist in preserving the historic character and architectural diversity of this neighborhood.

## Historic Resources

o Standards should be proposed that require more not less Design Review for more Development Projects in Residential Urban Villages.

## Open Space & Recreation

- 12 Open Space: We have very little neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional play field for league sports and is not available for public use. This “park” will also be used as Meany Middle School’s sole recreational outdoor facilities starting this fall.
- Madison Miller currently has approximate 1.6 acres of open space per 1000 residents, which is below the Parks Plan standard of 9.34 acres per 1000 residents. Alternatives 2 and 3 further decrease by Madison Miller parks and open space level of service to 1.2 and 1.1 acres per 1000 people, respectively.
  - In our community outreach survey 86% of respondents agreed that, “accessible public green spaces”, are highly important.
  - The DEIS assumes the entire acreage of Miller Park and Playfield is our open green space. However, the majority of this park is utilized as a very popular regional playfield, used almost exclusively for league play. The playfield is NOT a community asset and league games are often utilizing the playfield until 10 pm most days of the week, year-round.
  - In addition, much of the park space is associated with Meany Middle School. Meany does not meet Washington State minimum school requirements for on-site outdoor recreational area or on-site parking. Instead it uses Miller Park for school activities and the neighborhood for staff and parent parking.
  - The DEIS does not take any of these factors into consideration. Mitigation is not provided, only suggested as potentially addressed under future City planning and analysis efforts.
  - Given the lot sizes in the area, it is unlikely that developers will be incentivized to provide open space within their projects.
  - Specific Requests:
    - o The DEIS should be required to calculate the actual acreage of the park that will be open to the public (and neighborhood) with consideration of Meany Middle School’s use of the park.
    - o Before up-zoning the MMRUV the City of Seattle needs to procure additional open space within the MMRUV and future development must pay impact fees to cover those costs.

## Public Services & Utilities

- 13 Public Services: Existing infrastructure, including storm sewers, sanitary sewers, and road ways are already compromised due to their age, overused condition and our narrow streets. Garbage pick-up causes traffic backups, and these will increase with the volume of multifamily units in Alternatives 2 and 3.
- The Madison-Miller area regularly has flooded street intersections and alleys that will be exacerbated by dramatic increases in impervious surface. SDOT (Seattle Department of Transportation) and the City of Seattle provides little to no street cleaning services.
  - Garbage, recycling, and compost pick-up is not discussed in the Draft EIS. Because of the small lots and extremely narrow alleys that do not allow for garbage truck access, collection for larger buildings will be forced to the street edge, creating unsightly and unhealthy dumpsters, blocking traffic and parking, and obscuring sight lines.

- In our community outreach survey 83% of respondents agreed that, “infrastructure improvements and additions should be made concurrent with increases in density.”e.g. upgrade road surfaces, sewer lines, power lines and storm drainage.
- Specific Requests:
  - o To mitigate the infrastructure impacts from up zones in both Alternative 2 and 3 development impact fees need to be incorporated into any up-zones to improve existing infrastructure that is in poor condition. Without fees to mitigate these impacts the functionality and livability of neighborhoods are sacrificed.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Claudia Bach
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 I believe Alternative 2 best meets the needs of the larger community.
<b>Land Use</b>	2 Encouraging retention of existing residential housing and increases in creating backyard cottages and mother-in-law apartments is important in retaining the character and experience of our communities, in addition to new multifamily construction. Commercial use should be focused on arterials with more limited use on more residential blocks, and should favor businesses that accommodate neighborhood interaction such as restaurants.
<b>Aesthetics</b>	2 Encouraging backyard cottages and mother-in-law apartments is important in creating density while retaining the residential aesthetic character of the Crown Hill neighborhood.
<b>Transportation</b>	3 It is critical to improve mass transit from the Crown Hill area to accommodate the increase in population that Alternative 2 will result in. The current bus service is deeply flawed as a viable form of timely transit. It is likely that permitted street parking will be important in the surrounding residential area since we are already seeing daytime parking by those taking the Rapid D.
<b>Biological Resources</b>	4 Retaining existing mature trees, and city-sponsored planting of new trees should be included in the plan, to meet or exceed current levels.
<b>Open Space &amp; Recreation</b>	5 It is critical to protect all existing open space, and explore opportunities for new "pocket" parks and other green space and recreation options for area residents. The increase in dogs suggests more options for dog exercise as well.
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced</b>	

**homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**From:** Judith Bader  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Judith Bader](#); [Jack Baker](#)  
**Subject:** MHA Draft EIS Comments from a member of the Madison-Miller Park Community  
**Date:** Monday, August 07, 2017 3:12:16 PM

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To Whom It May Concern:

I support the *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, submitted on behalf of the Madison-Miller Park Community.

I have lived in the Madison Miller Park Community since 1976. Starting off as a renter in one of the first apartment houses to be converted to condominiums on 20<sup>th</sup> Ave E and then as a homeowner on 21<sup>st</sup> East. I am a retired educator who worked for the Seattle Schools for 28 years. I live with my husband who is a retired architect and disabled daughter. We have built a DADU on our property and intend to have our home be available to several people with disabilities in the future. We are part of what one might call the “hidden density” in the Madison-Miller Park Community. We are also very vulnerable to this neighborhood becoming a place we can no longer afford to live due to the environmental impact of the upzoning and increased taxes as the property values increase. Our intention has been to age in place and 3-4 story town houses do not provide such options for the elderly or the disabled.

The “Conclusions” below quoted from the MHA Draft EIS Comments from the Miller-Park Community Group express my concerns with the Draft EIS for our neighborhood. I attended numerous HALA workshops and the Madison-Miller Park community meetings. I support the group’s conclusions.

#### **Conclusions:**

**The MHA DEIS reads more as promotional material for the MHA program. It is not an objective evaluation of the significant impacts of the programs implementation, nor a fair attempt to provide measures to mitigate the adverse impacts of the program. The Madison-Miller Residential Urban Village community has responded to MHA DEIS proposals by investing a large amount of time and consideration to provide the most constructive feedback possible to both preserve that which makes it livable, unique, and a part of what makes Seattle great and at the same time add density and MHA contribution. After extensive review of the MHA DEIS we have concluded that:**

--[if !supportLists]-->• <!--[endif]-->**The Madison Miller Residential Urban Village is and will continue to be highly impacted by a growing Seattle. Both Alternative’s 2 and 3 in the MHA DEIS will put at risk this functional, livable, and unique neighborhood;**

--[if !supportLists]-->• <!--[endif]-->**As a community we support Alternative 1, with the modifications stated previously, which could better meet both density and affordability goals without sacrificing the fabric of this community;**

--[if !supportLists]-->• <!--[endif]-->**Residents in the Madison Miller Urban Village have been displaced and will continue to be at risk in the future. Residents will be at an even higher risk for displacement with the proposed**

**future development shown in Alternative’s 2 and 3;**

--[if !supportLists]-->• <!--[endif]-->**Given the over burdened and narrow streets within the Madison-Miller Residential Urban Village on site parking must be required for all single family and multifamily housing development;**

--[if !supportLists]-->• <!--[endif]-->**Current low income and affordable housing options are at risk for demolition without replacement under the MHA Alternative’s 2 and 3 rezones. If affordability is not a false promise of MHA then these complexes, within the Madison-Miller Residential Urban**

**Village, need to be protected;**

--[if !supportLists]-->• <!--[endif]-->**MHA would be most fairly, equitably, and effectively implemented as a citywide program and as a fee applied to all development in the city;**

--[if !supportLists]-->• <!--[endif]-->**All development within areas that are rezoned must include developer impact fees to help pay for infrastructure impacts;**

--[if !supportLists]-->• <!--[endif]-->**MHA should be implemented to all development throughout the city. MHA should also be implemented without citywide rezones as proposed in Alternative's 2 & 3 and without the changes to existing land use zoning i.e. LR1 throughout the city should become LR1(M);**

--[if !supportLists]-->• <!--[endif]-->**The MHA contribution or percentage of affordable housing should be significantly higher than the current proposed levels;**

--[if !supportLists]-->• <!--[endif]-->**For these reasons, we prefer implementation of MHA with zoning map of Alternative 1."**

Sincerely submitted,  
Judith Bader

<b>Name</b>	Shannon Bailey
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 While it is obvious that thought has gone into the proposed actions, , what is not obvious is the bias against a neighborhood that is already taking on higher density. Expanding the boundaries (alt 2 and alt 3) would place even further infrastructure stress on a neighborhood that will be dealing with upzoning issues . I support alternative 1 and would marginally support alternative 2. Alternative 3 is a boon for developers that care nothing about neighborhoods.</p>
<b>Housing and Socioeconomics</b>	<p>2 Under the current upzone there should already be plenty of "affordable" housing. I would suggest that if affordable housing is the concern, then address the issue of gouging by landlords (look at the price of apodments), allowing housing prices to soar because of the influx of out of of country money (money coming from china), and the tearing down of smaller, more affordable homes to make way for larger, million dollar homes. Once more, it is the builders that are benefitting at the loss of Seattleites...</p>
<b>Land Use</b>	<p>3 Expanding the urban village beyond its original boundaries, at least at this time, goes beyond the spirit and the intention of all the work that the community has done up to this point. Again, the Roosevelt area is taking a huge amount of density through upzoning. To try and move the boundaries may be necessary, but there is no need for it at this time.</p>
<b>Aesthetics</b>	<p>4 Whatever alternatives are chosen, please have the developers always put in new sidewalks and pay for street improvements. Walking and biking in the Roosevelt area is a safety hazard while construction is going on. If the repairs are not made after the buildings are built, then the hazards remain. And if we are adding more population to the area then the sidewalks and streets should be made safe to use.</p>
<b>Public Services &amp; Utilities</b>	<p>5 Given the fact that we cannot get support from the City Council to expand our Northend precinct, it seems a joke to expect that there would be anymore capacity for added police for the north end. By implementing alternative 2 or alternative 3 the potential issues are obvious. Also, there is no specific plan for adding fire or medics to the area with the proposed density increase. This is of concern. Again - I would support option 1 since the necessary fire and police infrastructure would not be enough for the increased density of alt 2 or alt 3.</p>
	<p>6 The expectation is that because people are living next to Light Rail that they won't need cars - at least as much. Good idea. Most likely not to happen. Due to increased traffic there will be decreased air quality.</p>

**Air Quality & Green House Gas Emissions**

6 But there is also another reason why will the green house gasses will increase - the cutting down of our trees. Because trees uptake CO2 their losses will add to the increase of green house gasses. The loss of tree canopy through out Seattle, the "Emerald city", means not only increase in green house gasses, but less wildlife and more urban blight. Under Alt 2 and Alt 3 the loss of trees is greatly expanded. Again - I support not expanding the boundaries.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**From:** Jack Baker  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS Comments from a member of the Madison-Miller Park Community  
**Date:** Monday, August 07, 2017 4:14:59 PM

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### To Whom It May Concern:

I have lived with my family at 404 21st Ave. E. for 37 years. When we moved here the neighborhood was a red-lined high crime area with lots of problems. On the other hand it was racially and ethnically diverse and we could afford the little 530 sq.ft. house and we felt we could make things better if we tried. With our neighbors, we formed a block watch and with lots of commitment over a period of 20 or so years we managed to reduce break-ins and drug dealing significantly. We joined neighbors to plant street trees and to plan and build a new community center. We connected with all of the neighbors and developed abiding friendships with them. We continue to have those deep connections.

We have always been a low and moderate income neighborhood. We are teachers, midwives, ship scalers, social workers, small business owners and city workers. Over the years we maintained our houses and yards and ultimately made what was an iffy neighborhood a desirable one. As the area became more desirable our real estate taxes began to escalate. We paid them with little complaint and in fact supported every initiative and levy that came our way to improve all of the services that the city needed. Those initiatives often supported housing projects and even though some could barely pay their taxes, most voted for those projects.

There came a day however when once again property taxes began to rise ominously and for those who were retired, on fixed incomes or underemployed, the taxes became more and more burdensome.

About this time the city passed the Cottage Ordinance which allowed homeowners to build a rental cottage near their primary residence. Several of us saw an opportunity to meet the rising real estate taxes and create a small cushion between our families and rising cost of living in Seattle. We heard as well the City's concern about providing more housing and were pleased to participate. We stepped up and built cottages in a scale that was appropriate to the neighborhood and still accomplished the desired results of increasing the density of the area. My family and I built a cottage on our lot (see photo above) less than a year ago. It has been rented since September.

So one might imagine our surprise when a neighbor relayed an invitation to a community meeting about our street being slated for a significant up zone: L-2 and L-3, i.e. 40 and 50 feet in height with few limits on the number of apartments that can be built within the 40 and 50 foot height limits.

Here is the dilemma for us and our neighbors. When just one person builds to Low Rise 40 all of a sudden the value of the land under every adjacent house is raised significantly and taxed accordingly making it unlivable for retired folks or in the our case our disabled daughter who depends on the very connected community for acceptance.

So HALA is moving out the very people they purport to help, artists, teachers, nurses, social workers, massage therapists, city workers out of our community. We have invested our very lives in this community. We have raised children here and are raising children here. We are connected to one another in the best ways.

We are multi-ethnic and multi-racial. As a community we not only get along, we have evolved and continue to evolve deep and abiding friendships. We are deeply concerned about losing the fine community that we have worked so hard and long to build.

We understand the need to house more people in the city and we have and are responding to that need by building cottages and putting in ADU's in our houses. I personally have volunteered for ten years at St. Martin de Poores, a homeless shelter. For 12 years after my work at St. Martin's I joined the board at MHCP, a non-profit housing provider with about 500 housing units in five communities serving as board president for six of those years. I hope you understand that we care deeply about our community and about affordable housing.

**Alternative's 2 and 3 in the MHA DEIS will put at risk this functional, livable, and unique neighborhood;**

HALA'S proposal for up zoning our block to L-2, for all of its good intentions, would destroy our much loved community, put a wedge between neighbors and ultimately displace young families many of whom just rebuilt their homes and added ADU's in an attempt to provide more housing and adapt to a growing city. This is a community that works extraordinarily well. My sense is that we are willing to accept three units per lot as long as the metric maintains a scale and density that allows us to connect to one another and to the larger community consciously.

**I support the MHA Draft EIS Comments from the Madison-Miller Park Community Group dated August 2, 2017, submitted on behalf of the Madison-Miller Park Community.**

The "Conclusions" below quoted from the MHA Draft EIS Comments from the Miller-Park Community Group express my concerns with the Draft EIS for our neighborhood. I attended numerous HALA workshops and the Madison-Miller Park community meetings. I support the group's conclusions.

**Conclusions:**

The MHA DEIS reads more as promotional material for the MHA program. It is not an objective evaluation of the significant impacts of the programs implementation, nor a fair attempt to provide measures to mitigate the adverse impacts of the program. The Madison-Miller Residential Urban Village community has responded to MHA DEIS proposals by investing a large amount of time and consideration to provide the most constructive feedback possible to both preserve that which makes it livable, unique, and a part of what makes Seattle great and at the same time add density and MHA contribution. After extensive review of the MHA DEIS we have concluded that:

**The Madison Miller Residential Urban Village is and will continue to be highly impacted by a growing Seattle. Both Alternative's 2 and 3 in the MHA DEIS will put at risk this functional, livable, and unique neighborhood;**

**As a community we support Alternative 1, with the modifications stated previously, which could better meet both density and affordability goals without sacrificing the fabric of this community;**

**Residents in the Madison Miller Urban Village have been displaced and will continue to be at risk in the future. Residents will be at an even higher risk for displacement with the proposed**

**future development shown in Alternative's 2 and 3;**

**Given the over burdened and narrow streets within the Madison-Miller Residential Urban Village on site parking must be required for all single family and multifamily housing development;**

**Current low income and affordable housing options are at risk for demolition without replacement under the MHA Alternative's 2 and 3 rezones. If affordability is not a false promise of MHA then these complexes, within the Madison-Miller Residential Urban Village, need to be protected;**

**MHA would be most fairly, equitably, and effectively implemented as a citywide program and as a fee applied to all development in the city;**

**All development within areas that are rezoned must include developer impact fees to help pay for infrastructure impacts;**

**MHA should be implemented to all development throughout the city. MHA should also be implemented without citywide rezones as proposed in Alternative's 2 & 3 and without the changes to existing land use zoning i.e. LR1 throughout the city should become LR1(M);**

**The MHA contribution or percentage of affordable housing should be significantly higher than the current proposed levels;**

**For these reasons, we prefer implementation of MHA with zoning map of Alternative 1."**

Respectfully submitted,

Jack Baker

**From:** dbaldner@comcast.net  
**To:** [PCD\\_MHAEIS](#); [eseca.brand@seattle.gov](#); [Staley, Brennon](#); [Welch, Nicolas](#); [Wentlandt, Geoffrey](#); [Assefa, Samuel](#); [Herbold, Lisa](#); [Johnson, Rob](#); [Williams, Spencer](#); [Harrell, Bruce](#); [Sawant, Kshama](#); [Juarez, Debora](#); [O'Brien, Mike](#); [Bagshaw, Sally](#); [Burgess, Tim](#); [Gonzalez, Lorena](#)  
**Subject:** MHA Draft EIS Comments  
**Date:** Sunday, August 06, 2017 10:46:52 AM

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support the *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, submitted on behalf of the Madison-Miller Park Community.

Our neighborhood prefers Alternative 1 (with modifications). We recommend that MHA (*Mandatory Housing Affordability*) requirements be implemented into the existing zoning in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (*Accessory Dwelling Unit*) and DADU's, (*Detached Accessory Dwelling Unit*) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units. These recommendations are based on the following:

- **Flawed typology:** We are deeply concerned that the DEIS falsely represents Madison-Miller as “Low Displacement Risk/High Access to Opportunity”. This misrepresentation will result in significant negative impacts if Alternatives 2 or 3 are adopted. Please see our detailed comments below.
- **Density increases not equitable:** Our current zoning in Madison-Miller will exceed HALA density goals without additional proposed zoning changes. Indeed, based on current development and permitted housing units, Madison-Miller density will exceed MHA goals by the end of 2017 with our current zoning. Other urban villages, such as West Seattle Junction and Ballard, categorized as “Low Displacement Risk and High Access to Opportunity” have 10 – 30% less proposed increases than MMRUV (*Madison Miller Residential Urban Village*), despite being designated for more density as Hub Urban Villages and identified as locations for future light rail extensions.
- **MHA process not inclusive:** We do not feel the area-wide zoning changes outlined in Alternatives 2 and 3 reflect adequate neighborhood and stakeholder input. The current zoning, established by the 2035 Comprehensive Zoning Plan, was developed with a more inclusive process and was more responsive to neighborhood input.
- **Concerns for significant negative impacts:** Our request for MHA implementation with Alternative 1 zoning map should not be understood as a resistance to increased density. As we've said in previous correspondence, we embrace increased density in our neighborhood but feel Alternatives 2 and 3 (as written):
  1. do not adequately mitigate for displacement of low and middle income residents;
  2. do not equitably distribute the density and cost of MHA city-wide;
  3. will increase racial and economic segregation;

4. do not match increased density with increased access to green space and recreational opportunities;
5. will burden our already fragile infrastructure; and,
6. pose significant public safety hazards with increased traffic on our narrow streets and heavy pedestrian and bicycle usage (with Meany Middle School and the pedestrian/bike greenway).

The Madison-Miller Park Community could support Alternative 2 with modifications noted in comments below (and is **opposed** to DEIS proposed zoning shown in Alternative 3). Please refer to the **Alternate Proposal Zoning Map** that was included with *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, for specific zoning modifications. As noted in the DEIS, Alternative 2 generates more housing, jobs, and affordable housing than Alternative 3. The allocation of growth in Alternative 2 better reflects the existing character of our neighborhood, and has fewer significant negative impacts on current stakeholders than Alternative 3.

#### **Summary of our detailed comments to follow:**

1. **Housing and Socioeconomics:** Both the “Low Displacement Risk” and the “High Access to Opportunity” designations misrepresent our neighborhood and need further analysis and mitigation. **We are concerned about the displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents,** (a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.
2. **Transportation:** Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk.
3. **Transportation:** The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
4. **Open Space:** We have virtually no neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional playfield for league sports and summer sports camps and is not available for public or neighborhood use. This playfield will also be used as the sole recreational field for Meany Middle School starting this fall.
5. **Public Services:** Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded power lines are already compromised due to their age and condition. Garbage pickup on our historic and narrow streets creates traffic backups now, and additional volume of apartment buildings will increase that problem.
6. **Historic Resources:** MMRUV (*Madison Miller Residential Urban Village*) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS does not address the impact of losing this historic housing stock.

**Aesthetics:** Alternatives 2 and 3 propose dramatic changes to the character of the neighborhood (in some cases as extreme as SF (*Single Family*) changing to LR3(*Low-Rise3*)). This is in direct conflict with the stated MHA principle to maintain and create appropriate transitions (“between higher and lower scale zones as additional development capacity is accommodated”). The only proposed DEIS mitigation measures for aesthetic changes to the character of the neighborhood is the Design Review process. HALA has requested from OPCD (*Office of Planning and Community Development*) a determination of non-significance for proposed changes to the Design Review process. The HALA proposed changes to modify the Design Review process will further erode safeguards already in place to mitigate these adverse impacts.

Thank you,

Dan Baldner  
314 21st Ave. East  
Seattle, WA 98112

**From:** Jason Barber  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** HALA  
**Date:** Monday, August 07, 2017 9:40:08 PM

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Greetings,

As a lifelong resident of Seattle, the latest density re-zoning proposals put forth in HALA's DEIS statement are of great concern to me. While an increase in urban density and lack of affordable housing is now an unavoidable issue of living in Seattle, I feel the problem needs to be approached with more nuance than what has been proposed, especially given HALA's stated goals of increasing housing affordability.

I ask the city to please consider the proposals being put forth by the Madison-Miller Park Community Group, specifically:

A. Re-evaluate our status as "Low Displacement Risk" and "High Access to Opportunity". The DEIS already documents a history of displacement in the Madison-Miller Residential Urban Village (MMRUV), and the latest upzone proposal would undoubtedly continue this trend.

B. Recognize that designated urban villages are being forced to bear a livability cost that most other Seattle neighborhoods are not, even though any revenue generated from proposed upzoning would not be earmarked specifically for the neighborhoods being impacted, and would instead go into a general fund for housing affordability. It is imperative to understand that increased density also requires corresponding upgrades to sewer lines and other infrastructure, parking availability, public safety measures, and other aspects of city living.

C. Urban density can be easily accommodated with structures that do not sacrifice aesthetics or otherwise compromise the feel of the neighborhood. At a minimum, sufficient setbacks from sidewalks and adjacent lots need to be required for all new residential structures.

D. Consider a more liberal use of the "Residential Small Lot" designation for Madison-Miller, especially since the existing lots are in fact quite small, and this would help preserve more of the historic-era housing.

Thank You,  
-Jason



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**August 7, 2017**

TO: [MHA.EIS@seattle.gov](mailto:MHA.EIS@seattle.gov)

**RE: MHA Draft EIS Comments from the Morgan Community Association (MoCA)**

The following comments are respectfully submitted on behalf of the Morgan Community Association (MoCA). MoCA is a grassroots association of residents, business persons, property owners and other stakeholders focusing on the future of the Morgan Junction neighborhood, including the Morgan Junction Urban Village.<sup>1</sup> Our primary purpose is to make Morgan Junction a better place to live, work, shop and enjoy. MoCA began community outreach on the MHA/HALA proposals with our October 2016 meeting, and sponsored the first West Seattle-wide HALA/MHA workshop in November 2016.

**Overall comments on MHA Alternatives 1, 2, and 3**

**1a-d Our neighborhood prefers Alternative 1.** We recommend that any MHA (Mandatory Housing Affordability) requirements be implemented into the existing zoning of our residential urban village through measures that include retention of the *previous definition RSL*; require developer impact fees for traffic, schools, parks and affordable housing to be collected citywide, not just from urban villages, in order make the funding of these basic function more equitable; increase MHA percentage requirements when any displacement occurs to generate significantly more affordable housing units, and abandon the “one urban village size fits all” mentality.

These recommendations are based on the following:

- 2 • 2.0 Flawed Typology:** We are concerned that the DEIS misrepresents Morgan Junction Urban Village as “Low Displacement Risk” and “Low Access to Opportunity”, and accordingly assigns growth increases (from NC3-30 jumps to NC3-75) that are out of proportion with the size of this Urban Village. The only other UV with this typology (Aurora/Licton Springs) has a population that is two thirds larger than that of Morgan Junction and includes the four lane Aurora Avenue which is larger than roadways of California Ave SW or Fauntleroy Way SW. Morgan Junction and Aurora/Licton Springs are not similar urban villages and should not be lumped into the same typology with the same “solutions.”
- 3 • 2.0 Growth Assignment impacts:** The current zoning in Morgan Junction will exceed HALA density goals without additional proposed zoning changes. We accept that this brings density to an Urban Village that lacks a library, a community center, or light rail. What we do have is affordable housing on scales both large and small. Yet, we realize that the proposed up-zoning will affect and ultimately displace our large existing low income resources such as the 26-unit Marnae apartments, affordable senior housing apartments, and Seattle Housing Authority’s Cal-

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<sup>1</sup> Morgan Community Association Mission Statement

- Provide information to the community.
- Provide opportunities to participate in projects.
- Monitor and provide oversight on progress of the Morgan Junction Neighborhood Plan.
- Provide community forum to coordinate with the City of Seattle.

Mor Complex. This contradicts the “low displacement” categorization assigned to Morgan Junction. The categorization should be changed to High Displacement Risk.

- 4 • **2.0 Affordability going elsewhere:** Morgan Junction has already seen a “rare 7 parcel assemblage” marketed as a “development opportunity in advance of rezoning” from SF to LR3 offered for \$5.6 Million - resulting in 148 apartments or 30 townhomes where there are currently seven modest single family homes. There is no guarantee that the replacement units will maintain the affordability quotient that now exists. Instead of being created in our Urban Village, affordable housing is being pushed out of the Morgan Junction Urban Village by the proposed MHA alternatives.
- 5 • **2.0 The MHA process was not inclusive:** We do not feel that extensive neighborhood and stakeholder input was incorporated on proposed zoning changes outlined in Alternatives 2. Proposed zoning changes in Alternative 3 were never disclosed until issuance of the DEIS. The zoning established by the 2035 Comprehensive Zoning Plan reflects the zoning adopted through extensive public outreach and participation as the Morgan Junction Neighborhood Plan was adopted in 1998. Furthermore, Morgan Junction has written letters and met with the City a number of times to attempt to convey our already codified “neighborhood design guidelines” included in our Neighborhood Plan, to no avail. The proposed heights are in violation of the Morgan Junction Urban Village Neighborhood Plan, and are now more so with the newly introduced, undiscussed and previously undisclosed higher proposed limits in Alternative 3. For any “Assessment” to introduce the concept of “work(ing) with neighborhood groups”, and then not include a scheduled strategy to reconcile the existing Neighborhood Plan conflicts with the ‘Grand Bargain’, makes that Assessment inadequate.
- 6 • **2.0 Neighborhood Plan Conflicts:** With the proposed (MHA) zoning changes, some of the adopted goals and policies of the Morgan Junction Neighborhood Plan are in conflict with the zoning changes proposed by the MHA program. It has been the position of the Office of Planning and Community Development (OPCD) that the MHA zoning changes are in line with the current Comprehensive Plan 2035 policies, but they acknowledge that our Neighborhood policies are in conflict with those “fresh policies” (OPCD presentation at the Morgan Junction Design Workshop March 6, 2017). However, the Seattle Comprehensive Plan 2035 is very clear about conflicts: in the Community Involvement Element, policy CI 2.11 *“Maintain consistency between neighborhood plans and the Comprehensive Plan. In the event of a possible inconsistency between the Comprehensive Plan and a neighborhood plan, amend the Comprehensive Plan or the neighborhood plan to maintain consistency.”* In letters and verbal communications, MoCA notified the HALA team of the existing conflicts and requested City action. We believe that a formal Community/Neighborhood Planning process is required to address the conflicts introduced by the MHA proposal, and further believes that the current MHA outreach has not risen to the level of full planning activity, nor did that outreach rise to the level of an Urban Design Workshop or Action Plan, which are other tools used by the OPCD to review and revise Neighborhood Plan goals and policies. As a result, the Morgan Community Association submitted a Comprehensive Plan Amendment in May 2017 in order to ensure that our existing Neighborhood Plan Policies are maintained until such time as a Community Planning effort can take place.<sup>2</sup> On July 10, 2017, OPCD announced plans to make amendments to specific neighborhood plan policies if they would clearly and directly conflict with draft MHA implementation. Those neighborhood plan policies included Morgan Junction. As far as outreach, “additional community engagement will occur prior to a final recommendation by

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<sup>2</sup> This Comprehensive Plan Amendment has been docketed by the Seattle City Council as of this date.

OPCD". A conflict that has not been acknowledged or addressed by OPCD in the past seven months is unlikely to achieve the level of proper community outreach and vetting procedures requested by Morgan Community Association. The DEIS is focused on a one-size fits-all Urban Village concept, and is therefore disconnected from existing Neighborhood Plans, fails to recognize MHA program inconsistencies with Neighborhood Plans, and fails to identify tools and methodology used by the OPCD to review and revise Neighborhood Plan goals and policies.

- 7 • **3.1 Significant negative impact concerns:** This request for MHA implementation within the Alternative 1 Morgan Junction zoning map should not be viewed as resistance to increased density. We embrace increased density within our neighborhood, but believe that as presented, Alternatives 2 and 3 do not adequately mitigate for low and middle income displacement, fails to fairly distribute the density and cost of MHA through-out the city, fails to link increased density with supporting services, over burdens fragile infrastructure, and poses significant public safety hazards included but not limited to increased traffic and poor air quality.
- 8 • **3.2 Land Use:** Both Alternatives 2 and 3 depict stark transitions of low density uses next to high density uses, including NC3-75 next to RSL zoned property. At every outreach opportunity, Morgan Junction residents provided comments about the need for zoning and associated height density to reflect the topography in order to avoid canyon-like effects on California Ave. SW and maintain view corridors. This means locating the greatest height adjacent to the slopes east of Fautleroy Way SW. Neither Alternative 2 or Alternative 3 reflect this preference but instead maintain the height and density into the already congested California Ave corridor. In addition, the current Morgan Junction Neighborhood Plan does not contain any RSL zoning, so anything built under zoning in the Urban Village will be a change from the status quo Single Family zoning. Unfortunately, this zoning designation has expanded greatly since inception in the late 1990's, with smaller lot averages and narrower setbacks. As a result, the proposed RSL development standards proposed under MHA are affiliated more with Low Rise zoning than Single Family. If it comes to pass that RSL zoning is used in Morgan Junction, the original version should be implemented.
- 9 • **3.3 Aesthetics and Cumulative Effects:** Regarding Aesthetics and the DEIS section "Mitigation Measures", *page 1.22*: Use of three noted "features intended to reduce the effects associated with increased development intensity" in West Seattle has not proved successful, resulting in the dark tunnel known as California Ave SW. It is not appropriate for this EIS to present this as the only mitigation option to mitigate development intensity. Appropriate Assessment should document the existing public views, sunlight to the sidewalk and existing shadow effects and THEN assess and present the loss of public views, loss of sunlight to the sidewalk and increased shadow effects to ALL impacted public spaces including two blocks away for proposed high-rises. This is not presented in this DEIS, and therefore this assessment is inadequate. Additionally, on *page 1.23* for the discussion of hypothetical measures that "could" be implemented, there is no quantitative, analytical plan for adopting these measures; therefore this paragraph falls short of an Assessment, and is inadequate. Further, we challenge this statement: *"The proposal includes a variety of features and development regulation amendments to minimize these impacts. In combination with the City's adopted development regulations, Design Review process, aesthetic impacts should be reduced to less than significant levels. Therefore, no significant unavoidable adverse impacts are anticipated. In the urban context of a rapidly growing city, such changes are substantial but are also subjective in nature and are not necessarily significant impacts pursuant to SEPA."* Firstly, upper level setbacks do not mitigate street level impacts of density. Secondly, to dismiss the residents' persistent complaints about overbuilding introducing unacceptable aesthetics as "less than significant" is not only closed minded, but unprofessional. It is our empirically founded opinion that "Significant Adverse Impacts" are anticipated, including loss of

- light to the sidewalk and corresponding loss of business, higher crime rates, and demoralized and less diversified populations.
- 10 • **3.3 Affected Environment:** While this section describes existing height and floor-area-ratio generalizations for City planning, no analysis is cited for statements such as, “Taller buildings are a common development form that use urban land more efficiently.” Efficiency is not discussed or defined in this section. Many urban planning studies have been documented which present data that show that taller buildings (denser populations) lead to less sunlight reaching the sidewalks, higher crime rates, demoralized and less diverse populations. [\[https://www.washingtonpost.com/news/wonk/wp/2015/05/04/in-the-shadows-of-booming-cities-a-tension-between-sunlight-and-prosperity/?utm\\_term=.a37776246fdc\]](https://www.washingtonpost.com/news/wonk/wp/2015/05/04/in-the-shadows-of-booming-cities-a-tension-between-sunlight-and-prosperity/?utm_term=.a37776246fdc), “Shadows even turn light into another medium of inequality — a resource that can be bought by the wealthy, eclipsed from the poor.” We disagree with your statement about “efficiency”. Additionally, page 3.139, where the M1 zoning is discussed it is stated, “These changes would potentially include smaller building setbacks and more visually prominent building forms, which *could* reduce the amount of direct sunlight reaching ground level...” This is an improper use of the word “could”. Larger volume buildings do, factually, reduce the amount of sunlight reaching the ground. The use of incorrect and misleading language in the document does not lend credence to it as an “Assessment”.
  - 11 • **3.3 Design Guidelines:** Morgan Junction as a whole has benefited from Design Guideline standards and processes during past redevelopment phases. However, at a time when most public design review processes are proposed to be eliminated, the “losers” will be those property owners adjacent to upzoned areas. As Design Review Board advocacy vanishes, so too will the quality of life along a street until full redevelopment occurs. Therefore, where Design Review is cited as mitigation, the EIS should clearly indicate the thresholds under which projects are exempt from Design Review. This becomes most significant as areas that are upzoned from Single Family Residential to Low Rise categories become exempted from design review process, meaning that there really isn’t any mitigation available in the end.
  - 12 • **3.4 Transportation:** The heart of Morgan Junction is at the intersection of California Ave SW and Fauntleroy Way SW, which is served by the Rapid Ride C buses, Metro routes 128, 22, 116, 118, 119, and 773, in addition to being a bike corridor and a school walking route. This corridor is also impacted each year by the averaged 1.6 million vehicles that pass through the Washington State Ferry (WSF) Fauntleroy dock onto Fauntleroy Way SW. The majority of these trips through Morgan Junction are the weekdays as drivers head to jobs east of the Duwamish River. WSF plans to increase the size and vehicle capacity of the boats using the Fauntleroy dock, adding to the already overburdened AM and PM peak hours of the Morgan Junction California and Fauntleroy Way intersection. The DEIS only covered the areas of impact resulting from auto and transit, pedestrian and bike, safety and parking, and fails to address Washington State Ferry related impacts on the existing transportation grid of the Morgan Junction Urban Village. It should also be noted that the intersection of Fauntleroy Way SW at SW Alaska Street in the West Seattle Junction Triangle Urban Village is also affected by this same ferry-related traffic.
  - 13 • **3.5 Historic Resources:** Proposed upzone areas in Alternatives 2 and 3 are ground zero for the few remaining early 20<sup>th</sup> Century culturally significant artifacts in Morgan Junction. The listed mitigation measures are simply naive in the face of 55 foot to 75 foot-tall building heights.
  - 14 • **3.7 Open Space and Recreation:** The DEIS fails to offer implementation of any form of Developer Impact Fees as a mitigation measure to open space and recreation deficits. Density proposed under Alternative 3 will effectively destroy many park resources without draconian measures enacted. Morgan Junction has open space deficits, and there is no funding available for land-banked future park properties.

15 In summary, please do not misinterpret these Morgan Junction Urban Village comments as a desire to prevent even more affordable housing in Morgan Junction. To the contrary, our Neighborhood Plan supports continued growth in a fashion compatible with the existing community. We want to make Morgan Junction a place that discerning, urban folks want to live. We want to attract them with our businesses, character and livability – including light and air. To quote a NY Central Park user,

*“Laws can be changed. Even trees and traffic patterns can be changed. But once you have buildings of that caliber and that height and that massing, there’s nothing we can do to save the park any more. Those shadows are there in perpetuity.”*

Let’s learn from other cities’ mistakes, and not repeat them. Morgan Community Association supports DEIS Alternative 1 for the Morgan Junction Urban Village.

For the Morgan Community Association (MoCA)

President - Deb Barker

Vice President - Phillip Tavel

Secretary - Natalie Williams

**From:** Deb Barker  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Deb Barker"s e-mail](#); [Phil Tavel](#); [Natalie Williams - MoCA](#)  
**Subject:** DEIS comments from Morgan Community Association  
**Date:** Monday, August 07, 2017 4:51:15 PM  
**Attachments:** [EIS Comments MOCA.pdf](#)

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Attached please find DEIS comments from the Morgan Community Association (MoCA).

Sincerely,

Deb Barker, President  
Morgan Community Association  
206-940-2255 (m)  
djb124@earthlink.net

Deb Barker  
206-940-2255 (m)  
djb124@earthlink.net

<b>Name</b>	Bruce Barnett
<b>Email address</b>	
<b>Comment Form</b>	
<b>Aesthetics</b>	1 Please limit density increases to a 10-minute walking radius around currently existing light rail and streetcar stations along with rapidride stops. Increasing density away from transit increases car use and living in West Seattle, the bridge is nearing capacity during rush hour.
<b>Transportation</b>	2 Can we get a pilot project for dial-a-bus or local commuter bus for West Seattle neighborhoods more than 5-minute walk from Rapid ride?
<b>Historic Resources</b>	3 With the housing crisis, would the city consider requiring developers to move and renovate existing housing (if not unsafe) instead of allowing demolition?
<b>Air Quality &amp; Green House Gas Emissions</b>	4 If increased density is not close enough to reliable rapid transit, it will increase car usage that will increase greenhouse gases and degrade air quality and the environment
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your</b>	

**From:** Sybil Barney  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** ATTN: Geoffrey Wentlandt re: Up - zoning of 11th Avenue East (between Aloha and Prospect)  
**Date:** Monday, July 31, 2017 8:29:36 PM  
**Attachments:** [2017\\_EIS\\_Map.jpg](#)  
[2017\\_921\\_11th Avenue East.JPG](#)  
[2017\\_931\\_11th Avenue East.JPG](#)  
[2017\\_941\\_11th Avenue East.JPG](#)

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NAME: Sybil Barney  
ADDRESS: 926 11TH Avenue East, Seattle 98102

I live on 11th Avenue East between Prospect and Aloha across the street from the proposed up-zoning of the west side of the block, and have for a number of years. (Please see the attached EIS map.)

It was my understanding that the 2015 Comprehensive Plan Policy LU 1.4 states that the city is to: "Provide a gradual transition in building height and scale inside urban centers and urban villages where they border lower-scale residential areas" The up-zoning of this half block does the opposite. It would be a very abrupt transition extending the Urban Village character into the single family homes on the east side of the street. AND, the gracious old brick buildings and some single family homes on the west side of 11th Avenue East. There is no strategic geographic reason to up-zone this half-block (or other random spots on HALA maps.) Please stick to your development strategy: don't up-zone just because there are grandfathered condo buildings on this 11th Avenue East block.

Please maintain Seattle's commitment to the distinction between urban centers / villages (UVs) and single-family neighborhoods.

P.S. For those of you who have not driven down this block, I have attached photos (3 of the 4) of the lovely old buildings (two were built in the 1920's) on the west side of the block. Please note, the landscaping and old trees in front. It is really a nice "entrance" to the west side of Volunteer Park. These buildings have parking spaces/garages in the back. Even with those garages, we have had to restrict parking on 11th Ave East for residents only. People outside the neighbor were using "our" street to park while they hopped a bus to work.

Regards

Sybil Barney

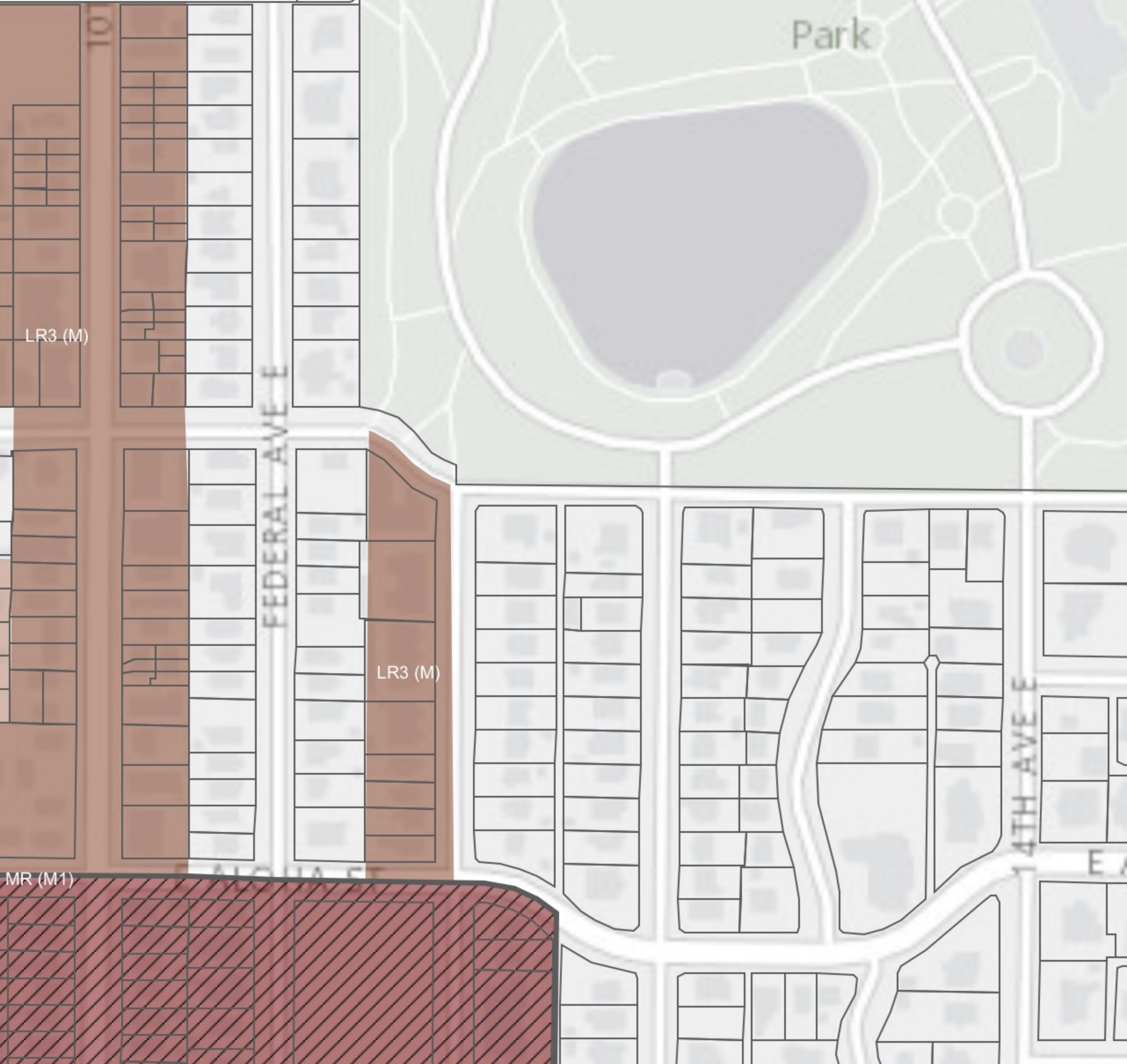


address or place



Volunteer  
Park

Barney, Sybil



LR3 (M)

FEDERAL AVE E

LR3 (M)

MR (M1)

14TH AVE E







To whom this concerns,

The DEIS needs to address how the entire City will be impacted by the changes in this DEIS and the other SEPA analyses combined.

Seattle residents live in both their own neighborhoods and in the City at large.

DEIS has FAILED to analyze the impacts to both neighborhoods and the city at large.

More thorough study is a must for a well run plan.  
Thank you for your serious attention to this matter.

Sincerely,

Carole Barrer  
[Colorcurrents@gmail.com](mailto:Colorcurrents@gmail.com)

**From:** Tawny Bates  
**To:** [PCD\\_MHAEIS](#); [Herbold, Lisa](#); [Johnson, Rob](#); [O'Brien, Mike](#); [Sawant, Kshama](#); [geoff.wentlandt@seattle.gov](mailto:geoff.wentlandt@seattle.gov); [sally.bagsh \(sally.bagsh@seattle.gov\)](mailto:sally.bagsh@sally.bagsh@seattle.gov); [Burgess, Tim](#); [Gonzalez, Lorena](#); [Juarez, Debora](#)  
**Subject:** Please extend MHA DEIS public comment period  
**Date:** Sunday, July 30, 2017 10:57:56 PM

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The DEIS is a legal requirement for the city to identify and consider the environmental impacts of the Mandatory Housing and Affordability program, before making decisions, and to identify mitigation measures, as required by SEPA per chapter 43.21RCW.

There are gaps in how the MHA DEIS responds to SEPA. Limiting the public comment time to only 2 added weeks, prevents the full range of feedback the city should consider. Please extend the deadline by a meaningful amount of time, such as 4 weeks into Sept. so the full range of comment can be collected. If gaps, oversights, and weakness are not addressed at this stage it has ramifications into the future. There are major subject fields required by SEPA that were not included or passed over lightly, such as noise, electrical grid system impacts, light pollution, and glare, to name a few. Other less tangible subjects require added time to respond intelligently on the oversights encountered.

The DEIS should not be considered a legal obstacle to be overcome, it requires a comprehensive response to identify impact and mitigations. A responsible DEIS is critical to ensure that MHA lives up to its commitment to provide density and livability.

This is a very long document and a lot of effort was involved by everyone to produce it. Please show respect for the time involved and the extensive size of the documents, by extending the comment period too allow diligent and meaningful review. A poorly completed DEIS will not add to the city's ability to increase housing. Thank You.

**From:** Tawny Bates  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA EIS Comments  
**Date:** Monday, August 07, 2017 1:25:49 AM  
**Attachments:** [COMMENTS LIGHT POLLUTION AND HEALTH HAZARD- MHA DEIS - Bates.docx](#)  
[COMMENTS UTILITIES - MHA DEIS - Bates.docx](#)  
[COMMENTS HUMAN HEALTH MHA DEIS - Bates.docx](#)

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Enclosed are comments on the MHA EIS – attached are supplemental WORD docs. Under **SEPA chapter 43.21c RCW** an EIS is required to assess environmental concerns very specifically. As part of your obligation to perform an EIS, you are required to fully and clearly call out impacts, identify mitigation, and improvements, to ensure the upzones do not result in negative or harmful consequences. I have the following concerns with the DEIS:

- The DEIS **does not consider multiple alternatives**, relying on only one approach to increasing affordable housing, the MHA upzones, with alternative 2 and 3 being slight variations of the same alternative. SEPA requires more than one alternative. Upzones are not necessary to accommodate growth, and only make marginal contribution to affordability for small numbers of people, review real alternate plans.
- The DEIS **does not address the full range of health and environmental impacts** mandated by SEPA for an EIS in relation to people and animals, such as impacts of; noise, utilities, toxins, light and glare, (material comments are attached WORD files titled HUMAN HEALTH, LIGHT POLLUTION, UTILITIES)
- The DEIS **does not evaluate extended daily exposure** to toxins and pollutants and **overlapping impacts of multiple construction sites** adjacent one another, or in close proximity. Urban Villages could be in a state of constant demolition & construction, **every day for years.** Constant construction will occur in residential areas where seniors, small children, and people who work from home live. OSHA and right to know programs do not exist for “neighborhoods”. Mitigation appropriate to the situation is required. Per Impacts Section 3.2.2 page 18. “.the greatest potential for significant adverse land use impact occurs in SF areas rezoned to higher intensities... urban villages with greater quantities of existing single family could experience more local impact than urban villages with little single family.”
- The DEIS **combines lightly impacted areas, with heavily impacted areas, then averages impacts**, to conclude impact overall is equal, and **not significant**, this dilutes and falsely minimizes the actual impact on areas experiencing huge changes. Impacts are *not distributed equitably* from one Village to another, Queen Anne is projected for 5% change in land use, Greenwood at 1%. While South Park and Crown Hill and Wallingford are near 60%. Rolling all the villages into the same EIS, waters down the enormous diversity and falsely represents the actual impacts. **Separate EIS statements which recognize the unique aspects of each UV** are required to provide the micro level of planning needed, and effectively identify and respond to actual impacts per SEPA.
- The DEIS **does not identify mitigation strategies** appropriate to the intensity of the zone change, per the WAC SEPA checklist part D Supplemental Sheet for non project actions “...if (the proposal results in) a **greater intensity or a faster rate** than if the proposal were not implemented.. **“this must be responded to..”** The DEIS **approach is not a valid method to establish impact**, since it does not respond to rate of change and presumes through the DEIS changes will be gradual. Example; Land Use 3.2.3 pg 20 Rate and Pattern of Growth “.the city anticipates housing growth will occur relatively evenly over the course of the 20 year planning horizon... if a faster or more concentrated pattern of growth occurs greater land use impact could occur.” Mitigation methods must ramp upward in accordance with rate and intensity, the change we are seeing now is not gradual.
- The **DEIS does not identify mitigation which actually exists** and relies on strategies which are conceptual, Example: Land Use 3.2.3 pg 44 “The following tools are available **if the city wishes** to proactively mitigate identified land use impact. Example: **Biological Resources- Section 3.6.3 Mitigation measures**, nine ideas for protection of trees are listed, most only in discussion phase. **NO upzones without appropriate mitigation measures in place!**
- The DEIS **identifies as mitigation methods ordinances which are at times outdated or unrelated codes**, this does do not provide mitigation ( see attached WORD documents on noise and utilities). The DEIS does not identify how referenced codes mitigate impacts, when the code was last updated, and why it renders impact to be not significant. Codes and ordinances are part of city infrastructure and must be updated and enforced to be effective. The DEIS also identifies as **mitigation strategy measures which are being reduced or eliminated**: items like Design Review or development standards setbacks, these are the opposite of mitigation, and this produces negative impacts on building bulk and aesthetics

- In closing, **it is irresponsible for the DEIS to arrive at a conclusion of no significant impact for Chap 3.6 Biological Resources: re Tree Canopy.** The DEIS **does not have sufficient data** to proclaim impact of MHA on tree canopy will be insignificant.
  - There is limited historical data on tree canopy; it has been collected in inconsistent methods; impacts of converting SF zoned areas to RSL and LR have not been studied, particularly RSL; no actual *field data* on trees in UV's has been collected.
  - The 2016 Tree Canopy survey concluded; most trees, **72%, are in the SF zones**, in particular the most desirable coniferous trees; **once lost these are not replaced with the same type or size tree**; and tree canopy is currently decreasing. MHA proposes **to rezone large amounts of SF** in 30% of the UV's, to RSL and LR, and relax standards for height and required setback
  - The DEIS claims **mitigation will be achieved by relying on existing Tree Protection Ordinances.** The *Tree Protection Ordinances depend on* allowing developers to utilize departures to development standards, in exchange for preserving trees. Typical *departures depend on* allowing developers to reduce parking, increase height or make adjustments to reduce setbacks, as concessions to retain trees.
  - However, Urban Villages are not required to have parking, and under MHA heights will already be increased and setbacks reduced. This will significantly limit the ability to negotiate with the developer to save trees, as all "bargaining chips" have been given up.
  - If departures **cannot be found which allow the developer to achieve the maximum density allowed, even exceptional trees may be removed.**
  - Design Review will also be removed in UV's, a process which typically provided oversight and support for trees on the parcel to be developed, *and the adjacent parcels.*
  - Most large trees will need to be removed under MHA, unless some **very lucrative benefit** can be provided to the developer not to do this. Even an allowance to opt out of MHA in exchange might not be sufficient. It is likely even street trees will be sacrificed to build under MHA, as large trees typically require 10 feet minimum for branches and roots. If construction will occur on *multiple sides* of the tree, it may be deemed a hazard to retain it.
  - The DEIS does not accurately assess the value of trees as **environmental machines**, it is possible to estimate environmental benefit to air quality, noise level, cooling impacts, stormwater runoff, etc, This should be identified so loss of trees can be correctly valued.

<b>UTILITY IMPACTS - Comments MHA DEIS – Tawny Bates 8-6-17</b>
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The DEIS also excluded the following impacts called for by SEPA, or did not address them in a meaningful way.

**Broadband access**- Communications city wide in the UV needs to be addressed and consider rates, access, and speeds, as part of increased density. Faster more expansive options will be provided to high opportunity- high growth areas. With lesser internet options to low income- high displacement areas, where service will not be as robust, this disadvantages them. Internet speed is key to future success. An example: I live in Wallingford, my extended family are in Rainier Valley. I can afford more than \$100 a month for internet cable speed needed for tech workers who live in my DADU. Fiber optics will be here soon. It will be a long time before my relatives south of Rainier see similar service. With the density comes improved buses, and better internet, more opportunity they could benefit from. Please address inequity in all directions. All neighborhood need good services, including grocery stores, bus routes and a robust commercial zone to provide the resident with equity and opportunity, distribute growth broadly enough to serve all areas well, and reduce impact of overbuilding in some places.

**Electric Utility**– The DEIS does not address energy impacts of increased growth on the electrical grid system. An analysis should be included which evaluates electrical and gas infrastructure in locations proposed for significant upzones. Energy use for these zones should be forecasted per household, and impact on lines, feeders, and substations, and distribution capacity of the electrical grid system determined as well, and gas distributions system.

A new substation was constructed on Denny to handle South Lake Union growth, this was a **huge expense** to ratepayers. Identify how the added loads of upzones will be handled, and include possible renewable energy generation in the analysis. Shading of existing solar is **Section 6 B Energy and Natural Resources RCW 43.21c** and relates to considering if the project would impact solar on adjacent properties, there are properties in the UV's that will be impacted. In addition new structures may prevent other new structures from using solar. There are currently no underlying codes or standards to mitigate impact on solar investments. An environmental impact statement should address this.

Two mitigation strategies are identified under electricity, (and nothing for gas usage.) For electricity Benchmarking is listed as a mitigation strategy; Benchmarking involves improving information about performance in the built environment; it is not a **mitigation** strategy, and it won't apply to buildings less than 20,000 square feet. Energy Codes are the second strategy for mitigation. Energy codes are part of the building code system, **code minimum** requirements. **Code minimum requirement cannot be considered mitigation for increased growth.** Mitigation relates to what will be done beyond what is typical, to prevent the increased growth from being so impactful.

**SPU- Waste disposal** - Significant amounts of demolition and removal of toxic hazards will be produced by the upzones increasing debris going into landfills. This subject of **waste disposal and recycling is not discussed in the DEIS.** Seattle could mitigate its impact by mandating deconstruction, as Portland recently did for homes built prior to 1916. This creates jobs and salvages materials which are no longer available, such as old growth, and reduces carbon impacts of producing new materials, and reduces

landfills. The EPA estimates that over 250,000 homes are demolished in the US each year, adding 124,670,000 tons of construction and demolition debris, if even a portion of those homes were deconstructed, thousands of tons of waste would be diverted from landfills. Seattle could implement similar ordinances to Portland and also pursue a greener approach to demolition.

*By Dirk Wassink, BMRA Newsletter June 2016 - "On October 31 of this year Portland plans to implement a policy requiring deconstruction on any demolition of a house or duplex which was built in 1916 or earlier. Pre-1917 houses currently account for approximately one-third of the 300+ demolitions taking place in the city each year. We are excited by the opportunity presented by the deconstruction ordinance to create meaningful, well-paying jobs, and by the opportunity to reduce waste to the landfill and to provide some really spectacular old growth lumber to our customers."*

## **MHA DEIS COMMENTS - LIGHT POLLUTION, GLARE AND HEALTH HAZARDS –**

Tawny Bates - 8-6-17 tawny.bates@outlook.com

The DEIS does not address the issue of light pollution, glare, and associated impacts of excessive outdoor lighting. Bright high contrast light that is not shielded, is frequently used on building exteriors, decks and rooftops, and is left on all night. Excess exterior lighting is a safety concern, and also a health concern. Impacts may be extensive. To address SEPA lighting impacts must be considered, no section in the DEIS addresses ramifications or mitigation for increased light levels the proposal will produce.

Certain types of lighting interfere with normal night vision, and result in hazards for pedestrians, drivers, and bicyclists on the street. Contrary to what many think the brightest light is not the best light. The Seattle Streetlight Dept. knows this, which is why all streetlights are fully shielded and directed down onto the street surface, at a very low level about 1 footcandle using 4000 kelvin light sources.

Comparatively the new residential apartments down the street utilize overly bright surface mounted lights which are not shielded in any way, often producing 4 time as much light, and throwing light outward vertically. This vertical light output pictured below is 7 times higher than a typical sidewalk (I measured).

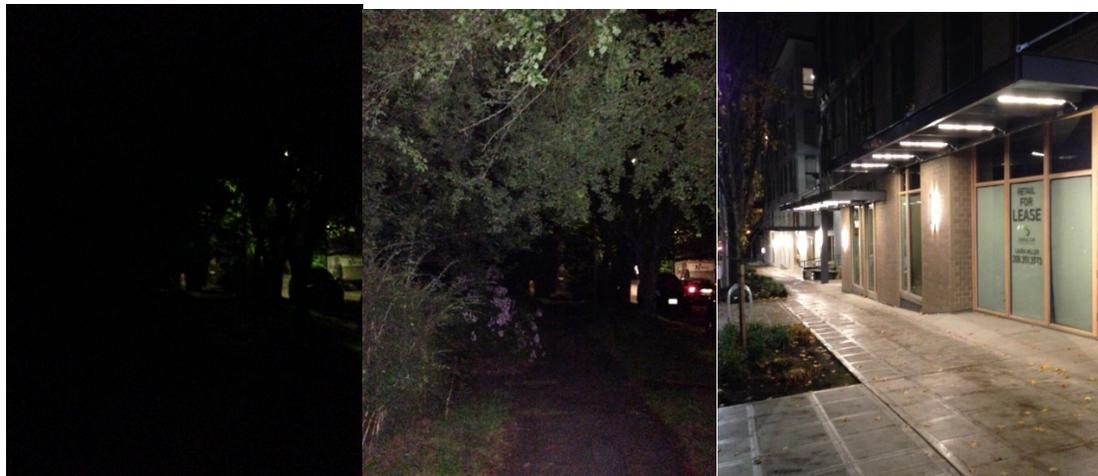
This is a safety hazard from glare as it interferes with vision, replaces less intense residential uses with high levels of lighting, and wastes energy. It also is being increasingly implicated in a variety of health problems and impacts on humans and wildlife, such as migratory birds, particularly as lighting trends toward LED sources (light emitting diodes), which utilize a 450-480 blue wavelength spectrum. Allowing unshielded exterior fixtures that produce excessive amounts of light not useful to the intended need and exceeding IES (Illuminating Engineering Society) code requirements is common for new residential buildings, on buildings facades, rooftops, and decks. If there is a code restriction related to this in Seattle it is apparently not enforced. In response to growing concern, in 2013 Paris imposed restrictions requiring much commercial lighting to be off at night.

Below are excerpts from 1. [Wikipedia](#) 2. [American Medical Association](#), 3. [International Dark Sky](#), on varied impacts of different aspects of light pollution. Also some photos of typical Seattle streets illustrating impacts.

**From Wikipedia under light pollution- Effects on animal and human health and psychology**—Medical research on the effects of excessive light on the human body suggests that a variety of adverse health effects may be caused by light pollution or excessive light exposure. In 2007, "shift work that involves circadian disruption" was listed as a probable carcinogen by the World Health Organization's International Agency for Research on Cancer. (IARC Press release No. 180).<sup>[45][46]</sup> Multiple studies have documented a correlation between night shift work and the increased incidence of breast and prostate cancer.<sup>[47][48][49][50][51][52]</sup> A more recent discussion (2009), written by Professor Steven Lockley, Harvard Medical School, can be found in the CfDS handbook "Blinded by the Light?".<sup>[53]</sup> Chapter 4, "Human health implications of light pollution" states that "... light intrusion, even if dim, is likely to have measurable effects on sleep disruption and melatonin suppression. Even if these effects are relatively small from night to night, continuous chronic circadian, sleep and hormonal disruption may have longer-term health risks". The New York Academy of Sciences hosted a meeting in 2009 on Circadian Disruption and Cancer.<sup>[54]</sup> Red light suppresses melatonin the least. ...In June 2009, the [American Medical Association](#) developed a policy in support of control of light pollution. News about the decision emphasized glare as a public health hazard leading to unsafe driving conditions. Especially in the elderly, glare produces loss of contrast, obscuring night vision.<sup>[20]</sup>

**From the American Medical Association REPORT OF THE COUNCIL ON SCIENCE AND PUBLIC HEALTH CSAPH Report 2-A-16 –** “Not all LED light is optimal, however, when used as street lighting. Improper

design of the lighting fixture can result in glare, creating a road hazard condition.<sup>4,5</sup> LED lighting also is available in various color correlated temperatures. Many early designs of white LED lighting generated a color spectrum with excessive blue wavelength. This feature further contributes to disability glare, i.e., visual impairment due to stray light, as blue wavelengths are associated with more scattering in the human eye, and sufficiently intense blue spectrum damages retinas.<sup>6,7</sup> The excessive blue spectrum also is environmentally disruptive for many nocturnal species. Accordingly, significant human and environmental concerns are associated with short wavelength (blue) LED emission. ....In human studies, a short-term detriment in sleep quality has been observed after exposure to short wavelength light before bedtime. Although data are still emerging, some evidence supports a long-term increase in the risk for cancer, diabetes, cardiovascular disease and obesity from chronic sleep disruption or shiftwork and associated with exposure to brighter light sources in the evening or night.<sup>25</sup>



The above pictures demonstrate the difference between the light level on a typical current residential street on N. 42<sup>nd</sup> St, with LED streetlighting. The middle photo is taken with a flash as existing light level is too low to photograph well. Far right is the type of lighting of allowed in a new building. Building setbacks affect lighting impact, as does vegetation, acting as a buffer. Lights at far right on all night. Below from International Dark Sky (IDA) are examples of acceptable fixtures and ones to avoid.  
<http://www.darksky.org/light-pollution/>

Continue on for the IDA Lighting Basics page

# Outdoor Lighting Basics

Modern society requires outdoor lighting for a variety of needs, including safety and commerce. IDA recognizes this but advocates that any required lighting be used wisely. To minimize the harmful effects of light pollution, lighting should

- Only be on when needed
- Only light the area that needs it
- Be no brighter than necessary
- Minimize blue light emissions
- Be fully shielded (pointing downward)

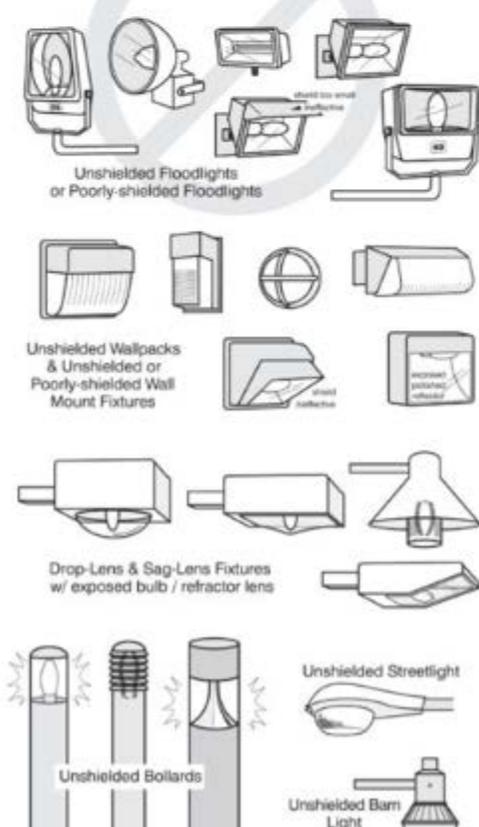
The illustration below provides an easy visual guide to understand the differences between unacceptable, unshielded light fixtures and those fully shielded fixtures that minimize skyglow, glare and light trespass.

[Glossary of Lighting Terms](#)

## Examples of Acceptable / Unacceptable Lighting Fixtures

### Unacceptable / Discouraged

Fixtures that produce glare and light trespass



### Acceptable

Fixtures that shield the light source to minimize glare and light trespass and to facilitate better vision at night



END



COMMENTS MHA DEIS – HUMAN HEALTH , NOISE - TOXINS
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Tawny Bates 8-6-17 tawny.bates@outlook.com

**NOISE-**

- The DEIS **did not address impacts neighborhood residents will be exposed to with multiple construction sites producing** varied levels of noise, which can continue 7 days a week, and could continue under different projects, in close proximity, for **years**
- The DEIS **did not address the large areas of some Urban Villages which are residential** in nature, and did not acknowledge possible impacts on seniors at home, disabled people at home, young children at home, or people who work from home, or people who are employed or visit business nearby
- The DEIS **did not acknowledge that noise is a significant stressor and impacts the health of the residents**, see the DCI website, nor that it appears there are 3 inspectors to enforce rules for the entire city
- The DEIS **did not address the suggestions made in the 2035 Comprehensive plan to update noise ordinances to best practices controls**, to use pre drilling, sonic drives, and cushion technology to reduce impacts of noise
- The DEIS **does not address construction techniques likely for zero lot line or reduced setback** construction in the upzoned residential zones, where **pile driving is increasingly likely** to provide support for larger taller structures.
- The DEIS **did not acknowledge that the 2035 Comprehensive Plan identified moderate to adverse impacts** associated with construction work noise, and this was not affiliated with the density levels proposed in MHA
- The DEIS did not acknowledge that **certain kinds of construction techniques can have negative impacts** on older historic structures.
- The DEIS did not indicate **what level of monitoring is planned, if any in areas proposed for MHA density** increases at the accelerated pace.
- The DEIS did not acknowledge that **noise ordinances are apparently antiquated**, and rely on standards abandoned by other cities long ago, see article from crosscut below. **Crosscut title** ([crosscut.com/2016/12/seattle-construction-noise-code-outdated-development-boom/](http://crosscut.com/2016/12/seattle-construction-noise-code-outdated-development-boom/))

*“The current ordinance allows noise-producing construction activity in non-commercial residential areas 7 a.m. to 10 p.m. on weekdays, and 9 a.m. to 10 p.m. on weekends and holidays. Noise levels cannot exceed 75 decibels, averaged over a one-hour period and measured 50 feet away.” “ We compared Seattle’s noise ordinance to 33 other cities, and several points became immediately apparent: 1. Of the cities we’ve examined across the country, only Seattle and Houston allow construction to continue as late as 10 p.m., on any day of the week. In most cities construction must stop by 7 p.m. or earlier. This is generally a restriction on any after-hours construction activity.”*

*“Most cities do not allow construction on Sundays, and Saturday construction must stop by 6 p.m. 3. Only Seattle and San Diego measure averaged noise levels. Every other city on this chart with a noise limit uses a maximum level of 75-85 decibels produced by a single construction activity. For reference, commonly used belt sanders generate sound above 85 decibels at 50 feet away.”*

**TOXINS** –

- The **DEIS does not consider the full range of contaminates** and provides only an assessment of vehicles air pollutants and asbestos, yet indicates cancer due to proximity to transit pollutants is already greater and impacts are moderate to adverse
- The **DEIS does not provide a robust assessment of the full range of possible air borne contaminates** including lead, and coal dust entrenched in houses from the early 1900's
- The **DESI does not acknowledge other contaminants resulting from new construction such as silica, and impact of construction equipment fumes** on public health, in particular whether there should be a limitation to number of sites underway at one time.
- The **DEIS does not acknowledge toxins in these older neighborhoods zones may be very different** from one UV to another, bulldozing of century old houses rather than deconstructing, and digging down, may expose chemicals such as benzene, or other hazardous waste,
- The **DEIS should assess impact on areas of a higher, medium and low rate of development**, and implement mitigation which scales up based on intensity, and relates to multiple sites in close proximity.
- The **DEIS should consider mitigation related to deconstructing older homes rather than demolishing**, such as Portland, which requires houses built before 1916 to be deconstructed, which reduces pollutants, recycles material, saves old growth lumber, land creates jobs.
- The **DESI should advocate for increased air pollution monitoring and enforcement to mitigate, especially**, where simultaneous projects are underway in close proximity to residential zones, to ensure new contaminates are not introduced which will add to the already moderate to adverse impact of air pollution and increased cancer risk.
- The **DEIS did not address the large areas of some Urban Villages which are residential** in nature, and did not acknowledge possible impacts on seniors at home, disabled people at home, young children at home, or people who work from home, or people who are employed or visit business nearby

<b>Name</b>	Greg Beams
<b>Email address</b>	
<b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b>	Photographic Center Northwest
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 I am supportive of the proposed changes.
<b>Land Use</b>	2 I am supportive of the proposed changes and request that the City combine four adjacent parcels of property under common ownership into one parcel and so request NC2P-75 zoning for all 4 parcels that comprise the Photographic Center Northwest. This will allow us to develop the property in a manner consistent with this proposal and meet the goals and objectives laid out within this document,
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Jennifer Beetem
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 I support either Alternative 2 or Alternative 3. I still feel that 7% MHA performance requirement is far too low to generate the amount of affordable housing low-income residents need.</p>
<b>Housing and Socioeconomics</b>	<p>2 On one hand, Alternative 2 accommodates more total affordable housing and would better alleviate displacement in my high-displacement-risk, high-access-to-opportunity neighborhood (Capitol Hill). However, I also want to see dense low-income housing distributed throughout all Seattle neighborhoods, which seems to be a goal of Alternative 3.</p> <p>3 The analysis admits that it does not include data for the most recent years. Yet, we all know friends and colleagues who have become rent-burdened after steep rent hikes or left town due to economic displacement. The actual current state of income disparity and insufficient new affordable housing is likely worse than the graphs indicate. The struggle of low-income Seattle residents to afford housing here is acute and must not be shrugged off just because the most recent data is not in yet.</p>
<b>Land Use</b>	<p>4 I am in favor of more multi-family housing in all Seattle neighborhoods and a 10-minute walkshed to transit corridors.</p>
<b>Aesthetics</b>	<p>5 Alternatives 2 and 3 do an adequate job of balancing increased building heights.</p>
<b>Transportation</b>	<p>6 Increase in density will make current parking congestion worse, making Alternative 3 more attractive for spreading out increases in density across the city. It may also be helpful for the city to limit residential street parking permits to require residents with garages to use that space for car storage instead of general storage.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced</b>	

**homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**From:** Benita B  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Hala  
**Date:** Sunday, July 30, 2017 2:39:11 AM

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After looking over the documents provided I'm adamantly opposed to HALA.

Nowhere do you address the possibility of SFR owners having to pay taxes based on the possible new use of their property.

This is a significant oversight and blatantly unfair and discriminatory.

In addition, most of the burden is placed on SFR owners because they are easy targets. HALA is in bed with the developers as is obvious from even a cursory look at the people who made up these stupid suggestions. The HALA committee was comprised of mostly developers and their paid lobbyists or other cronies. This level of inside dealing is disgusting. I really thought Seattle was better than this, but here we are.

People in the proposed upzone areas should have veto power. Stop forcing people out of their homes by over-taxing them or destroying their neighborhoods. There is a reason why people chose to purchase homes where they did. I realize change is inevitable, but can't it be done with more community input and consideration?

There has been significant development throughout the city already with little to no additional infrastructure. Remember the overflowing, decrepit treatment plant? It spewed thousands of gallons of untreated wastewater into our local waters. The focus should be on getting the new construction to pay for the additional infrastructure needed. Get your priorities straight!!

There is a housing crisis in Seattle but stealing the homes of current residents isn't going to fly. No matter how you try to "spin" HALA, it's only good for construction companies and developers.

I have a lot more to say, but this will do for now.

Toss HALA in the trash where it belongs and start over. I'm watching and recruiting others against HALA.

Ben

**From:** Judy Bendich  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Williams, Spencer](#)  
**Subject:** Response to MHA Draft EIS  
**Date:** Sunday, August 06, 2017 9:01:07 PM

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Dear Persons:

This letter addresses some of the issues in the HALA MHA DEIS.

1. Accessibility, Style and Size: The DEIS is 462 pages long, and the Appendices are 364 pages long. It is impossible to meaningfully read and digest this document in electronic form. I am an educated reader with a post-graduate degree, whose career involved voluminous reading and writing. I found trying to read this on-line to be impossible. For example, in print, one can easily flip the pages to view the main text and then refer to the appropriate appendix. Or, even within the appendix, there are multiple charts on the same issue, and on line one cannot easily compare them and analyze them. When trying to "flip" back to an earlier or later page, the little wheel goes round and round just to get the print on the screen. It has been frustrating (to put it mildly) to even try to read this. It is impossible in this format to comprehend and synthesize the information.

There are approximately 28 public libraries in the City of Seattle. I went to my local library so that I could read a printed version, but there was none. This DEIS is perhaps the most important DEIS ever prepared involving a major overhaul of the entire City. Yet, while there were many EIS's and DEIS's on the shelf, none for this DEIS. I asked the librarian to obtain a copy. The librarian found that the only print DEIS was at the Central Library. In effect, because the City did not distribute print copies to the libraries in this region, the City has effectively discouraged and impeded residents' ability to meaningfully comment. (Parenthetically, I had even requested help from one of our City Council member's staff to get this on library shelves. It never happened.) For this reason there is a real issue whether there has been adequate ability for the public to meaningfully comment.

2. The DEIS Fails to Address At All the Impact on Businesses. This is a significant omission. The DEIS goes on at some length to discuss the importance of neighborhood businesses to the well-being and livability of the community. Yet, the DEIS ignores this issue entirely. How, with the boom in land prices, will the City assure that community businesses survive and thrive to make the neighborhoods/urban villages livable? It is not enough to require that certain tall buildings include some space for businesses. None of the current pre-building plans require developers to consider the businesses that might occupy them, consult with businesses and the community in the first instance – before the plans are developed. Nor, if specific businesses were identified, to require the developer to include plan specifications to include such businesses as the community needs. None of present spaces or design is at present large enough for a grocery store or automotive parts store (businesses that were displaced in the

Roosevelt/Ravenna neighborhood). As light rail is anticipated in some areas, local businesses have already been displaced, with no replacement possible due to increased land values and rents. The DEIS offers no comment how to mitigate these losses or prevent them from happening in the first place. The DEIS is insufficient because it omits this issue in its entirety.

3. The DEIS Fails to Address in Any Meaningful Way How Affordable Units Will Be Built Within the Urban Villages. The whole point of this DEIS is to assure that Seattle neighborhoods are racially diverse and affordable. First, the data used are not necessarily reliable, particularly in the middle north-end. The charts and tables sometimes identify race, but do not correlate this with economic data. For example, the DEIS lumps a broad class as Asian, which can include every conceivable Asian ethnic background, such as Chinese, Korean, Japanese, Indian, Pakistani, Philippino, Laotian, Vietnamese. Studies indicate that certain Asian ethnicities are highly-educated and in the high middle to upper middle income level, and others are not. The DEIS fails to distinguish among them and cannot, therefore, make any categorical statements or assumptions. The DEIS points out that data are most likely skewed in the north end due the student population at the UW. But acknowledging these data, the DEIS makes no attempt to explain how to target different socio-economic groups and to include those who are truly in need of affordable housing within the Urban Villages that have good transportation and urban amenities.

Second, the DEIS assumes that upzoning in present single family neighborhoods is essential in order to bring affordable housing to that community:

**LOW DISPLACEMENT RISK/HIGH ACCESS TO OPPORTUNITY** (App. A, p. 24) Neighborhoods with low risk of displacement and high access to opportunity are desirable and have fewer marginalized populations. These areas generally offer good access to economic and educational opportunities. In these neighborhoods, housing costs tend to be high, housing choices limited, and market-rate housing unaffordable to lower-income households. With relatively few marginalized populations, these areas may also lack the cultural services and community organizations geared to those populations. An equitable approach to development in these places expands pathways into the neighborhood for people who currently cannot afford to live, work, or operate a business there and leverages market demand to welcome new residents, jobs, and businesses. This approach calls for allowing the private market to meet the high levels of demand for housing in these neighborhoods by increasing the supply and variety of housing options available. Because they have lower displacement risk and higher access to opportunity, these urban villages can welcome higher levels of growth in order to expand access for marginalized populations without displacement. Incentives for private market housing that serves a range of incomes and household sizes could make it possible for marginalized populations to live and work in these areas and take advantage of the opportunities that exist there. This means allowing and encouraging a denser and broader range of housing types, such as duplexes, triplexes, rowhouses, flats, and other forms appropriate for a range of incomes and household sizes, within and adjacent to these urban villages beyond what current zoning allow.

This is a fallacious assumption, particularly in areas where land costs are rapidly escalating. Under the present "grand bargain" - where developers either pay a fee or include affordable housing units - developers have no incentive to include affordable units. The fee is ridiculously low and is based solely on construction cost. The comparator should be the both the building cost of the unit and the cost a unit rents/sells for at market rate amortized over the expected life-span of the building less actual costs to maintain the property. (That calculation is the

actual value to the developer.) For example, currently, the land/housing costs in the Roosevelt/Ravenna area have skyrocketed to close to or over the one million dollars range per parcel. Unless developers are required to include affordable housing within the development, there will be no affordable housing in the very Urban Villages where they are most needed in terms of equity. And certainly, the upzoned duplexes, skinny lots, multiplexes, and extra stories in the neighborhoods contiguous to the Urban Villages will not be "affordable" unless the EIS/City requires developers to include affordable housing *within* the development. The only real beneficiaries of the upzoning are the developers. The "fee" is a pittance compared to the overall project's profits, and the fees will not be used in the communities which have the greatest amenities because the land values are too high. Or, alternatively, if the City can find parcels to build affordable housing within these communities, this housing will be socioeconomically segregated. The DEIS fails to address this issue - how to assure that affordable housing is actually included within the upzoned area. Additionally, the DEIS fails to address or explain how to mitigate the probable segregation which would result in the event no affordable housing is included within the development.

**4. The DEIS Fails to Address Impacts and Mitigation for Each Urban Village Individually.** Seattle has many neighborhoods; each has different housing patterns, and different physical and topological locales. The DEIS fails to address each of these Urban Villages separately, but lumps them together. For example, the DEIS has an alternative upzone for Roosevelt Urban Village which is outside the boundaries of the recently adopted Comprehensive Plan and extends to the east of 15th Avenue NE (in one alternative to 16th NE and in the other to 17th NE) between NE 65th St. and NE 62nd St. This area has perhaps the largest number of intact Craftsman and bungalow housing in the City. Although the criteria state that areas of architectural uniqueness should be examined, that significant issue is not addressed at all. See SMC 25.05.330 C-3. "In determining an impact's significance (Section [25.05.794](#)), the responsible official shall take into account that: The same proposal may have a significant adverse impact in one location but not in another. The DEIS fails to evaluate the unique impacts on each neighborhood, each Urban Village, and the contiguous neighborhoods. *See also comments of Historic Seattle, which addresses this deficiency in more detail.*

Additionally, the DEIS fails to state that the alternatives are not consistent with the Comprehensive Plan and provide alternatives that are consistent with the Plan.

**5. The DEIS Fails to Include Mitigation Requirements Congruent With Upzoning.** Both the DEIS and the City's Comprehensive Plan stress the need for mitigation. These include, but are not limited to, green spaces, community centers, schools, libraries, cultural amenities, affordable facilities for seniors and families (senior centers, day care centers, etc.). The DEIS fails to include concrete plans for these required amenities. Most of the Urban Centers and contiguous neighborhoods are upzoned for development but include no identifiable parcels for these spaces. Nor does the DEIS examine how these requirements can congruently be included such that development cannot occur unless the mitigating criteria are also in place. With parcels in Seattle at a premium, there must be a congruent plan or mitigation will not/cannot occur.

6. The DEIS Fails to Include How the Cost of Mitigation and Basic Services Will Be Paid.

Nowhere in the DEIS does the City discuss specific mitigation needs in specific Urban Villages. But, in addition, there is no discussion of the financial resources required to pay for and provide not only mitigation expenses, but basic necessities – police, fire, sewer lines, water supply, schools. Additionally increased density requires upgrades to all services; it requires mitigation for communities, including displaced housing and displaced businesses, in order to make the City livable – green space, community centers, etc. The impact on the City from increased development has already been enormous. The DEIS needs to examine alternatives to cover these costs, including, but not limited to impact fees on developers.

7. The DEIS Fails to Consider Alternatives to Upzoning in the Ravenna Area Contiguous to the Roosevelt Urban Village. There are alternatives to the alternative upzones proposed in the DEIS, which the DEIS does not address. The DEIS does not address adding affordable housing in single-family neighborhoods, such as mother-in-law apartments, creating apartments by authorizing subdivision of the interior of existing large single-family houses, using accessory buildings such as garages to build units. None of these options are explored in the DEIS as a substitute for upzoning existing single-family parcels. These options should be addressed before any determination is or can be made whether upzoning should occur that is outside the boundaries of Urban Villages. Similarly, neighborhoods have specific knowledge as to where upzoning might be most appropriate. In the Roosevelt/Ravenna neighborhood, the parcels north of NE 65th St. for two blocks between 15th Ave. NE and 16th Ave. NE, have been suggested but are not addressed in the DEIS.

8. The DEIS By Its Own Admission Has Failed to Take Into Account Public Comments That Were Made at Public Meetings Before the DEIS Was Issued. Before the DEIS was issued, the City held a series of public meetings and solicited comments from those in attendance, from surveys, and from community organizations. Many ordinary people from all over the City attended and, spent time they could have been spending on other things, to share their concerns and suggestions. The DEIS has a generic list of some of those comments but candidly states it did consider them at all in its analysis and proposals. The DEIS states that it is deferring responding until the FEIS when it will respond to concerns, suggestions and comments made before the DEIS was written, as well as the comments made after the DEIS was written:

**The alternatives studied in the MHA Draft DEIS are not a direct reflection of public feedback received on the draft MHA zoning maps published in October 2016.** Why not? Because the Draft EIS studies a much wider range of options and uses the results of the analysis to better understand the potential impacts of a final proposal. We developed the alternatives with public input about what we should study, but none of them represents a specific preferred alternative. Our Final DEIS will include a preferred alternative that reflects public input.

The zoning maps the DEIS refers to are the same zoning maps that the public commented on before the DEIS issued. The fact that the City studied a "wider range of options" should have

no bearing on its addressing in the DEIS the comments, suggestions, and alternatives which involve the same maps. The expansion alternatives in Ravenna, contiguous to the Roosevelt Urban Village, are but one example. The people who attended the public meeting I attended were quite clear there should be no expansion from the east side of 15<sup>th</sup> Ave. NE between NE 65<sup>th</sup> St. and NE 62<sup>nd</sup> St. The group came up with many suggestions including increased density nearer to the freeway within the Urban Village, greater community input into the location of upzones, and consideration of derelict and vacant properties, such as the parcels north of NE 65<sup>th</sup> St.

This process the City used turns the whole statutory and regulatory scheme on its head. The purpose of public input before the DEIS is issued is so that those concerns and alternatives can be meaningfully addressed in the draft. This then gives the public the ability to understand the City's thought-process and permits the public to meaningfully agree or reject the DEIS's proposals, or to raise new alternative proposals. By ignoring the suggestions and concerns in the first instance, the DEIS has disregarded alternatives that were previously suggested and disregarded concerns that were previously raised. These should have been included in the DEIS. For this reason alone, the City should start all over and do it properly.

Sincerely,

Judith E. Bendich

1754 NE 62nd Street  
Seattle, WA 98115  
(206) 525-5914

<p><b>Name</b></p> <p><b>Email address</b></p> <p><b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b></p> <p><b>Comment Form</b></p> <p><b>Housing and Socioeconomics</b></p>	<p>Carol Benedick</p> <p>Congregation Beth Shalom</p> <p>Dear City Planners,</p> <p>1 I am the Executive Director of Congregation Beth Shalom, located at 6800 35th Ave NE. I have looked over the MHA plan and am struck by the inconsistency of zoning along 35th Ave NE that is not addressed by the plan. I am writing to ask you to address the inconsistency and rezone the 6800 block for mixed commercial and multi-family use,</p> <p>Creating a mixed use core along this major arterial not only enhances the walkability and the already established character of 35th Ave NE, it would also buffer the single-family areas east and west of 35th Ave NE. This plan of creating a more vibrant 35th Ave NE has been outlined in the Wedgwood Community Council Vision Plan.</p> <p>Historically, the zoning of the 6800 block of 35th Ave NE is an anomaly when compared to the blocks to the north and south. The 6500 block is zoned as Low-Rise 2 except for the commercially zoned apartment buildings at the south corner of the block. Despite the variance in zoning, the 6500 block and the 6800 block are very similar in terms of actual usage of the buildings. There is a church along with several rental homes owned by the church. Likewise, the 7000 block of 35th Ave NE has a church which is zoned as Low-Rise 2 and several commercial buildings at the south end of the block.</p> <p>Not only is the 6800 block zoned differently from the 6500 and 7000 blocks, our own synagogue is zoned inconsistently. The south half of our building is zoned as Low-Rise 2. The north half of our building is zoned as single-family. Just north of us on the 6800 block are four houses. We own three of them and are in the process of buying the fourth house. They are zoned as single-family homes. We use the first home (6830 35th Ave NE) for classes. The other two are rented to families. When the purchase of the fourth house is finalized, we will use that as a rental as well. The homes were all built in the 1930s, and they show their age. They are accessible by an alley. We have invested a significant amount of money in renovating them</p>
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(replacing the furnace, windows, roofs, etc.), but there is only so much we can do to improve their street side appearance. Eventually we would like to replace the houses with one or several new structures to accommodate the growing demands of our congregation, including our Religious School and Early Childhood Center. We are interested in mixed-use buildings, possibly with some commercial-use and apartments. Our vision for our properties complements the vision of the Wedgwood neighborhood, and I believe it fits in with the overall concept of the Mandatory Housing Affordability zoning changes.

We will all benefit from maximizing the housing and small scale commercial zones along 35th Ave NE. Please help us by changing the 6800 block zoning to be consistent with the rest of the arterial.

Sincerely,

Carol Benedick

### **Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of**

**Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Vernon C Bennett
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 32nd Ave SW and SW Genesse are all single family homes, you can not dump 5 story apartments in the middle of it, please give us some smaller steps, alternative 2 is the best, but not great...
<b>Transportation</b>	2 32nd ave SW is only a single lane that is two blocks long with no other outlets, how can you put in 5 story apartments on a street like that, it will be gridlocked all the time!!!
<b>Open Space &amp; Recreation</b>	3 We have NO open spaces close by, unless your going to allow people to walk their dogs and have their children play on the fairways of the golf course ....
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you</b>	

**resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Max Benson
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 I am supportive of either proposal 1 or 2, the city of Seattle needs more affordable housing and the status quo is unacceptable.
<b>Housing and Socioeconomics</b>	.
<b>Land Use</b>	2 While the focus of the EIS is on areas within the urban growth boundary there are impacted areas outside of it. Those areas do not currently require sidewalks to be installed and substantial townhouse developments have occurred without sidewalks in the N. Greenwood area. Given the increased density of converting L-1 and L-2 lots to (r), The inclusion of sidewalks makes sense.
<b>Transportation</b>	2 While the focus of the EIS is on areas within the urban growth boundary there are impacted areas outside of it. Those areas do not currently require sidewalks to be installed and substantial townhouse developments have occurred without sidewalks in the N. Greenwood area. Given the increased density of converting L-1 and L-2 lots to (r), The inclusion of sidewalks makes sense.
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**



**From:** Dan Berger  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Herbold, Lisa](#)  
**Subject:** Draft EIS comment period extension  
**Date:** Sunday, July 02, 2017 4:35:54 PM

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Please extend the draft EIS comment period to at least 90 days. The EIS is a massive document that the City and staff too months to prepare. The citizens of Seattle (especially those directly impacted by the EIS and HALA) need more time to review and comment on the content of the draft EIS. Expecting residents to review and understand such a massive document in 45 days is unacceptable and undermines this being a truly open and public process.

**From:** Dan Berger  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Dan Berger](#)  
**Subject:** HALA Rezone Proposal DEIS Comments Section 3.1  
**Date:** Monday, August 07, 2017 8:38:42 AM  
**Attachments:** [DEIS Social and Economic Analysis 3.1.pdf](#)

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Please accept these comments related to the HALA Rezone DEIS.

## COMMENTS ON DEIS SOCIAL AND ECONOMIC ANALYSIS

The DEIS fails to provide a comprehensive study of the social and economic impact to the impacted neighborhoods. The magnitude of the project should not absolve the City from providing a substantive analysis. Rather, the thousands of individuals that will be directly affected by the proposed action are entitled to a meaningful effort by the City to provide information.

The DEIS acknowledges the likelihood that “there is ample zoning capacity to accommodate the minimum amount of household growth anticipated in the Seattle 2035 Comprehensive Plan.” See DEIS at § 3.45. Given that reality, it is critical for constituents to be able to effectively analyze whether the affordable housing projected to be added as a result of the proposal outweighs the elimination of existing affordable housing and displacement of existing residents.

### **A. Data Clearly Establishes Significant Potential for Net Loss of Affordable Housing and Displacement in West Seattle Junction Urban Village.**

Even a cursory analysis shows the potential for significant displacement in the West Seattle Junction Urban Village as a result of the likely elimination of existing affordable housing.

Exhibit A is a list of the West Seattle Junction Urban Village (and proposed expansion) single family parcels proposed to be up zoned, as well as an indication of those houses currently publicly disclosed to be rentals and well as the estimated rental value of each, per Zillow. As can be seen in Exhibit B, approximately 22% of the existing units are rentals with an average estimated monthly rent of approximately \$2,700. 100% of these homes are suited for family living, with 2+ bedrooms. A majority, 62% are suited for larger families with 3+ bedrooms.

The DEIS does not consider this displacement. It does not consider families of this size and/or those with children. Overall the MHA program is biased towards production of studio and 1 BR units. We conclude that implementing MHA in the Junction SF zones will have an unacknowledged and significantly negative impact by displacing family-sized households, and further, it will decrease our housing diversity.

In addition, this does not take into account the myriad of other situations present in single family areas in which affordable housing is provided through existing owner occupied homes providing affordable housing for housemates, extended family and others.

### **B. Critical Information Missing from DEIS**

The DEIS should provide the following information so that impacted residents can adequately evaluate the likely social and economic to their neighborhoods.

1. Identification of the current use of each of the impacted sites and the adjacent properties;
2. Description of the extent to which the proposal affects current land use of each of the impacted sites and nearby or adjacent areas;
3. Description of the structures that will be demolished as result of the proposal;

4. Identification of the current Comprehensive Plan designation of each of the sites impacted by the proposal;
5. Identification of any part(s) of any impacted site that is classified as critical area by the city or county;
6. Identification of the approximate number of people that would reside or work in each of the sites impacted by the proposal.
7. Identification of the approximate number of people that the proposal, if implemented, would displace;
8. Identification of proposed measures to avoid or reduce displacement impacts, if any;
9. Identification of any proposed measures to ensure the proposal is compatible with existing and projected land uses and plans;
10. Identification of the approximate number of units that the proposal would provide;
11. Identification of whether the units provided by the proposal will be high, middle, or low-income housing;
12. Identification of the approximate number of units that would be eliminated by the proposal;
13. Identification of whether the units to be eliminated are high, middle, or low-income housing;
14. Identification of any proposed measures to reduce or control housing impacts.

**C. DEIS Findings Reflect Insufficient Data and Analysis of Proposal.**

Type of Impact	Significant DEIS Impacts/Finding	Proposed Mitigation	Issue
Housing Supply	“...lesser amounts of certain types of housing units.” Only 2% increase of proposed housing units in Alt 2 and Alt 3, are qualified as “better suited to families with children and larger households. (Exhibit 3.1-34)”	No mitigation proposed.	Net family housing in impacted areas will likely <u>decrease</u>
Commercial Development	“...this EIS does not quantitatively analyze the additional need for low-income housing from commercial development in each alternative...it is a consequence of commercial development and a contributing factor to the need for rent and income restricted housing...(DEIS, 3.47)”	N/A	These commercial projects are directly responsible for increased need of affordable housing but in no way are responsible for mitigation.

Type of Impact	Significant DEIS Impacts/Finding	Proposed Mitigation	Issue
Housing Affordability	“...affordability of market rate housing would continue to be a burden for many residents under all three alternatives, notwithstanding implementation of MHA.	No mitigation proposed	Affordability will continue to be an issue regardless of the proposed rezones with their significant negative impacts; Insufficient analysis provided to enable decision makers to weigh benefits and costs.
Housing Affordability	Zoning changes have the potential to increase the cost of living burden of existing owners or tenants.(3.48)	“Local property tax exemption for exiting rental homes...The bill was reintroduced and retained in the preset status and will presumably be picked up again in the future.(DEIS, 3.72)	Tax burden on residents will increase. Proposed mitigation is based purely on speculation as to future legislative process.
Housing Affordability	“...the most positive impact on housing affordability will be through the production of new affordable units through MHA...(3.49)”	N/A	DEIS forecasts that over 20 years in Alt 2 and Alt 3, <b>only 6 and 10 new affordable units respectively would be built in the West Seattle Junction (WSJ) Urban Village study area through performance.</b> While the up zoning and development of WSJ will potentially generate payments equal to 37-45 additional affordable units. The DEIS falsely assumes that the payments generated from up zoning and developing WSJ will result in a meaningful number of affordable units built in the area.
Housing Affordability	“...developers may experience some financial impact. Whether such costs are absorbed by the developers or passed along to users will depend on complex circumstances that...cannot be estimated.” “Seattle will continue to experience face significant challenge in the area of housing affordability. This condition is a result of market and economic forces and not an impact of MHA.”	No mitigation proposed.	The study incorrectly concludes that MHA won’t contribute to housing costs. The EIS should study the impact of developers passing on the cost of MHA to users. It should study how many current residents will move into the ‘severely burdened’ category when comparing income to housing costs due to the passed through costs.

Type of Impact	Significant DEIS Impacts/Finding	Proposed Mitigation	Issue
Displacement	WSJ is classified as high opportunity low displacement risk study area (DEIS 3.51).	N/A	The DEIS incorrectly assesses WSJ as low risk for displacement. The assessment doesn't align with the fact that in the WSJ is comprised of 31%-45% of households that are at or below 60% AMI, the City's definition of low or very-low income (DESI, 3.12).
Displacement	No data presented with respect to West Seattle Junction Urban Village.	N/A	The DEIS fails to collect or analyze parcel level analysis of existing housing stock including rentals, seniors, or families. 24% of SF parcels in the proposed West Seattle Junction Urban Village MHA up zone are non-owner-occupied units (aka rentals). 100% of these properties are suitable for families (2 bedrooms) and 62% are suitable for large families (3+bedrooms).
Affordability/Displacement	The DEIS assumes a rate of affordable unit development exchange agreed to by the mayor and special interests which hasn't been audited, vetted, or tested against alternatives that have the real possibility of generating substantial new affordable units without displacing existing residents.	None.	The DEIS fails to analyze in any meaningful way the opportunity to maximize the MHA proposed upzone and the affordable unit exchange rate. The current assumed exchange rate was proposed and refined by special interests who are incentivized to maximize their own development profit.

**From:** Dan Berger  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Re: HALA Rezone Proposal DEIS Comments Section 3.1  
**Date:** Monday, August 07, 2017 8:46:21 AM  
**Attachments:** [Alaska Junction SF Non-Owner Occupied 7.25.17 Summary 2.pdf](#)  
[Alaska Junction SF Non-Owner Occupied 7.25.17 Summary.pdf](#)  
[Alaska Junction SF Non-Owner Occupied 7.25.17.pdf](#)

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Attached is the analysis and summaries for West Seattle Alaska Junction Single Family parcels.

22% of all single family zoned parcels in the Junction are non-owner occupied. This is a conservative estimate of rental properties not including owner occupied rentals. Of these 100% are 2+ bedrooms suitable for small families and 62% are 3+ bedrooms suitable for large families.

The DEIS fails to account and analyze the current housing stock in the proposed up zone areas and thus is unable to provide mitigation for displacement of families with children and housing diversity.

On Mon, Aug 7, 2017 at 8:38 AM Dan Berger <[berger.dan@gmail.com](mailto:berger.dan@gmail.com)> wrote:  
| Please accept these comments related to the HALA Rezone DEIS.

Street Address	Units (#)	Non-Owner Occupied (1=yes)	RentZestimate	Bedrooms
4717 35th Ave SW	1	1	\$ 2,850	3
4721 35th Ave SW	1	0	\$ 2,900	3
4725 35th Ave SW	2	1	\$ 2,700	3
4731 35th Ave SW	1	1	\$ 2,325	2
4735 35th Ave SW	1	0	\$ 2,800	2
4741 35th Ave SW	1	0	\$ 3,000	3
4745 35th Ave SW	1	0	N/A	3
4747 35th Ave SW	1	0	\$ 2,695	2
4755 35th Ave SW,	1	1	\$ 2,950	3
4718 36th Ave SW,	1	0	\$ 2,950	4
4722 36th Ave SW	1	0	\$ 2,250	1
4724 36th Ave SW	1	0	\$ 3,200	4
4728 36th Ave SW,	1	0	\$ 3,200	4
4736 36th Ave SW	1	0	\$ 2,900	2
4740 36th Ave SW	1	0	\$ 2,950	3
4746 36th Ave SW,	1	0	\$ 2,695	2
4750 36th Ave SW	1	1	\$ 2,000	2
4754 36th Ave SW	1	1	\$ 3,000	3
4755 36th Ave SW,	1	0	\$ 2,800	2
4751 36th Ave SW	1	1	\$ 2,795	3
4747 36th Ave SW	1	0	\$ 2,850	4
4745 36th Ave SW	1	0	\$ 3,150	4
4739 36th Ave SW	1	0	\$ 2,995	2
4735 36th Ave SW	1	0	\$ 2,700	3
4731 36th Ave SW	1	0	\$ 2,850	4
4727 36th Ave SW	1	1	\$ 2,950	2
4725 36th Ave SW	1	0	\$ 2,800	3
4721 36th Ave SW	1	0	\$ 2,950	4
4715 36th Ave SW	2	1	\$ 2,200	3
4714 37th Ave SW	1	0	\$ 2,900	3
4722 37th Ave SW	1	1	\$ 2,950	4
4724 37th Ave SW,	1	0	\$ 2,500	2
4730 37th Ave SW	1	0	\$ 2,800	2
4734 37th Ave SW,	1	0	\$ 3,400	3
4738 37th Ave SW,	1	0	\$ 3,841	3
4744 37th Ave SW,	1	0	\$ 2,900	3
4750 37th Ave SW,	1	1	\$ 3,000	5

4754 37th Ave SW,	1	0	\$	3,200	3
4709 37th Ave SW,	1	0	\$	2,325	2
4715 37th Ave SW,	1	0	\$	2,650	2
4717 37th Ave SW,	1	0	\$	2,900	3
4721 37th Ave SW,	1	0	\$	2,900	4
4725 37th Ave SW,	1	0	\$	2,550	2
4729 37th Ave SW,	1	0	\$	2,500	3
4733 37th Ave SW,	1	0	\$	2,400	2
4737 37th Ave SW,	1	0	\$	2,800	3
4741 37th Ave SW,	1	0	\$	3,000	3
4745 37th Ave SW,	1	0	\$	3,200	3
4749 37th Ave SW,	1	0	\$	2,900	3
4753 37th Ave SW,	1	1	\$	2,800	2
3700 SW Edmunds St,	1	0	\$	3,873	4
4714 38th Ave SW,	3	1	\$	3,200	5
4718 38th Ave SW,	1	0	\$	2,800	3
4724 38th Ave SW,	1	1	\$	2,650	3
4728 38th Ave SW,	1	0	\$	2,795	3
4732 38th Ave SW,	1	0	\$	2,950	3
4736 38th Ave SW,	1	0	\$	3,150	4
4740 38th Ave SW,	1	0	\$	2,500	2
4744 38th Ave SW,	1	1	\$	2,650	2
4748 38th Ave SW,	1	0	\$	2,995	3
3718 SW Edmunds St,	1	0	\$	3,400	4
4727 38th Ave SW,	1	1	\$	2,695	2
4731 38th Ave SW,	1	1	\$	2,590	2
4731 38th Ave SW,	1	0	\$	3,000	3
4755 38th Ave SW,	1	0	\$	3,000	5
4807 38th Ave SW,	1	1	\$	3,000	2
4811 38th Ave SW,	1	1	\$	2,500	3
4817 38th Ave SW,	1	1	\$	2,650	2
4823 38th Ave SW,	1	0		N/A	N/A
4823 38th Ave SW,	1	0		N/A	N/A
4831 38th Ave SW,	1	0		N/A	N/A
4837 38th Ave SW,	1	0		N/A	N/A
4841 38th Ave SW,	1	0		N/A	N/A
4847 38th Ave SW,	1	1	\$	2,995	4
4853 38th Ave SW,	1	0		N/A	N/A
4857 38th Ave SW,	1	1	\$	2,900	4
3719 SW Edmunds St,	1	1	\$	3,000	2
4808 38th Ave SW,	1	0			

4814 38th Ave SW,	1	0		
4818 38th Ave SW,	1	0		
4822 38th Ave SW,	1	1	\$ 2,500	2
4828 38th Ave SW,	1	0		
4832 38th Ave SW,	1	0		
4836 38th Ave SW,	1	0		
4842 38th Ave SW,	1	0		
4846 38th Ave SW,	1	0		
4850 38th Ave SW,	1	0		
4856 38th Ave SW,	1	0		
4803 37th Ave SW,	1	0		
4807 37th Ave SW,	1	0		
4811 37th Ave SW,	1	0		
4817 37th Ave SW,	1	1	\$ 2,899	4
4817 1/2 37TH Ave SW,	1	1	\$ 2,395	2
4821 37th Ave SW,	1	0		
4827 37th Ave SW,	1	0		
4833 37th Ave SW,	1	0		
4837 37th Ave SW,	1	0		
4841 37th Ave SW,	1	1	\$ 2,900	3
4847 37th Ave SW,	1	0		
4853 37th Ave SW,	1	0		
4857 37th Ave SW,	1	0		
4424 41st Ave SW	1	0	N/A	3
4426 41st Ave SW	1	1	\$ 2,650	2
4430 41st Ave SW	1	0	\$ 3,250	3
4434 41st Ave SW	1	0	\$ 3,100	N/A
4436 41st Ave SW	1	1	\$ 2,500	2
4440 41st Ave SW	1	0	\$ 2,595	3
4446 41st Ave SW	1	0	\$ 2,700	3
4452 41st Ave SW	1	0	N/A	3
4456 41st Ave SW	1	0	\$ 2,650	2
4401 40th Ave SW	1	0	N/A	3
4403 40th Ave SW	1	0	N/A	3
4405 40th Ave SW	1	0	N/A	3
4407 40th Ave SW	1	0	\$ 3,213	3
4409 40th Ave SW	1	0	\$ 3,200	3
4411 40th Ave SW	1	1	\$ 3,200	3
4413 40th Ave SW	1	0	N/A	3
4415 40th Ave SW	1	0	N/A	3
4421 40th Ave SW	1	0	N/A	4

4429 40th Ave SW	1	0	\$ 2,500	3
4433 40th Ave SW	1	0	\$ 2,600	3
4437 40th Ave SW	1	0	\$ 2,550	2
4441 40th Ave SW	1	0	\$ 2,350	2
4449 40th Ave SW	1	0	\$ 2,600	4
4453 40th Ave SW	1	1	\$ 2,400	3
4457 40th Ave SW	1	0	N/A	2
4402 40th Ave SW	1	0	\$ 2,800	2
4414 40th Ave SW	1	0	\$ 2,600	4
4416 40th Ave SW	1	0	N/A	3
4418 40th Ave SW	1	0	N/A	2
4422 40th Ave SW	1	0	N/A	3
4426 40th Ave SW	1	0	\$ 2,495	3
4432 40th Ave SW	1	0	\$ 2,450	2
4438 40th Ave SW	1	0	\$ 2,500	2
4442 40th Ave SW	1	0	\$ 3,050	3
4446 40th Ave SW	1	0	\$ 2,100	2
4452 40th Ave SW	1	0	\$ 2,900	2
4456 40th Ave SW	1	0	N/A	3
4403 39th Ave SW	1	0	N/A	3
4409 39th Ave SW	1	0	N/A	4
4413 39th Ave SW	1	1	\$ 2,995	3
4417 39th Ave SW	1	0	\$ 2,700	4
4421 39th Ave SW	1	0	\$ 3,200	4
4427 39th Ave SW	1	1	\$ 2,500	3
4433 39th Ave SW	1	0	\$ 2,995	4
4437 39th Ave SW	1	0	\$ 3,000	3
4441 39th Ave SW	1	0	\$ 3,000	4
4447 39th Ave SW	1	1	\$ 2,195	2
4451 39th Ave SW	1	1	\$ 2,600	3
4457 39th Ave SW	1	1	\$ 2,500	5
4402 39th Ave SW	1	0	N/A	3
4406 39th Ave SW	1	1	\$ 2,900	5
4414 39th Ave SW	1	0	\$ 2,950	3
4416 39th Ave SW	1	0	\$ 3,200	5
4420 39th Ave SW	1	0	\$ 2,600	3
4424 39th Ave SW	1	0	\$ 2,500	3
4428 39th Ave SW	1	0	N/A	5
4434 39th Ave SW	1	0	N/A	4
4436 39th Ave SW	1	1	\$ 2,850	3
4440 39th Ave SW	1	0	\$ 2,500	2

4442 39th Ave SW	1	0	\$ 2,600	4
4446 39th Ave SW	1	0	N/A	3
4448 39th Ave SW	1	1	\$ 2,400	3
4452 39th Ave SW	1	0	\$ 2,450	2
4456 39th Ave SW	1	0	\$ 2,695	2
3812 SW Oregon St.	1	1	\$ 2,400	2
4403 38th Ave SW	1	0	\$ 2,900	4
4407 38th Ave SW	1	0	\$ 2,700	3
4411 38th Ave SW	1	0	N/A	3
4417 38th Ave SW	1	0	\$ 3,150	4
4423 38th Ave SW	1	0	\$ 2,700	3
4427 38th Ave SW	1	0	\$ 2,695	2
4433 38th Ave SW	1	0	\$ 2,950	4
4437 38th Ave SW	1	1	\$ 2,950	2
4441 38th Ave SW	1	1	\$ 2,495	5
4451 38th Ave SW	1	1	\$ 2,750	3
4453 38th Ave SW	1	0	\$ 3,200	4
4457 38th Ave SW	1	1	\$ 2,100	2
4402 38th Ave SW	1	0	N/A	4
4406 38th Ave SW	1	0	N/A	3
4412 38th Ave SW	1	0	\$ 2,395	2
4416 38th Ave SW	1	0	N/A	4
4420 38th Ave SW	1	0	\$ 2,495	2
4422 38th Ave SW	1	0	\$ 2,950	2
4426 38th Ave SW	1	0	N/A	3
4432 38th Ave SW	1	0	\$ 2,900	2
4436 38th Ave SW	1	0	\$ 3,000	4
4442 38th Ave SW	1	0	N/A	5
4446 38th Ave SW	1	0	N/A	3
4403 37th Ave SW	1	0	\$ 2,700	2
4407 37th Ave SW	1	0	\$ 2,450	2
4413 37th Ave SW	1	1	\$ 2,350	2
4417 37th Ave SW	1	0	\$ 3,300	3
4421 37th Ave SW	1	0	\$ 2,600	3
4427 37th Ave SW	1	0	\$ 2,700	3
4400 37th Ave SW	1	0	\$ 2,700	3
4406 37th Ave SW	1	1	\$ 2,500	2
4410 37th Ave SW	1	0	N/A	2
4414 37th Ave SW	1	0	N/A	2
4811 42nd Ave SW	1	1	\$ 2,295	4
4817 42nd Ave SW	1	1	\$ 2,950	3

4823 42nd Ave SW	1	0	\$ 2,350	2
4827 42nd Ave SW	1	0	N/A	5
4833 42nd Ave SW	1	0	\$ 2,750	3
4837 42nd Ave SW	1	0	\$ 2,650	2
4843 42nd Ave SW	1	1	\$ 2,700	3
4847 42nd Ave SW	1	0	\$ 2,600	2
4853 42nd Ave SW	1	0	N/A	2
4857 42nd Ave SW	1	0	\$ 2,700	3
4812 42nd Ave SW	1	1	\$ 2,800	3
4816 42nd Ave SW	1	0	\$ 3,200	4
4822 42nd Ave SW	1	0	\$ 2,700	3
4828 42nd Ave SW	1	0	N/A	3
4832 42nd Ave SW	1	0	\$ 3,000	4
4836 42nd Ave SW	1	0	\$ 3,200	3
4840 42nd Ave SW	1	0	\$ 2,650	4
4846 42nd Ave SW	1	0	\$ 3,200	5
4852 42nd Ave SW	1	0	\$ 2,700	2
4856 42nd Ave SW	1	0	\$ 2,600	2
4811 41st Ave SW	1	0	\$ 2,950	4
4815 41st Ave SW	1	0	\$ 3,600	4
4823 41st Ave SW	1	0	\$ 3,200	3
4827 41st Ave SW	1	0	\$ 2,950	3
4837 41st Ave SW	1	0	\$ 4,546	5
4843 41st Ave SW	1	1	\$ 4,542	5
4847 41st Ave SW	1	1	\$ 2,700	2
4853 41st Ave SW	1	0	\$ 2,695	2
4857 41st Ave SW	1	0	\$ 3,095	5
4811 40th Ave SW	1	0	N/A	4
4815 40th Ave SW	1	1	\$ 3,250	4
4817 40th Ave SW	1	0	\$ 2,200	2
4823 40th Ave SW	1	0	N/A	3
4827 40th Ave SW	1	0	\$ 2,650	5
4831 40th Ave SW	1	1	\$ 2,500	4
4837 40th Ave SW	1	0	N/A	2
4843 40th Ave SW	1	0	N/A	2
4845 40th Ave SW	1	0	\$ 2,800	5
4849 40th Ave SW	1	0	\$ 3,300	4
4859 40th Ave SW	1	0	\$ 3,250	4
3237 SW Genesee	1	0	\$ 2,550	2
3229 SW Genesee	1	0	\$ 2,650	3
3227 SW Genesee	1	0	N/A	3

3225 SW Genesee	1	1	\$	2,650	4
3221 SW Genesee	1	0	\$	2,495	2
3215 SW Genesee	1	0	\$	2,095	1
3211 SW Genesee	1	0	\$	2,600	4
3205 SW Genesee	1	1	\$	2,400	2
3201 SW Genesee	1	0	\$	2,900	4
3127 SW Genesee	1	1	\$	2,695	3
3119 SW Genesee	1	0		N/A	3
3166 SW Genesee	1	0		N/A	3
4150 32nd Ave SW	1	0		N/A	4
4144 32nd Ave SW	1	0		N/A	3
4140 32nd Ave SW	1	0	\$	2,500	2
4136 32nd Ave SW	1	0	\$	2,395	3
4134 32nd Ave SW	1	0	\$	2,700	3
4130 32nd Ave SW	1	0	\$	2,695	4
4126 32nd Ave SW	1	0		N/A	3
4122 32nd Ave SW	1	1	\$	2,700	4
4118 32nd Ave SW	1	0		N/A	3
4114 32nd Ave SW	1	1	\$	2,950	3
4110 32nd Ave SW	1	0	\$	2,600	4
4106 32nd Ave SW	1	0		N/A	3
4104 32nd Ave SW	1	0	\$	2,995	3
4100 32nd Ave SW	1	0		N/A	3
4046 32nd Ave SW	1	0	\$	2,300	3
4044 32nd Ave SW	1	1	\$	2,195	2
4040 32nd Ave SW	1	0		N/A	3
4036 32nd Ave SW	1	0		N/A	3
4030 32nd Ave SW	1	1	\$	2,200	4
4026 32nd Ave SW	1	0		N/A	3
4022 32nd Ave SW	1	0		N/A	3
4018 32nd Ave SW	1	0		N/A	4
4014 32nd Ave SW	1	0		N/A	3
4012 32nd Ave SW	1	0	\$	2,325	2
4008 32nd Ave SW	1	0		N/A	4
3021 SW Andover Street	1	0		N/A	2







## West Seattle Alaska Urban Village SF Parcel Summary

Total SF Units	Total NOO	Total NOO Bedrooms	Median Rent Zestimate
277	61	182	\$ 2,702

0.220217

## Total Urban Village SF Parcel NOO Units by Bedrooms

# of Bedrooms	Non-Owner Occupied SF Units	% of Total	Median Rent Zestimate \$ SF Units NOO
0	0	0%	N/A
1	0	0%	N/A
2	23	38%	\$ 2,543
3	22	36%	\$ 2,743
4	10	16%	\$ 2,734
5	6	10%	\$ 3,106

## Edmonds Slope SF Parcel Summary

Total SF Units	Total NOO SF Units	Total NOO Bedrooms	Median Rent Zestimate
91	27	77	\$ 2,742

## Edmonds Slope SF Parcel NOO Units by Bedrooms

# of Bedrooms	Total Non-Owner Occupied SF Units	% of Total	Median Rent Zestimate \$ Edmonds Slope NOO
0	0	0%	N/A
1	0	0%	N/A
2	12	44%	\$ 2,630
3	9	33%	\$ 2,727
4	4	15%	\$ 2,936
5	2	7%	\$ 3,100

**From:** Miranda Berner  
**To:** [PCD\\_MHAEIS](#); [Wentlandt, Geoffrey](#); [Morris, Geri](#); [Herbold, Lisa](#); [Sawant, Kshama](#); [O'Brien, Mike](#); [Gonzalez, Lorena](#)  
**Subject:** Please extend DEIS comment period to September  
**Date:** Saturday, August 05, 2017 12:49:22 PM

---

Dear Mr. Assefa,

Thank you for extending the comment period two weeks.

As there are over 800 pages to review; it would be nice to have additional time.

Many of us are working parents, with full schedules, and a month and half is not a lot of time to give this the consideration that it deserves.

Please extend the comment period until at least September.

Thank you for your consideration,

Miranda Berner

**From:** Miranda Berner  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** DEIS - every urban village should have its own EIS  
**Date:** Saturday, August 05, 2017 12:52:05 PM

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*The DEIS is not sufficient to represent all Urban Villages and the City overall. Each Urban Village is unique, with different housing types, cultural traditions, businesses, resources, and growth needs. This DEIS fails to recognize and examine these differences.*

*Each Urban Village and Surrounding Area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.*

*Additionally, the DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined. Seattle residents live in both their own neighborhoods and in the City at large, yet this DEIS has failed to analyze the impacts to both thoroughly and accurately.*

Regards,  
Miranda Berner  
Wallingford, Seattle

**From:** Keiko Budech  
**To:** [Wentlandt, Geoffrey](#); [PCD\\_MHAEIS](#)  
**Cc:** [Assefa, Samuel](#); [Feldstein, Robert](#); [Maxana, Sara](#); [Dan Bertolet](#)  
**Subject:** Sightline Institute MHA DEIS Comment Letter  
**Date:** Monday, August 07, 2017 12:25:35 PM  
**Attachments:** [Sightline Institute MHA DEIS Comment Letter 08.07.17.pdf](#)

---

Dear Mr. Wentlandt,

Please accept Sightline Institute's attached comments on the DEIS for citywide MHA. Thank you for the opportunity to comment. Please feel free to contact me if you have any questions.

Sincerely,  
Keiko

**Keiko Budech** | Senior Communications Associate  
**Sightline Institute** | 1402 Third Avenue, Suite 500 | Seattle, WA 98101  
[www.sightline.org](http://www.sightline.org) | T 206.447.1880 x114 | [@keikoanya](#)

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**Sightline Institute is a think tank providing leading original analysis of energy, economic, and environmental policy in the Pacific Northwest.**



August 7, 2017

Mr. Geoff Wentlandt  
City of Seattle Office of Planning and Community Development  
600 4th Avenue, Floor 5  
PO Box 94788  
Seattle, WA 98124-7088  
Email: MHA.EIS@Seattle.gov

Re. Draft Environmental Impact Statement for Mandatory Housing Affordability-Citywide

Dear Mr. Wentlandt:

The Sightline Institute would like to thank the City of Seattle for giving us the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for the citywide implementation of Mandatory Housing Affordability (MHA). Sightline is a public policy think tank, and I lead our research on affordable housing policy. Sightline's founder and executive director Alan Durning served on Seattle's HALA committee, and was an early supporter of MHA.

Over the past 14 months I have written a series of technical articles assessing MHA, including the citywide proposal ([link](#), [link](#), [link](#), [link](#), [link](#)), U District ([link](#)), Downtown/SLU ([link](#)) and the MHA DEIS ([link](#)). All of these articles are attached as integral components of this comment letter. My research shows that MHA has the potential to improve access to affordable housing by increasing the production of both market-rate and below-market rate housing, but only if the cost of the affordability requirements is fully offset by the value of the upzones.

The DEIS for citywide MHA suffers from a fundamental, critical flaw: it does not analyze the impact of the MHA affordability requirements on the future production of housing. MHA would implement upzones coupled with requirements on developers to include below-market-rate units in their projects or pay a fee in lieu. As demonstrated in the Sightline articles cited above, these requirements alter the financial feasibility of private development projects, and thus can change the rate of market-rate housing development. The DEIS provides no analysis of this potential impact. It estimates future housing production based on historic trends, ignoring whether the MHA requirements might change those trends. Because analyses of so many of the environmental elements of the DEIS rely on the estimated number of additional housing units under the action alternatives, this is a fatal omission.

The DEIS cites a city feasibility study ([link](#)) that found that under MHA some housing development prototypes would likely be feasible, and some likely not. In other words, the study indicates that MHA would change the rate of housing production in different areas of the city, yet this information was not included in the DEIS projections of housing unit growth. Furthermore, the study did not compare feasibility under MHA with feasibility under existing regulations. The basic purpose of a DEIS is to compare a "no action" alternative to "action" alternatives. Because it lacks an assessment of feasibility

under existing conditions to establish a baseline for comparison—that is, the no action alternative—the city’s feasibility study cannot properly inform the DEIS.

Financial impacts are typically beyond the purview of Environmental Impact Statements. However, the missing analysis I describe above does not concern direct financial impacts on private developers or any other individual or environmental element. Because the action alternatives alter housing development feasibility, careful consideration of real estate development economics is necessary to yield a reliable projection of the number of new households that will be added to the city under the action alternatives. Without financial analysis of housing development, the DEIS is flying blind.

In the majority of cases analyzed in the Sightline articles cited above, housing development projects subject to MHA as proposed would be significantly less financially viable than projects subject to existing regulations. These results indicate that there could be **fewer** market-rate housing units developed under the two DEIS action alternatives compared to the no action alternative. Under this scenario, in many cases potential adverse environmental impacts would be less severe compared to what is estimated in the DEIS, because there would be less household growth.

**However, more importantly, under this scenario MHA would fail in its intended purpose to help solve Seattle’s housing affordability crisis, and in fact, could make affordability even worse.**

With such a gaping hole in its analysis on the effects of the action alternatives on housing production, the DEIS for citywide MHA cannot accurately assess the potential adverse environmental impacts. This shortcoming must be addressed in the Final EIS with robust economic analysis comparing financial feasibility of housing development under the no action and action alternatives. This is not a technicality. The housing security of thousands of Seattle residents—both current and future—depends on the city getting MHA right.

Thank you for your consideration.

Sincerely,



Dan Bertolet  
Senior Researcher  
Sightline Institute



# SEATTLE'S HOUSING FUTURE DEPENDS ON A MATHEMATICAL AND POLITICAL BALANCING ACT

## The Mandatory Housing Affordability program, explained.



Author: Dan Bertolet  
(@danbertolet) on June 1, 2016 at 6:30 am

This article is part of the series [Legalizing Inexpensive Housing](#)

The centerpiece of Seattle's [Housing Affordability and Livability Agenda](#) (HALA) is an innovative policy called [Mandatory Housing Affordability](#) (MHA). Exemplifying HALA's core principle of leveraging growth for affordability, MHA promises to fulfill almost a third of the city's ten-year goal to produce 20,000 affordable homes.

To get there, though, MHA must play nice with the unpredictable and dynamic world of private real-estate development, and that calls for a cautious approach to setting the program's parameters. Getting it right will be like shooting an apple off someone's head with a shotgun: you'd better aim high. Oh, and the person with the apple is also dancing.

Menu

At the same time, the populist impulse to demand more affordable units, combined with the anti-growth impulse to oppose larger buildings, will create political pressure for more stringent MHA requirements—as if someone's pulling down on the barrel of that shotgun as you're trying to aim. Hyperbole? Read on.

### What is MHA?

MHA couples affordability mandates on private development with zoning changes that allow the construction of taller buildings. If it works, the city scores a win-win of more market-rate housing and more subsidized affordable housing. But if policymakers push the requirements beyond what homebuilding economics can support, they risk the lose-lose outcome of no new housing at all.

Seattle's MHA approach can become a model for growing cities in Cascadia and beyond.

Seattle Mayor Ed Murray recently unveiled the [MHA framework](#), which lays out preliminary targets for the number of apartments affordable to low-income households that developers must include in new housing projects. It also proposes fees that developers can pay in lieu of providing those units that Seattle's Office of Housing would then use to fund affordable housing built elsewhere. Over the next six months, planners will



beyond the metrics, the MHA dialogue has already begun to catalyze an unprecedented **political alliance** between the social justice community and urbanists, along with a corresponding **marginalization** of those advocating for tighter limits on new housing. Over the long run, this cultural shift may prove more important than the policy itself. But the success of both will hinge on implementation driven by data, not politics. If policymakers can pull that off, Seattle's MHA approach can become a model for growing cities in Cascadia and beyond.

## The balancing act, part 1: Feasibility vs. affordability

Creating new affordable housing through MHA completely depends on risk-taking private developers—no private development means no new subsidized homes. And the catch is, restricting rents to below the market rate reduces a building's revenue-generating potential, undermining the feasibility of development. This isn't about greedy developers getting mad, taking their ball, and going home. Banks won't grant the large loans needed to fund apartment construction if the projected returns are too low.

Accordingly, city policymakers aim to set up a balanced system in which a zoning change that allows the construction of a larger building—an "upzone"—offsets the financial burden of fulfilling the affordability mandate. A larger building makes room for additional market-rate rentals that generate extra revenue to cover the losses on the below-market-rate units (or the cost of the in-lieu fee if the developer chooses that option).

If policymakers can strike this balance, MHA will have no impact on feasibility. Development projects will move ahead at the same pace as they would have without MHA, but they will yield subsidized housing as well as additional market-rate housing. Matching the cost of the mandate with the value of the upzones will also keep MHA on the right side of the law: **by most interpretations, Washington** prohibits such **financial penalties** on private property without compensation.

But the balance is extremely delicate. Development feasibility depends on numerous factors, including interest rates, real-estate cycles, neighborhood market strength, land values, building type, site-specific conditions, permitting uncertainties, and construction costs such as wages and materials. These factors shift over time, sometimes quickly.

Given this unpredictable morass of variables, Seattle would be prudent to err on the side of lower mandates. Because when feasibility is close to the brink, the financial hit caused by a requirement for too many below-market-rate units could tip the scales and kill a project altogether, which, it's worth repeating, means no new market-rate or affordable homes for anyone. The city's challenge will be to resist the **inevitable political pressure** to escalate the affordability mandates, so as to avoid killing the golden goose of private development.

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## The balancing act, part 2: Upzones vs. upset

involved in real estate development, the city would be smart to err on the side of generous upzones. As a starting point, the 2015 HALA report included recommendations for upzones, most of which raise allowed building heights by one story.

Untangling the complexities of MHA and establishing a system that keeps the golden goose alive will not be easy. Most critically, policymakers must not overlook the basic fact that private development is a game of risk and probability, and any financial penalty that reduces the potential return on investment will reduce the likelihood of new housing getting built—market-rate or affordable. In a city with an affordability crisis caused by a housing shortage, imposing new regulations that impede the construction of housing is like cutting off a farmer's water supply during a famine.

On the other hand, if Seattle can strike the right balance and enact upzones that otherwise would never have passed political muster, the payoff will be big: much more housing, and more of it affordable.

### Today (no MHA)...

40' height limit  
FAR limit 3.25

- New Development**
- 30 housing units
  - No affordable housing
  - 17,100 sq. ft.
  - 4 stories



### with MHA...

50' height limit  
FAR limit 3.75

- New Development**
- 39 housing units
  - 3 dedicated affordable housing units or in-lieu payment of \$300,000-400,000
  - 21,400 sq. ft.
  - 5 stories

existing 40' height limit



City of Seattle diagram illustrating how MHA would allow the addition of a fifth floor to a four-story building in exchange for the provision of three below-market-rate units or an in-lieu fee payment in the range of \$300,000 to \$400,000. A measure of development intensity, FAR (floor-area-ratio) is the ratio between the total floor area in the building and the area of the property it is built on. By City of Seattle, used with permission.

## The MHA weeds

For those readers comfortable crawling deeper into the weeds of MHA, it's safe to keep reading. Others, you have been warned.



units along with a corresponding upzone, would the rent income from all of the additional units cover the cost of building them, including a reasonable return on the investment?

If yes, then feasibility is not compromised and the enlarged project will yield below-market-rate apartments, as well as a greater number of market-rate units than the base building would have included. If no, then the policy is likely to do more harm than good by impeding the development of new housing.

## Penciling out the on-site affordable units option

As a test case, let's try the example project described on page 20 of the [Director's Report on the MHA framework](#). It's a 255-unit apartment building for which an upzone granted an increase from five to six stories. The proposed mandate is that **6 percent** of the building's total units must be affordable to households earning up to 60 percent of area median income (AMI), for a period of 50 years. That translates to 15.3 below-market-rate units, leaving room for an additional 27.2 market-rate units in the remainder of the new space created by the upzone (for this estimate we can ignore that the unit counts are fractional).

The feasibility modeling requires the inputs given in the table below (see the notes at the end of the article for definitions and sources). Applying these assumptions, rent revenue from the added units minus the cost of operating them—the “net operating income” (NOI)—is \$557,000 per year. The annual cash flow to both cover the expense of building the additional floor's worth of units and also achieve a 6 percent return on investment is \$554,000, or just 0.6 percent less than the NOI. In other words, under this scenario the MHA parameters are almost perfectly balanced. The project remains feasible—it's in the policy's sweet spot.

### MHA Feasibility Modeling Assumptions

Market Rent	\$2.80/sf
Rent for 60% AMI	\$1.60/sf
Operating Expense	\$0.92/sf
Turn-key Development Cost of Added Floor	\$236/gsf
Rentable Floor Area Efficiency	0.82
Required Project Yield	6.0%
Inclusionary Unit Requirement	6.0%
In-lieu Fee	\$12/gsf

However, modest changes can push the project out of that sweet spot. For example, if construction costs rose by 20 percent—common during boom times—the annual cash flow needed to cover construction of the extra units is \$107,000 more than the NOI from those units. If instead, the below-market-rate requirement

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If on top of that, the rent restriction was deepened to provide affordability for 30% AMI households (\$0.80/sf rent), the NOI would take a total hit of \$385,000, equivalent to a 9 percent reduction of NOI for the whole building. For any such scenario in which the MHA requirements cause the dollar signs to go substantially negative, developers will be less likely to pursue the project, jeopardizing the production of any housing at all.

## Penciling out the in-lieu fee option

If the developer of our example project opted to pay the in-lieu fee instead of building the below-market-rate units, the proposed fee of \$12 per square foot translates to a total fee of \$2.8 million. In this scenario, the NOI and the annual cash flow necessary cover the cost for construction—which now includes the \$2.8 million fee—remain very closely matched. That is, the choice between building the below-market-rate units and paying the in-lieu fee is a financial wash.

The merits of including subsidized units in a market-rate building versus collecting in-lieu fees that fund subsidized units built elsewhere is the subject of [ongoing debate](#). But either way, their relative cost to a project under MHA depends on a sensitive equation. In our example, with an increase in market rent to \$3.25 per square foot, the bottom line for the in-lieu fee scenario is about \$60,000/year better than including below-market-rate units in the project.

## Ready, aim...

Remember that apple target at the start of this article? The shotgun metaphor ought to make more sense now. Now to explain why I said the person is dancing: The example project analyzed above is complicated enough in itself, but it's only one permutation among myriad building types and upzones for which the city must define MHA requirements. The task of setting these parameters in the stone of Seattle's land use code is rife with the risk of oversimplification and loaded with potential for unintended consequences.

For example, small-scale projects are particularly problematic. How does a developer provide 6 percent affordable units in a project that only has eight apartments? And granting an additional floor on a townhouse isn't likely to add much value because it won't increase the number of homes that a builder can erect on a site. [Small efficiency dwelling units](#), too, need their own set of unique requirements.

On top of the variability of the buildings themselves, to account for how market rents vary by location, planners have divided up the city geographically into three tiers. Based on the premise that higher market rents can support a bigger mandate, preliminary below-market-rate unit targets for the three tiers are [five, six, or seven percent of total units](#). But this system introduces fairness issues at the boundaries between tiers and needs frequent updating to reflect evolving market conditions.

High-rise construction is another special case. To mesh with Seattle's existing [incentive zoning program](#), the MHA upzone cannot grant additional height. Instead it must allow buildings to have larger cross-sectional area—that is, to get bulkier. Furthermore, to make the math balance out with the higher construction costs of high-rises, planners are proposing below-market-rate unit percentages in the range of 2 to 5 percent,

The unruly complexity of MHA begs the question: is there a simpler solution? In an ideal world, a cleaner approach would be to adopt the same upzones recommended by HALA but replace the MHA affordability mandates with a citywide **land-value tax**. The land-value tax would capture the property value boost from the upzones, and its proceeds could pay for subsidized housing. Unfortunately, in our non-ideal world, land-value taxes face daunting **legal barriers**, while on the political side, few constituencies are likely to mobilize for such an approach.

## ...Fire!

I've been harping on the risky shot before the architects of MHA not because I believe it's hopeless. Rather, my intent is to emphasize that an aim-high approach to setting the affordability mandates is the key to MHA's success.

Yes, if the mandates are too small—that is, if they are less demanding than they could have been without dampening development—the city will end up with somewhat fewer below-market-rate apartments. That outcome would be unfortunate though not disastrous, because the city would still get more market-rate apartments that absorb pent-up demand for housing and relieve upward pressure on prices. (HALA also has a ten-year goal of 30,000 market-rate units.)

But if the mandates are too large—if they are more onerous than the ever-shifting economics of housing construction will tolerate—the city stands to lose both new subsidized apartments and new market-rate apartments. And that outcome truly would be a disaster in a city where a shortage of housing is driving prices sky-high.

With MHA, Seattle has an unprecedented opportunity to create affordable housing while simultaneously building a new political bridge between two worlds: that of social justice advocates and non-profit housing developers and that of pro-density urbanists and private developers. If Seattle can successfully overcome both the technical and political challenges of implementation, MHA will not only put more housing on the ground but will also lay the cultural and political groundwork for ongoing progress towards growth with affordability.

An aim-high approach to setting the **affordability** mandates is the key to MHA's success.



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## Notes

The assumptions used in the feasibility model are based on input from local real estate development professionals.

bedroom, assuming a unit with 650 square feet of rentable space.

Rent for 30% AMI is based on Seattle's **rent limit of \$504 per month** for a one-bedroom.

Operating expense is based on typical new Seattle apartments; subtracting operating expense from rent revenue yields the net operating income (NOI).

The turn-key development cost of an added floor is the cost of building a sixth woodframe floor on a five-story project; the cost is lower than the typical development cost for an entire building mainly because it does not include the cost of land.

Rentable **f**loor area **efficiency** is the ratio of the building's rentable square feet (doesn't include floor area not used by specific tenants such as utility spaces) to gross square feet (the floor area of everything in the building).

Required project yield is the return on investment lenders need to justify risking money on a project. For a project to "pencil," the NOI must cover the yield. In Seattle's current hot market, yields in the range of 5.5% are not uncommon, but we use 6% percent to represent more typical market conditions.

sf = rentable square feet; gsf = gross square feet

Thank you to Kristin Ryan, Maria Barrientos, Ben Broesamle, Gabriel Grant, and Matt Hoffman for vetting the assumptions and results.

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Tagged in: [HALA](#), [Housing](#), [Housing Affordability](#), [Mandatory Housing Affordability](#), [MHA](#), [Seattle](#), [Upzones](#), [Urbanism](#)

Previous article in series:

« [Exclusionary Zoning Robs Our Cities of Their Best Qualities](#)

Next article in series:

[Why Quashing Short-Term Rentals Is a Zero-Sum Game for Housing Affordability](#) »



## CHECKING SEATTLE'S MHA MATH

Fixing first draft errors can fulfill the city's housing affordability promise.



Author: Dan Bertolet

(@danbertolet) on January 10, 2017 at 1:00 pm

Since the release of Seattle's [Housing Affordability and Livability \(HALA\) plan](#) in July 2015, city policymakers have been plugging away at defining its most ambitious policy, a type of [inclusionary zoning](#) called "Mandatory Housing Affordability" (MHA). MHA couples zoning changes that allow larger buildings—"upzones"—with mandates on developers to provide affordable homes or pay into the city's affordable housing fund. With MHA, Seattle has an opportunity to become a model for Cascadia and beyond for embracing growth and supporting affordability in concert.

But as I have written previously ([here](#) and [here](#)), the success of MHA hinges on striking the right balance between upzones and mandates. If they balance, MHA will propel progress toward a more economically integrated and inclusive Seattle—the kind of city where people from all income levels find housing options where there are great schools and close job opportunities. If they do not, Seattle will get the opposite: less housing overall and less lower-cost housing, too. The housing shortage will worsen, competition will stiffen for what's available, and prices will escalate, [displacing more low-income residents](#). As [more cities](#) consider inclusionary zoning, they too will face the risk of its potential backfire.

The theory of MHA is exactly right, but its implementation was always going to be the hard part. It's a technically difficult policy to operationalize, because not only is real-estate development a complicated process in itself, but the MHA program parameters must also be custom tailored for a vast range of building types and zones throughout the city. Defining MHA affordability requirements that work well under such a huge variety of conditions is a monumental urban planning challenge.

The theory of MHA is exactly right, but its implementation was always going to be the hard part.



Last month Seattle's Office of Planning and Community Development released the last in a [series of reports](#) that lay out its proposals for MHA. This article first provides a brief overview of the program followed by a theoretical discussion of value exchange—that is, what builders trade for investing in subsidized, below-market-rate housing. It then evaluates the city's proposed MHA upzones and mandates, identifies problems, and recommends fixes.

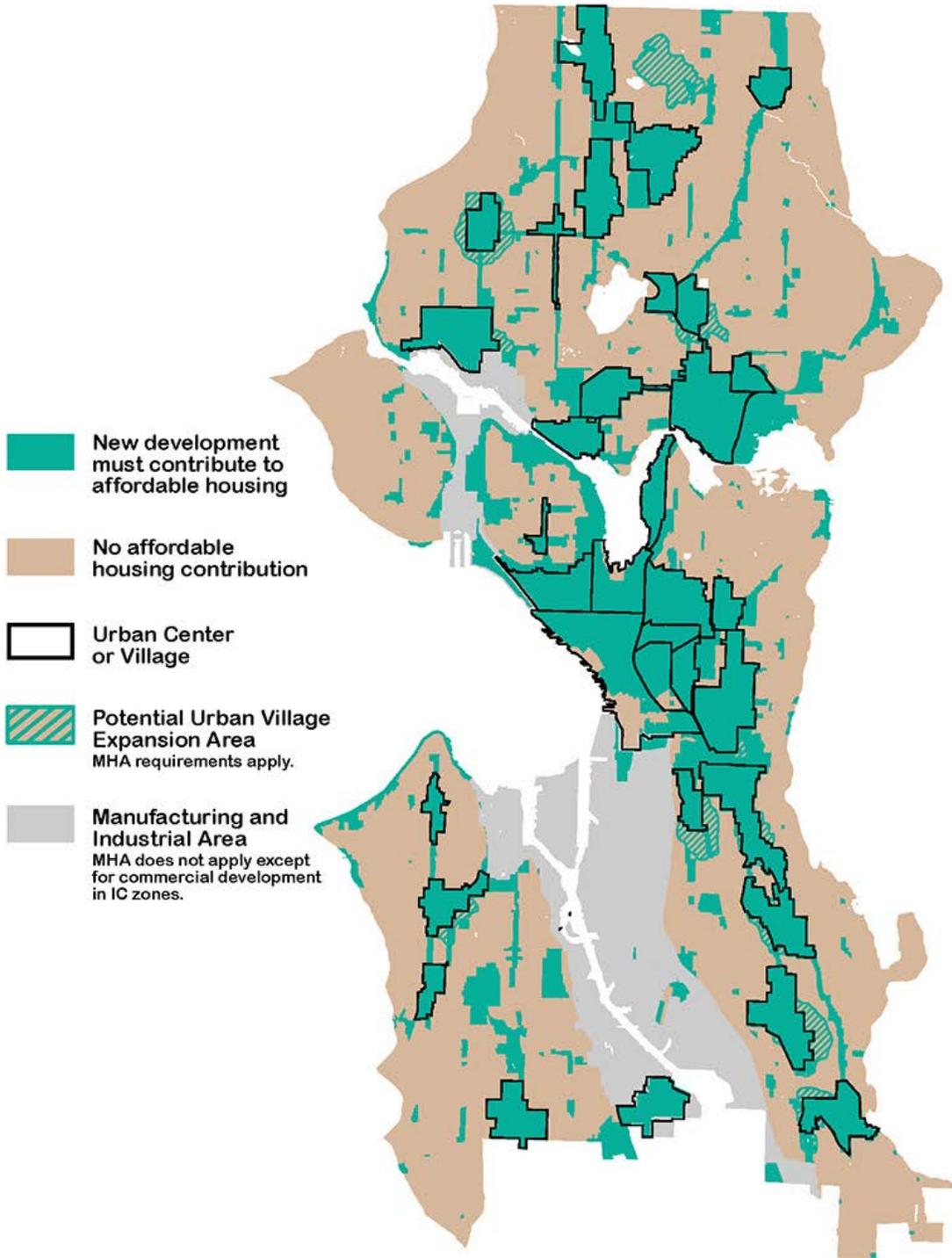
Fixing some first draft errors can ensure the city delivers on its housing affordability promises. The main findings are that (1) the MHA program as proposed would create serious inconsistencies in the balance between the value created by the upzones and the cost of the affordability mandates, and (2) in many cases that balance is tilted toward mandates that are too onerous relative to the value of the upzones. The resultant added costs imposed on homebuilding will suppress development, jeopardizing the program's goal of 6,000 new affordable homes. To avoid that failed outcome and get the MHA program back in balance, additional real estate development feasibility analysis is the critical missing ingredient.

## An overview: What the planners have been cooking up and where it's headed

Although Seattle's MHA program applies to both residential and commercial development, this article addresses only the residential side, wherein lies the greatest risk of unintended, counterproductive consequences for affordability in Seattle neighborhoods. The city projects that residential MHA will produce **4,080 affordable homes over 10 years**. To hit that number, planners have proposed a **stretching set** of MHA upzones and associated affordability mandates throughout the city. The scale of the upzones varies, but most are relatively modest (for example, maximum height raised from six to seven stories). Each upzone is assigned a performance requirement and payment requirement, and developers can choose one or the other.

Under the performance option, building developers must rent or sell a specified percentage of a building's housing units at prices affordable to households earning 60 percent of area median income (AMI), currently **\$54,180 for a family of four**. Under the payment option, builders pay a per-square-foot fee based on the total floor area of residential use in the building, and the city uses that money to fund separate affordable housing projects. The city sets the payment amounts roughly equal to the monetary loss builders would incur if they had chosen the performance option. (Details on the calculation **are here**, and projections on performance versus payment **are here**.)

The **draft MHA** applies to all property within the city's urban villages and centers and to all property zoned for multi-family elsewhere in the city (excluding designated historic districts), as illustrated in the map below. Nearly all single-family and industrial zones are excluded from the program. The areas subject to MHA get assigned upzones and corresponding performance and payment amounts. The specifics of each upzone depend on the existing zoning and other city planning priorities. Maps detailing the proposed MHA upzones in each of 21 different neighborhoods are **here** and **here**.



Map of proposed locations in Seattle where MHA would apply. Map by City of Seattle Office of Planning and Community Development (used under public domain).

The first neighborhood likely to see MHA implemented will be the **University District**, where a rezone process began way back in 2011. Approval by Seattle City Council could come as early as mid-February 2017. Getting the MHA numbers right in the University District rezone would set a precedent for other parts of the city.

The city plans to implement MHA next in downtown and South Lake Union (SLU) in April – May 2017. For the remainder of the city, the Office of Planning and Community Development is currently preparing an

**Environmental Impact Statement** and expects to complete it in May 2017. The city is also conducting an **extensive outreach process** to educate residents and get feedback on the 21 proposed neighborhood upzones noted above. The mayor hopes to have **MHA implementation completed** as early as late summer 2017.

## The core principle of MHA is equal value exchange

As proposed in Seattle's **HALA recommendation R.1**, MHA is grounded in the concept of an equal exchange of value: upzones would allow developers to make more money, but they would dedicate most of that money to housing low-income families:

Amount of *affordable* housing required (and in-lieu fees) is based on value of upzones, and varies by market and construction type.

Implementing this principle consistently across Seattle's dozens of different zones and dozens of different building types is essential. First, an inconsistent value exchange will have capricious effects on housing development. Without consistency, in one zone MHA might cause, say, a five to ten percent net increase in the total cost of building—enough to kill feasibility. Meanwhile, the owner of a property around the corner in a different zone with balanced MHA requirements might see no net increase in development costs at all. An imbalance in the opposite direction could leave affordable units “on the table,” that is, construction would have remained feasible under higher requirements.

More importantly, the biggest risk to the success of MHA is if inconsistency leads to affordability mandates so onerous that homebuilding diminishes. In this lose-lose outcome, the city not only gets fewer new rent-restricted homes, but also ends up with a lot less market-rate housing. And when market-rate homes don't materialize in a high-demand city such as Seattle, competition for what housing remains intensifies through a **cruel game of musical chairs in which the poorest families always lose**. The loss of market-rate housing eliminates affordable housing through the process of economic displacement—by far the **most common cause of displacement in Seattle**, when rising rents force tenants to move.

To put things in perspective, the production goal for the residential portion of MHA averages about 400 rent-restricted units per year. Just two 200-unit apartment buildings rendered infeasible by MHA per year would **effectively negate most** of the subsidized units produced by the program. And suppressing construction of two 200-unit buildings per year could easily result from poorly balanced MHA rates in a city where thousands of apartments are built per year. When that housing doesn't get built, the would-be tenants will instead bid up the prices of existing city apartments, setting in motion the musical chairs dynamic all the way down the market, where the people with the least are most likely to get pushed out. In the end, close to 400 low-income families and individuals could have no options but cheaper homes outside of the city or to double up with friends. The very solution intended to help these families winds up driving them away from their community, schools, and jobs.

On the other hand, if the mandate/upzone tradeoff errs on the side of incentives rather than disincentives for homebuilding, the only downside is that the number of rent-restricted



units per building would be slightly lower. But because under these conditions MHA would improve feasibility, the city would expect to see an uptick in homebuilding projects, each of which would deliver rent-restricted homes. So in fact, a lower mandate could actually lead to more subsidized, lower-cost housing, not to mention the indirect affordability benefits of supplying more market-rate housing—and that means getting closer to the important city goal of plenty of homes of all kinds for more people of all walks of life.

Just two 200-unit apartment buildings rendered infeasible by MHA per year would *effectively* negate the *benefits* of all of the subsidized units produced by the program.

Given the complexities of zoning and real estate development, it is unrealistic to expect MHA to provide a perfectly equal value exchange in all cases. But given the lose-lose unintended consequences of excessive affordability requirements, the architects of MHA would do well to err on the low side when setting the mandates: aim high with the upzones, aim low with the requirements!

Lastly, if the costs imposed by MHA are greater than the upzone's value, and especially if the value exchange varies widely, the program may be more vulnerable to a **legal challenge**. Washington state law bans affordability mandates outright unless they are balanced through value exchanges.

## Equal value exchange starts with a proportional relationship between affordability requirements and the increase in building size

The value of an upzone is determined by the extra rent or sales income derived from the additional market-rate homes permitted by the upzone. At the most basic level, equal value exchange necessitates a proportional relationship between the number of subsidized housing units mandated (or the in-lieu fee) and the number of market-rate units gained.

For example, a simple formula for maintaining that balance is a stipulation that for every three additional apartments allowed by an upzone, one unit must be reserved as affordable for families at 60 percent of AMI. An upzone that allows just three extra units yields one rent-restricted apartment. An upzone that yields 300 extra units produces 100 rent-restricted apartments.

In contrast, Seattle defines the MHA performance and payment amounts in relation to the entire building, not to the size of the upzone. This approach makes Seattle's MHA math more complicated than it needs to be, though it's still just math. The value exchange can still be balanced and consistent as long as the whole-building requirements are derived from the extra capacity granted by the upzone.

For example, consider a 6-story apartment building with 12 units per floor, subjected to an MHA upzone that allows one additional floor and mandates that one-third of the extra units be subsidized. The resulting enlarged building would provide four rent-restricted units out of 84 total, or about 5 percent. Boost the upzone to two floors, and the building would have to provide eight rent-restricted units out of

96 total, or about 8 percent. The value exchange can be kept consistent by adjusting the whole-building requirement as the size of the upzone varies.

## The increase in building size is governed by multiple factors

The simplest metric for gauging development capacity is “floor-area-ratio” (FAR), which expresses the total floor space of a building relative to the area of the property it’s built on. For example, a one-story building that completely covers its property has an FAR of one: for every square foot of property, there is one square foot of floor. A four-story building that covers half its property has an FAR of two. An upzone from four to five full stories corresponds to a 25 percent increase in allowed FAR. In Seattle, most multi-family zones are regulated through FAR, though some are not (many zones in downtown, for example).

Cities can also control building capacity with regulations such as height limits, density maximums, setbacks from property lines, and open space and parking requirements. In some cases, variation in the cost of different construction types may also act as a restraint on development capacity. For example, if building codes mandate expensive concrete or steel construction for buildings exceeding a given height, it may be cost-prohibitive for developers to use all of the height allowed by zoning (more on this later). In other cases, market demand for certain unit sizes or inherent dimensional constraints on unit layouts may limit the usability of capacity granted on paper. Depending on the specifics of a zone, in addition to FAR, any or all of the above factors may play a role in determining the value developers can derive from an MHA upzone.

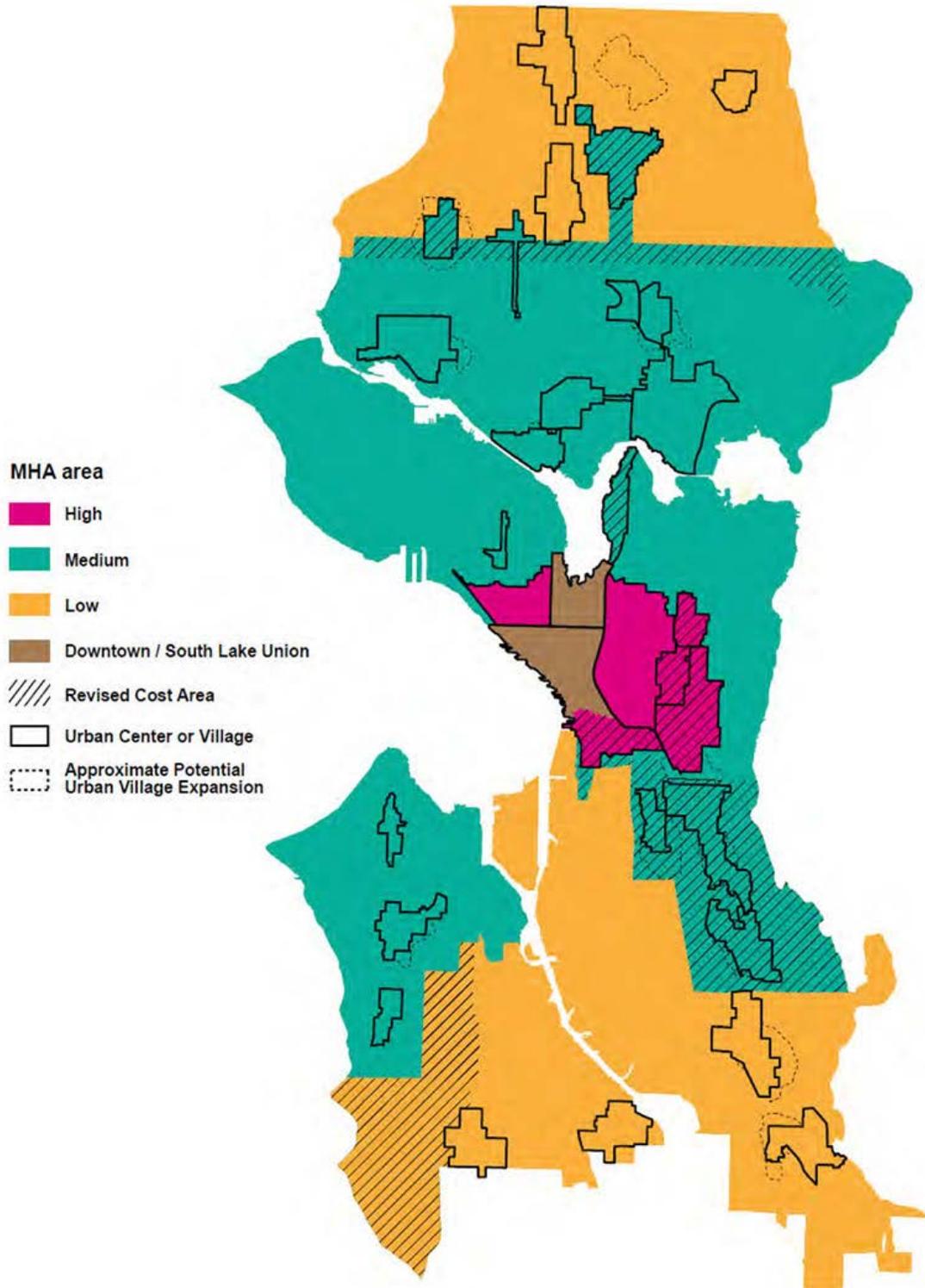
## Value exchange is also determined by rents, but rents don’t sit still

The value of an upzone also depends on the market rent (or price) of housing. All else being equal, the higher the rent, the more valuable every extra increment of building capacity that zoning allows, and the higher the affordability mandate can be without jeopardizing feasibility. But here’s the challenge: market rents vary continuously over both location and time. Like a stopped clock that tells the correct time twice a day, MHA mandates are static and cannot track changing rents. That’s an inherent drawback—there is simply no way that an MHA system can be defined to accurately and consistently account for the endlessly churning variability of real estate economics.

To help compensate for the effect of varying rents on value exchange, Seattle planners have proposed three location-based tiers of “market strength” that reflect typical rents in different parts of the city, as shown in the map below. The proposed performance amounts increase along with market strength: 5, 6, and 7 percent for the low, medium, and high tiers, respectively. Places with higher rents get higher requirements. For example, new housing in Capitol Hill must provide 7 percent affordable units; in Ballard, 6 percent; in Rainier Beach, 5 percent.

The proposed market-strength areas are well aligned with the general variation in typical rents across Seattle. But the geographical delineation of the market areas has such a low level of granularity, the inevitable result will be requirements that hit or miss equal value exchange depending on the exact location and unique features of individual development projects. This moving target highlights the

importance of erring on the low side with affordability requirements to avoid the lose-lose result of suppressed housing production when the determining factors are so fluid.



Map of proposed MHA low, medium, and high market-strength areas. Map by City of Seattle Office of Planning and Community Development (used under public domain).

## Getting MHA right depends on the right kind of feasibility analysis

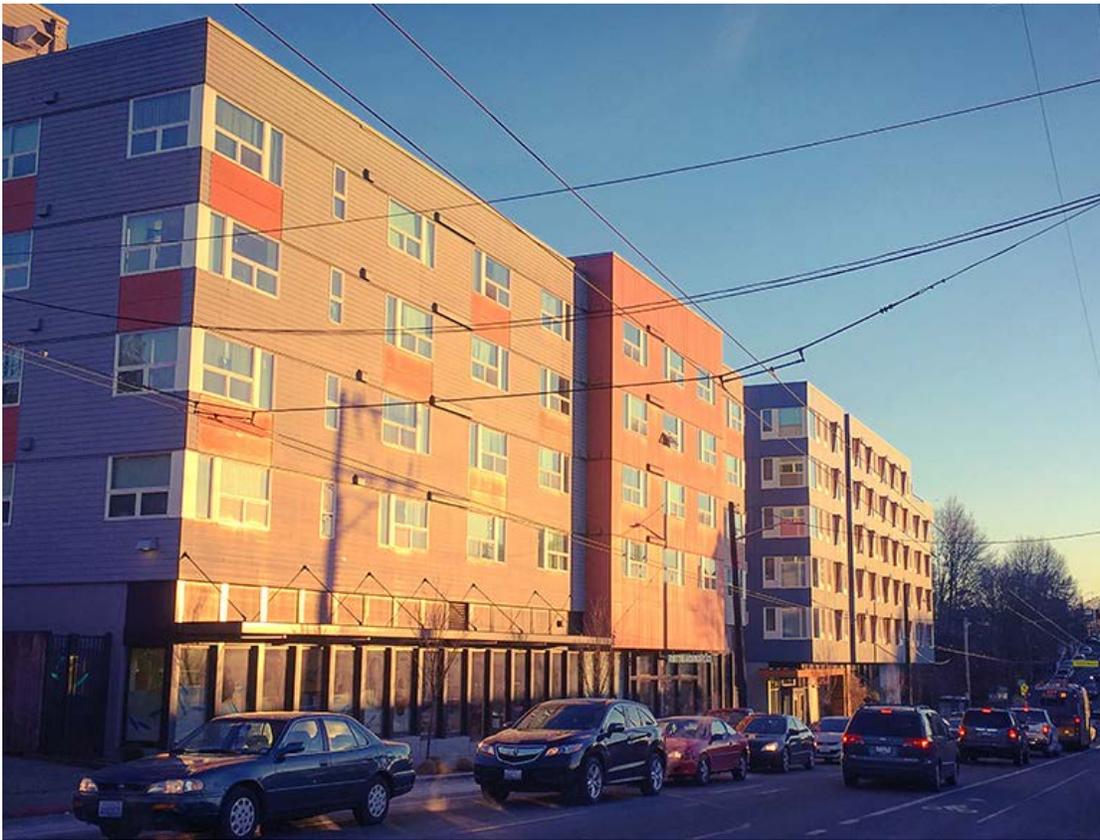
Quantitative assessment of the MHA value exchange requires real estate development feasibility analysis. Feasibility analysis seeks to answer this fundamental question: does homebuilding pay for itself plus enough return on investment to induce builders to risk their money?

In particular, evaluating the impact of Seattle's proposed MHA program on feasibility necessitates a before-and-after comparison. "Before" means the status quo existing zoning conditions, and "after" means subject to the new rules of MHA, including the upzone and the affordability mandate. This two-part, "all else being equal" feasibility analysis can answer the question that matters most: compared to doing nothing, would the implementation of MHA compromise feasibility and result in fewer new homes produced?

Seattle's planners hired a consultant to conduct a feasibility study on MHA and **published the final report last month**. For the purposes of assessing value exchange, though, the city's study has a critical shortcoming: the analysts did not assess feasibility under the "before" conditions, and therefore the study provides no information on how MHA would change development feasibility.

Instead, in brief, the study did a static analysis. It imagines a scenario in which MHA upzones and mandates are already in place. It assumes an array of things about rents, construction costs, interest rates, and the like. And it calculates, based on these assumptions, that housing development under MHA would mostly be feasible in high-market areas, mostly infeasible in low-market areas, and a mixed bag in medium-market areas. So even ignoring the lack of before-and-after comparison, the report still signals big problems with the current draft of MHA because it imposes a larger encumbrance on housing construction feasibility in lower-rent areas of the city.

But a static analysis is largely irrelevant. It doesn't test the principle of value exchange, which is the foundation of a successful MHA program. And without an understanding of how implementing MHA would or wouldn't impact development feasibility, any **projections of home production** are just guesswork.



Both of these apartment buildings in Seattle's Central Area were developed by the non-profit Low Income Housing Institute and provide subsidized housing affordable to seniors and families earning less than 50 to 60 percent of area median income. In-lieu fees collected through MHA would be used to help fund similar buildings throughout the city. Photo by Dan Bertolet, used with permission.

## How does the MHA proposal measure up on value exchange?

The city has proposed two separate systems of MHA affordability requirements: one for **downtown and the South Lake Union (SLU) neighborhood** and one for **everywhere else in the city**. This article addresses only the “everywhere else” system. (An initial look indicates that the proposed MHA requirements for downtown/SLU are partially based on a proportional relationship to the added capacity granted by the upzone but that there are also inconsistencies.) Outside downtown and SLU, MHA is projected to produce **3,080 rent-restricted homes** over ten years.

The proposed **performance and payment amounts** for **outside of downtown/SLU** are shown in the matrix below, and they apply uniformly to all proposed upzones. On the horizontal axis of the matrix, the requirements vary according to three geographically based market-strength areas, as described and mapped above. On the vertical axis of the matrix, the requirements vary in very rough proportion to the scale of the upzone, as designated by an “M” suffix (definitions [here](#)). For example, a zone that currently allows four-story buildings upzoned to five stories is classified as “M”; if upzoned to seven stories, it’s “M1”; and if upzoned to high-rise, it’s “M2” (more on this later).

### Proposed MHA performance (%) and payment (\$) amounts

		Low Area		Medium Area		High Area	
		%	\$	%	\$	%	\$
Scale of upzone	Standard M suffix	5%	\$7.00	6%	\$13.25	7%	\$20.75
	Zones with M1 suffix	8%	\$11.25	9%	\$20.00	10%	\$29.75
	Zones with M2 suffix	9%	\$12.50	10%	\$22.25	11%	\$32.75

Source: City of Seattle Office of Planning and Community Development

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Within each "M suffix" tier, the affordability requirements apply uniformly to a wide variety of upzones. It follows that planners must be assuming that the value created by each upzone is fairly consistent. But is it?

As a first measure, the table below shows [FAR and height increases for proposed MHA upzones](#) with the "standard M suffix." The FAR boosts for these upzones range greatly, from just 4 percent to as much as 41 percent. In other words, based on raw FAR alone, the value exchange is severely inconsistent.

And how close to equal are these value exchanges? As noted above, the city has not conducted the kind of before/after feasibility study necessary to answer that question with any precision. The original HALA report describes the typical MHA upzone as adding one floor to apartments with four to six stories. Assuming a full added floor, that translates to FAR boosts ranging from about 17 to 25 percent. Based on analysis conducted by HALA committee members, upzones in this range are likely to create a value exchange that is reasonably balanced with the proposed affordability mandates shown in the table above. Likewise, in a [previous article](#), I presented a simple before-and-after feasibility analysis for a hypothetical MHA upzone that granted an increase in FAR of 20 percent, and it indicated that the value exchange would be roughly equal.

As a preliminary rule of thumb for equal value exchange under the proposed MHA affordability requirements, in general, a FAR increase of 20 percent is a reasonable target. As shown in the table below, many of the proposed MHA upzones provide lower FAR boosts, and therefore risk rendering some homebuilding projects less feasible. The two most powerful levers for restoring balance are the FAR boost and the affordability requirements: either raise the former or lower the latter, or both. But in addition, as discussed above, factors other than FAR may also influence the value of an upzone. In the following sections, I'll take a closer look at some of these unique conditions and their implications on value exchange.

### FAR and height increases for proposed MHA "M" upzones

Designations for "M" Upzones	FAR Before Upzone	FAR After Upzone	FAR Increase	Max Height After Upzone	Height Increase
LR1 (Lowrise 1)	1.2	1.3	8%	30'	0'
LR2 (Lowrise 2)	1.3	1.5	15%	40'	10'
LR3 (Lowrise 3)	2.0	2.2	10%	50'	10'
NC-40	2.5	3.0	20%	40'	10'
NC-55	3.25	3.75	15%	55'	15'
MR (Midrise)	3.2	4.5	41%	80'	20'
NC-75	4.75	5.5	16%	75'	10'
SM-U-85	5.75	6.0	4%	85'	20'
NC-95	6.0	6.25	4%	95'	10'
NC-145	6.0	7.0	17%	145'	20'
NC-200	7.0	8.25	18%	200'	40'

Source: City of Seattle Office of Planning and Community Development



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## The "NC" upzones generally reflect the original intent of HALA, but lean toward compromising feasibility

With the exception of NC-95, the "NC" upzones shown in the FAR table above have FAR boosts from 15 to 20 percent. Based on the 20 percent rule of thumb discussed above, these upzones are likely to be close to a balanced value exchange—though if anything they are likely erring on the high side of requirements.

However, new requirements for upper-level setbacks take a bite out of the value of both the NC-55 and NC-75 upzones. Such rules insist that upper stories of a building have a smaller floor plate than lower stories, to make them less visible from the street. The problem is that the irregularities in building form introduced by setbacks increase construction costs, negating some of the added value. The NC-75 upzone suffers from an additional hit on upzone value because the extra floor is built in the base of the building out of concrete, which is more expensive than the wood used in the upper floors.

The FAR boosts for the NC-55 and NC-75 upzones are already on the low end of the rule-of-thumb target, and these additional value-reducing factors heighten the risk that the value exchange will tilt too far against feasibility. In both cases the risk could be mitigated by removing the setback requirement and raising the FAR to allow the addition of a full floor.

## Upzones from 85 to 95 feet will suppress development

The NC-85 to NC-95 upzone stands out with a paltry 4 percent FAR increase. What's more, a jump from 85 to 95 feet is probably worthless anyway, from a builder's perspective. Raising a building's height from 85 to 95 feet requires a change of construction type from wood (relatively cheap) to concrete or steel (expensive) and also crosses the high-rise height threshold, triggering costly building code requirements. These structural and building code barriers explain why vanishingly few new apartments

are nine to eleven stories tall. Either you frame in wood and stop at eight, or you switch to concrete and steel and build much taller—typically at least twelve—to recoup the cost.

Given that developers will rarely, if ever, use the additional 10 feet of height, what matters is how much value the upzone grants without that height bump. The worst-case before-and-after MHA scenario is mixed-use apartment buildings of similar construction type that both maximize FAR, yielding only that miniscule capacity increase of 4 percent, and a corresponding diminutive increase in value (this is the case analyzed in [the city's feasibility study](#)).

Here again, though, the raw FAR boost doesn't tell the whole story because this particular zone reserves 1.5 FAR for non-residential use only, and typical mixed-use apartment buildings don't include enough retail or office space to take advantage of that FAR. The likely best-case scenario for value creation is a 70-foot-tall "5-over-2" building at FAR 5 before MHA, compared to an 85-foot tall "5-over-3" building at FAR of 5.5 after MHA. That's an FAR boost of only 10 percent. But the third floor of concrete and the required more expensive fire-retardant wood negates some of the 5-over-3 building's added value. (See notes at the end of the article for details on these building types.)

In sum, MHA upzones that raise heights from 85 to 95 feet will likely function as downzones. No one will build to nine stories because of the extra construction cost. Eight-story buildings will bear the brunt of the MHA costs because the upzone provides relatively little value. Consequently, fewer eight-story buildings will be erected than if MHA had never been introduced.

The city could fix this flaw by reverting to the upzone proposed in the original HALA report: 85-foot zones would increase to 125 feet, thereby creating value sufficient to cover the affordability requirements. Removing the unusually high FAR requirement for non-residential use would also help.

## Low-rise upzones have relatively low capacity increases and are further compromised by unique constraints

The FAR boosts for LR1, LR2, and LR3 upzones are 8, 15, and 10 percent, respectively. So right off the bat, two of the zones are well below the 20 percent rule-of-thumb FAR boost, while the third is at best getting close.

On top of that, the value of upzones is compromised by unique aspects of townhouse or rowhouse projects. First, developers can't derive much extra value from an upzone unless it allows the addition of a full extra unit. At the same time, homebuyer preferences limit the range of marketable unit sizes. Extra capacity applied only to enlarging units typically reduces the per-square-foot value of the building, eroding the value of the upzone. Also, larger units will have a higher price tag when sold.

The city's townhouse prototypes for the LR2 zone [described here \(page 30\)](#) illustrate the diminishing returns of enlarged unit size. The MHA upzone yields the same number of units, but the prototypes' average size rises from 1,500 to 1,750 square feet. Even worse, the units get a fourth floor, which undermines marketability because it's not desirable to walk up and down four stories in a home. It also bumps the project out of the residential code and into the more expensive building code intended for commercial structures. Required setbacks on the fourth floor would also tend to increase construction costs.

Second, density is typically limited by restrictions other than FAR, such as setback, open space, and parking requirements. Without relaxation of the various development standards that limit density, the additional FAR is unlikely to result in more homes getting built. Accordingly, the proposed LR1 upzone, for example, includes the removal of the **current limit on housing unit density** (one unit per 1,600 or 2,000 square feet of lot, depending on type). Similarly, the LR3 upzone removes currently required design standards for enclosed parking and alley access improvements in exchange for added FAR.

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Other potential design standard fixes that the city could consider include reduced setbacks, longer maximum facade lengths, and FAR exemptions for partially underground portions of the structure. In any case, even with relaxed design standards that add value by enabling better use of the additional FAR, the value of the LR1 and LR3 upzones is still ultimately limited by their relatively small 8 and 10 percent FAR boosts.

All told, the net effect of the draft MHA values would likely be to suppress housing construction in low-rise zones, yielding little in-lieu fee revenue for subsidized housing projects and further tightening the supply of “**missing middle**” housing in Seattle—that is, cheaper options like duplexes, triplexes, rowhouses, and small apartment buildings, and in particular family-friendly homes affordable to first-time buyers. Again, the solution is to either lower the mandates or raise the value of the upzones. And to compensate for the quirks of low-rise, planners should consider erring even more on the side of lower mandates.

## Complicated intermeshing with existing regulations creates outliers

The MR and SM-U-85 upzones are outliers on either end of the FAR spectrum shown in the table above. The 41 percent FAR boost for the MR upzone is so high because the MHA upzone is incorporating the FAR bonus currently available through the city's **Incentive Zoning Program**. Several **other proposed upzones** absorb capacity from Incentive Zoning in the same way, including High-rise (HR) zones in the North Rainier and Dravus Urban Villages, and many zones in downtown and SLU.

Meanwhile, the proposed upzone in the University District from NC-65 to SM-U-85 is complicated by the additional FAR granted through the city's **Station Area Overlay**. The overlay already raises the allowed FAR to 5.75 in the existing NC-65 zone, even though typical buildings in that zone can't use that much FAR anyway. So in practice, the proposed upzone's FAR of 6.0 represents a boost bigger than the 4 percent shown in the table above, since the two added floors can actually consume the extra FAR. But on the downside, building to 85 feet requires a more expensive construction type that knocks down the value of the upzone.

These two cases, along with the NC-95 and low-rise upzones described in the previous sections, illustrate how the city's proposal to set uniform affordability requirements on the whole building for a variety of different upzones is an ill-suited method for consistently creating equal value exchange. As suggested above, planners could minimize the inconsistency by instead setting requirements specific to each upzone, based on the specific upzone's estimated value.

## The value exchange for larger upzones is inconsistent

As noted above, the draft MHA loosely reflects the scale of upzones by assigning higher mandates for cases in which an upzone increases the allowed building size by more than one standard zoning change increment, as designated by M, M1, and M2 suffixes. This refinement helps balance the affordability mandate with the extra value of these larger upzones, but it still falls far short of delivering a consistent value exchange because here again, the FAR increases vary enormously.

The table below illustrates the inconsistency among larger-scale upzones classified as "M1." The increase in FAR is all over the map for different upzones, but the performance and payment amounts are the same for all of them, regardless. For example, the upzone from 65 to 320 feet is far more valuable than the upzone from 65 to 95 feet, yet both bring the same affordability requirements.

To avoid the inevitable inconsistency caused by three categories (M, M1, and M2), here again, the solution is individual calculation of performance and payment amounts for each upzone. For example, applying the rule-of-thumb baseline standard I proposed above (5 percent inclusion for a 20 percent FAR boost) the mandate would be 18 percent inclusion for the upzone from 65 to 320 feet and 7 percent for the upzone from 65 to 95 feet.

That is not to say those should be the final numbers, though, because, as discussed above, FAR is not the only determinant of value. But such customization would also allow adjusting the mandates down to reflect unique conditions that reduce the value of the upzone. The leap in construction costs above the high-rise threshold of 85 feet is one such condition. Another threshold above 240 feet triggers requirements for time-consuming and costly structural peer review, reducing the net value of upzones that cross that height, such as the one from 65 to 320 feet—and this particular upzone crosses both thresholds, such that a hefty reduction in mandate would likely be appropriate.

FAR and height increases for proposed MHA "M1" upzones

Before > After Designations for "M1" Upzones	FAR Before Upzone	FAR After Upzone	FAR Increase	Max Height After Upzone	Height Increase
LR3 > NC-55	2.0	3.75	88%	55'	15'
LR3 > MR	2.0	4.5	125%	80'	40'
NC-30 > NC-55	2.5	3.75	50%	55'	25'
NC-40 > NC-75	3.25	5.25	62%	75'	35'
NC-65 > NC-95	4.75	6.25	32%	95'	30'
NC-65 > SM-U-240	4.75	10.0	111%	240'	175'
NC-65 > SM-U-320	4.75	12.0	153%	320'	255'

Source: City of Seattle Office of Planning and Community Development



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## Upzones to high-rise may warrant reduced mandates to support other city goals

As shown in the table above, upzones to high-rise (SM-U-240 and SM-U-320) grant relatively large FAR boosts, and, based solely on the principle of equal value exchange, would justify relatively high affordability mandates. However, in the case of high-rise, other city planning goals may warrant departing from an equal exchange by scaling back the mandates.

Built of concrete or steel, high-rises are typically about 20 percent more expensive to construct than mid-rise buildings (less than 85 feet tall) that can be framed in wood. For that reason, high-rise construction is typically only feasible in areas that command high rents, such as downtown and SLU, but usually not in medium market-strength areas such as the University District or Northgate. However, in both of those medium-market centers, the city hopes to focus high-density housing growth to meet Comprehensive Plan targets and to leverage the region's investment in light rail. High-rise housing development is key to achieving those goals.

In a medium market-strength area, a straight upzone without MHA might be enough to make high-rise feasible. Compared to that baseline, the larger the financial encumbrance imposed by MHA, the less likely a high-rise building will pencil out. This increases the risk not only of stymied projects outright, but also of under-building: in areas where rents aren't high enough to support high-rise, developers may opt to construct lower-cost, non-high-rise buildings even though zoning would have allowed them to go taller. The result is permanently underutilized land that could have provided more housing—both market-rate and affordable—if not overly encumbered by MHA requirements.

A second reason that may warrant scaled-back requirements on high-rise derives from an inherent quirk in the whole MHA scheme: properties that got upzoned before MHA will invariably have lower affordability requirements than properties subject to the exact same upzones implemented under MHA. That's because the city cannot impose new affordability requirements against the value of upzones that happened in the past. This built-in inequity of MHA will tend to precipitate lower fees in zones that already allow the largest buildings in the city—downtown and SLU in Seattle, for example. And that imbalance would shift production away from the areas upzoned to high-rise under MHA to areas that already allowed high-rise.

As they work toward finalizing the MHA requirements, planners could conduct further analysis to determine if competing city priorities could be better met with pared-back affordability requirements on upzones that allow high-rise construction where it is desired but has not occurred historically. Fortunately, as discussed above, erring on the side of lower affordability mandates is the lower-risk path for MHA.

## Raising affordability requirements will *increase*, not decrease, displacement

In a [recent update](#) to the original MHA proposal, policymakers raised the performance and payment amounts in certain parts of Seattle in response to community concerns about displacement. These changes were focused on areas the city previously identified as having [high risk of displacement](#), including the Central Area, North Beacon Hill, North Rainier, Columbia City, Northgate, Crown Hill, and Chinatown/International District (the areas are highlighted with crosshatching on the map above).

Community concerns are genuine and important. **Displacement is a serious** problem in Seattle, and city leaders should explore all possible avenues for minimizing it and for mitigating it. Unfortunately, setting higher MHA requirements will not help achieve these objectives and in fact is likely to have the opposite effect. Raising the mandates shifts the value exchange against development feasibility, and the result will be fewer new homes—both subsidized and market-rate—built in the targeted areas. But contrary to popular belief, the **best available evidence shows** that the construction of market-rate housing **reduces displacement**. In fact, the city's own study of the University District showed that the proposed upzones would accelerate housing development **yet would result in less displacement** than if the zoning was left unchanged.

The goal of reducing displacement would be best accomplished by rescinding these elevated MHA requirements and implementing a suite of separate, targeted anti-displacement measures in areas with high displacement risk. Seattle's **Equitable Development Implementation Plan** is a great example, with successful anti-displacement projects underway. Targeted preservation of existing, privately owned, low-cost housing is another complementary strategy.

## Delivering on Seattle's affordability housing promises means getting the math right

Seattle policymakers have so far made good progress on developing a complicated program that must establish upzones and corresponding affordability requirements for a vast range of conditions throughout the city. However, the success of MHA under the current proposal is jeopardized by major inconsistencies in the balance between the upzones and affordability mandates, and in many cases, by what is likely an imbalance that will suppress development and undermine the program's goals.

Correcting these flaws will rely on more rigorous feasibility analysis that will vet the current MHA proposal against existing zoning to ensure that on balance the program does not create a net encumbrance on homebuilding that would worsen Seattle's housing shortage, exacerbate displacement trends rather than curb them, and potentially negate the program's expected housing affordability benefits.

To review, here's a rundown of the key findings and conclusions:

To avoid the lose-lose outcome of suppressed homebuilding, policymakers should err on the side of lower affordability mandates and larger upzones.

Overall, the proposed MHA value exchange is inconsistent, and on net, the balance leans toward a value exchange that would reduce homebuilding feasibility.

Several of the proposed upzones would likely achieve a value exchange more or less in line with the spirit of the original HALA proposal, though some are compromised by construction-related factors.

MHA upzones from 85 to 95 feet are likely to be worthless to most builders and will suppress construction in these zones.

Peculiar aspects of low-rise building types call for a revised, unique set of MHA requirements if the city hopes to avoid quashing the production of “missing middle” housing (affordable options like duplexes, triplexes, rowhouses, and small apartment buildings).

The MHA value exchange is inconsistent for larger upzones (those designated “M1” and “M2”) and could be corrected with individual calculations for specific characteristics of each upzone.

For MHA upzones that enable high-rise, additional reductions in affordability requirements may be justified to meet other important planning goals in the city, such as the need to focus high-density housing development near high-capacity transit.

The proposal to raise affordability requirements for mitigation against displacement contradicts the city’s own analysis and will slow housing production in the targeted areas—an outcome that is more likely to aggravate displacement than to curb it.

Yes, there is still work to be done on MHA. I plan further research and articles to more deeply explore MHA’s effects on feasibility. Given what’s at stake—thousands of affordable homes and tens of thousands of market-rate homes desperately needed to provide plenty of homes and plenty of housing options to address Seattle’s housing shortage—getting it right is worth the time and effort it takes.

By linking affordability to growth, Seattle’s MHA program has the potential to protect people who call this city home and set Seattle on a path to being a more equitable and sustainable city. And Seattle still has a chance to show cities in Cascadia and beyond [inclusionary zoning done right](#).

## Notes

In Seattle, mid-rise apartments in the four- to seven-story range are almost always constructed of a one- or two-story concrete base topped with multiple floors framed in wood. Because in building code lingo concrete is known as “Type I” and the most economical wood is known as “Type V,” construction professionals often refer to this building type as “5-over-1.” To confuse things, though, in popular jargon the same terminology is commonly used to indicate the number of concrete floors and the number of wood floors. For example, a building with a two-story concrete base and five wood floors above is called a “5-over-2.” In this article I employ the popular usage.

Building codes dictate that any building constructed of Type V wood cannot exceed 70 feet in height. But because Type V wood is so cheap developers often opt to underbuild a 5-over-2 even if the zoning would allow 75 or 85 feet of height. The next cheapest option for buildings exceeding 70 feet is Type III wood, which is more fire resistant. On January 1<sup>st</sup> this year the city of Seattle adopted new building code from the [International Building Code](#) that allows five stories of Type IIIA wood on top of a three-story concrete base—“5-over-3”—enabling mixed-use apartments up to 85 feet tall. Previously, reaching 85 feet required more expensive concrete or steel, so the code change will allow for more efficient

construction in Seattle's 85-foot zones. However the code change will not help in the proposed MHA 95-foot zones because Type IIIA wood is cannot exceed 85 feet.

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## HIGHER PRICES, FEWER AFFORDABLE HOMES?

### Seattle's draft MHA numbers don't pencil: case studies of two apartment zones.



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(@danbertolet) on January 23, 2017 at 2:45 am

**Last time**, I broadly assessed the math behind Seattle's proposed **Mandatory Housing Affordability** (MHA) program and found it flawed but repairable. This time, I take a closer look at the thing I said Seattle policymakers most need to do if MHA is going to deliver on its promise—a promise to build more homes for everyone and more affordable homes for low-income residents, a promise to become a new North American model of blending housing choice with equity. Here, I analyze whether the current draft MHA proposal will impede housing development or not.

Specifically, I do a simple "feasibility analysis." That is, I estimate whether construction of homes will turn enough of a profit to justify the risk investors and builders take—I see if projects "pencil."

The **essential notion of MHA** is that it compensates builders for constructing reduced-price homes for low-income families by giving them something in exchange: allowing them to build larger buildings. **Done right**, MHA will never stop housing construction projects from proceeding that would have penciled without MHA. Instead, it will turn every currently feasible planned building into a bigger building with affordable apartments in it.

So the test of MHA's effects on feasibility is "do housing projects that are currently profitable remain roughly as profitable, neither markedly more nor less, after MHA?" It's a before-and-after test. Unfortunately, the City of Seattle has yet to do any analysis of this question, though the **feasibility study** it commissioned does provide much of the data needed to conduct such a check.

The **flawed** MHA math the city is currently proposing may be worse than doing nothing at all.



For this article, I studied two zoning categories, and what I found is troubling. In one of the city's most common types of apartment construction in one of its critical zones for moderately priced apartments, the current MHA draft would impose a loss of return on investment big enough to render a substantial share of projects infeasible. It would suppress construction of a key source of new housing in urban villages across the city.

As I've laid out [in detail elsewhere](#), problems with the current MHA draft are not unique to these two zones. Unfortunately, this new analysis compounds the implication of the previous one: unless MHA is corrected, the hindrance it imposes on homebuilding will not only worsen Seattle's housing shortage and accelerate rising rents throughout the city but may also fail to achieve [the city's goals for subsidized affordable homes](#). That is, the flawed MHA math the city is currently proposing may be worse than doing nothing at all. Conversely, by correcting the current MHA draft in ways I discuss below, Seattle can have more housing choice, lower rents, and more apartments affordable to low-income families.



Six-story mixed-use apartment building located in Seattle's Ballard neighborhood, by Dan Bertolet (Used with permission.)

## How feasibility is assessed

The routine method that developers and investors use for feasibility analysis is a spreadsheet called a "pro forma." To do the math, the main things you need to know are:

- the expected rent (or sale price),
- the expenses of operating the building,
- the costs of land and construction, and
- the interest rates on the loans that fund the project.

Pro formas provide two fundamental feasibility measures: yield and return. I'll focus on return here, which rarely leads to different conclusions than yield, and document the parallel results for yield in the appendix.

Return is the difference between the price for which a completed building could be sold and the total cost of developing it. The more value created, the more attractive the investment. As a rough guideline, the bare minimum return for feasibility is 10 percent ([here](#) and [here](#), for example). Given all the risk and uncertainty, however, most developers and the banks funding them need to see the potential for returns greater than 10 percent to get interested—closer to 15 or 20 percent is a more realistic target.

## Evaluating MHA's impact on feasibility

The vital question for assessing MHA is this: would the policy make housing development more or less feasible than the status quo? More pointedly, compared to doing nothing, would the implementation of MHA slow or speed construction of the new homes desperately needed in Seattle's current housing shortage?

Answering these questions necessitates a feasibility analysis that does a before-and-after comparison—"before" meaning under current zoning and "after" meaning subject to the new rules of MHA, including the upzone and the affordability mandate. Seattle city planners recently released a [feasibility study](#) of MHA, but it does not assess existing zoning and therefore provides no insight on how MHA would alter the feasibility of various types of homebuilding projects.

The city's report calls out the wide variability of market factors and the uncertainty that injects into feasibility projections. Fortunately, a before-and-after comparison reduces potential inaccuracies arising from imprecise pro forma assumptions, because the same variables apply to both scenarios. The crucial result is the *difference* in return on investment.



Typical “5-over-1” apartment construction with five stories of wood-frame on top of a concrete base, by Dan Bertolet (Used with permission.)

## Pro formas for two MHA upzones

I developed a simple, static pro forma model to compare feasibility before and after the implementation of MHA. In practice, developers usually apply a more complex pro forma, but again, because for MHA the important result is the before-and-after difference in return, a simple pro forma is sufficient here. For [input assumptions](#) and development prototypes, I used the city’s [MHA feasibility study](#) and [Urban Design study](#). Zoning regulations, building prototype metrics and assumptions, pro forma model inputs, and raw data are provided in the appendix below.

I selected two of the city’s proposed MHA upzones to illustrate the effect of value exchange on feasibility: NC65 to NC75, and NC85 to NC95. (“NC” stands for “neighborhood commercial” and the number indicates the maximum allowed building height in feet.) As I [described previously](#), Seattle’s MHA proposal establishes a tiered set of affordability requirements based on three market-strength areas corresponding to the typical rents found in different neighborhoods. Based on what is typically built in Seattle, I analyzed the NC75 upzone in low and medium market-strength areas and the NC95 upzone in medium and high market-strength areas. For each upzone, I assumed land prices that provide a return of 13 percent on a mixed-use apartment building conforming to existing zoning. These land prices fall in the range of existing land prices in Seattle, according to the survey in the city’s feasibility study. I then

applied the same land price, parking ratio, and other inputs to a building conforming to the MHA upzone.

The pro forma results are summarized in the table below, which shows the estimated return on investment without and with MHA. The upshot: MHA undermines feasibility for NC75 and obliterates it for NC95. (Full pro forma tables are in the appendix, including returns under the in-lieu fee option, which are similar to the results shown here.)

**Effect of MHA on returns for NC75 and NC95 upzones**

MHA Zone	Market Strength	MHA Mandate (share low-income units)	Return		Reduction of Return Caused by MHA
			Existing Zoning	With MHA	
NC75	Low	5%	13%	8.3%	36%
	Medium	6%	13%	9.0%	31%
NC95	Medium	6%	13%	1.3%	90%
	High	7%	13%	2.2%	83%



## The NC75 upzone

Compared with the existing NC65 zone, under the MHA NC75 upzone, returns are 36 and 31 percent lower in the low and medium market-strength areas respectively. Clearly, MHA does not provide an equal value exchange: the cost of including the below-market-rate units exceeds the value of the upzone, causing a hefty drop in the return on investment.

In addition to the added expense of providing the affordable units, higher construction costs also cut deeply into the value of the NC75 upzone. Going from six to seven stories entails adding a second story constructed of concrete to the base of the building, and concrete is **25 percent more expensive than wood**.

The proposed NC75 upzone also adds a new requirement for **10-foot setbacks on the top two floors**. Setbacks drive up construction costs for reasons including offsets in vertical circulation, breaks in plumbing and mechanical stacking, and expensive load-bearing transfer beams. Builders estimate that such setbacks introduce a 1 to 2 percent cost premium to the entire building. I applied the more conservative 1 percent. With the extra concrete floor and setbacks, on a per-square-foot basis (not including parking), under MHA, the seven-story building costs an estimated 3.4 percent more than the six-story building.

Seattle policymakers have two options for bringing the NC75 upzone into balance: raise the value of the upzone or reduce the affordability requirements. To maintain the baseline 13 percent return on investment for the NC75 building in a medium market-strength area, the city could make the following three changes:

- 1) increase useable floor-area-ratio (FAR) from 5.5 to 6.0,
- 2) remove the upper-level setback requirement to reduce construction cost, and
- 3) lower the required affordable unit percentage from 6 percent to 4 percent.

The first two fixes are straightforward with minimal drawbacks, but the third—reducing the mandate from 6 to 4 percent—might at first appear to result in fewer affordable homes built. Paradoxically, though, if one-third of projects were rendered altogether infeasible by the 6 percent mandate and so weren't built, the city would end up with the same number of new affordable homes under a 4 percent mandate that didn't harm feasibility. Plus, crucially, it would also get 50 percent more market-rate homes, which would relieve rent inflation pressure overall. In this scenario, a lower mandate actually delivers a better outcome for affordability.

Even more pressing than correcting the flawed math in the citywide MHA draft for NC75 is fixing it in the currently proposed [counterpart upzone in the University District](#), which is there called [SM-U 75](#), and which the Seattle City Council plans to vote on in February. Adopting this upzone without first correcting this flaw would not only suppress housing choices and therefore raise rents in that neighborhood but also set a precedent for counterproductive policy in NC75 zones throughout the city.

Lastly, the NC75 pro forma results also indicate that MHA imposes a greater encumbrance—a bigger hit on returns—on housing construction feasibility in low market-strength areas than in medium market-strength areas, corroborating the findings of the [city's feasibility study](#). This inequity could be corrected by reducing the affordability mandates in low market-strength areas. Otherwise, MHA will disproportionately discourage homebuilding in lower-rent areas of Seattle such as the Rainier Valley.



Eight-story mixed-use apartment building located in Seattle's Ballard neighborhood, by Dan Bertolet (Used with permission.)

## The NC95 upzone

For the NC95 upzone, returns under MHA drop to nearly zero in both market-strength areas. The combination of the affordability mandates and an 8 percent bump in costs for high-rise construction eats up almost all of the return on investment. Under MHA as currently proposed, 95-foot-tall apartment buildings will never happen.

If any new homes are built in the NC95 zone, they will likely come in two forms. Some will be 85-foot apartment buildings constructed of five stories of wood-frame on top of three-story concrete bases, and others will be a cheaper alternative: 70-foot buildings constructed of five stories of wood over two stories of concrete. In either scenario, compared with existing zoning, MHA would knock down return on investment by 40 percent or more. In practice, MHA's proposed NC95 upzone provides so little value that it is likely illegal under the [State of Washington statute that authorizes affordable housing mandates](#) only if "incentives" are also granted by the jurisdiction.

As with the NC75 upzone, removing the setback requirement would help add value to the NC95 upzone. But since it is so far in the red, it would also need a lot more of both FAR and height to pencil. For reference, the original HALA plan recommended [increasing the allowed height to 12 stories](#). If such heights are unacceptable politically, the NC95 upzone would be better removed from the MHA program entirely.

## The impact on homebuilding

What happens when a city enacts a land use policy that inflicts 30 percent or greater losses of return on investment in homebuilding? That city gets fewer new homes.

These cuts in return on investment are not trivial. If you were deciding where to invest your retirement nest egg and the city imposed a new policy that slashed the return on investment for one of the options you were considering by say, a third, you would likely put your money somewhere else. Same goes for investors in housing development.

How many new homes would be lost? The governing rule is simple: the lower the potential return on investment, the less likely a homebuilding project is to happen. For most typical feasible planned projects, an unforeseen change that imposes a 30 to 40 percent hit on return is usually a dealbreaker. And as I spelled out in a previous article, it does little good if developers try to compensate by bidding less for land: in most cases, [that, too, holds back homebuilding](#). (The city's MHA feasibility study is based on the same principle: MHA upzones are categorized as infeasible if they push [residual land value](#) below market prices.)

NC65 is one of the most prevalent zones in Seattle's Urban Villages, and the six-story apartments that are typically built there are the city's bread-and-butter form of new high-density housing. According to [Dupre + Scott Apartment Advisors](#), Seattle currently has some 4,300 apartments in 44 buildings in NC65 zones that are either proposed or under construction. Over the past 20 years, these six-story buildings have yielded almost [one-quarter of all the new multi-family homes](#) built outside of downtown and South Lake Union.

Diminished return on investment under the proposed NC75 upzone jeopardizes the production of thousands of new homes over the next ten years. Historically, Seattle's NC85 zones have yielded only about **one-seventh** the housing units of NC65 zones, but here still, the current MHA draft could eliminate many hundreds of new homes.

## What it means for affordability

The city's failure to conduct before-and-after feasibility analysis on MHA implies that city policymakers do not appreciate the negative impacts on affordability caused by the suppression of market-rate homebuilding. Would MHA extinguish all housing development? No. But even a single project killed—to say nothing of the many of projects MHA appears likely to doom—makes a big difference.

**A hot housing market is like a giant game of musical chairs**, with players joining faster than new chairs can be added. In the housing version of the game, instead of the slowest players landing on the floor, it's the people with the emptiest bank accounts that always lose. Those with fatter wallets can secure a spot on a chair by offering more money for it. As soon as someone sets out a newly built chair, though, no matter how luxurious it may be, once it's taken, there will be one more open chair to keep a family or individual with lower income off the floor.

The prototype I analyzed for NC75 has 250 apartment homes. Factoring in the existing housing that could be **lost to demolition** to make way for the new building, if MHA renders just one project like that infeasible, that's a net loss of at least 225 new homes. And through the musical chairs competition that cascades all the way down to the bottom of the housing market, the inevitable end result is some 225 families at the low-end of the income spectrum who are left

Killing *off* just one 250-unit housing project negates about half of the MHA annual production goal of 400 subsidized homes.

without housing options in Seattle. Because the housing market is a fluid, interconnected system, as long as demand is outstripping supply, homes sacrificed anywhere in the market transmute to a loss—through accelerated rent increases—of the city's cheapest, non-subsidized homes.

To put it in perspective with the proposed MHA program, killing off just one 250-unit housing project negates about half of the MHA annual production goal of 400 subsidized homes. Now multiply that loss by the potential elimination of many, perhaps even most NC75 and NC95 homebuilding projects across the whole city and you can see why the draft MHA may be worse than doing nothing. It could not only fail to produce many new subsidized apartments, it might make the city's musical chairs even crueler, eliminating so many new homes that hundreds of existing cheap ones at the bottom get snapped up by middle-class tenants.

## Too important for guesswork

Seattle's proposed Mandatory Housing Affordability (MHA) program is a quintessential instance of "the devil's in the details." MHA has great potential to unite growth and equity. But if the city gets the details wrong, it could do more harm than good. The problem is, city policymakers have not yet done the

necessary homework of a comprehensive before-and-after analysis, and so they can't know if they're getting the MHA details wrong or right.

My [previous analysis](#) raised multiple red flags that the MHA draft could indeed backfire by imposing a burden on homebuilding that works against the city's goals for both subsidized affordable homes and market-rate homes. In the current article, pro forma analysis of two case studies verifies that my red flags about MHA were warranted.

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Compared to the city's existing NC65 zoning, the proposed MHA upzone to NC75 yields a roughly one-third lower return on investment in a typical apartment building. That loss of profitability would render infeasible a substantial share of homebuilding projects in a zone that has historically been one of the biggest sources of new multi-family housing in the city.

For the proposed upzone from NC85 to NC95, MHA would actually obliterate almost all of the return on investment, such that the upzone would never be utilized in practice. The production of new homes would take a big hit because anything built in the NC95 zone would bear the full cost of the affordability mandate while gaining little to nothing from the upzone.

The city cannot hope to get MHA right without conducting thorough, before-and-after feasibility analyses and following them with fixes where necessary. The stakes are too high to play a guessing game.

Next time: The current draft MHA proposal for the city's low-rise and high-rise multi-family zones appears as worrisome for *affordable* and market-rate homebuilding as do the NC75 and NC95 upzones. I'll examine these zones in my next two articles.

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## Appendix

Pro forma input assumptions were taken from the city's [MHA feasibility study](#) and are summarized in the two tables below. The capitalization rate, or cap rate for short, is the ratio of the building's net operating income (NOI) to its sale price. NOI is the building's total rent revenue minus the total operating expenses. Return on investment is extremely sensitive to the cap rate. Cap rates vary depending on local conditions as well as national financial trends such as the Federal Reserve discount rate, and typically fall between five and six percent—perhaps less than five percent in unusually hot real estate markets.

**MHA pro forma inputs**

60% AMI Monthly Rent (1-bedroom unit)	\$1,017
Vacancy Rate	5%
Floorspace Efficiency (NSF/GSF)	80%
Operating Expenses (percent of rent revenue)	30%
NC65 Construction Hard Costs w/o Parking (per GSF)	\$168
NC75 Construction Hard Costs w/o Parking (per GSF)*	\$174
NC85 Construction Hard Costs w/o Parking (per GSF)	\$208
NC95 Construction Hard Costs w/o Parking (per GSF)*	\$225
Construction Soft Costs (percent of hard costs)	28%
Parking Construction Cost (per stall)	\$35,000
Parking Vacancy Rate	25%

GSF = gross square feet; NSF = net square feet  
 \*includes 1% cost premium for upper-level setbacks

**MHA mandates and pro forma market assumptions**

	Market Strength		
	Weak	Medium	Strong
MHA Inclusion Rate	5%	6%	7%
MHA In-lieu Fee (per GSF)	\$7.00	\$13.25	\$20.75
Monthly Market-rate Rent (per NSF)	\$2.39	\$2.88	\$3.34
Monthly Retail Rent (per NSF)	\$1.67	\$2.08	\$2.83
Monthly Parking Rent (per stall)	\$64	\$107	\$159
Cap Rate	5.50%	5.25%	5.00%

Pro forma data for each of the four case studies are given in the tables below. Parameters defining the individual building prototypes were taken from the city’s [MHA feasibility study](#) and from the city’s [MHA Urban Design study](#). To maintain consistency between the before and after MHA prototypes, the present analysis assumes a consistent parking ratio, as opposed to the single full floor of underground parking assumed in the city’s analysis.

The number of required affordable units was based on an assumption that all of the increased development capacity granted by the upzone goes to residential use (the retail floor space remains constant). Because the math never yields an exact integer number of required affordable units, the leftover fractional part of a unit was converted to in-lieu fee according the city’s method, documented [here](#).

In addition to the option to include affordable units discussed in the main text, the pro forma tables below also show results for the in-lieu fee payment option, and for comparison, the MHA upzone without the affordability mandate. In all cases, the in-lieu fee option had an impact on returns almost identical to that imposed by the inclusion option. This indicates that the inclusion and payment mandates are well matched, at least in raw monetary value. In practice, however, there are less tangible factors that would likely favor the in-lieu fee option.

Even without the affordability mandate, the MHA upzone doesn’t necessarily add value—see for example NC75 in a weak market, where returns are 12 percent lower than in the NC65 existing zoning case. This drop is caused by the higher per-square-foot cost of a seven-story building, and illustrates the importance of considering construction cost changes when assessing the value of an upzone.

In addition to return on investment, the pro forma tables below also show yield, which is the building's NOI divided by the total cost of developing it. A rule of thumb target for yield is 6 percent. A drop in yield of just one or two tenths of a percentage point can flip a project from "go" to "no-go." The yield results are qualitatively similar to the return results. For example, for the NC75 upzone in a medium market-strength area, compared to existing NC65 zoning, the yield is two tenths of a percentage point lower.

#### Pro forma for NC65 to NC75 MHA upzone in weak market-strength area

NC65/NC75 - WEAK MARKET	NC65 CURRENT ZONING	NC75 WITH MHA INCLUSION	NC75 WITH MHA IN-LIEU FEE	NC75 (NO MHA)
<b>Return on Investment</b>	13.0%	8.3%	8.3%	11.5%
<b>Percent Change in Return</b>		-35.8%	-36.2%	-11.6%
<b>Yield</b>	6.22%	5.96%	5.96%	6.13%
Floor-area ratio (FAR)	4.75	5.50	5.50	5.50
Lot Size (SF)	46,000	46,000	46,000	46,000
Stories	6	7	7	7
Total Floor Area (GSF)	218,500	253,000	253,000	253,000
Residential Floor Area (GSF)	178,500	213,000	213,000	213,000
Residential Floor Area (NSF)	142,800	170,400	170,400	170,400
Average Unit Size (NSF)	680	682	682	682
Market Units	210	236	250	250
MHA Units	0	14	0	0
MHA Unit Rent (per month)	0	\$1,017	0	0
Residential Rent (per month)	\$341,292	\$398,688	\$407,256	\$407,256
Residential Rent (per year)	\$3,890,729	\$4,545,039	\$4,642,718	\$4,642,718
Retail Floor Area (GSF)	40,000	40,000	40,000	40,000
Retail Rent (per year)	\$608,000	\$608,000	\$608,000	\$608,000
Parking Ratio (stalls per unit)	0	0	0	0
Parking Stalls	0	0	0	0
Parking Rent (per year)	0	0	0	0
Total Building Rent (per year)	\$4,498,729	\$5,153,039	\$5,250,718	\$5,250,718
Expenses (per year)	\$1,349,619	\$1,575,216	\$1,575,216	\$1,575,216
Net Operating Income (NOI)	\$3,149,110	\$3,577,824	\$3,675,503	\$3,675,503
Building Value (5.5% Cap Rate)	\$57,256,548	\$65,051,343	\$66,827,325	\$66,827,325
Construction Cost	\$46,986,240	\$56,257,485	\$56,257,485	\$56,257,485
Land Cost (per SF)	\$80	\$80	\$80	\$80
Land Cost	\$3,680,000	\$3,680,000	\$3,680,000	\$3,680,000
In-Lieu Fee Paid	\$0	\$101,080	\$1,771,000	\$0
Total Development Cost	\$50,666,240	\$60,038,565	\$61,708,485	\$59,937,485
Value Created	\$6,590,308	\$5,012,778	\$5,118,840	\$6,889,840

## Pro forma for NC65 to NC75 MHA upzone in medium market-strength area

NC65/NC75 - MEDIUM MARKET	NC65 CURRENT ZONING	NC75 WITH MHA INCLUSION	NC75 WITH MHA IN-LIEU FEE	NC75 (NO MHA)
<b>Return on Investment</b>	13.0%	9.0%	9.0%	13.7%
<b>Percent Change in Return</b>		-31.0%	-31.0%	5.3%
<b>Yield</b>	5.93%	5.72%	5.72%	5.97%
Floor-area ratio (FAR)	4.75	5.50	5.50	5.50
Lot Size (SF)	46,000	46,000	46,000	46,000
Stories	6	7	7	7
Total Floor Area (GSF)	218,500	253,000	253,000	253,000
Residential Floor Area (GSF)	178,500	213,000	213,000	213,000
Residential Floor Area (NSF)	142,800	170,400	170,400	170,400
Average Unit Size (NSF)	680	682	682	682
Market Units	210	233	250	250
MHA Units	0	17	0	0
MHA Unit Rent (per month)	0	\$1,017	0	0
Residential Rent (per month)	\$411,264	\$474,670	\$490,752	\$490,752
Residential Rent (per year)	\$4,688,410	\$5,411,236	\$5,594,573	\$5,594,573
Retail Floor Area (GSF)	40,000	40,000	40,000	40,000
Retail Rent (per year)	\$760,000	\$760,000	\$760,000	\$760,000
Parking Ratio (stalls per unit)	1.0	1.0	1.0	1.0
Parking Stalls	210	250	250	250
Parking Rent (per year)	202,230	240,750	240,750	240,750
Total Building Rent (per year)	\$5,650,640	\$6,411,986	\$6,595,323	\$6,595,323
Expenses (per year)	\$1,695,192	\$1,978,597	\$1,978,597	\$1,978,597
Net Operating Income (NOI)	\$3,955,448	\$4,433,390	\$4,616,726	\$4,616,726
Building Value (5.25% Cap Rate)	\$75,341,861	\$84,445,516	\$87,937,637	\$87,937,637
Construction Cost	\$54,336,240	\$65,007,485	\$65,007,485	\$65,007,485
Land Cost (per SF)	\$268	\$268	\$268	\$268
Land Cost	\$12,328,000	\$12,328,000	\$12,328,000	\$12,328,000
In-Lieu Fee Paid	\$0	\$153,700	\$3,352,250	\$0
Total Development Cost	\$66,664,240	\$77,489,185	\$80,687,735	\$77,335,485
Value Created	\$8,677,621	\$6,956,332	\$7,249,903	\$10,602,153

## Pro forma for NC85 to NC95 MHA upzone in medium market-strength area

NC85/NC95 - MEDIUM MARKET	NC85 CURRENT ZONING	NC95 WITH MHA INCLUSION	NC95 WITH MHA IN-LIEU FEE	NC95 (NO MHA)
<b>Return on Investment</b>	13.0%	1.3%	1.4%	5.6%
<b>Percent Change in Return</b>		-90.0%	-89.3%	-56.9%
<b>Yield</b>	5.93%	5.32%	5.32%	5.54%
Floor-area ratio (FAR)	6.00	6.25	6.25	6.25
Lot Size (SF)	28,800	28,800	28,800	28,800
Stories	8	9	9	9
Total Floor Area (GSF)	172,800	180,000	180,000	180,000
Residential Floor Area (GSF)	136,800	144,000	144,000	144,000
Residential Floor Area (NSF)	109,440	115,200	115,200	115,200
Average Unit Size (NSF)	651	651	651	651
Market Units	168	164	177	177
MHA Units	0	13	0	0
MHA Unit Rent (per month)	0	\$1,017	0	0
Residential Rent (per month)	\$315,187	\$320,629	\$331,776	\$331,776
Residential Rent (per year)	\$3,593,134	\$3,655,174	\$3,782,246	\$3,782,246
Retail Floor Area (GSF)	36,000	36,000	36,000	36,000
Retail Rent (per year)	\$684,000	\$684,000	\$684,000	\$684,000
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5
Parking Stalls	84	89	89	89
Parking Rent (per year)	80,892	85,226	85,226	85,226
Total Building Rent (per year)	\$4,358,026	\$4,424,399	\$4,551,472	\$4,551,472
Expenses (per year)	\$1,307,408	\$1,365,442	\$1,365,442	\$1,365,442
Net Operating Income (NOI)	\$3,050,618	\$3,058,958	\$3,186,030	\$3,186,030
Building Value (5.25% Cap Rate)	\$58,107,014	\$58,265,859	\$60,686,292	\$60,686,292
Construction Cost	\$48,946,272	\$54,990,492	\$54,990,492	\$54,990,492
Land Cost (per SF)	\$86	\$86	\$86	\$86
Land Cost	\$2,476,800	\$2,476,800	\$2,476,800	\$2,476,800
In-Lieu Fee Paid	\$0	\$49,407	\$2,385,000	\$0
Total Development Cost	\$51,423,072	\$57,516,699	\$59,852,292	\$57,467,292
Value Created	\$6,683,942	\$749,161	\$834,000	\$3,219,000

## Pro forma for NC85 to NC95 MHA upzone in strong market-strength area

NC85/NC95 - STRONG MARKET	NC85 CURRENT ZONING	NC95 WITH MHA INCLUSION	NC95 WITH MHA IN-LIEU FEE	NC95 (NO MHA)
<b>Return on Investment</b>	13.0%	2.2%	2.5%	7.8%
<b>Percent Change in Return</b>		-83.2%	-80.5%	-39.9%
<b>Yield</b>	5.65%	5.11%	5.13%	5.39%
Floor-area ratio (FAR)	6.00	6.25	6.25	6.25
Lot Size (SF)	28,800	28,800	28,800	28,800
Stories	8	9	9	9
Total Floor Area (GSF)	172,800	180,000	180,000	180,000
Residential Floor Area (GSF)	136,800	144,000	144,000	144,000
Residential Floor Area (NSF)	109,440	115,200	115,200	115,200
Average Unit Size (NSF)	651	651	651	651
Market Units	168	162	177	177
MHA Units	0	15	0	0
MHA Unit Rent (per month)	0	\$1,017	0	0
Residential Rent (per month)	\$365,530	\$367,416	\$384,768	\$384,768
Residential Rent (per year)	\$4,167,037	\$4,188,537	\$4,386,355	\$4,386,355
Retail Floor Area (GSF)	36,000	36,000	36,000	36,000
Retail Rent (per year)	\$930,240	\$930,240	\$930,240	\$930,240
Parking Ratio (stalls per unit)	1.0	1.0	1.0	1.0
Parking Stalls	168	177	177	177
Parking Rent (per year)	240,408	253,287	253,287	253,287
Total Building Rent (per year)	\$5,337,685	\$5,372,064	\$5,569,882	\$5,569,882
Expenses (per year)	\$1,601,306	\$1,670,965	\$1,670,965	\$1,670,965
Net Operating Income (NOI)	\$3,736,380	\$3,701,100	\$3,898,918	\$3,898,918
Building Value (5.0% Cap Rate)	\$74,727,596	\$74,021,990	\$77,978,351	\$77,978,351
Construction Cost	\$51,886,272	\$58,087,992	\$58,087,992	\$58,087,992
Land Cost (per SF)	\$494	\$494	\$494	\$494
Land Cost	\$14,227,200	\$14,227,200	\$14,227,200	\$14,227,200
In-Lieu Fee Paid	\$0	\$117,567	\$3,735,000	\$0
Total Development Cost	\$66,113,472	\$72,432,759	\$76,050,192	\$72,315,192
Value Created	\$8,614,124	\$1,589,232	\$1,928,159	\$5,663,159

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## HOW TO FIX SEATTLE'S MHA PROPOSAL FOR U DISTRICT HIGHRISES

**Uncorrected, the draft plan will undermine city's goals for affordability and sustainability.**



**Author: Dan Bertolet**

(@danbertolet) on February 2, 2017 at 6:30 am

In previous articles on Seattle's proposed Mandatory Housing Affordability (MHA) program, I explained the program's **theory** and **risks**, gave a **broad critique of the math**, and presented a **case study** of MHA for two types of mid-rise buildings, *finding* that MHA as currently drafted would suppress homebuilding and jeopardize the city's *affordability* goals. Today: MHA's high-rise upzones.

Seattle plans soon to launch MHA in the **University District** (U District), where **the proposal** includes upzones from mid-rise heights (65 to 85 feet) to high-rise (240 to 320 feet). You might think that tripling or quadrupling building heights would justify relatively high MHA requirements.

But applying the same kind of **feasibility analysis I explained last time** tells a different story. In large part because high-rise construction is so expensive, with today's typical rents in the U District, new high-rise apartments conforming to the city's draft MHA proposal would yield zero return on investment. In other words, adopting MHA as currently drafted for the U District would mean that for the foreseeable future nobody will build high-rise housing, denying the neighborhood much needed new homes—both market rate and subsidized.

To be fair, even without MHA requirements, high-rise apartments are typically not feasible in the U District today, and won't be unless rents in the neighborhood escalate over time sufficiently to offset the big price tag of high-rise construction. The catch is this: the greater the net costs imposed by MHA, the higher the rents necessary for projects to pencil, and the longer homebuilding will be delayed. And during this waiting game of worsening scarcity, competition for what's available, and rising rents, more low-income families and individuals will be displaced from Seattle.

If passed as proposed, the U District high-rise MHA upzones will not only backfire on affordability by stalling high-rise homebuilding in the U District; they will also hinder the city's progress on concentrating new homes around the U District's future light rail station, and thwart equitable access to the neighborhood's

Erring on the moderate side is the lower-risk path to keeping home prices down for everybody, citywide.



rich employment and educational opportunities.

Furthermore, if the city sets the wrong precedent in the U District, it will likely “lock in” the same affordability-defeating MHA requirements for other neighborhoods, such as Northgate, where high-rise construction is at best marginally feasible today.

City policymakers have it within their power to avoid that lose-lose outcome for Seattle neighborhoods and local families: they can dial back the mandates. Fortunately, erring on the moderate side is the lower-risk path to keeping home prices down for everybody, citywide.

## Where the U District numbers now stand

Because the U District is one of Seattle's six designated Urban Centers and the site of a future Sound Transit Link light rail station, the city has been working to **upzone the neighborhood** since 2011. One of **the plan's** primary objectives is to enable high-rise construction and “put more homes and jobs in the area directly served by light rail.” In the eleventh hour of the rezone process, planners integrated the city's 2015 proposal for the new MHA program. Planners estimate that MHA in the U District will produce between 610 and 920 homes subsidized for lower-income affordability over the next 20 years. A final City Council vote on the U District rezone may come as soon as mid-February.

Under the **original MHA proposal**, all housing development in the U District would have been required to offer either 6 percent of homes at below-market-rate rent or pay a “fee in lieu” of \$13.25 per square foot of building floor space. In Fall 2016, planners **raised the requirements** for the U District's high-rise upzones to 9 percent inclusion and \$20 per square foot (details [here](#)). The Seattle City Council is currently considering an **amendment** that would push the mandates even higher, to 10 percent and \$22.25.

High-rise housing construction under the **proposed U District rezone** is also subject to the city's **Voluntary Incentive Zoning** (VIZ) program that requires developers to build or fund amenities such as open space and historic preservation. Good ideas but these also factor into the cost of the project and must be part of the calculation (the city's **MHA feasibility study** did not account for VIZ's costs). Because builders can choose different VIZ options, the cost of meeting the requirements can also vary. For this analysis, I assume a cost of \$5 per square foot of building capacity that exceeds the U District's baseline floor-area-ratio (FAR) of 4.75 (see appendix for details).

## Case study: NC65 to SM-UD240

Following the **before-and-after method** I used previously, I applied simple, static pro formas—the **standard process** for real estate feasibility assessment—to analyze the proposed MHA upzone from the existing NC65 designation (“Neighborhood Commercial” up to 65 feet) to SM-UD240 (“Seattle Mixed – U District” up to 240 feet). Pro forma **input assumptions** and SM-UD240 building parameters are from the city's **MHA feasibility study**. I adjusted land price to yield a baseline return on investment of 15 percent for a six-story mixed-use building that conforms to existing NC65 zoning. I then applied the same land price, parking ratio, and other inputs to a high-rise apartment building conforming to the MHA upzone.

## Effect of MHA on returns for SM-UD240 upzone

Market Strength	Average Monthly Rent for 708 SF Apartment	Percent Return on Investment			
		NC65 Existing Zoning	SM-UD240 with MHA Inclusion	SM-UD240 with MHA In-lieu Fee	SM-UD240 without MHA and VIZ
Medium	\$2,038	15%	-3%	-2%	5%
High	\$2,363	15%	8%	10%	17%



Pro forma results for percent return on investment are summarized in the table above. Under the city's assumed existing medium market-strength conditions for the U District, compared to the baseline NC65 building, return on investment is totally wiped out for an SM-UD240 high-rise that meets MHA requirements. As shown in the far right column of the table, even without the added cost of of the MHA requirements, return on investment for the 240-foot high-rise is just 5 percent, a return that would not convince any investor to risk his or her millions of dollars.

What if the U District's average rents got higher at some point in the future? The bottom row of the table shows the return on investment under the city's assumptions for rents in a high market-strength area. Compared to the medium market-strength case, in the higher rent scenario, the baseline NC65 building can support a land price about 2.5 times higher (see pro forma tables in the appendix). And in this scenario, MHA causes much less damage to return on investment for an SM-UD240 high-rise, demonstrating how higher rents can absorb more of the costs imposed by the MHA mandates.

Though improved by the higher rents, the high-rise returns are still much lower than the 15 percent yielded by the baseline NC65 building: the MHA upzone reduces returns by 48 percent and 32 percent for the inclusion and in-lieu fee cases, respectively. Both cases would be marginally feasible, if that. In contrast, without MHA, the 17 percent return exceeds the baseline case and falls well within the feasibility range.

The pro forma results show that under current conditions, the proposed MHA upzone from NC65 to SM-UD240 is not really an upzone at all, in practice. The value gained through the additional building capacity doesn't come close to balancing the added expenses of the MHA affordability mandate, the greater cost of high-rise construction, and the VIZ charges. Surprisingly, even though the upzone grants a 111 percent increase in building capacity, the extra rent the larger building would yield isn't nearly enough to make up for all the added costs. It's hard to imagine how such a valueless upzone could meet the [state's legal standard](#) for an "incentive" in conjunction with affordability mandates.

## A 100-year lost opportunity for affordability

If implemented as proposed, the SM-UD240 upzone will result in fewer new homes built than if the zoning were left unchanged as NC65. Without MHA, a 240-foot high-rise in the U District would be extremely difficult to make pencil in the first place. MHA as drafted would drive the infeasibility nail deep into the high-rise coffin. The proposed SM-UD320 upzone is likely to exhibit similarly dismal feasibility performance, especially since it crosses the 240-foot threshold that triggers **costly and time-consuming structural peer review**.

In the near term, any housing built in the SM-UD240 zone would almost certainly be six-story mid-rise construction, like the baseline NC65 building analyzed above. But the same MHA requirements apply to smaller buildings, too, and the 9 percent inclusion rate would knock down the return on investment by about 30 percent—enough to kill many projects that would otherwise be feasible today (see pro forma tables in the appendix for results on NC65 under the high-rise MHA requirements).

Adding to the downside, any new housing development so much smaller than what zoning would allow is a 100-year lost opportunity twice over. It's a loss for affordability simply in terms of fewer new homes to ameliorate Seattle's housing shortage. And it simultaneously compromises the city's planning goals to concentrate new high-density housing near the U District's future high-capacity transit station, the primary reason for pursuing high-rise upzones in the first place. Using the two prototypes analyzed here as examples, every time a new apartment is underbuilt to 65 feet instead of 240 feet, the city loses the potential to gain another 166 homes without consuming any extra land.

Eventually, rents in the U District will increase enough such that high-rise housing development will start to reliably pencil. Will that take five years? Ten years? More? It's difficult to predict, and land values and construction costs will rise over time as well. The 2021 opening of the Link light rail station will make the neighborhood more desirable and accelerate upward pressure on rents. Also, as rents escalate, the absolute return that a large high-rise project can yield will start to eclipse smaller mid-rise projects, boosting relative feasibility. In absolute terms, a 15 percent return on a \$200 million dollar project is three times bigger than a 20 percent return on a \$50 million dollar project.

Without MHA, many high-rise projects would likely pencil once U District rents have risen to the city's high market-strength benchmark. But if subjected to the exaction imposed by MHA as it is currently proposed, that higher rent benchmark is still likely to be a mixed bag for high-rise development: a significant share of projects won't justify investment, impeding homebuilding and thwarting the city's affordability and transit-oriented development goals. All told, stalling high-rise homebuilding until rents "get there" is a backslide that will permanently widen the gap between homes available and people who want to live in Seattle, a gap that will hit hardest those residents with the least.

## How to fix it: Less is more

Like the NC65-to-NC75 MHA upzone I **analyzed previously**, the MHA mandates on high-rise in the U District are simply too high. And they are too high for the same reasons. City planners are using more guesswork than analysis.

MHA has a **sweet spot**. If the mandates are pushed beyond it, the resultant loss of homebuilding feasibility means the policy will be

worse for affordability than doing nothing. Under these circumstances, dialing back the mandate to the sweet spot will deliver more subsidized homes and more market-rate homes. Counterintuitively, less yields more. The present analysis indicates that the proposed MHA rezone for SM-UD240 needs exactly that sort of correction.

MHA has a sweet spot. If the mandates are pushed beyond it, the resultant loss of homebuilding feasibility means the policy will be worse for affordability than doing nothing.

How much of a mandate reduction is warranted?

For a precedent, we need look no further than the city's MHA proposal for **high-rise zones in downtown and South Lake Union (SLU)**. The MHA requirements for downtown and SLU were negotiated as part the "Grand Bargain" compromise hammered out between private developer interests, nonprofit affordable housing providers, and city officials. Achieving this compromise necessarily hinged on MHA requirements that all parties could recognize as generally well balanced.

The proposed MHA inclusion rates for high-rise upzones in downtown and SLU range from 2 to 5 percent. While many of the downtown/SLU upzones are relatively small, certain **zones in SLU** would allow net capacity increases under MHA that are comparable in scale to the SM-UD240 upzone (see appendix for details). These particular SLU upzones require 4 percent inclusion or an in-lieu fee of \$10 per square foot. At the same time, rents in downtown and SLU are the highest in the city, so certainly the U District deserves an MHA requirement no higher than 4 percent or \$10.

For the SM-UD240 high-rise apartment example I discussed above, 4 percent inclusion in a high market-strength area yields a return of 12 percent. That's down a bit from the 15 percent baseline, but on the plus side, the absolute return is \$15.6 million compared to \$9.1 million for the NC65 project. For the highrise example, dropping the inclusion rate from 9 to 4 percent would yield 15 affordable homes instead of 34. But 15 is better than zero, which is what Seattle would most likely get under the current MHA proposal.

To assuage concerns that the requirements would become too lenient as rents climbed over time, the city could consider a provision tying the metrics to rent inflation or for a performance review at given intervals. In Seattle's political climate, once the MHA mandates are established, raising them will always be easier than lowering them.

## Getting to the MHA sweet spot—now

High-rise construction is a paradox. It enables efficient use of urban land but is also inherently expensive. If Seattle hopes to reap the benefits of high-rise housing in neighborhoods such as the U District where the economics are challenging, policymakers must avoid trying to squeeze too much out of MHA. Unfortunately the feasibility analysis presented here indicates that MHA as proposed will inhibit high-rise homebuilding in a Seattle neighborhood where there is great transit access lots of jobs but where there aren't currently enough places to live.

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The solution? Lower the mandates to the level the math tells us is an MHA sweet spot, where we maximize production of both market-rate and subsidized homes so that a neighborhood like the U District can be a place for those who work and go to school nearby can actually live. Based on my feasibility analysis and the proposed mandates for high-rise in downtown and SLU, cutting the current U District high-rise requirements from 9 percent (or even 10 percent) to 4 percent or less is a prudent place to start.

Dialing MHA down to the sweet spot that produces more homes of all kinds may be counterintuitive but it makes all the difference between more inclusive or more exclusive neighborhoods. And the time to fix MHA is now, while it's still a draft proposal and before it's baked into the U District upzone. The alternative is an MHA mandate that will fail to deliver on its promise to leverage the city's growth for affordability—that will, in fact, produce less housing than would doing nothing—and that will be vulnerable to legal challenge.

Next time: How does the draft MHA proposal measure up for the city's low-rise multi-family zones?

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## Appendix

(Correction: This article originally included a statement about underbuilding at Yesler Terrace that was inaccurate.)

Pro forma input assumptions were taken from the city's [MHA feasibility study](#) and are summarized in the two tables below. Based on feedback on my previous MHA feasibility article that the construction costs were too low compared to current norms, I raised concrete and wood frame construction costs by 10 percent, corresponding to the upper limit the city's study applies in its sensitivity testing. I also increased the per-stall cost of underground parking from \$35,000 to \$40,000.

The city has not documented the estimated costs of the meeting the VIZ requirements under the proposed rezones, and the city's feasibility analysis on the U District upzones apparently did not include the costs of VIZ. For this analysis, I assumed \$5 per square foot payment on capacity above the FAR 4.75 baseline, based on the following examples. The proposed land use code (SMC 23.48.622) specifies that VIZ must compensate for 35 percent of the building capacity above the base. If the developer chose to meet the VIZ requirement through purchasing historic TDRs for \$15 per square foot, that would translate to about a \$5-per-square-foot payment on the capacity above base. If the developer chose to meet the VIZ requirement by building a public plaza at a cost of \$105 per square foot, that would also translate to about a \$5-per-square-foot payment on the capacity above base.

### MHA pro forma inputs

MHA Inclusion Rate	9%
MHA In-lieu Fee (per GSF)	\$20
Cost of VIZ Requirements (per GSF above baseline)	\$5
60% AMI Monthly Rent (1-bedroom unit)	\$1,017
Vacancy Rate	5%
Floorspace Efficiency (NSF/GSF)	80%
Operating Expenses (percent of rent revenue)	30%
NC65 Construction Hard Costs w/o Parking (per GSF)	\$185
Highrise Construction Hard Costs w/o Parking (per GSF)	\$229
Construction Soft Costs (percent of hard costs)	28%
Underground Parking Construction Cost (per stall)	\$40,000
Parking Vacancy Rate	25%

GSF = gross square feet; NSF = net square feet

### MHA pro forma market assumptions

	Market Strength	
	Medium	Strong
Monthly Market-rate Rent (per NSF)	\$2.88	\$3.34
Monthly Retail Rent (per NSF)	\$2.08	\$2.83
Monthly Parking Rent (per stall)	\$107	\$159
Cap Rate	5.25%	5.0%

Pro forma data are given in the two tables below, one showing results for medium market-strength rents, and the other showing results for strong market-strength rents. Parameters defining the high-rise building prototype were taken from the city's [MHA feasibility study](#). The NC65 building was scaled to fit on the same size lot as the high-rise. To maintain consistency between the before-and-after MHA prototypes, the present analysis assumes a consistent parking ratio, as opposed to the single full floor of underground parking assumed in the city's analysis.

The number of required affordable units was based on an assumption that all of the increased development capacity granted by the upzone would go to residential use (the retail floor space remains constant on both buildings). Because the math never yields an exact integer number of required affordable units, the leftover fractional part of a unit was converted to an in-lieu fee, according the city's method, documented [here](#).

The pro forma results reveal that the in-lieu fee option becomes more attractive as rents and construction costs rise. This relationship is inherent to the math the city uses to convert between the inclusion percent and the in-lieu fee, and it is reflected in the city's assumption that 90 percent of projects in downtown and South Lake Union will opt to pay the in-lieu fee.

In addition to return on investment, the pro forma tables below also show yield, which is the building's net operating income (NOI) divided by the total cost of developing it. A rule-of-thumb target for yield is 6 percent. A drop in yield of just one- or two-tenths of a percentage point can flip a project from "go" to "no-go." The yield results are qualitatively similar to the return results.

Regarding the comparison to MHA upzones in downtown and South Lake Union, for zones that currently have VIZ, meeting the MHA requirements grants the developer 60 percent of VIZ capacity above the base. Developers earn the remaining 40 percent by providing other amenities or by paying the in-lieu fee. While the MHA upzones tend to be relatively small, the VIZ capacity is often quite large. After this 60/40 split, in the case of three upzones, MHA requirements—4 percent inclusion or \$10 per square foot—are "paying" for capacity boosts of around 100 percent, roughly similar in scale to the 72 percent boost (111 percent times 0.65) of the SM-UD240 upzone.

#### Pro forma for NC65 to SM-UD240 MHA upzone in medium market-strength area

NC65/SM-UD240 MEDIUM MARKET	NC65 CURRENT ZONING	NC65 WITH MHA INCLUSION	SM-UD240 WITH MHA INCLUSION	SM-UD240 WITH MHA IN-LIEU FEE	SM-UD240 WITHOUT MHA AND VIZ
Return on Investment	15.0%	10.2%	-2.8%	-2.0%	4.6%
Change in Return on Investment		-31.8%	-118.8%	-113.1%	-69.6%
Absolute Return	\$7,331,724	\$5,001,473	-\$3,253,192	-\$2,399,307	\$5,210,430
Yield	6.04%	5.8%	5.10%	5.15%	5.49%
Floor-area ratio (FAR)	4.75	4.75	10.0	10.0	10.0
Lot Size (SF)	34,010	34,010	34,010	34,010	34,010
Stories	6	6	23	23	23
Total Floor Area (GSF)	161,548	161,548	340,100	340,100	340,100
Residential Floor Area (GSF)	147,598	13,950	326,150	326,150	326,150
Residential Floor Area (NSF)	118,078	147,598	259,680	259,680	259,680
Average Unit Size (NSF)	708	708	708	708	708
Market Units	167	152	333	367	367
MHA Units	0	15	34	0	0
MHA Unit Rent (per month)	0	\$1,017	\$1,017	0	0
Residential Rent (per month)	\$340,065	\$324,734	\$713,171	\$747,878	\$747,878
Residential Rent (per year)	\$3,876,737	\$3,701,968	\$8,130,146	\$8,525,814	\$8,525,814
Retail Floor Area (GSF)	13,950	13,950	13,950	13,950	13,950
Retail Rent (per year)	\$265,050	\$265,050	\$265,050	\$265,050	\$265,050
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5	0.5
Parking Stalls	83	83	184	184	184
Parking Rent (per year)	80,303	80,303	176,711	176,711	176,711
Total Building Rent (per year)	\$4,222,090	\$4,047,321	\$8,571,906	\$8,967,574	\$8,967,574
Expenses (per year)	\$1,266,627	\$1,214,196	\$2,690,272	\$2,690,272	\$2,690,272
Net Operating Income (NOI)	\$2,955,463	\$2,833,125	\$5,881,634	\$6,277,302	\$6,277,302
Building Value (5.25% Cap Rate)	\$56,294,533	\$53,964,281	\$112,031,120	\$119,567,657	\$119,567,657
Construction Cost	\$41,548,629	\$41,548,629	\$106,943,046	\$106,943,046	\$106,943,046
Land Cost (per SF)	\$218	\$218	\$218	\$218	\$218
Land Cost	\$7,414,180	\$7,414,180	\$7,414,180	\$7,414,180	\$7,414,180
In-Lieu Fee Paid	\$0	\$2,833,125	\$119,348	\$6,802,000	\$0
Voluntary Incentive Zoning Cost	\$0	\$0	\$807,738	\$807,738	\$0
Total Development Cost	\$48,962,809	\$48,962,809	\$115,284,312	\$121,966,964	\$114,357,226
Value Created	\$7,331,724	\$5,001,473	-\$3,253,192	-\$2,399,307	\$5,210,430

## Pro forma for NC65 to SM-UD240 MHA upzone in high market-strength area

NC65/SM-UD240 STRONG MARKET	NC65 CURRENT ZONING	NC65 WITH MHA INCLUSION	SM-UD240 WITH MHA INCLUSION	SM-UD240 WITH MHA IN-LIEU FEE	SM-UD240 WITHOUT MHA AND VIZ
Return on Investment	15.0%	9.6%	7.7%	10.1%	16.8%
Change in Return on Investment		-35.6%	-48.4%	-32.2%	12.3%
Absolute Return	\$9,066,058	\$5,839,616	\$9,796,599	\$13,550,467	\$21,160,204
Yield	5.75%	5.5%	5.39%	5.51%	5.84%
Floor-area ratio (FAR)	4.75	4.75	10.0	10.0	10.0
Lot Size (SF)	34,010	34,010	34,010	34,010	34,010
Stories	6	6	23	23	23
Total Floor Area (GSF)	161,548	161,548	340,100	340,100	340,100
Residential Floor Area (GSF)	147,598	13,950	326,150	326,150	326,150
Residential Floor Area (NSF)	118,078	147,598	259,680	259,680	259,680
Average Unit Size (NSF)	708	708	708	708	708
Market Units	167	152	333	367	367
MHA Units	0	15	34	0	0
MHA Unit Rent (per month)	0	\$1,017	\$1,017	0	0
Residential Rent (per month)	\$394,381	\$374,165	\$821,557	\$867,331	\$867,331
Residential Rent (per year)	\$4,495,938	\$4,265,478	\$9,365,750	\$9,887,576	\$9,887,576
Retail Floor Area (GSF)	13,950	13,950	13,950	13,950	13,950
Retail Rent (per year)	\$360,468	\$360,468	\$360,468	\$360,468	\$360,468
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5	0.5
Parking Stalls	83	83	184	184	184
Parking Rent (per year)	119,329	119,329	262,589	262,589	262,589
Total Building Rent (per year)	\$4,975,735	\$4,745,275	\$9,988,806	\$10,510,632	\$10,510,632
Expenses (per year)	\$1,492,720	\$1,423,582	\$3,153,190	\$3,153,190	\$3,153,190
Net Operating Income (NOI)	\$3,483,014	\$3,321,692	\$6,835,617	\$7,357,443	\$7,357,443
Building Value (5.0% Cap Rate)	\$69,660,287	\$66,433,845	\$136,712,331	\$147,148,851	\$147,148,851
Construction Cost	\$41,548,629	\$41,548,629	\$106,943,046	\$106,943,046	\$106,943,046
Land Cost (per SF)	\$560	\$560	\$560	\$560	\$560
Land Cost	\$19,045,600	\$19,045,600	\$19,045,600	\$19,045,600	\$19,045,600
In-Lieu Fee Paid	\$0	\$3,321,692	\$119,348	\$6,802,000	\$0
Voluntary Incentive Zoning Cost	\$0	\$0	\$807,738	\$807,738	\$0
Total Development Cost	\$60,594,229	\$60,594,229	\$126,915,732	\$133,598,384	\$125,988,646
Value Created	\$9,066,058	\$5,839,616	\$9,796,599	\$13,550,467	\$21,160,204

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## SEATTLE'S FLAWED PLAN FOR MANDATORY HOUSING AFFORDABILITY WOULD SUPPRESS 'MISSING MIDDLE' HOUSING

How to . x MHA for modest apartment buildings in Seattle's low-rise zones.



Author: Dan Bertolet

(@danbertolet) on March 13, 2017 at 6:30 am

This article is part of a series on Seattle's proposed [Mandatory Housing Affordability](#) (MHA) program. Previously, I identified [inconsistencies](#) in the proposal and presented case studies ([here](#) and [here](#)) on two key housing types. In both cases, MHA would suppress homebuilding and backfire on the city's affordability goals. Next up: apartments in MHA's low-rise upzones.

In Seattle urban planner-speak, "low-rise" means modest-scale multi-family housing such as townhouses, rowhouses, and small—3 or 4 story—apartment buildings. These homes fill the gap between single-family houses and large-scale apartments, providing much needed affordable home options in city neighborhoods near schools, transit, and jobs. They are often referred to as "[missing middle](#)" because in many US cities the [predominance of single-family zoning](#) has made them uncommon.

Seattle's proposed [Mandatory Housing Affordability](#) (MHA) program would allow the developers of low-rise buildings to construct larger structures with more homes in them. And it would require that in exchange, they either provide a quota of subsidized affordable homes within the building or pay a fee to the city, with which Seattle would subsidize homes elsewhere. The [theory of MHA](#) is sound, but implementation is [risky](#): if the mandate costs homebuilders more than the added apartments let them earn, they may choose not to build at all, yielding neither additional market-rate nor affordable housing choices. A policy intended to be a win-win becomes a lose-lose.

Indeed, my previous case studies of [mid-rise](#) and [high-rise](#) upzones found that MHA as proposed—and [now implemented](#) in the University District—is so poorly balanced that it would slash builders' return on investment and suppress homebuilding. Disappointingly, it's a similar story for the low-rise apartments I analyze here: the draft low-rise MHA policy is imbalanced and will slow construction and produce less housing—subsidized and market-rate—as a consequence. And less housing means more competition for what's available, rising rents, and more displacement of low-income families and individuals.

MHA's financial hit on low-rise homebuilding would be less severe than what my previous analysis indicated for mid-rise and high-rise examples. But most low-rise housing is built by small businesses that have less tolerance for added costs than the larger companies that build mid- and high-rise apartments. MHA as currently proposed would not only undermine Seattle's goals to build more

affordable homes for low-income residents, but also the city's goals to create a full spectrum of housing choices for all.

The good news is that Seattle officials can fix it. The city could grant more capacity in the MHA upzone along with complementary changes to development rules to ensure builders can make use of that extra capacity. Or they could make the affordability requirements less demanding. Or they could combine those options. Either way, bringing MHA into balance will unlock its potential to deliver Seattle neighborhoods more subsidized homes and more market-rate missing middle housing.



Four-story apartment on 16th and Denny in Seattle, by Dan Bertolet, used with permission.

## Assessing MHA's net effect on affordability

In a [previous article](#) I described the rationale behind my method of assessing MHA. Here's a synopsis for newcomers; skip ahead if you don't need it:

The root cause of Seattle's soaring housing prices, leading to displacement, monster commutes, and community disruptions, is a shortage of housing; to keep prices down for everybody, we need more homes of all kinds. Building market-rate homes is good for affordability.

Regulations that hold back the production of market-rate housing ultimately hurt the city's lowest income individuals and families most through the housing market's **cruel version of musical chairs** that results in fierce competition for what's available in the city and leaves no homes for those with the least to pay for them.

MHA's net impact on affordability depends not only how many subsidized homes it creates but also on how it affects market-rate production. If, for every one subsidized home created, the policy also prevents the production of two market-rate homes, the outcome will be a net loss of affordability.

The rate of private housing development is determined by risk versus return. When regulations make homebuilding more expensive or risky, **less housing gets built**.

The hinderance on homebuilding caused by MHA's cost is not nullified by reduced land prices because when owners get offered less for property that is producing income, they will be less likely to sell it, and if they don't, no new housing gets built.

Designing and assessing MHA requires a comparison of homebuilding feasibility under existing regulations versus under the proposed MHA requirements. Inexplicably, the City of Seattle has **not conducted this type of before-and-after analysis of MHA** and does not account for feasibility—that is, the market test—in its **MHA production projections**.

Feasibility analysis is highly sensitive to assumptions about rent, construction cost, capitalization rates, and other factors. But before-and-after analysis is largely immune to the noise caused by imprecise assumptions: they largely cancel out to reveal the most critical result which is the change in feasibility caused by MHA.

Feasibility does not operate like a light switch, contrary to what is presumed in the City's **MHA feasibility study** and other similar analyses (**here** and **here**, for example). Just because the costs imposed by MHA don't drop the return on investment (ROI) below some arbitrarily chosen cutoff doesn't mean it's not harming feasibility. Across the city, on average, feasibility is a game of **probabilities**: like any other building regulation, the more MHA drives ROI down, the less new housing becomes available to city residents

## Case study: LR2 and LR3

I assessed three small apartment building prototypes from the city's own analyses to illustrate likely development under the proposed MHA low-rise upzones (details **here**, **here**, and **here**). Following the **before-and-after method** I described previously, I applied static pro formas to estimate how the MHA upzone would change the homebuilder's return on investment (ROI) compared to a baseline project under existing zoning that would deliver a 15 percent ROI.

I focus on results under the assumptions for a medium market-strength area in Seattle because that is where these projects would most likely be built. (Results for low and high market-strength areas are qualitatively similar and are in the appendix). The proposed MHA performance (inclusion) and payment (in-lieu fee) amounts are 6 percent subsidized units or \$13.25 per square foot of building, respectively. Because these prototypes have relatively small numbers of units, setting aside 6 percent of them will sometimes be mathematically impossible. Many developers will have no option but pay the fee, so this article highlights results for the in-lieu fee option. (Results for inclusion are similar and are in the appendix)

I chose three examples that cover a range of sizes and included examples in both the **low-rise 2 (LR2)** and **low-rise 3 (LR3) zones** to illustrate the effect of the increase in allowed floor-area-ratio (FAR) granted by the upzones. (For reference, a table of all the proposed MHA low-rise upzones is in the appendix.) For both the LR2 and LR3 upzones, planners have proposed a requirement for 12-foot upper-level setbacks on the top floor. Because this requirement introduces construction inefficiencies, I assume a 1 percent construction cost premium.

### Effect of MHA on return on investment (ROI) for low-rise upzones

Apartment Building Size (Zone)	FAR Increase Granted by MHA Upzone	MHA In-lieu Fee	ROI		Reduction of ROI Caused by MHA
			Existing Zoning	With MHA	
14 units (LR3)	10%	\$146,000	15%	11.3%	25%
50 units (LR3)	10%	\$530,000	15%	11.3%	25%
28 units (LR2)	15%	\$298,125	15%	13.0%	14%



The table above shows the pro forma results. For the two LR3 prototypes, the MHA upzone knocks down ROI by one quarter. For the LR2 prototype, the ROI loss is 14 percent. The simple reason LR2 looks better: the LR2 upzone grants more capacity (more FAR), and that allows the developer to add a larger share of market-rate units, which offsets more of what the developer is required to pay in fees.

These ROI reductions for low-rise apartments are smaller than my previous analysis found for MHA's proposed **mid-rise** and **high-rise** upzones. That's mainly because for low-rise, enlarging a building to conform to the MHA upzone does not require a switch to more expensive construction. Builders simply add another floor of the same wood-frame construction.

I did not analyze the proposed MHA upzone for LR1, because it would typically involve a major change in building type. Instead of homes for sale, the upzone would likely result in apartments for rent—a change that greatly complicates the value comparison. To encourage small apartments, the **proposed LR1 upzone** removes the existing limit on numbers of apartments and exempts from FAR any

apartments that are partially below grade, although it also adds a requirement for family-sized units. My preliminary estimates suggest that the proposed upzone's generous FAR boost of 30 percent would likely balance the MHA mandates and fees. ROI would likely stay about the same, an MHA upzone done right. It might even improve ROI compared to existing zoning. But historically, **production** of new homes in LR1 zones has lagged behind production in LR2 and LR3 zones. So the LR2 and LR3 zones matter more to Seattle's housing future.



Three-story condo building at 16th and Pike in Seattle, by Dan Bertolet, used with permission.

## What's at stake

The estimated reductions in ROI shown above for the LR2 and LR3 zones will result in less low-rise homebuilding under MHA as proposed, compared to homebuilding that would occur under existing zoning. Unfortunately, there is no easy way to quantify the new homes sacrificed. To give a better sense of what's at stake citywide, from 2006 to 2016 low-rise comprised 19 percent of all homes built in Seattle. For comparison, Seattle's neighborhood commercial (NC) zones—the zones where all the new four- and six-story mixed-use apartments are built—accounted for 21 percent.

As noted above, the estimated drops in ROI caused by MHA are not catastrophic, especially in the case of LR2. However, compared to larger-scale mid-rise and high-rise developments, low-rise homebuilding is more likely to be more susceptible to death by reduced returns. Because low-rise buildings are relatively modest in size and cost, they are most often developed by local, small-scale homebuilders who are more vulnerable to added expenses. Larger projects usually have the benefit of financial backing from deep-pocketed institutional investors who have access to lower cost capital and can

accept lower returns if necessary. In contrast, small-scale local developers are typically faced with less favorable lending terms, and they may be literally risking everything they own on a project.

Consider the prospect of building the small LR3 apartment prototype. Today, by my pro forma estimates, investors would weigh the risk of a \$3.2 million total investment against a potential return of \$474,000. After MHA, they would weigh the risk of a larger \$3.6 million investment against a smaller return of \$422,000. In addition, the developer would have to write a check up front to the city for \$146,000 before even receiving a permit to start construction.

Implementing MHA without tuning it for feasibility is a recipe for failure—not just for HALA's promises but for the very people that HALA promises to protect.

Would the loss of incentive caused by MHA stop all low-rise apartment projects? No. But neither would it be harmless. The shrinking returns and rising costs would stifle projects. And every new home sacrificed matters, because one less home means one more low-income household pushed out of Seattle. Every time a homebuilding project that would have occurred under current zoning gets shelved because of MHA, the housing shortage gets worse and stiffened competition for the homes we have forces families without resources out. Implementing MHA without carefully tuning it for feasibility is a recipe for failure—not just for the goals of Seattle's Housing Affordability and Livability Agenda (HALA), but for the very people that HALA promises to protect.

## How to . x it

To balance the scales, Seattle can either increase the value of the upzones or reduce the affordability requirements.

Allowing a higher FAR—a larger building—is the most straightforward means. In particular, the proposed LR3 FAR boost of only 10 percent is low compared to almost all of the **other proposed MHA upzones**. For the larger LR3 prototype, raising the FAR boost to 25 percent would increase the estimated ROI to 13.7 percent, getting closer to the 15 percent ROI baseline. For the LR2 prototype, raising the FAR boost to 25 percent would increase ROI to 14.8 percent.

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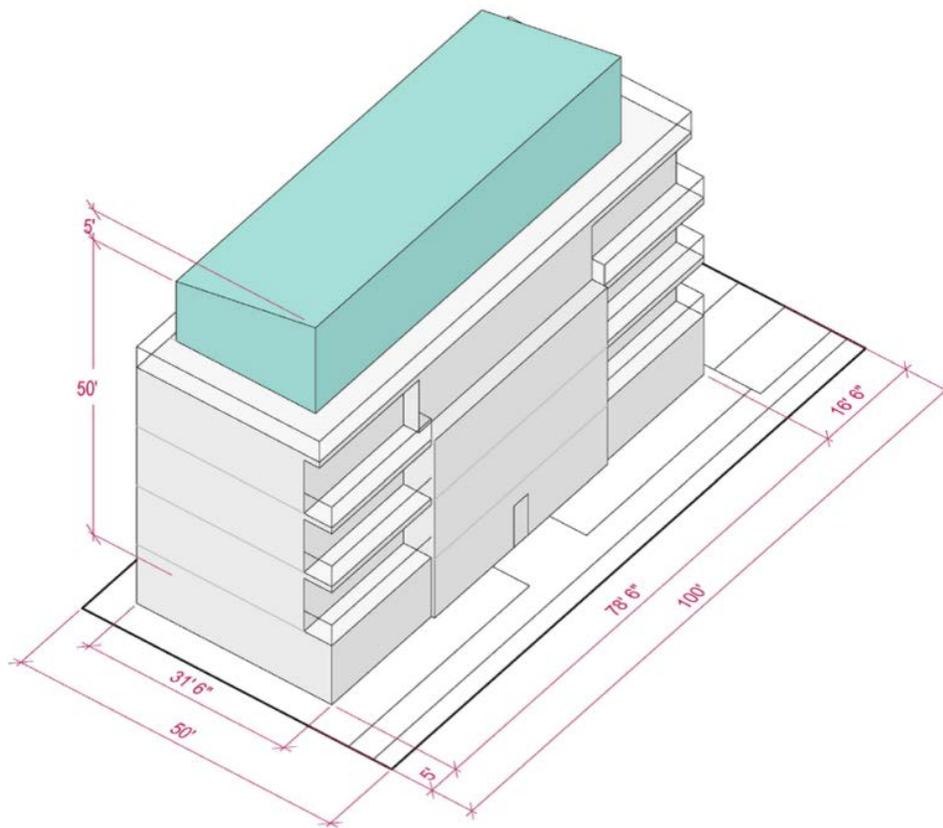
As shown in the FAR table in the appendix, the proposed MHA upzone for apartment buildings in LR3 zones not located inside a designated Urban Village or Station Area Overlay grants a 20 percent FAR boost. The feasibility of homebuilding projects in these specific areas would suffer less under MHA than the LR3 prototypes I analyzed, but this FAR discrepancy again illustrates the **troubling inconsistencies in the MHA proposal**.

For typical low-rise buildings, however, the floor space that can be built is often more constrained by other rules than by FAR. Seattle's code, for example, currently requires larger side and rear setbacks for apartments than for townhouses and rowhouses. The code also erodes design efficiency by mandating

a maximum "façade length," that is, the uninterrupted length of a building's exterior walls. Seattle's HALA called out the need to revise these standards ([recommendation MF.6](#)):

In some of the low-rise multifamily zones, townhouse or rowhouse forms of development are favored by the code over stacked *flats* (apartments or condominiums located on *different* levels in a building). This can limit production of potentially greater numbers of housing units, or limit the housing product to ownership units instead of rental units. The City should change the code to allow more stacked *flats* in all low-rise zones.

Relaxing these requirements would help meet the intent of HALA and also reduce the MHA burden. It would let homebuilders actually use the upzone MHA grants them.



City of Seattle diagram of the LR3 small apartment prototype illustrating 12-foot setbacks on the 5th floor (shown in turquoise) as would be required under the proposed MHA upzone.

The MHA upzones for both LR2 and LR3 add a new requirement for 12-foot setbacks on the top floor (see diagram above). I assumed that these setbacks add a 1 percent premium to the building's total construction cost, which may be an underestimate of the added cost. For the larger LR3 prototype, that's an extra \$93,000—about 6 percent of the ROI—out of the homebuilder's pocket. For the larger LR3 prototype, increasing the FAR to 2.5 and eliminating the setback requirement would bring the ROI under MHA up to 14.6 percent. In practice, MHA's setback requirement prioritizes some people's opinions about how a building might look over other people's need for a place to live.

On the other hand, Seattle's low-rise zones were designed for relatively small-scale housing. If officials opt not to upsize the buildings further, they could instead balance MHA by reducing the affordability requirements. How much reduction would be needed? For the larger LR3 prototype, lowering the in-lieu fee from the proposed \$13.25 to \$3 achieves an ROI that matches the existing zoning baseline ROI of 15 percent. For the LR2 prototype, a reduction of the in-lieu fee to \$8 would do the same.

## Keeping the affordability promise

Done right, MHA can deliver affordability two ways: by helping Seattle neighborhoods add enough homes of all kinds to keep prices down overall and by leveraging new building to invest in subsidized homes across the city. Done wrong, it will hamper both. Discouragingly, the current draft low-rise MHA proposal is more likely to hamper than deliver. City leaders can avoid this damaging misstep by enlarging the proposed upzones, or dialing back the proposed mandates and fees, or a bit of both.

Unfortunately, a pattern is emerging among the MHA upzones I have so far analyzed: they all lean by varying degrees toward diminished homebuilding and the lose-lose outcome of fewer new affordable homes and fewer new market-rate homes. If the city hopes to implement an MHA program that doesn't risk doing more harm than good for affordability overall, policymakers must do the math and bring MHA into balance.

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## Appendix

The table below shows the FAR limits for the four building types allowed in Seattle's low-rise zones, under existing zoning and under the currently proposed MHA upzones. The change in FAR—the most fundamental determinant of the value of the upzone—varies substantially depending on both the zone and building type. Note that to encourage small apartments the proposed LR1 upzone removes the existing unit density limit and exempts partially below-grade units from FAR, although it also adds a requirement for family-sized units. The proposed LR1 upzone was not analyzed in this article because it would involve a major change in building type from a for-sale to a rental product, complicating the value comparison. Given the generous FAR boost of 30 percent, the proposed LR1 upzone would likely result in a preserved or even improved return on investment compared to existing zoning.

## Proposed MHA FAR increases for low-rise building types

Building Type	FAR	LR1	LR2	LR3 (outside UV/SAO)	LR3 (inside UV/SAO)
Cottage	existing	1.1	1.1	1.1	1.1
	proposed	1.3	1.3	1.3	1.3
	change	<b>18.2%</b>	<b>18.2%</b>	<b>18.2%</b>	<b>18.2%</b>
Rowhouse	existing	1.2	1.3	1.4	1.4
	proposed	1.3	1.4	1.6	1.6
	change	<b>8.3%</b>	<b>7.7%</b>	<b>14.3%</b>	<b>14.3%</b>
Townhouse	existing	1.1	1.2	1.3	1.4
	proposed	1.2	1.4	1.5	1.6
	change	<b>9.1%</b>	<b>16.7%</b>	<b>15.4%</b>	<b>14.3%</b>
Apartment	existing	1	1.3	1.5	2
	proposed	1.3	1.5	1.8	2.2
	change	<b>30.0%</b>	<b>15.4%</b>	<b>20.0%</b>	<b>10.0%</b>

UV = urban village or center; SAO = station area overlay

Source: City of Seattle

Pro forma **input assumptions** were taken from the city's **MHA feasibility study** and are summarized in the tables below. For simplicity parking was not included in the prototypes. Including parking would not significantly alter the change in ROI before and after MHA, and in higher density areas of the city, projects such as these with zero parking are not uncommon. The assumption of a 1 percent cost premium for the loss of efficiency and added expense of the upper level setback is likely conservative. For a cost premium of 2 percent on the large LR3 prototype, the loss of ROI caused by MHA would increase from 25 percent to 30 percent.

## MHA pro forma inputs

60% AMI Monthly Rent (1-bedroom unit)	\$1,017
Vacancy Rate	5%
Floorspace Efficiency (NSF/GSF)	80%
Operating Expenses (percent of rent revenue)	30%
Construction Hard Costs with existing zoning (per GSF)	\$182
Lowrise Construction Hard Costs with MHA (per GSF)*	\$184
Construction Soft Costs (percent of hard costs)	28%

GSF = gross square feet; NSF = net square feet

\*includes 1% cost premium for upper-level setbacks required by MHA

## MHA mandates and pro forma market assumptions

	Market Strength		
	Weak	Medium	Strong
MHA Inclusion Rate	5%	6%	7%
MHA In-lieu Fee (per GSF)	\$7.00	\$13.25	\$20.75
Monthly Market-rate Rent (per NSF)	\$2.39	\$2.88	\$3.34
Cap Rate	5.50%	5.25%	5.00%

Pro forma data are given in the tables below, including the three prototypes discussed in the article, along with results for the larger LR3 prototype in both low and high market-strength areas to illustrate qualitatively similar results. Note that the city's larger LR3 prototype includes 7000 square feet of partially underground units that don't count toward FAR but do count for calculating the MHA requirements.

## Pro forma for LR3 MHA upzone in medium market-strength area

LR3 SMALL APARTMENT	CURRENT CODE	MHA IN-LIEU FEE BUT NO UPZONE	MHA INCLUSION	MHA IN-LIEU FEE	UPZONE w/o MHA
<b>Return on Investment</b>	15.0%	10.2%	11.3%	11.3%	16.2%
<b>Change in Return on Investment</b>		-31.9%	-24.6%	-24.6%	8.0%
<b>Absolute Return</b>	\$457,580	\$325,080	\$392,086	\$392,086	\$537,836
<b>Yield</b>	6.04%	5.8%	5.84%	5.84%	6.10%
Floor-area ratio (FAR)	2.00	2.00	2.2	2.2	2.2
Lot Size (SF)	5,000	5,000	5,000	5,000	5,000
Stories	4	4	5	5	5
Total Floor Area (GSF)	10,000	10,000	11,000	11,000	11,000
Residential Floor Area (GSF)	10,000	0	11,000	11,000	11,000
Residential Floor Area (NSF)	8,000	10,000	8,800	8,800	8,800
Average Unit Size (NSF)	615	615	629	629	629
Market Units	13	13	14	14	14
MHA Units	0	0	0	0	0
MHA Unit Rent (per month)	0	\$1,017	\$1,017	0	0
Residential Rent (per month)	\$23,040	\$23,040	\$25,344	\$25,344	\$25,344
Residential Rent (per year)	\$262,656	\$262,656	\$288,922	\$288,922	\$288,922
Retail Floor Area (GSF)	0	0	0	0	0
Retail Rent (per year)	\$0	\$0	\$0	\$0	\$0
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5	0.5
Parking Stalls	0	0	0	0	0
Parking Rent (per year)	0	0	0	0	0
Total Building Rent (per year)	\$262,656	\$262,656	\$288,922	\$288,922	\$288,922
Expenses (per year)	\$78,797	\$78,797	\$86,676	\$86,676	\$86,676
Net Operating Income (NOI)	\$183,859	\$183,859	\$202,245	\$202,245	\$202,245
Building Value (5.0% Cap Rate)	\$3,502,080	\$3,502,080	\$3,852,288	\$3,852,288	\$3,852,288
Construction Cost	\$2,432,000	\$2,432,000	\$2,701,952	\$2,701,952	\$2,701,952
Land Cost (per SF)	\$123	\$123	\$123	\$123	\$123
Land Cost	\$612,500	\$612,500	\$612,500	\$612,500	\$612,500
In-Lieu Fee Paid	\$0	\$132,500	\$145,750	\$145,750	\$0
Voluntary Incentive Zoning Cost	\$0	\$0	\$0	\$0	\$0
Total Development Cost	\$3,044,500	\$3,177,000	\$3,460,202	\$3,460,202	\$3,314,452
Value Created	\$457,580	\$325,080	\$392,086	\$392,086	\$537,836

## Pro forma for LR3 MHA upzone in medium market-strength area

LR3 LARGE APARTMENT	CURRENT CODE	MHA IN-LIEU FEE BUT NO UPZONE	MHA INCLUSION	MHA IN-LIEU FEE	UPZONE w/o MHA
<b>Return on Investment</b>	15.0%	10.2%	11.7%	11.3%	16.2%
<b>Change in Return on Investment</b>		-32.0%	-22.0%	-24.9%	7.7%
<b>Absolute Return</b>	\$1,690,676	\$1,200,426	\$1,411,026	\$1,419,236	\$1,949,236
<b>Yield</b>	6.04%	5.8%	5.86%	5.84%	6.10%
Floor-area ratio (FAR)	2.00	2.00	2.2	2.2	2.2
Lot Size (SF)	15,000	15,000	15,000	15,000	15,000
Stories	4	4	5	5	5
Total Floor Area (GSF)	30,000	30,000	33,000	33,000	33,000
Residential Floor Area (GSF)	37,000	0	40,000	40,000	40,000
Residential Floor Area (NSF)	29,600	37,000	32,000	32,000	32,000
Average Unit Size (NSF)	643	643	640	640	640
Market Units	46	46	47	50	50
MHA Units	0	0	3	0	0
MHA Unit Rent (per month)	0	\$0	\$1,017	0	0
Residential Rent (per month)	\$85,248	\$85,248	\$89,681	\$92,160	\$92,160
Residential Rent (per year)	\$971,827	\$971,827	\$1,022,368	\$1,050,624	\$1,050,624
Retail Floor Area (GSF)	0	0	0	0	0
Retail Rent (per year)	\$0	\$0	\$0	\$0	\$0
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5	0.5
Parking Stalls	0	0	0	0	0
Parking Rent (per year)	0	0	0	0	0
Total Building Rent (per year)	\$971,827	\$971,827	\$1,022,368	\$1,050,624	\$1,050,624
Expenses (per year)	\$291,548	\$291,548	\$315,187	\$315,187	\$315,187
Net Operating Income (NOI)	\$680,279	\$680,279	\$707,181	\$735,437	\$735,437
Building Value (5.0% Cap Rate)	\$12,957,696	\$12,957,696	\$13,470,110	\$14,008,320	\$14,008,320
Construction Cost	\$8,619,520	\$8,619,520	\$9,411,584	\$9,411,584	\$9,411,584
Land Cost (per SF)	\$177	\$177	\$177	\$177	\$177
Land Cost	\$2,647,500	\$2,647,500	\$2,647,500	\$2,647,500	\$2,647,500
In-Lieu Fee Paid	\$0	\$490,250	\$0	\$530,000	\$0
Voluntary Incentive Zoning Cost	\$0	\$0	\$0	\$0	\$0
Total Development Cost	\$11,267,020	\$11,757,270	\$12,059,084	\$12,589,084	\$12,059,084
Value Created	\$1,690,676	\$1,200,426	\$1,411,026	\$1,419,236	\$1,949,236

## Pro forma for LR2 MHA upzone in medium market-strength area

LR2 APARTMENT	CURRENT CODE	MHA IN-LIEU FEE BUT NO UPZONE	MHA INCLUSION	MHA IN-LIEU FEE	UPZONE w/o MHA
<b>Return on Investment</b>	15.0%	10.2%	13.3%	13.0%	18.0%
<b>Change in Return on Investment</b>		-32.0%	-11.7%	-13.6%	20.0%
<b>Absolute Return</b>	\$891,216	\$632,841	\$901,068	\$904,803	\$1,202,928
<b>Yield</b>	6.04%	5.8%	5.95%	5.93%	6.20%
Floor-area ratio (FAR)	1.30	1.30	1.5	1.5	1.5
Lot Size (SF)	15,000	15,000	15,000	15,000	15,000
Stories	4	4	5	5	5
Total Floor Area (GSF)	19,500	19,500	22,500	22,500	22,500
Residential Floor Area (GSF)	19,500	0	22,500	22,500	22,500
Residential Floor Area (NSF)	15,600	19,500	18,000	18,000	18,000
Average Unit Size (NSF)	650	650	643	643	643
Market Units	24	24	27	28	28
MHA Units	0	0	1	0	0
MHA Unit Rent (per month)	0	\$0	\$1,017	0	0
Residential Rent (per month)	\$44,928	\$44,928	\$51,006	\$51,840	\$51,840
Residential Rent (per year)	\$512,179	\$512,179	\$581,464	\$590,976	\$590,976
Retail Floor Area (GSF)	0	0	0	0	0
Retail Rent (per year)	\$0	\$0	\$0	\$0	\$0
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5	0.5
Parking Stalls	0	0	0	0	0
Parking Rent (per year)	0	0	0	0	0
Total Building Rent (per year)	\$512,179	\$512,179	\$581,464	\$590,976	\$590,976
Expenses (per year)	\$153,654	\$153,654	\$177,293	\$177,293	\$177,293
Net Operating Income (NOI)	\$358,525	\$358,525	\$404,171	\$413,683	\$413,683
Building Value (5.0% Cap Rate)	\$6,829,056	\$6,829,056	\$7,698,490	\$7,879,680	\$7,879,680

## Pro forma for LR3 MHA upzone in strong market-strength area

LR3 LARGE APARTMENT	CURRENT CODE	MHA IN-LIEU FEE BUT NO UPZONE	MHA INCLUSION	MHA IN-LIEU FEE	UPZONE w/o MHA
<b>Return on Investment</b>	15.0%	8.9%	11.4%	11.2%	17.5%
<b>Change in Return on Investment</b>		-40.6%	-24.3%	-25.5%	16.9%
<b>Absolute Return</b>	\$2,059,174	\$1,291,424	\$1,661,402	\$1,716,464	\$2,546,464
<b>Yield</b>	5.75%	5.4%	5.57%	5.56%	5.88%
Floor-area ratio (FAR)	2.00	2.00	2.2	2.2	2.2
Lot Size (SF)	15,000	15,000	15,000	15,000	15,000
Stories	4	4	5	5	5
Total Floor Area (GSF)	30,000	30,000	33,000	33,000	33,000
Residential Floor Area (GSF)	37,000	0	40,000	40,000	40,000
Residential Floor Area (NSF)	29,600	37,000	32,000	32,000	32,000
Average Unit Size (NSF)	643	643	640	640	640
Market Units	46	46	47	50	50
MHA Units	0	0	3	0	0
MHA Unit Rent (per month)	0	\$0	\$1,017	0	0
Residential Rent (per month)	\$98,864	\$98,864	\$103,518	\$106,880	\$106,880
Residential Rent (per year)	\$1,127,050	\$1,127,050	\$1,180,107	\$1,218,432	\$1,218,432
Retail Floor Area (GSF)	0	0	0	0	0
Retail Rent (per year)	\$0	\$0	\$0	\$0	\$0
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5	0.5
Parking Stalls	0	0	0	0	0
Parking Rent (per year)	0	0	0	0	0
Total Building Rent (per year)	\$1,127,050	\$1,127,050	\$1,180,107	\$1,218,432	\$1,218,432
Expenses (per year)	\$338,115	\$338,115	\$365,530	\$365,530	\$365,530
Net Operating Income (NOI)	\$788,935	\$788,935	\$814,578	\$852,902	\$852,902
Building Value (5.0% Cap Rate)	\$15,778,694	\$15,778,694	\$16,291,558	\$17,058,048	\$17,058,048
Construction Cost	\$8,619,520	\$8,619,520	\$9,411,584	\$9,411,584	\$9,411,584
Land Cost (per SF)	\$340	\$340	\$340	\$340	\$340
Land Cost	\$5,100,000	\$5,100,000	\$5,100,000	\$5,100,000	\$5,100,000
In-Lieu Fee Paid	\$0	\$767,750	\$118,571	\$830,000	\$0
Voluntary Incentive Zoning Cost	\$0	\$0	\$0	\$0	\$0
Total Development Cost	\$13,719,520	\$14,487,270	\$14,630,155	\$15,341,584	\$14,511,584
Value Created	\$2,059,174	\$1,291,424	\$1,661,402	\$1,716,464	\$2,546,464

## Pro forma for LR3 MHA upzone in weak market-strength area

LR3 LARGE APARTMENT	CURRENT CODE	MHA IN-LIEU FEE BUT NO UPZONE	MHA INCLUSION	MHA IN-LIEU FEE	UPZONE w/o MHA
<b>Return on Investment</b>	15.0%	11.7%	11.3%	11.0%	14.2%
<b>Change in Return on Investment</b>		-21.6%	-24.3%	-26.7%	-5.4%
<b>Absolute Return</b>	\$1,337,291	\$1,078,291	\$1,108,973	\$1,097,469	\$1,377,469
<b>Yield</b>	6.32%	6.1%	6.12%	6.10%	6.28%
Floor-area ratio (FAR)	2.00	2.00	2.2	2.2	2.2
Lot Size (SF)	15,000	15,000	15,000	15,000	15,000
Stories	4	4	5	5	5
Total Floor Area (GSF)	30,000	30,000	33,000	33,000	33,000
Residential Floor Area (GSF)	37,000	0	40,000	40,000	40,000
Residential Floor Area (NSF)	29,600	37,000	32,000	32,000	32,000
Average Unit Size (NSF)	643	643	640	640	640
Market Units	46	46	48	50	50
MHA Units	0	0	2	0	0
MHA Unit Rent (per month)	0	\$0	\$1,017	0	0
Residential Rent (per month)	\$70,744	\$70,744	\$75,455	\$76,480	\$76,480
Residential Rent (per year)	\$806,482	\$806,482	\$860,185	\$871,872	\$871,872
Retail Floor Area (GSF)	0	0	0	0	0
Retail Rent (per year)	\$0	\$0	\$0	\$0	\$0
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5	0.5
Parking Stalls	0	0	0	0	0
Parking Rent (per year)	0	0	0	0	0
Total Building Rent (per year)	\$806,482	\$806,482	\$860,185	\$871,872	\$871,872
Expenses (per year)	\$241,944	\$241,944	\$261,562	\$261,562	\$261,562
Net Operating Income (NOI)	\$564,537	\$564,537	\$598,623	\$610,310	\$610,310
Building Value (5.0% Cap Rate)	\$10,264,311	\$10,264,311	\$10,884,057	\$11,096,553	\$11,096,553
Construction Cost	\$8,619,520	\$8,619,520	\$9,411,584	\$9,411,584	\$9,411,584
Land Cost (per SF)	\$21	\$21	\$21	\$21	\$21
Land Cost	\$307,500	\$307,500	\$307,500	\$307,500	\$307,500
In-Lieu Fee Paid	\$0	\$259,000	\$56,000	\$280,000	\$0
Voluntary Incentive Zoning Cost	\$0	\$0	\$0	\$0	\$0
Total Development Cost	\$8,927,020	\$9,186,020	\$9,775,084	\$9,999,084	\$9,719,084
Value Created	\$1,337,291	\$1,078,291	\$1,108,973	\$1,097,469	\$1,377,469

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## FINDING THE MISSING MIDDLE: ROWHOUSES, TOWNHOUSES, AND SEATTLE'S AFFORDABILITY PLAN

Fixing the draft MHA proposal so the middle doesn't stay missing.



Author: Dan Bertolet

(@danbertolet) on March 27, 2017 at 6:30 am

This article is part of a series on Seattle's proposed Mandatory Housing Affordability (MHA) program. In previous articles I identified [inconsistencies](#) in the proposal and presented case studies ([here](#), [here](#), [here](#), [here](#)) on several housing types. Next up: for-sale townhouses and rowhouses in MHA's low-rise zones.

Neighborhoods that are home to people from a range of income levels need all kinds of housing choices. Townhouses and rowhouses provide modestly sized homes for purchase. In Seattle, as in many cities, these homes are called "[missing middle](#)" housing because they help [fill the gap](#) in the spectrum of housing options between super-expensive single-family houses and higher-density large-scale apartment buildings.

Complementing my [prior analysis](#) on missing middle low-rise apartment buildings, this article looks at the potential impact of Seattle's proposed [Mandatory Housing Affordability](#) (MHA) program on townhouses and rowhouses. MHA would allow larger buildings in exchange for a portion of homes priced for lower-income residents (below market-rate) or payment into a city affordable housing fund. If the requirements are carefully balanced, MHA can be a powerful tool for improving affordability by delivering more of both market-rate and subsidized homes—and in a shortage as severe as Seattle's, we need both to keep prices down.

But MHA as proposed for townhouses and rowhouses is not balanced, similar to [my previous findings for other housing types](#). The cost of the MHA mandates exceeds the value of the increased building capacity, so MHA would impede homebuilding, exacerbate Seattle's already acute housing shortage, and undermine the program's own goals. Unfortunately, because of the unique characteristics of townhouses and rowhouses, and unlike other housing types and zones I've studied, there is no straightforward fix for the MHA draft in Seattle's low-rise zones. In fact, because missing middle housing comes in such idiosyncratic forms and yet is so important to Seattle's housing mix, the most practical fix may be to exempt low-rise entirely.

### A rowhouse or a townhouse?

Rowhouses and townhouses are homes attached side-by-side along common walls. The only difference, as the City of Seattle defines them, is that rowhouses line the street, while townhouses may stand

behind one another. Both types are typically three stories tall and have one parking space apiece.

Because Seattle's single-family zones have been almost completely built out for decades, rowhouses and townhouses have long provided nearly all of the city's additional for-sale homes with ground-level access to entries and small yards—features particularly attractive to families with children.



City of Seattle sketches of typical townhouse (left) and rowhouse (right) developments. Used with permission.

## Larger units, fewer homes, higher prices

Upzones only increase value for builders substantially if they accommodate extra homes. Enlarging a multi-family building without upping the unit count means larger units, which provide a diminishing return to builders because home value per square foot declines with increasing size. Larger units also have higher prices, which doesn't help people struggling to afford homes across the city. The quandary is that rowhouses and townhouses have inherent characteristics that in most cases would preclude additional units under the MHA upzones as proposed.

Townhouse and rowhouse developments consist of a small number of individual homes, so adding a unit requires a major reconfiguration of the design. Unlike most other multi-family housing in Seattle, rowhouses and townhouses are usually sold, not rented. To enable “fee simple” sales—individual ownership of each home and the land beneath it—they are divided vertically over the entire height of the building.

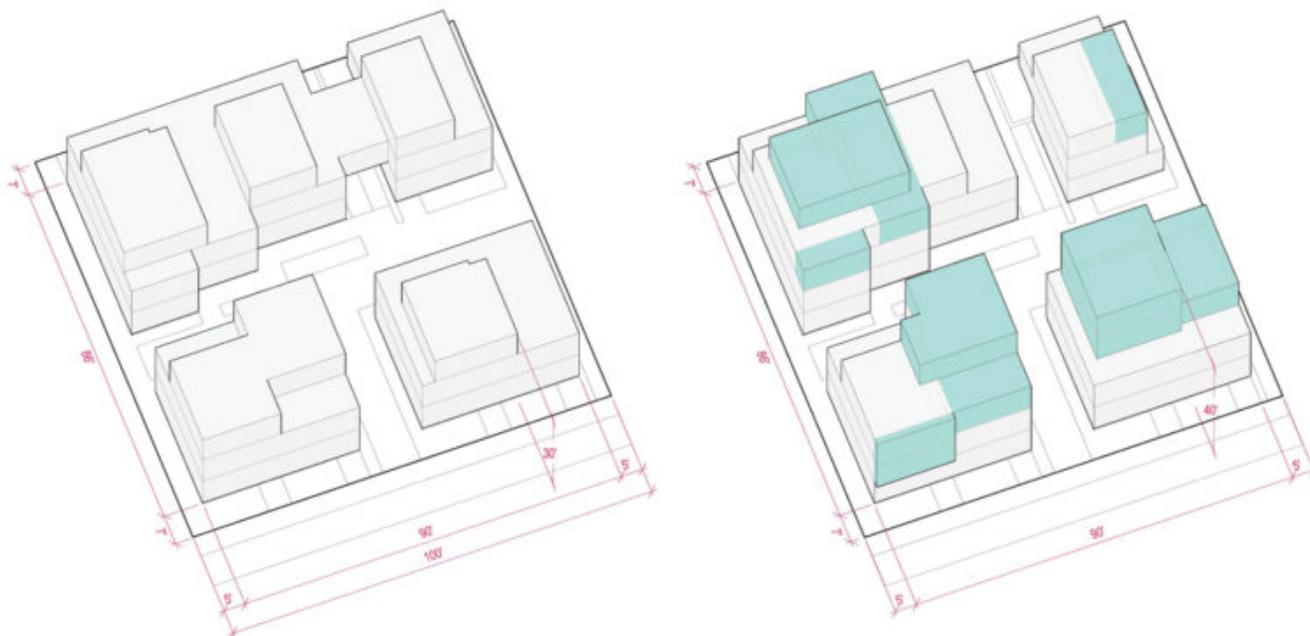
In contrast, apartment homes are stacked, allowing much more flexibility for redesign to accommodate extra units.

The number of rowhouse or townhouse units in a single development depends on the size and geometry of the site and on city rules for setbacks from the property lines, maximum allowed building length, open space, and parking access. Also, to allow for practical floorplans and accommodate a stairway, the “floorplate”—the patch of land that the building sits on—of each home cannot be much less than 400 square feet. Builders already maximize the number of units on each site within these constraints.

A bump in size yields a more expensive home—which defeats the purpose twice over.



Floor-area ratio (FAR) almost never dictates the limit on units per site, so the additional FAR granted by an MHA upzone will rarely allow another rowhouse or townhouse on a site. If the MHA upzone doesn't allow an added unit, the only way to use extra FAR is through bigger units. Again, the larger the unit, the less it's worth per square foot, which erodes the value to the builder of the extra FAR. And a bump in size yields a more expensive home—which defeats the purpose twice over.



City of Seattle diagrams of an 8-unit townhouse project before (left) and after (right) the proposed MHA upzone. Used with permission.

## Where to put the MHA capacity?

Those problems are just the beginning. To understand the rest, consider a case study: [City of Seattle planners illustrated](#) (above) how one proposed low-rise MHA upzone (the one for the LR2 zone) might play out for an eight-unit townhouse project. Look at the plans and you'll see there's no room for an extra unit. Instead, the extra FAR granted by the upzone expands the size of the houses, shown in turquoise on the right. On some units, existing floors get larger; on others, homes spout fourth floors.

But getting taller is no good. Although the proposed LR2 upzone grants 10 feet of extra height to allow a fourth floor, most buyers of rowhouses and townhouses will shy away from a four-story home. Who wants to walk up and down four stories? What's more, building a fourth floor moves projects from the easier [residential building codes](#) to the more demanding and expensive [commercial building codes](#). Construction costs go up, typically, by 5 percent (see appendix for details). Furthermore, the proposed MHA upzone requires a 12-foot setback on the top floors, which in some cases would raise construction costs even more, by limiting design options and requiring more complicated engineering.

In sum, building bigger rowhouses and townhouses reduces the sale price per square foot for builders and reduces affordability for buyers. Building four-story rowhouses and townhouses saps buyers' interest, reducing the sale price even more, while raising the cost of construction.

In the end, most builders would avoid a fourth floor and instead try to cram whatever extra space they're allowed into three stories. In some cases, it would be physically impossible. In others, it would be possible but would yield units squatting close to each other and crowding the site, leaving less outdoor space and compromising livability (the "L" in HALA).



Rowhouses in Seattle's Central Area, by Dan Bertolet, used with permission.

## Townhouse and rowhouse feasibility case studies

I assessed prototypical six-unit townhouse and six-unit rowhouse projects, each sited on 7,200-square-foot lots in a low-rise 2 (LR2) zone. I assumed they were located in a medium market-strength area for which the proposed MHA in-lieu fee is \$13.25 per square foot. Because these projects only have six units, MHA's "inclusion" option—in which builders can provide a share of units for below-market prices rather than paying the in-lieu fee—would not be practical. Even the highest MHA fraction of 10 percent of units is 0.6 homes, and you can't build a fraction of a house.

Following the [before-and-after method](#) I described previously, I applied static pro formas to estimate how the MHA upzone would change the homebuilder's return on investment (ROI) compared to a baseline project under existing zoning that would deliver a 20 percent ROI—a realistic target ROI for these small-scale for-sale projects. I assumed the construction cost, cap rate, and other pro forma inputs used in the City of Seattle's [MHA feasibility study](#) (details in the appendix).

As noted above, for townhouses and rowhouses, as unit size increases, the sale price per square foot decreases. To account for this variation in the pro forma, I assumed a range of sale prices based on a survey of 500 sales throughout Seattle in 2016 and 77 sales in Seattle's 98122 Zip Code from 2012 to 2017, [extracted from Redfin sales data](#) (see price-per-square-foot table in the appendix).

Pro forma results for rowhouses and townhouses are summarized in the table below (full pro forma tables are in the appendix). For each building type I tested two scenarios: (1) all of the added FAR accommodated on three floors, and (2) a fourth floor added to accommodate the added FAR. In all scenarios the number of units remains constant at six.

For the three-story scenario, compared with existing zoning, MHA causes ROI reductions of 21 percent for rowhouses and 13 percent for townhouses. These results are similar to those for [low-rise apartments](#). The hit to ROI is smaller for townhouses because the townhouse upzone grants twice as much additional FAR as the rowhouse upzone and therefore creates more value. (FAR boosts for the proposed MHA upzones for each low-rise building type are in the appendix.)

As noted above, the change in applicable building code triggered by increasing height from three to four floors typically introduces a construction cost premium of about 5 percent. As shown in the table above for the four-story scenarios, this cost premium causes a big drop in ROI, illustrating its sensitivity to added costs.

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In the vast majority of cases, the MHA upzone would not enable builders to squeeze an additional unit on a site. If a seventh unit could somehow be added to these case study projects, my pro forma model projects an ROI of 19.3 percent for the rowhouses, and 21.1 percent for the townhouses, assuming height is limited to 3 stories. In other words, if MHA allowed an extra home and somehow enabled builders to bend space and make one fit, the upzone would be well balanced.

## Effect of MHA on return on investment (ROI) for low-rise upzones

Building Type	FAR Increase	MHA In-lieu Fee	ROI		Reduction of ROI Caused by MHA
			Existing Zoning	With MHA	
Rowhouse (3-story)	8%	\$133,560	20%	15.7%	21%
Rowhouse (4-story)				12.2%	39%
Townhouse (3-story)	17%	\$133,560	20%	17.5%	13%
Townhouse (4-story)				13.9%	31%



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## To build or not to build?

Under MHA as currently proposed, most townhouse or rowhouse projects would try to make use of the upzone's FAR on three floors. In such cases, compared to existing zoning, the loss of ROI caused by the required MHA fees would result in fewer projects being built—more so for rowhouses than townhouses because rowhouses would take a bigger hit on ROI.

If fitting all the FAR on three floors is not possible, then the builder has two choices: forfeit the FAR and take a corresponding hit on value and ROI, or build to four stories and pay the cost premium that takes a big bite out of ROI, as shown in the table above. Actually, the builder has one more choice: not to build at all. And many would probably make that choice, because both of the other options spell a much narrower margin for profit and a greater risk of losing money. In rare cases, a builder might find a way to utilize the added FAR in an extra unit, in which case the value exchange would be close to equal and the impact on production minimal.

Like modest-scale missing middle apartments, townhouses and rowhouses are usually built by small, local businesses that operate on thin balance sheets. They can't easily absorb added development costs, as compared to large-scale homebuilding firms that typically have deeper pockets and access to cheaper capital. Thus the projected loss of ROI for townhouses and rowhouses—though less severe than my analysis showed for [larger-scale housing prototypes](#)—would likely cause no less harm to homebuilding, hampering Seattle's goals for adding market-rate and low-income homes across the city. As with any added development expense, construction of rowhouses and townhouses would ramp back

up only after home prices rose sufficiently to offset MHA's net costs. That is to say: the draft MHA currently under consideration would make rowhouses and townhouses more expensive across the city, by making them scarcer.



Townhouses in Seattle's Central Area, by Dan Bertolet, used with permission.

## Bringing MHA back into balance

To avoid suppressing construction of townhouses and rowhouses, MHA must be brought back into balance. For these building types, however, there are no good options for increasing the value of the upzone. Anything greater than a FAR of 1.4 gets increasingly difficult to fit in three stories without sacrificing open space, but going to four floors introduces a big cost premium because of the commercial building code. Additional FAR alone will almost never enable the addition of an extra unit to a project, which means the new homes would almost always grow bigger, draining more of the homebuyer's bank account, while at the same time yielding less value per square foot to the builder.

Changes to design standards are also unlikely to provide much value. The proposed **removal of standards for parking location and access** might allow more efficient use of the site but only in rare cases. Reducing setback requirements could enable use of a bit more FAR on three floors or perhaps increase the (minute) chances for an additional unit. But it would also yield built form less compatible

with the intended character of low-rise zones because the structures would press in closer to homes on adjacent lots.

To encourage rather than discourage building missing middle homes, the only effective option remaining is to dial back the affordability requirements. In my pro formas, preserving ROI at 20 percent requires lowering the in-lieu fee to \$6 per square foot on townhouses, and to just \$1 per square foot on rowhouses. But those numbers would only balance MHA for scenarios in which all of the FAR can be used on three floors. For projects requiring a fourth floor or in which FAR can't be fully utilized, the in-lieu fees would have to be even lower to balance MHA.

## Let's not miss out on the missing middle

Today in Seattle, townhouses and rowhouses are the only for-sale units many families can even imagine affording. They aren't cheap, typically hitting the market at \$500,000 and up, but they are far more attainable than Seattle's astronomically priced single-family houses, 40 percent of which currently for sale are priced **greater than \$1 million**.

The size and shape that townhouses and rowhouses come in, the way they fit on a lot, and the quirks of their construction make them unsuitable for a one-size-fits-all MHA program. As the proposal now stands, the city is cooking up a recipe not only for stymied homebuilding, but also for unintended consequences that would arbitrarily favor some kinds of housing over others. Most of the missing middle homes that did manage to get built under MHA would be larger and therefore more expensive.

To avoid a policy that may do more harm than good, Seattle policymakers can substantially reduce the MHA requirements. But even that solution is unlikely to buffer the policy's unpredictable ill effects on such idiosyncratic housing types. It may be better to nix MHA in low-rise zones altogether than risk nixing the missing middle housing that Seattle so sorely needs.

Thank you to David Neiman who provided invaluable conceptual guidance and did most of the heavy lifting for the pro forma calculations.

## Appendix

The table below shows the assumed price per square foot sale prices of townhouse and rowhouse homes based on a survey of recent sales extracted from Redfin, as described in the text above. When residential buildings exceed three stories, it triggers a shift from the residential building code to the commercial building code. The construction cost shown below reflects an assumed 5 percent cost premium caused by that change. For a recent townhouse project designed by Seattle builder David Neiman, a switch to the commercial code required sprinkler upgrades, a central monitoring system, rated garage doors, walls, and soffits, a fire alarm system, occupant notification systems, 42-inch railings, and double-sided handrails, adding up a 7 percent premium on the total project construction cost.

**MHA pro forma inputs**

1,000 GSF Unit Sale Price (per GSF)	\$500
1,400 GSF Unit Sale Price (per GSF)	\$470
1,600 GSF Unit Sale Price (per GSF)	\$450
2,000 GSF Unit Sale Price (per GSF)	\$430
MHA In-Lieu Fee (per GSF)	\$13.25
Construction Costs for 3 stories (per GSF)	\$201
Construction Costs for 4 stories (per GSF)	\$211

GSF = gross square feet

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The table below shows the pro forma data for before and after MHA for six-unit rowhouse and townhouse projects, assuming three-story construction.

The table below shows the assumed units sizes and their sale prices based on a survey of recent sales extracted from Redfin, as described in the text above.

## Pro formas for LR2 MHA upzone

MHA LR2 Before/After Pro Formas	Rowhouse		Townhouse	
	Existing Zoning	MHA with In- Lieu Fee	Existing Zoning	MHA with In- Lieu Fee
Number of units	6	6	6	6
Stories	3	3	3	3
Building Gross SF	9,360	10,080	8,640	10,080
Average gross unit size	1,560	1,680	1,440	1,680
Average unit price	\$ 708,800	\$ 751,733	\$ 662,533	\$ 751,733
Land SF	7,200	7,200	7,200	7,200
FAR	1.3	1.4	1.2	1.4
Const costs / sf	\$ 201	\$ 201	\$ 201	\$ 201
Gross Sales / sf	\$ 454	\$ 447	\$ 460	\$ 447
Land Costs	\$ 836,000	\$ 836,000	\$ 784,000	\$ 784,000
Pre-closing investigations	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000
Legal Set Up For LLC	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000
Arch Fees	\$ 45,000	\$ 50,000	\$ 45,000	\$ 50,000
Civil/Landscape	\$ 7,500	\$ 7,500	\$ 7,500	\$ 7,500
Structural Engineering	\$ 13,000	\$ 15,000	\$ 13,000	\$ 15,000
Geotechnical	\$ 3,000	\$ 3,000	\$ 3,000	\$ 3,000
Permits	\$ 28,000	\$ 30,000	\$ 28,000	\$ 30,000
Construction Costs	\$ 1,881,360	\$ 2,026,080	\$ 1,736,640	\$ 2,026,080
WSST on Construction	\$ 178,729	\$ 192,478	\$ 164,981	\$ 192,478
Water Meters	\$ 26,000	\$ 29,500	\$ 26,000	\$ 29,500
Electric Service	\$ 6,000	\$ 7,000	\$ 6,000	\$ 7,000
Survey for Short Plat	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000
Builders Risk Insurance & GL	\$ 7,500	\$ 7,500	\$ 7,500	\$ 7,500
Property Taxes	\$ 6,000	\$ 6,000	\$ 6,000	\$ 6,000
Accounting & Book Keeping	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000
Closing Costs for Loan	\$ 24,500	\$ 29,000	\$ 24,500	\$ 29,000
Interest	\$ 56,000	\$ 68,000	\$ 56,000	\$ 68,000
Contingency	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000
MHA In-Lieu Fee	\$ -	\$ 133,560	\$ -	\$ 133,560
Total Costs w/Financing	\$ 3,232,589	\$ 3,554,618	\$ 3,022,121	\$ 3,502,618
Total Sales	\$ 4,252,800	\$ 4,510,400	\$ 3,975,200	\$ 4,510,400
Cost of Sales	\$ (373,396)	\$ (396,013)	\$ (349,023)	\$ (396,013)
Loan	\$ 2,382,589	\$ 2,704,618	\$ 2,172,121	\$ 2,652,618
Equity	\$ 850,000	\$ 850,000	\$ 850,000	\$ 850,000
Loan to Value	56%	60%	55%	59%
Loan to Cost	74%	76%	72%	76%
Return on Investment (ROI)	\$ 646,815	\$ 559,769	\$ 604,057	\$ 611,769
Percent ROI	20.0%	15.7%	20.0%	17.5%

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The table below shows the assumed units sizes and their sale prices based on a survey of recent sales extracted from Redfin, as described in the text above.

### Assumed unit sizes and sale prices

Unit	LR2 Rowhouse				LR2 Townhouse			
	Existing Zoning		MHA w/In-Lieu Fee		Existing Zoning		MHA w/In-Lieu Fee	
	Size (sf)	Sales Price	Size (sf)	Sales Price	Size (sf)	Sales Price	Size (sf)	Sales Price
1	2,060	\$ 885,800	2,040	\$ 877,200	2,040	\$ 877,200	2,040	\$ 877,200
2	1,600	\$ 720,000	2,040	\$ 877,200	1,600	\$ 720,000	2,040	\$ 877,200
3	1,600	\$ 720,000	1,600	\$ 720,000	1,600	\$ 720,000	1,600	\$ 720,000
4	1,400	\$ 658,000	1,600	\$ 720,000	1,400	\$ 658,000	1,600	\$ 720,000
5	1,400	\$ 658,000	1,400	\$ 658,000	1,000	\$ 500,000	1,400	\$ 658,000
6	1,300	\$ 611,000	1,400	\$ 658,000	1,000	\$ 500,000	1,400	\$ 658,000
<b>Total</b>	<b>9,360</b>	<b>\$ 4,252,800</b>	<b>10,080</b>	<b>\$ 4,510,400</b>	<b>8,640</b>	<b>\$ 3,975,200</b>	<b>10,080</b>	<b>\$ 4,510,400</b>

Original table, compiled by Dan Bertolet, Sightline Institute. Available under our free use policy.

Lastly, the table below shows the FAR limits for the four building types allowed in Seattle's low-rise zones, under existing zoning, and under the currently proposed MHA upzones. The change in FAR—the most fundamental determinant of the value of the upzone—varies substantially depending on both the zone and building type.

### Proposed MHA FAR increases for low-rise building types

Building Type	FAR	LR1	LR2	LR3 (outside UV/SAO)	LR3 (inside UV/SAO)
Cottage	existing	1.1	1.1	1.1	1.1
	proposed	1.3	1.3	1.3	1.3
	change	<b>18.2%</b>	<b>18.2%</b>	<b>18.2%</b>	<b>18.2%</b>
Rowhouse	existing	1.2	1.3	1.4	1.4
	proposed	1.3	1.4	1.6	1.6
	change	<b>8.3%</b>	<b>7.7%</b>	<b>14.3%</b>	<b>14.3%</b>
Townhouse	existing	1.1	1.2	1.3	1.4
	proposed	1.2	1.4	1.5	1.6
	change	<b>9.1%</b>	<b>16.7%</b>	<b>15.4%</b>	<b>14.3%</b>
Apartment	existing	1	1.3	1.5	2
	proposed	1.3	1.5	1.8	2.2
	change	<b>30.0%</b>	<b>15.4%</b>	<b>20.0%</b>	<b>10.0%</b>

UV = urban village or center; SAO = station area overlay

Source: City of Seattle

Original table, compiled by Dan Bertolet, Sightline Institute. Available under our free use policy.

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## SEATTLE GETS MHA RIGHT IN DOWNTOWN AND SLU

Which means a win-win for Seattleites seeking a diversity of housing options.



Author: Dan Bertolet

(@danbertolet) on March 20, 2017 at 1:00 pm

This article is part of a series on Seattle's proposed Mandatory Housing Affordability (MHA) program. In previous articles, I identified [inconsistencies](#) in the proposal and presented case studies ([here](#), [here](#), and [here](#)) on several housing prototypes, in all cases *finding* that MHA would suppress homebuilding and *backfire* on the city's affordability goals to varying degrees. This time: MHA in downtown and South Lake Union, where the city got it right.

Seattle's proposed [Mandatory Housing Affordability](#) (MHA) program has the potential to deliver two things Seattle residents need most: more new homes overall to address the city's housing shortage and help keep prices in check for everyone, and more new subsidized homes for people without the means to afford what the market offers.

But if ever there was a policy where the devil is in the details, it's MHA. Because if the affordability requirements are pushed too high, the added costs could make homebuilding projects financially infeasible. And when that happens, the city loses out on both subsidized and market housing, losses that hit the city's most vulnerable the hardest. [My previous analyses](#) showed that, unfortunately, MHA as proposed for other areas of the city is likely to yield that lose-lose outcome.

This article analyzes the city's proposal for MHA in the downtown and South Lake Union neighborhoods, finding that in these places, the city got the MHA balance right. If adopted as proposed, MHA will deliver on its promise to link growth and equity by creating the diversity of home options that Seattleites so desperately need.



Seattle downtown skyline, by Dan Bertolet, used with permission.

## Background: The two flavors of MHA upzone in downtown/SLU

Seattle policymakers have proposed two separate systems of MHA affordability requirements: one for **downtown and South Lake Union (SLU)**, and one for **everywhere else in the city**. This article addresses the residential portion of MHA, for which the city projects a yield of **900 subsidized homes** in downtown/SLU over the next ten years.

For each of the 23 zones in downtown/SLU, planners have set a specific inclusion rate and in-lieu fee based on the amount of extra capacity granted by the MHA upzone, though with some exceptions to that rule (see table in appendix). In contrast, **they did not apply any standard formula** to set the MHA requirements for the rest of the city.

For zones in downtown/SLU currently subject to the city's existing **Voluntary Incentive Zoning Program (VIZ)**, the MHA requirements were set according to the **Grand Bargain** agreement's stipulation that the added capacity granted by the MHA upzones would be "charged at the existing incentive zoning rate." In other words, the total in-lieu fee paid for MHA on a new building would be equivalent to the in-lieu fee that would have been paid for affordable housing with the same capacity increase under VIZ. The proposed MHA requirements cover the 60 percent of the VIZ fees that currently go towards affordable housing, but in addition, the developers would also have to pay the remaining 40 percent portion of VIZ that's applied to transferred development rights (TDR) or amenities such as open space or daycare.

For zones not already subject to VIZ, **planners calibrated the MHA requirements** against a benchmark 5 percent inclusion rate for a 15 percent capacity increase. According to preliminary estimates provided

by the city, existing capacity for residential development in downtown/SLU is split roughly half and half between zones with and without VIZ.



Construction in the Denny Triangle neighborhood of downtown Seattle, by Dan Bertolet, used with permission.

## Pro forma results: The plan in action

Following the [before-and-after method](#) I described previously, I applied static pro formas to estimate how the MHA upzone would change the homebuilder's return on investment (ROI) compared to a baseline project under existing zoning that would deliver a 15 percent ROI. I assumed the rents, construction costs, cap rates, and other inputs used in the City of Seattle's [MHA feasibility study](#) (see input table in appendix), although the city did not include analysis of downtown/SLU zones in its study.

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I ran pro formas on two prototypical buildings, one in the SM-SLU 240 125-440 zone, following the example [recently presented by city planners](#), and the other in the DMR C 280 125 zone, which is not currently subject to VIZ. On request, city planners provided their capacity estimates for both prototypes. Results are summarized in the table below, which shows a 7 percent increase in ROI for the SLU building and an 8 percent decrease in ROI for the DMR building.

### Effect of MHA on ROI for downtown/SLU upzones

Zone	Height increase	Estimated FAR increase	Extra In-Lieu Fee Paid	Return on Investment (ROI)		
				Existing Zoning	With MHA In-lieu Fee	Change in ROI Caused By MHA
SM-SLU 240 125-440	40'	9%	\$ 958,388	15%	16.0%	7%
DMR C 280 125	40'	17%	\$ 4,092,972	15%	13.8%	-8%



Original table, compiled by Dan Bertolet, Sightline Institute. Available under our free use policy.

The SLU prototype demonstrates MHA done right: the value of the MHA upzone offsets the cost of the affordability requirement and therefore does not degrade ROI. For the DMR prototype, the value of the upzone is not quite enough to preserve ROI. The math is convoluted by the interplay of VIZ, but the simple reason for this difference is that the DMR project pays more for the added capacity granted by MHA.

Here's the math: For the SLU prototype, I assumed the baseline building uses all of the capacity available under VIZ and so is 400 feet tall. At the current VIZ rate of \$22.65, the required payment is \$6.54 million. For the upzoned SLU building, the MHA in-lieu fee is \$10 per square foot, which comes out to \$4.88 million, and the 40 percent VIZ charge is \$2.62 million, for a total payment of \$7.5 million. Taking the difference, the developer pays an extra \$958,000 for 42,000 square feet of MHA capacity. That converts to \$22.82 per square foot—an almost exact match to the city's existing VIZ fee, right in line with the Grand Bargain. In comparison, for the DMR prototype, the developer pays \$4.09 million for 44,800 square feet, which converts to \$91 per square foot.

Another way to think about this is in terms of the cost imposed by MHA per additional housing unit that the MHA upzone allows. Developers commonly assess these costs in comparison to how much they would have to pay per unit for **raw land to build on**. For the SLU prototype, the MHA charge is equivalent to \$17,200 per unit, and for the DMR prototype, it's \$68,800 per unit. For comparison, in my pro formas, the cost of land per unit is \$34,000 for the SLU prototype and \$49,000 per unit for the DMR prototype. In other words, for the SLU prototype, MHA is cheaper than buying bare land, but for the DMR prototype, MHA costs more than land. These differences reflect the ROI results shown in the table above.



Diagram of MHA upzone for a 400' residential tower, by City of Seattle (public domain).

## Why it works: A collaborative process, a balanced formula

The city applied a consistent formula to define the MHA requirements for all the zones in downtown/SLU that currently have VIZ. That means that for all of those zones MHA as proposed should be as well-balanced as my above analysis indicates for the SM-SLU 240 125-440 prototype. In short, the city nailed it: MHA will deliver more homes and more subsidized homes.

It's no coincidence that these particular MHA numbers work so well. They were defined through negotiation and compromise between private development interests, non-profit housing providers, and city officials. Furthermore, the proposed MHA numbers for these zones err slightly on the pro-feasibility side of the value exchange equation, which, as I have [argued previously](#), is a smart approach, given the swirling variability of real estate markets. In contrast, erring on the opposite side [increases the risk](#) of sacrificing both the affordable homes and the market-rate homes.

For downtown/SLU zones without VIZ, the city also applied a consistent formula, although it's one that yields MHA requirements higher than those for zones with VIZ. Thus for all the zones without VIZ, MHA would tend to result in a loss of ROI similar to the 8% drop my analysis shows above. That these MHA numbers missed the mark for equal value exchange should not be surprising: planners did not conduct sufficient

In short, the city nailed it:  
MHA will deliver more  
homes and more subsidized  
homes.



feasibility analysis before setting them. Fortunately, the ROI damage is not as severe as my analysis has shown for MHA as proposed for other parts of the city. For the DMR prototype pro forma, lowering the in-lieu fee from the proposed \$13 per square foot to \$9 per square foot would balance MHA.

## A win-win for Seattle home-seekers

After so much MHA bad news in my previous MHA analyses ([here](#), [here](#), [here](#), [here](#)), it's encouraging to find that the city of Seattle's proposal for MHA in downtown and South Lake Union gets it right. For roughly half of the new housing that could potentially be built in these areas, MHA as proposed would deliver the win-win outcome of more market-rate housing and more subsidized housing. For the remaining portion, MHA may cause a mild suppression of housing production, though the MHA balance is not far off and the damage done likely minimal.

In light of the technical complexities and political challenges, on my assessment the city's MHA proposal for downtown/SLU does a superb job of creating a balanced program overall, and it should serve as a good model and precedent as policymakers refine the MHA proposal for the rest of the city.

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## Appendix

The [proposed MHA requirements](#) for 23 different upzones in downtown/SLU are listed in the table below (don't get hung up on the cryptic zone designations—they're just shown for reference). Most upzones come in the form of height increases, but a few allow for a boost in the allowed area per floor, or "floor plate" (illustrative examples are [here](#)).

## MHA performance and payment amounts for downtown/SLU upzones

New Zone Designation After Upzone	Maximum Allowed Height After Upzone for Residential	Upzone Height Increase (or floorplate increase)	Estimated Capacity Increase Allowed by Existing VIZ	Estimated Capacity Increase Allowed by MHA Upzone	Performance Amount (required percent of affordable units)	Payment Amount (in-lieu fee per square foot of building)
DH2/75	75'	10'	0%	17%	5.0%	\$12.75
DMC 75	75'	10'	0%	17%	5.0%	\$12.75
DMC 95	95'	10'	0%	14%	5.0%	\$12.75
DMC 145	145'	20'	0%	17%	5.1%	\$13.00
DMC 170	170'	10'	0%	6%	2.1%	\$ 5.50
DMC 240/290-440*	440'	40'	44%	10%	3.2%	\$ 8.25
DMC 340/290-440*	440'	40'	44%	10%	3.2%	\$ 8.25
DMR/C 95/75	95'	10'	0%	14%	5.0%	\$12.75
DMR/C 145/75	145'	20'	0%	15%	4.6%	\$11.75
DMR/C 280/125	280'	40' (10%)	0%	17%	5.1%	\$13.00
DMR/R 95/65	95'	10'	0%	13%	5.0%	\$12.75
DMR/R 145/65	145'	20'	0%	15%	4.6%	\$11.75
DMR/R 280/65	280'	40' (10%)	0%	17%	5.1%	\$13.00
DOC1 U/450-U*	unlimited	(1,000 sf)	100%	7%	4.7%	\$12.00
DOC2 500/300-550*	550'	50'	66%	10%	4.0%	\$10.25
DRC 85-170	170'	20'	0%	12%	3.9%	\$10.00
SM-SLU 100/95*	95'	10'	33%	13%	2.9%	\$ 7.50
SM-SLU 145*	145'	20'	60%	19%	3.0%	\$ 7.75
SM-SLU 100/65-145*	145'	20'	71%	14%	3.0%	\$ 7.75
SM-SLU 85-280*	280'	40'	152%	15%	3.9%	\$10.00
SM-SLU 175/85-280*	280'	40'	152%	15%	3.9%	\$10.00
SM-SLU 240/125-440*	440'	40'	183%	9%	3.9%	\$10.00
SM-SLU/R 65/95	95'	10'	0%	14%	5.0%	\$12.75

\*Zone previously subject to the Voluntary Inclusionary Zoning Program  
Source: City of Seattle Office of Planning and Community Development

Original table, compiled by Dan Bertolet, Sightline Institute. Available under our free use policy.

Pro forma input assumptions were taken from the city's [MHA feasibility study](#) and are summarized in the table below. Based on feedback on my previous MHA feasibility article that the construction costs were too low compared to current norms, I raised construction costs by 10 percent, corresponding to the upper limit the city's study applies in its sensitivity testing. I also increased the per-stall cost of underground parking from \$35,000 to \$40,000.

## MHA pro forma inputs

Monthly Market-rate Rent (per NSF)	\$3.34
Monthly Retail Rent (per NSF)	\$2.83
Monthly Parking Rent (per stall)	\$159
Cap Rate	5.0%
60% AMI Monthly Rent (1-bedroom unit)	\$1,017
Vacancy Rate	5%
Floorspace Efficiency (NSF/GSF)	80%
Operating Expenses (percent of rent revenue)	30%
Highrise Construction Hard Costs w/o Parking (per GSF)	\$229
Construction Soft Costs (percent of hard costs)	28%
Underground Parking Construction Cost (per stall)	\$40,000
Parking Vacancy Rate	25%

Original table, compiled by Dan Bertolet, Sightline Institute. Available under our free use policy.

Pro forma data are given in the two tables below. To maintain consistency between the before-and-after MHA prototypes, the present analysis assumes a consistent parking ratio. The number of required affordable units was based on an assumption that all of the increased development capacity granted by the upzone would go to residential use (the retail floor space remains constant on both buildings). Because the math never yields an exact integer number of required affordable units, the leftover fractional part of a unit was converted to an in-lieu fee, according the city's method, documented [here](#). The DMR pro forma does not include the potential added cost caused by the upzone [crossing the 240' height threshold](#) that triggers requirements for structural peer review.

## Pro forma for SM-SLU 240/125-440 MHA upzone

SM-SLU 240/125-440	400' W/ EXISTING VIZ	440' W/ MHA 60% AMI	440' W/ MHA IN- LIEU FEE	440' (NO MHA)
<b>Return on Investment</b>	15.0%	16.0%	16.0%	16.7%
<b>Change in Return on Investment</b>	0.0%	6.7%	7.0%	11.0%
<b>Absolute Return</b>	\$25,450,055	\$28,691,243	\$29,534,651	\$30,493,039
<b>Yield</b>	5.7%	5.80%	5.80%	5.83%
Floor-area ratio (FAR)	21.25	23.3	23.3	23.3
Lot Size (SF)	21,000	21,000	21,000	21,000
Stories	40	44	44	44
Total Floor Area (GSF)	446,250	488,250	488,250	488,250
Residential Floor Area (GSF)	432,300	474,300	474,300	474,300
Residential Floor Area (NSF)	345,840	379,440	379,440	379,440
Average Unit Size (NSF)	602	602	602	602
Market Units	574	605	630	630
MHA Units	0	25	0	0
MHA Unit Rent (per month)	\$1,017	\$1,017	0	0
Residential Rent (per month)	\$1,155,106	\$1,242,464	\$1,267,330	\$1,267,330
Residential Rent (per year)	\$13,168,204	\$14,164,087	\$14,447,557	\$14,447,557
Retail Floor Area (GSF)	13,950	13,950	13,950	13,950
Retail Rent (per year)	\$360,468	\$360,468	\$360,468	\$360,468
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5
Parking Stalls	287	315	315	315
Parking Rent (per year)	410,849	450,765	450,765	450,765
Total Building Rent (per year)	\$13,939,521	\$14,975,320	\$15,258,790	\$15,258,790
Expenses (per year)	\$4,181,856	\$4,577,637	\$4,577,637	\$4,577,637
Net Operating Income (NOI)	\$9,757,665	\$10,397,683	\$10,681,153	\$10,681,153
Building Value (5.25% Cap Rate)	\$195,153,293	\$207,953,651	\$213,623,066	\$213,623,066
Construction Cost	\$142,289,050	\$155,715,840	\$155,715,840	\$155,715,840
Land Cost (per SF)	\$994	\$994	\$994	\$994
Land Cost	\$20,874,000	\$20,874,000	\$20,874,000	\$20,874,000
MHA In-Lieu Fee Paid	\$0	\$56,493	\$4,882,500	\$0
Voluntary Incentive Zoning Cost	\$6,540,188	\$2,616,075	\$2,616,075	\$6,540,188
Total Development Cost	\$169,703,238	\$179,262,408	\$184,088,415	\$183,130,028
Value Created	\$25,450,055	\$28,691,243	\$29,534,651	\$30,493,039

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## Pro forma for DMR C 280 125 MHA upzone

DMR/C 280/125	125' BASE	280' W/ MHA 60% AMI	280' W/ MHA IN-LIEU FEE	280' (NO MHA)
<b>Return on Investment</b>	15.0%	13.7%	13.8%	17.8%
<b>Change in Return on Investment</b>		-8.5%	-8.2%	18.4%
<b>Absolute Return</b>	\$15,359,812	\$16,034,064	\$16,646,308	\$20,739,280
<b>Yield</b>	5.75%	5.69%	5.69%	5.89%
Floor-area ratio (FAR)	13.81	16.1	16.1	16.1
Lot Size (SF)	19,556	19,556	19,556	19,556
Stories	24	28	28	28
Total Floor Area (GSF)	270,044	314,844	314,844	314,844
Residential Floor Area (GSF)	256,094	300,894	300,894	300,894
Residential Floor Area (NSF)	204,875	240,715	240,715	240,715
Average Unit Size (NSF)	603	603	603	603
Market Units	340	378	399	399
MHA Units	0	21	0	0
MHA Unit Rent (per month)	0	\$1,017	0	0
Residential Rent (per month)	\$684,283	\$783,620	\$803,989	\$803,989
Residential Rent (per year)	\$7,800,828	\$8,933,263	\$9,165,472	\$9,165,472
Retail Floor Area (GSF)	13,950	13,950	13,950	13,950
Retail Rent (per year)	\$360,468	\$360,468	\$360,468	\$360,468
Parking Ratio (stalls per unit)	0.5	0.5	0.5	0.5
Parking Stalls	170	200	200	200
Parking Rent (per year)	243,270	285,827	285,827	285,827
Total Building Rent (per year)	\$8,404,566	\$9,579,558	\$9,811,767	\$9,811,767
Expenses (per year)	\$2,521,370	\$2,943,530	\$2,943,530	\$2,943,530
Net Operating Income (NOI)	\$5,883,196	\$6,636,028	\$6,868,237	\$6,868,237
Building Value (5.25% Cap Rate)	\$117,663,926	\$132,720,558	\$137,364,732	\$137,364,732
Construction Cost	\$85,955,297	\$100,276,636	\$100,276,636	\$100,276,636
Land Cost (per SF)	\$836	\$836	\$836	\$836
Land Cost	\$16,348,816	\$16,348,816	\$16,348,816	\$16,348,816
In-Lieu Fee Paid	\$0	\$61,042	\$4,092,972	\$0
Voluntary Incentive Zoning Cost	\$0	\$0	\$0	\$0
Total Development Cost	\$102,304,113	\$116,686,495	\$120,718,424	\$116,625,452
Value Created	\$15,359,812	\$16,034,064	\$16,646,308	\$20,739,280

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Tagged in: HALA, Housing Affordability, Inclusionary Zoning, Mandatory Housing Affordability, MHA, Zoning



## DISPLACEMENT DILEMMA

### What Seattle's draft study tells us—and doesn't—about displacement.



Author: Dan Bertolet

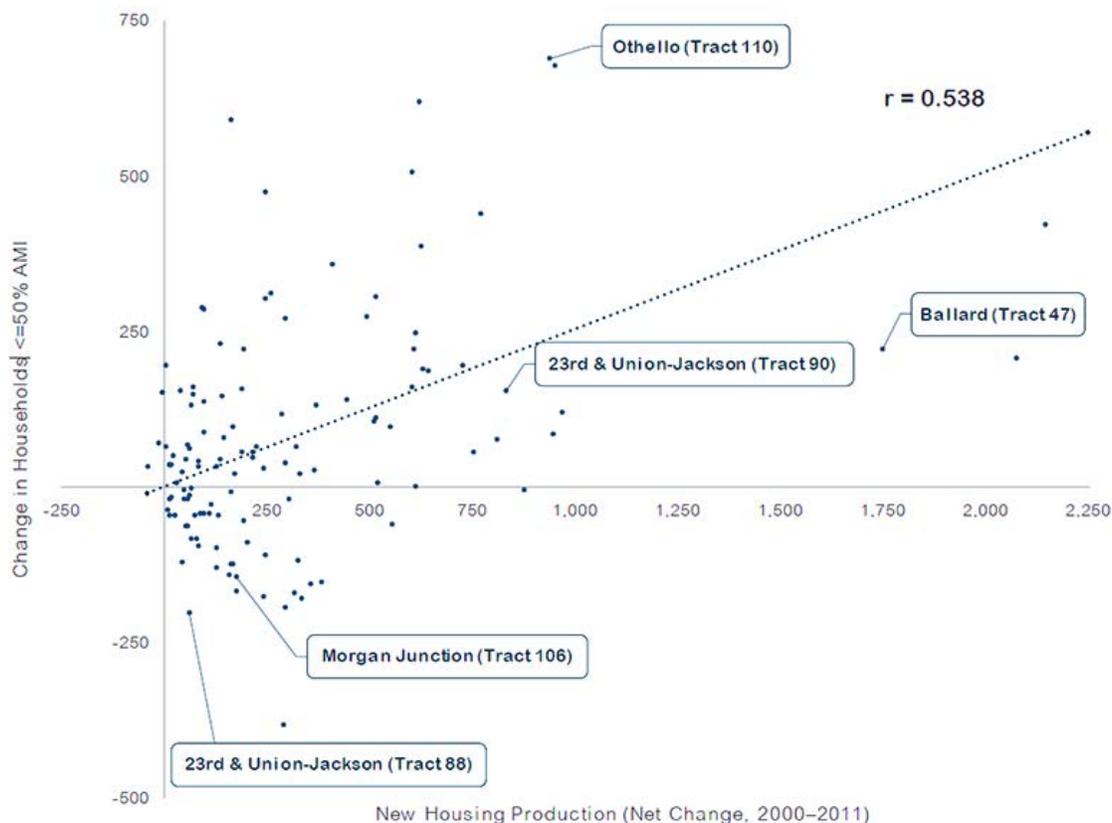
(@danbertolet) on June 8, 2017 at 5:27 pm

Cascadia's largest city, Seattle, **just released** its draft **Environmental Impact Statement** (EIS) on the proposed Mandatory Housing Affordability (MHA) program, a core part of the city's Housing Affordability and Livability Agenda. (I've written about MHA **here, here, here, here, here, here, and here.**)

The question that looms largest for many is whether upzones proposed to allow larger buildings should be scaled back in areas with high risk of displacement, as suggested by advocates in some of Seattle's neighborhoods historically populated by people of color. This gets at the heart of one of the most challenging aspects of the city's quest for equity and affordability. Most everyone agrees that **market-rate housing supply helps affordability** at the regional and citywide scale. But do citywide trends play out at the scale of a neighborhood or city block, where conditions may be uniquely sensitive and the effects of policy changes can be unpredictable?

The EIS dissects two possible MHA scenarios. In the first alternative, MHA upzones are distributed consistently across the city. In the second, upzones are dialed back in areas the **city has identified as having high displacement risk** and "low opportunity" (mostly, the historical homes of communities of color) and correspondingly dialed up in areas identified as having low displacement risk and "high opportunity" (which are mostly affluent and white). That translates to fewer upzones in minority neighborhoods like Rainier Beach and more upzones in white neighborhoods like Ravenna.

To explore impacts on **displacement**, the EIS examined its relationship to homebuilding at the census tract level, using the change in the number of households with incomes below 50 percent of the area median as a proxy (EIS p.3.37). Between 2000 and 2011, more new housing correlates with less displacement, as shown in the graph below. That relationship also holds in high-displacement risk areas (EIS p.3.41).

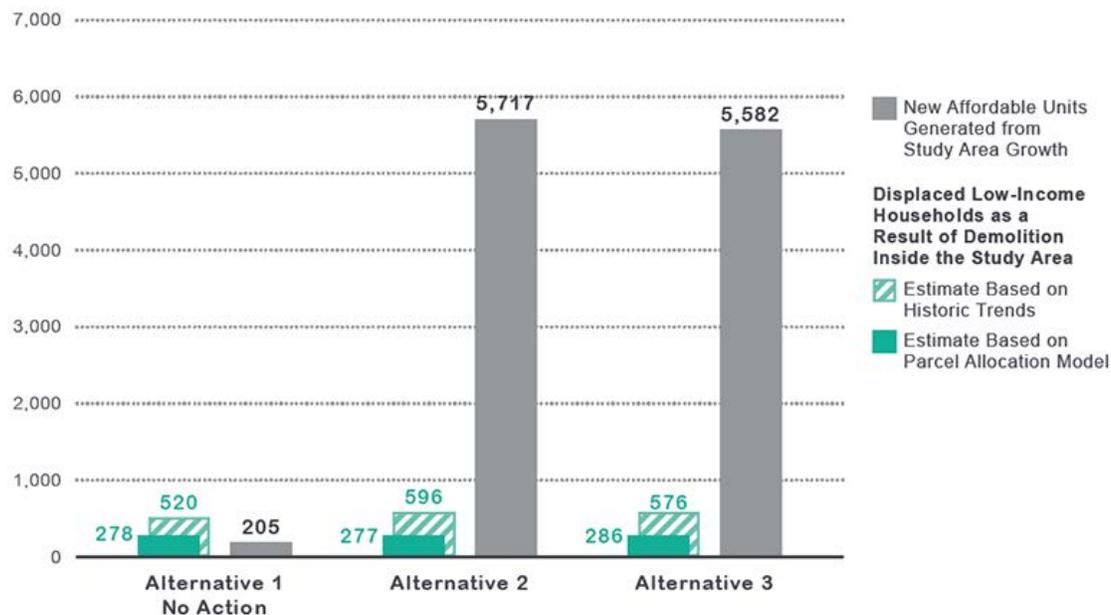


Relationship between new homes built and the change in number of households with incomes below 50% area median from 2000 to 2011, by Seattle census tract. Source: City of Seattle.

These findings suggest that holding back the construction of new homes through reduced upzones would not help stem displacement but would in fact likely do the opposite. This result **corroborates a similar study** conducted in the San Francisco Bay area.

Surprisingly, the analysis also shows that from 2000 to 2011, displacement as measured by the EIS's low-income household proxy was more common in neighborhoods facing low risk of displacement than in neighborhoods facing high displacement risk, as categorized by the city's **2016 Growth and Equity analysis** (EIS p.3.42). In other words, displacement appears to have happened more in affluent than in poorer neighborhoods.

The EIS also examined **“physical” displacement** caused when low-income residents are forced to leave when housing is slated to be demolished. (We documented how rare physical displacement is **here**.) Based on data from the city's **Tenant Relocation Assistance Ordinance (TRAO)**, the analysis projected very little difference in physical displacement among all of the EIS alternatives, including the status quo, as shown in the chart below (EIS p.3.58). Surprisingly again, TRAO data show that physical displacement caused by demolitions has been most common in “high opportunity” areas of the city, not in neighborhoods tagged by the city as facing the most risk of displacement (EIS p.3.31).



Projections of physical displacement of low-income households caused by demolitions, compared to projected affordable housing production. Source: City of Seattle.

But while the City's displacement analysis clearly does not support a policy to reduce upzones in areas it has labeled high risk, the data don't tell the whole story. The household income proxy is an unfortunate methodological limitation. The number of low-income households could have moved up or down due to a variety of causes unrelated to displacement, such as changes in jobs or earnings, a trend toward single-earner households, or moves having nothing to do with rising rent. Displacement is **notoriously difficult**—some would say impossible—to track. Also, as noted in the EIS, the analysis could be improved by removing new housing units that are subsidized.

Furthermore, new housing can have localized effects on displacement not detected by study at the census tract level. For example, does a shiny new apartment building signal to wealthier home seekers that a neighborhood is newly desirable? When local businesses are disrupted by development, does it feed a chain reaction of cultural displacement? Such questions currently animate the debate around the implementation of MHA in Seattle's **Central Area** and **Chinatown/International District**.

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The unavoidable gray areas in displacement analysis raise questions. Should policymakers weigh empirical evidence, even if imperfect, against community members' own opinions and preferences? Should local stakeholders get priority, especially in lower-income communities of color that have historically been excluded from city planning decisions?

Zoning may simply be the wrong tool for tackling displacement in high-risk communities. In neighborhoods such as the Central Area that are increasingly desirable because they are close to one of the hottest downtown job markets in North America, displacement will happen with or without upzones. What could make a difference, however, are upzones throughout the city—especially in the city's northern expanse of wealthy, exclusive, single-family neighborhoods. Zoning changes in those

places could be Seattle's most effective strategy for taking displacement pressure off of communities of color elsewhere.

But to securely stabilize fragile communities so that they can benefit from the city's rapid growth, targeted interventions that help establish economic and cultural anchors are the most promising solution. Currently, the city's best example of what we need more of is the [Equitable Development Initiative](#).

UPDATE (6/9/17): One factor absent in the draft EIS displacement analysis is the potential for MHA costs to render homebuilding projects financially infeasible. In such cases, the city's own analysis discussed above suggests that the resultant loss of new housing would likely increase the displacement of low-income households. Proper assessment of this potential adverse impact of MHA would require a [before-and-after feasibility analysis](#), which the city has not conducted.

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Tagged in: [Displacement](#), [Equity](#), [HALA](#), [MHA](#), [Seattle](#)

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**From:** Brooke Best  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** DEIS for Mandatory Housing Affordability (MHA) Implementation  
**Date:** Wednesday, August 02, 2017 8:00:49 PM

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Thank you for the opportunity to submit public comments for the DEIS which evaluates three alternatives for implementing proposed zoning changes under the MHA policy, and assesses the issues and potential impacts of these changes. First off, I applaud the City's efforts to grapple with one of the biggest issues facing our residents – access to affordable housing as well as a livable environment.

For MHA to be effective, we need to come up with more balanced approach to achieving growth; one that requires thoughtful consideration and community engagement to develop better options than what's being proposed. Our City is a leader in sustainability. Therefore, *how we grow* and add density should be both sustainable and resilient – this includes density without demolition and affordability without sacrificing livability.

I'm providing the following comments related to the Historic Resources analysis (Section 3.5) of the DEIS:

- Section 3.5 lacks any meaningful analysis or comprehensive coverage of the study area's history, context, and patterns of developments. For example, Section 3.5.1 should include details on neighborhoods to adequately assess potential impacts to historic resources, including potentially-eligible properties and future historic districts. Increased development pressure will lead to increased demolition of historic buildings and neighborhoods and adversely impact the character and scale of neighborhood blocks. Furthermore, the analysis should look at what already exists that's "affordable," in order to determine the net gain or loss from the proposed MHA changes. What will the impact be in terms of tear-downs?
- The DEIS does not connect MHA to URM. Unreinforced Masonry (URM) buildings are mentioned in Sections 3.5.1 and 3.5.3, however, the DEIS does not reference SDCI's list of over 1,100 URM documented properties. Any analysis should factor in the number of URMs in each of the study area neighborhoods in order to assess potential impacts to these properties. In addition, compliance with a possible City mandate to seismically retrofit URM buildings will pose a substantial financial burden on many property owners. "Preservation of existing affordable housing" is identified as a goal of HALA, so it would make sense to offer financial incentives to property owners in return for upgrading historic URMs to provide affordable housing.
- The DEIS does not provide substantive mitigation measures (Section 3.5.3).

Instead it includes two measures that are already in place – Comp Plan policies and Seattle Landmarks process; it proposes a third strategy of funding comprehensive survey/inventory efforts, something that hasn't been funded in years. Mitigation should respond to the potential impacts and not rely only on existing measures, especially without realistic ways to implement (i.e, additional funding and staff capacity).

The Final EIS needs to do a much better job of taking historic resources into consideration and analyzing the potential impact(s), in terms of demolition, character and scale of neighborhood blocks, and the livability and quality of Seattle's neighborhoods.

Sincerely,

Brooke Best

<b>Name</b>	Carl Bevis
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 My preference is the No Action Alternative for the Wallingford area as the other alternatives do not provide for realistic differences. Existing structures could easily account for the desired increases in housing.
<b>Housing and Socioeconomics</b>	2 The economic value of existing structures as it relates to rents, would be considerable less than construction of "new" construction where densities are higher. Therefore, slight modification of existing codes could satisfy the desire for additional affordable units.
<b>Land Use</b>	3 Alternative Number 1 of No Action is preferred in that existing land use is currently difficult at best meaning an increase in density would further degrade the conditions.
<b>Aesthetics</b>	4 Anything other than No Action would in effect eliminate the character of nearly 100 year old houses built of true old growth timbers with unique character. The alternatives would in effect force a new aesthetic of larger mass rectangular buildings made of less than long lasting materials. The scale of any new building would in effect eliminate and relation to the actual ground the respective building was build on.
<b>Transportation</b>	5 In terms of transportation, of note is the existing width of streets in Wallingford in effect being one-lane where proposed Alternatives 2 and 3 would force much, much greater use of the streets forcing would could at times be "grid-lock".
<b>Historic Resources</b>	6 Implementing Alternative 2 or 3 would contribute to the eroding of the character of the city of Seattle in ways that would be impossible to recover from. This is basically supporting the destruction of perfectly good old structures that represent what can be considered part of Seattle heritage.
<b>Biological Resources</b>	7 In current Single Family yards you in effect have a dispersed set of habitats the support a wide variety of bird and wild life. Alternative 2 or 3 would disrupt this situation without any viable alternative for these populations to "migrate" to. Thus, these various populations would be eliminated reducing the diversity of the region.
<b>Open Space &amp; Recreation</b>	8 With smaller livings spaces, impact to open public spaces would be more significant with Alternative 2 or 3.
<b>Public Services &amp;</b>	9 Alternative 2 or 3 would increase the rate of stormwater runoff adding to the already difficult situation Puget Sound is experiencing with the current densities. Further complicating the

**Utilities**

9 situation is that with increased populations, the impacts and effects of endocrine disruption on the natural environment would be exacerbated.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

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**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person with  
a disability?**

**Are you a U.S. Military  
veteran?**

<b>Name</b>	ERIKA BLACKSHER
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 I want to endorse the general aim of Seattle to create more affordable housing. Doing so it critically important in improving diversity -- racial, ethnic, socioeconomic, occupational -- in Seattle. More, not less, needs to be done to ensure that everyone can find safe healthy housing. These efforts help to promote equity in Seattle as well as economic sustainability, because it takes all kinds of people doing all kinds of work to keep a city running, creative, and innovative.</p>
<b>Housing and Socioeconomics</b>	<p>2 These data underscore the need in Seattle for creating housing density, growing up, rather than sprawling out, and building spaces that can be responsive to different needs (e.g., live-work). Cookie cutter solutions and cookie-cutter building forms that are developer driven are not the way to go. Get creative Seattle, tap your supply of talented architects to help the city figure out how to meet these 21st century housing needs.</p>
<b>Aesthetics</b>	<p>3 My husband and I moved into a CH neighborhood purchasing a "modern box" which sits in the midst of craftsman type homes. Our street is already full of density (L1s) and we love living here in part because we have so many great neighbors - people of all ages, races, occupations. People we would not meet in our workplaces. We suspect some people do not appreciate the "modern box" but they have come to know us and seem to appreciate us. We have made genuine friends in this neighborhood. This is what cities should do -- put all sorts of people in places and spaces where they can build connection and trust.</p>
<b>Transportation</b>	<p>4 I take the bus, stop three blocks away, to and from my employer -- the University of Washington where I am a professor. I take (and love taking) the bus, despite having a car. Lots of people do not have that option. We need better and more public transportation.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your</b>	

**neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

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**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

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**From:** Larry Bliquez <ljbliquez@gmail.com>  
**Sent:** Saturday, August 05, 2017 12:51 PM  
**To:** PCD\_MHAEIS  
**Subject:** MHA DEIS Public Comment

I realize that the city has a housing problem. That said, many of us in Wallingford feel, as we observe the many apartment buildings erected and now being erected along 45th St. and along Stoneway Ave. that we have done our fair share. Any environmental impact statement should be specific to our neighborhood. Lawrence Bliquez, 4326 Densmore Ave. N.

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**From:** Pat Bliquez <patbliquez@gmail.com>  
**Sent:** Saturday, August 05, 2017 12:24 PM  
**To:** PCD\_MHAEIS  
**Subject:** MHA DEIS Public Comment

Full disclosure, I am someone who lives within the designated upzone area. My husband and I moved here from San Francisco almost 50 years ago. From those early beginnings (I was 21) I have felt this was a neighborhood to grow old in and having reached senior status, I delight in the fact that I can walk anywhere. I am walking my granddaughter to the same park I walked her mother to. This is just a prelude to telling you what a great neighborhood this is for older people and young families. Given the lack of open parking spaces on a daily basis, I find it hard to imagine the future of this idyllic block once a new high school opens. Add to that the greater density brought on by the new zoning designation, I see an erosion in the quality of life for a neighborhood that works well in so many ways.

Therefore, I believe that the DEIS is not sufficient to represent all Urban Villages and the City overall. Each Urban Village is unique, with different housing types, cultural traditions, businesses, resources, and growth needs. This DEIS fails to recognize and examine these differences.

Each Urban Village and Surrounding Area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.

Additionally, the DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined.

Seattle residents live in both their own neighborhoods and in the City at large, yet this DEIS has failed to analyze the impacts to both thoroughly and accurately.

Pat Bliquez

4326 Densmore N.

Seattle 98103

[patbliquez@gmail.com](mailto:patbliquez@gmail.com)

**From:** info@livableudistrict.com  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Livable U District's Comments on MHA Draft EIS  
**Date:** Monday, August 07, 2017 1:03:48 PM  
**Attachments:** [LivableUDistrictComments\\_MHA-DEIS\\_080717.doc](#)

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## Office of Planning and Community Development

Attn: MHA EIS

PO Box 34019

Seattle, WA 98124-4019

Re: Livable U District's Comments on MHA Draft EIS

The Livable U District Coalition was formed in the autumn of 2015 to oppose the City's longstanding intention to upzone the U District, and to dispute the false claim that the (then new) HALA "Grand Bargain" principles justified upzoning not only the U District, but also in the remainder of the urban centers and urban villages in Seattle. Having witnessed (and been figuratively flattened by) the steamroller strategies employed by the City to achieve what it wants with upzones to specific neighborhoods, we recognize similar tactics again in play this blemished HALA – MHA DEIS process.

Members representing the Wallingford Community Council have done an admirable job in studying the massive MHA DEIS. We compliment them on their thorough analysis and endorse and support their comments. We also endorse comments submitted by Historic Seattle, and the emphasis on the need for this DEIS to better reflect the impacts of tear-downs to the affordability and livability of neighborhoods.

Flaws in the DEIS that stand out to Livable U District include:

- 1) The DEIS fails to contain an adequate study of cumulative impacts of MHA and Major Institutional Overlay zones. A vague reference to "maybe in the future somebody will look at this" is insufficient. *"Since some overlay zones modify base development standards such as the FAR limit, it is necessary to consider how increases in development capacity to implement MHA would be applied to overlay zones. Additional modeling and analysis of development capacity increases in overlay zones will be provided."* [MHA EIS, Appendix F, Page 76] Of particular interest to Livable U District is the UW Campus Master Plan MIO and the UW's MIO impact on surrounding neighborhoods including Wallingford, Eastlake, and Ravenna.
- 2) The DEIS fails to consider alternatives that could also meet the stated goals of the MHA legislation, which include "addressing the pressing need for housing affordable and available to a broad range of households" and "distributing the benefits and burdens of growth equitably." (DEIS section 1.2, p 1.3). The only alternatives considered are for degrees of up-zoning certain neighborhoods to implement the 2015 "Grand Bargain"; but this violates SEPA requirements for consideration of alternatives that "should be analyzed at a roughly comparable level of detail, sufficient to evaluate their comparative merits..." WAC 197-11-442(2). For example, alternatives could include incentivizing opportunities for sensitive and compatible infill using vacant and underdeveloped areas city wide.
- 3) Livability impacts and mitigation in a broader context are given short shrift in this DEIS. Seattle residents live in both their own neighborhoods and in the City at large; communities are interconnected and inter-dependent in the realms of public safety, public works, and public schools, to name a few.
  - More thorough and individualized analyses of neighborhood impacts are required in order for this DEIS to adequately address eventual policy choices.
  - A serious livability mitigation facing Seattle is to provide family housing for the "missing middle". Single family homes with yards in Seattle will continue to be over budget for many of the middle class. Do not turn Lowrise 1 into another bulky apartment development, but retain it as ground related units to address this issue with up-down living, 2-3 bedroom units, with set back from the property line for light, air and yard space for children.
- 4) The MHA Development Examples images (p 8, 9) in MHA Urban Design and Neighborhood Character

Study, Appendices F, *does not show* Lowrise 1! This is inadequate and puts the citizen reviewer at a disadvantage to understand the realities and impacts of changes to Lowrise 1, which are important (bigger, more units, more lot coverage).

Livable U District joins Wallingford Community Council to assert that:

- 1) The Draft EIS does not meet SEPA requirements for the consideration of alternatives, and
- 2) That the MHA-R framework did not undergo required environmental review, and therefore the framework should be part of the current DEIS or be subject to separate SEPA review.

Thank you for considering our comments.

Sincerely,

Nancy Bocek and Shirley Nixon

For Livable U Livable U District Coalition

**Office of Planning and Community Development**

Attn: MHA EIS

PO Box 34019

Seattle, WA 98124-4019

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- 4) The MHA Development Examples images (p 8, 9) in MHA Urban Design and Neighborhood Character Study, Appendices F, *does not show* Lowrise 1! This is inadequate and puts the citizen reviewer at a disadvantage to understand the realities and impacts of changes to Lowrise 1, which are important (bigger, more units, more lot coverage).

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Thank you for considering our comments.

Sincerely,

Nancy Bocek and Shirley Nixon  
For Livable U Livable U District Coalition

<b>Name</b>	Michael J. Bondra
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 Alternative 2 is the only option that uniformly distributes development, with all of its socio-economic advantages, across urban villages. In areas like Rainier Valley and the Central District, displacement will increase for every unit of affordable housing that doesn't exist due to restrictive land use and zoning.</p>
<b>Air Quality &amp; Green House Gas Emissions</b>	<p>2 Personal vehicles account for around 1/3 of the greenhouse gas emissions within the city. Providing fast and reliable public transit between all nodes, not just through downtown, should be among the highest priorities.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children</b>	

**under the age of 18  
in your household?**

**What is your  
household income?**

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your residence?**

**How long have you  
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**Do you identify as  
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**Are you a person  
with a disability?**

**Are you a U.S.  
Military veteran?**

<b>Name</b>	mimi boothby
<b>Email address</b>	
<b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b>	neighborhood
<b>Comment Form</b>	
<b>Land Use</b>	<p>1 Beacon Crossing wants to put 96 new housing units on Beacon Hill with exactly 3 "affordable" units and 3 parking spaces. This is totally unacceptable. This neighborhood doesn't need to be jammed to the gills. The developers need to scale back their project, add more "affordable" units and also put some parking in their building plan.</p>
<b>Transportation</b>	<p>2 99 Units are going to add at least 100 people to our neighborhood. Maybe only 1/3 of them have cars. That's still 30+ parking spaces. the rest of these people will be on our tiny 107 bus and the light rail.</p>
<b>Open Space &amp; Recreation</b>	<p>3 Please don't turn our neighborhood into another that is so tightly packed that everyone is frustrated going anywhere.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
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**Are there children under the age of 18 in your household?**

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**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

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**From:** Charles Borwick <cborwick@gmail.com>  
**Sent:** Friday, August 04, 2017 10:02 AM  
**To:** PCD\_MHAEIS  
**Subject:** Madison-Miller Park Community

To whom it may concern:

I am a nearby resident of the area under consideration and have lived in the area for the last twenty years. In that time I have seen the gradual erosion of our neighborhoods in favor of greater density for apparent affordability - none of which has been achieved. Clearly we need more housing for the increasing population but we should clear that much of this is driven by Amazon and its related tech satellites. It makes sense to house these people close to where they work in a dense neighborhood - so build up South Lake Union as much as you'd like. BUT please leave the few lovely residential neighborhoods that have not been decimated by rent-seeking developers alone. Density is a worthy goal but it should not and need to not be inflicted on the neighborhoods that will yield relatively little in terms of overall housing but be destroyed in the process.

Thanks for your consideration

Charles Borwick

<b>Name</b>	Amy Bosch
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 I think it sucks. The city and developers are ruining this city. Such a shame. All out greed - money, money, money. That's all you guys care about. It sickens me and many more who actually want Seattle as the nice place to live that it used to be rather than packing people into this city like rats for every last dollar you can make off it. Not to mention the traffic! Deplorable.</p>
<b>Housing and Socioeconomics</b>	<p>2 I really doubt you guys care about socioeconomics. Give me a break. It's all about fitting 14 units instead of 10 units to replace a single family home. Again, all about the \$\$\$. When does it stop? Pathetic.</p>
<b>Land Use</b>	<p>3 Land use -- is that what you call tearing down the well-built buildings to hammer a flimsy building together quickly and charge incredible rent and property taxes? Yea, great use of the land here.</p>
<b>Aesthetics</b>	<p>4 Aesthetics? Is there where developers try to make the outside of these badly built buildings look hipster-like? Only to crumble within 10 years? Yep the developer and city council is long gone by then living off what they reaped at the time they sold off Seattle and built these crappy structures!</p>
<b>Transportation</b>	<p>5 Let's just call it parking lot traffic in Seattle. What's the cure there? No one wants to use the land for transportation when they can make so much more by squeezing people into tall structures and charging \$\$\$ rent/mortgages to make the unlivable city full of nerds and people from outside the U.S.</p>
<b>Historic Resources</b>	<p>6 From what I've seen, anything historic around here has been torn down - I'm waiting for the Space Needle to be next. Seriously, what's left that is considered historic? Something built 5 years ago?</p>
<b>Biological Resources</b>	<p>7 Developers could care less about the environment. They want MONEY - that's the only GREEN thing they care about.</p>
<b>Open Space &amp; Recreation</b>	<p>8 What open space? Open space that draws 50 gazillion people because it's the only open space in the city that is now always CROWDED?</p>

**Public Services & Utilities**

9 I just see my utilities continuing to go up? Is there something else going on besides that? Just more nickel and dime taxes on the ever increase.... that is all I am aware of.

**Air Quality & Green House Gas Emissions**

10 Again, air quality? green house gases? Seriously, when MONEY is on the developer's brain as well as the city council - I'm not surprised this is last on the list.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

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**Are you a U.S.  
Military veteran?**

**From:** Dianne Boyd  
**To:** [PCD\\_MHAEIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** HALA Response Letter copy.docx  
**Date:** Saturday, July 29, 2017 11:10:40 AM  
**Attachments:** [HALA Response Letter copy.docx](#)

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Please find the attached letter. Thank you

Sent from my iPad

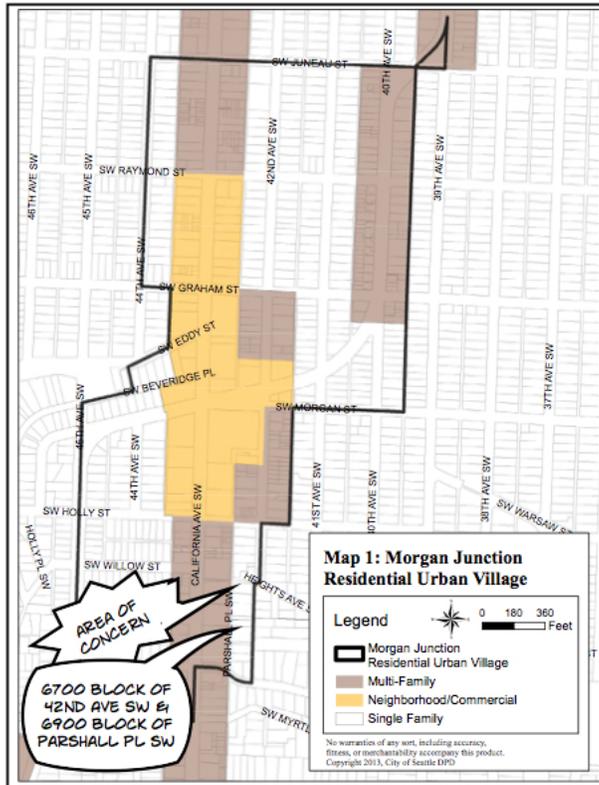
Dear City of Seattle Council Members:

My husband and I are writing to you regarding the HALA up zone plan for our neighborhood in the Morgan Junction of West Seattle. We will be carefully watching the positions that candidates for Mayor or City Council take on HALA (the grand bargain with developers) when we cast our votes in upcoming elections. While we support the need for affordable housing, we do not feel the current plans achieve this stated goal nor do they consider the impacts on existing neighborhoods and home owners who have lived in these neighborhoods for many years. We bought our home back in 1997. We chose our home and neighborhood because it was an older established neighborhood whose home owners had lived there for many years, in single family homes. It was a quiet street. Recently, developers have replaced single family homes with multi unit buildings exempt from providing parking. An example of this is the building at 6917 California Ave SW, a 30 unit building with no parking provided. The impact of this has resulted in those renters seeking street parking in the surrounding neighborhood. After work hours and on weekends the 6700 block of 42<sup>nd</sup> Ave SW, between Holly and Heights is filled with parked cars pushed up from California. The home owners our street often can't park in front of their own homes. The streets are so crowded that only one car can pass through, causing frustration as drivers have to back up to let each other pass before proceeding. This presents a safety concern with regards to emergency vehicles and impacts utility vehicles such as garbage and recycling trucks. Another safety concern is the lack of visibility in crossing the streets for pedestrians and drivers as it is hard to see around parked cars before stepping or driving across a street. With the HALA as it currently exists, we could potentially have 6 multi-unit structures built on our street. This will further impact parking as well as the privacy and quality of life we have historically had. The HALA doesn't really benefit anyone but the developers and they won't have to live with the impact. The fact that they can buy their way out does not ensure "affordability" for these new buildings, nor does the money from the buy out go back into the community, it goes into the city bank account. To be successful in creating affordable housing, developers should not have the option of a buy out. As you drive around West Seattle, there are new buildings going up all over. You see people standing on corners twirling "for lease" signs in front of these large structures, so why are we trying to create more. Why not work with developers to make the existing units more affordable before building more?? And, why not keep these large buildings along the main arteries where there is easy access to stores, restaurants and transportation. Why push up into family neighborhoods?

This letter is pinpointing our concern about one small area (6700 block), but we also have concerns about the impact to Morgan Junction as a whole. Our overall concern is one of too much density coming into a single family neighborhood and the fact that affordable housing in the HALA plan will yield too little compared to market housing. Seattle should do its part in providing affordable housing but it seems we are bearing the brunt of the zoning changes and costs both in financial terms and livability. **Below is a map** that identifies the areas of concern. We hope that you will work with neighborhoods to determine what is best for each neighborhood as opposed to a blanket approach imposed by the city. Our recommendation for our street, would be alternative one, no action. Thank you for your time and consideration in the matter.

Sincerely,

Dianne Boyd and Chris Harnish  
6733 42<sup>nd</sup> Ave SW, Seattle, WA 98136



Note: Design Review does not apply to all zones. See the Seattle Municipal Code, section 23.41.004 for more details. Additionally, zoning areas shown on this map are for general reference only. For confirmation of a specific property's zoning, contact the Department of Planning and Development.

**COMMENTS ON DRAFT EIS RE: MHA**

Boyd,Sugiki

**Overall Analysis**

DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3

**Community Feedback**

DEIS fails to take into account documented Junction neighborhood feedback.

**Lack of Affordable Housing**

DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.

**Neighborhood Plan**

DEIS reflects City's failure to honor neighborhood plan.

**Traffic**

DEIS analysis is flawed; Fails to utilize meaningful data.

**Green Space**

DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.

**Neighborhood Character**

DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.

**Loss of Light and Air**

DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings

**Loss of Views**

DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.

**Historic Buildings**

DEIS fails to recognize historic buildings in Junction.

**Public Safety**

DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.

**Utility Infrastructure**

DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.

**Schools**

DEIS fails to note existing lack of school capacity and impact of increased density thereon.

**Other**

I have other concerns regarding the DEIS including, but not limited to, the following:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Name: Boyd Sugiki  
Address: 3237 SW Genesee St.

**From:** Cindy Boyer  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA EIS comments  
**Date:** Monday, August 07, 2017 11:29:23 AM

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Alternative 3 would leave Crown Hill completely unrecognizable. The zoning changes are so extreme that it puts the entire neighborhood in jeopardy. There is no plan for light rail or improved infrastructure, so this plan runs the risk of creating a dense urban neighborhood with poor bus service, no light rail, no parking, no sidewalks and flooding. This is not a place where I would want to live. I would move and take my tax dollars with me.

Alternative 2 has less extreme zoning changes, but still runs the risk of creating a less desirable neighborhood if transit and infrastructure are not improved. I like that this alternative rezones the large properties at the center of Crown Hill from car-centric commercial to neighborhood commercial, which would provide the most new housing with the least impact to existing residents.

In Alternative 3, 20th Ave NW, north of 85th St is within the proposed expansion zone and in Alternative 2 the proposed expansion zone goes down the middle of the street. I would like to bring this street to your attention because it is completely unsuitable for increased density. The road is a 10 foot-wide, single lane, dead-end alley with no shoulder or sidewalks. Only one car can travel down the road at a time and it is the only access for properties on the west side of 20th Ave NW and the alley for properties on the west side of 19th Ave NW. All properties that use 20th Ave NW, north of 85th St should be excluded from both the Alternative 2 and 3 expansion zone. The Crown Hill Urban village boundary should go no further west than the middle of 19th Ave NW.

In my opinion, there is no need to expand the Crown Hill Urban Village. Keeping the urban village smaller and denser would focus development of large apartment buildings in the center of the village first rather than random town house development at the periphery. Rents in large apartment buildings are much more affordable than in townhouses. This would meet the goals of HALA by providing the most new affordable housing without losing affordable housing that already exists in Crown Hill.

Regards,  
Cynthia Boyer  
8734 20th Ave NW, Seattle

**From:** Julie Braybrooks  
**To:** [PCD\\_MHAEIS](#); [Brand, Jesseca](#); [Staley, Brennon](#); [Welch, Nicolas](#); [Wentlandt, Geoffrey](#); [Assefa, Samuel](#); [Herbold, Lisa](#); [Johnson, Rob](#); [Williams, Spencer](#); [Harrell, Bruce](#); [Sawant, Kshama](#); [Juarez, Debora](#); [O'Brien, Mike](#); [Bagshaw, Sally](#); [Burgess, Tim](#); [Gonzalez, Lorena](#)  
**Subject:** MHA Draft EIS comments  
**Date:** Friday, August 04, 2017 12:59:58 PM

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Dear Seattle Public Servants:

Thank you for your service!

I support the *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, submitted on behalf of the Madison-Miller Park Community.

Our neighborhood prefers Alternative 1 (with modifications as stated on the Madison-Miller Community Group August 2, 2017 map). We recommend that MHA (*Mandatory Housing Affordability*) **requirements be implemented into the existing zoning** in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (*Accessory Dwelling Unit*) and DADU's, (*Detached Accessory Dwelling Unit*) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units.

Other issues raised in the Madison-Miller Park Group document

1. **Housing and Socioeconomics:** Both the "Low Displacement Risk" and the "High Access to Opportunity" designations misrepresent our neighborhood and need further analysis and mitigation. **We are concerned about the displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents,** (a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.
2. **Transportation:** Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk.
3. **Transportation:** The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller

Park/Playfield.

4. **Open Space:** We have virtually no neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional playfield for league sports and summer sports camps and is not available for public or neighborhood use. This playfield will also be used as the sole recreational field for Meany Middle School starting this fall.
5. **Public Services:** Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded power lines are already compromised due to their age and condition. Garbage pickup on our historic and narrow streets creates traffic backups now, and additional volume of apartment buildings will increase that problem.
6. **Historic Resources:** MMRUV (*Madison Miller Residential Urban Village*) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS does not address the impact of losing this historic housing stock.

Thank you for your careful attention,  
Julie Braybrooks  
( 30 year resident Madison/Miller Neighborhood)

Sent from [Mail](#) for Windows 10

From: Jacki Bree  
To: [PCD\\_MHAEIS](#)  
Subject: Comments on DEIS  
Date: Monday, August 07, 2017 6:41:43 AM

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"In the end, Koehler said, 20 affordable housing units would be built by 2035 in the West Seattle Junction UV – with no action – while with alternative 2, it would be 42, and alternative 3, it would be 56. All that upzoning, for that little impact? one person observed."

1

I begin my comments with the line from the JUNO meeting because I have long wondered why, with the tremendous amount of building going on in West Seattle over the past 10-15 years, there are no affordable housing units already in place. In other words, how many of the developers agreed to include affordable housing in their apartment buildings or, to their financial advantage, paid an insignificant amount to a city fund to avoid that. and then charged exorbitant rental fees. How many apartment units have been built in West Seattle since 2005 and how many of those are affordable. I think we taxpayers ought to know.

2

One of my biggest concerns is parking and traffic. Single family neighborhoods are already becoming dense with street parking and apartments with little or no parking would only add to that density. As it is, many neighborhood streets are congested with desperate drivers overlapping corners and blocking curb ramps and through traffic. making passage through these areas difficult. This could only get worse with the addition of denser population and no light transit projected for many years to come.

3

Please redraw the Junction Urban Village boundaries back to the original UV plan.

Please redraw the Junction Urban Village boundaries to protect the character and integrity of single family areas as promulgated in the original neighborhood plan.

4

Please preserve our neighborhood plan that plans for growth, affordability, livability, and yet still preserves the small-town atmosphere that makes West Seattle an attractive place in which to live.

Thank you for your consideration,.

Sincerely,  
Jacki Bree  
Fairmount Park

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Jacki Bree

[nana@nosh.org](mailto:nana@nosh.org)



August 7, 2017

Office of Planning and Community Development  
Attn: MHA EIS  
PO Box 34019  
Seattle, WA 98124-4019

To Whom It May Concern,

Thank you for this opportunity to comment on the draft environmental impact statement (DEIS) for the citywide mandatory housing affordability (MHA) program. The Capitol Hill Renter Initiative is a grassroots group of 354 renters living on Capitol Hill, supported by staff from Capitol Hill Housing, committed to addressing our neighborhood and city's affordability challenges. Eighty percent of residents in our neighborhood rent their housing, but for too long renters have been left out of neighborhood decision making that affects our future. This exclusion is especially true for issues like land use policy and environmental review that are highly technical and time-intensive.

It is with this history in mind that our 31-member MHA working group reviewed the 462-page draft DEIS report. We provide the following comments on several aspects of the DEIS, including zoning alternative choices for our neighborhood, the zoning alternative philosophy citywide, the housing and socioeconomics analysis, and other areas where we feel the impacts analysis can be improved. We hope you will consider these comments when completing the final environmental impact statement (FEIS).

### **Zoning Alternatives in Capitol Hill and Adjacent Urban Villages**

Below we provide fine-grained feedback on zoning proposals for the urban villages where we live including Capitol Hill, Pike Pine, Madison-Miller, and 12<sup>th</sup> Avenue. This feedback reflects personal and collective knowledge of the intimate details of our neighborhood, which we hope will be of use in the EIS process.

- Capitol Hill Urban Village

For the Capitol Hill Urban Village, we generally prefer the zoning changes proposed in Alternative 2.

Alternative 2 is distinguished by a larger upzoned area, from lowrise to midrise, east of Broadway. This upzone would lead to a higher level of affordability requirements, M2, that would help preserve the economic diversity that we love about our neighborhood. Across the entire Capitol Hill-First Hill Urban Center, Alternative 2 would result in 1,267 new affordable units, rather than only 819 new affordable units under Alternative 3. Alternative 2 will also have the benefit of allowing more housing overall in the Capitol Hill Urban Village.

We believe that the area east of Broadway is an appropriate place for growth with access to light rail and frequent bus service, walkable streets with stores and services, and proximity to jobs in Downtown and South Lake Union. The urban village includes great schools from elementary (Lowell) to college (Seattle Central) and great community open spaces from Cal Anderson to our many new pocket parks. These are just some of the many factors that led the City to designate this urban village “high opportunity.”

Our neighborhood has ample experience with midrise as a zoning category and we like how it has performed west of Broadway. Contrary to the perception of some unfamiliar with midrise zoning, on Capitol Hill the area currently zoned midrise is notable for big beautiful trees and a human-scaled, granular development pattern. Midrise zoning allows for lots of apartment buildings for renters to live in and maximizes our building codes capacity for low cost wood frame construction that can contribute to affordability as acknowledged in the Housing and Socioeconomics section.

While the Capitol Hill Urban Village is designated as high displacement risk, the area being upzoned is relatively high income with a median income of \$63,419 (US Census Tract 75, ACS 2011-15). The higher displacement risk parts of the Capitol Hill Urban Village are already zoned midrise. Adding more capacity in the eastern portion of the neighborhood will help relieve development pressure on other parts of our neighborhood and the city, areas where the residents are more genuinely at high risk of displacement.

We are disappointed that the urban village boundaries cannot be extended further north to Volunteer Park and east to Madison-Miller. We believe this could allow for a more gradual step down in heights and greater economic and social integration of the wealthy mansion blocks immediately outside of the urban village boundaries. It could also give more people access to great amenities such as Volunteer Park, Interlaken, and Lowell and Stevens Elementary.

While we support the changes to midrise in Alternative 2, we also believe the city should accompany them with increased investments in quality of life in this area. Investments such as pocket parks, street trees, and walkability improvements will help the neighborhood accommodate the projected growth while mitigating the biological and open space impacts.

- Pike Pine Urban Village

Both Alternatives 2 and 3 generally treat Pike Pine the same. Our main concern for Pike Pine is in regard to the impact on the Pike Pine Conservation Overlay.

The Conservation Overlay has been a successful tool for accommodating growth while preserving and enhancing human-scale neighborhood character among pre-World War II commercial and mixed-use buildings. This success includes the retention of character structures as well as a unique set of zoning and design guidelines that incentivize smaller building footprints and storefronts. We believe that similar regulations could help mitigate concerns discussed in the historical resources section, especially regarding business corridors, not just on Capitol Hill, but around the city, such as the Ave.

Despite its success as a voluntary incentive program, the Overlay is at risk from the Mandatory Housing Affordability zoning changes. When the base zoning in most of the Pike Pine Urban Village moves from 65 feet to 75 feet, the value of an additional 10 feet of height will be reduced. Without other actions, in many cases the incentive will no longer be sufficient to cover the cost of character structure preservation.

We believe that a solution can be found that both preserves the effectiveness of the Overlay and incorporates MHA in Pike Pine. We hope that the City of Seattle will continue to work with the Pike Pine Urban Neighborhood Council's process to refine the base zoning and incentives in Pike Pine so that both programs can work effectively together. We also support proposed changes to building code requirements that would reduce the cost of construction at 85 feet by allowing 6 stories of type IIIA wood frame construction over two stories of type I concrete construction.

- 12<sup>th</sup> Avenue Urban Village

Alternatives 2 and 3 are almost identical for the 12<sup>th</sup> Avenue Urban Village. We believe both alternatives miss a valuable opportunity to increase heights and ground floor retail adjacent to the Madison Bus Rapid Transit Corridor.

In particular, we believe that M1 affordability requirements and zoning change from LR3 to NC3-75 would be most appropriate in the area south of Union Street between 13<sup>th</sup> and 14<sup>th</sup> Avenues, an already high foot traffic area with commercial uses on the north side of Union St. This area also includes property owned by non-profit affordable housing providers such as Capitol Hill Housing and the First AME Church Housing Corporation that could use the added development capacity to produce more affordable units. In addition to added housing capacity, NC3-75 zoning would allow these non-profits to provide affordable space for culturally relevant businesses and social service providers.

- Madison-Miller Urban Village

We are generally more supportive of the zoning changes proposed in Alternative 3 for the Madison-Miller Urban Village.

As identified in the DEIS, Madison-Miller is a very high opportunity Urban Village. It has great transit service to jobs in Downtown (bus routes 11 and 12), South Lake Union (8) and the U District (48). Madison-Miller is close to great schools (Meany, Stevens, St Joes, Holy Names), parks and open space (Miller Playfield, Volunteer Park, Interlaken, Washington Park Arboretum), and a fantastic community center. This neighborhood provides a welcoming home for many families with kids and the added

lowrise zoning will allow townhouses a more moderate-cost family housing option. As fewer households have large yards, the city should mitigate the loss of these play spaces by finding ways to slow traffic and create more play streets.

Madison-Miller is already home to several affordable housing properties that help keep this part of our neighborhood economically and racially diverse. These buildings are a great asset for our community because they protect their residents from the risk of displacement. Alternative 3 would result in 177 new affordable units rather than only 133 under Alternative 2, and far more than Alternative 1. This is true not only because increased development capacity will allow for more on-site performance of affordable housing, but also because it will create more zoning under which the Seattle Office of Housing can make cost-effective investments leveraging federal low income housing tax credits.

The arrival of new residents can spur concerns about insufficient parking. We believe that Madison-Miller deserves its own restricted parking zone (RPZ) to better manage on-street parking. We also hope that the Seattle Department of Transportation will continue to look at reforms to the RPZ system that address oversubscription, which can make the zones ineffective.

Finally, we do not support the M2 changes from single family to LR3 just east of Miller Park. We believe an M1 change to LR2 would be more appropriate given the location adjacent to the edge of the urban village. We are disappointed that an urban village boundary expansion is not being considered for the areas immediately north, west, and south.

- **Beyond the Existing Urban Village Boundaries**

While we understand that none of the urban villages in our neighborhood is being considered for boundary expansion, we believe this is a mistake. The current boundaries, in light of the many changes since 1994, today feel restrictive, arbitrary and unfair in many cases. The boundaries create donut holes between our urban villages and leave out some of the wealthiest areas most equipped to accommodate growth without risk of displacement. In the long run, we hope the City will consider including upzones and mandatory housing affordability in these areas. If more areas had been included in the current process, the same housing production goals could have been accommodated with more modest changes within the existing urban village boundaries.

### **Zoning Alternatives Citywide**

We generally prefer the zoning changes suggested in Alternative 3. We state this preference acknowledging that we prefer Alternative 2 for the Capitol Hill Urban Village itself, which we believe is somewhat miscategorized as high displacement risk, especially in the portion of the urban village designated for larger zoning changes. Even if the DEIS displacement analysis does not show that increased development results in increased displacement, we still think it is safer to focus more growth in areas with lower risk of displacement. Our one overriding disagreement with the Alternative 3 framework relates to the urban village boundary expansions. We believe that such boundary expansions are an unmitigated good and that the maximum boundary expansions, with zoning changes to at least residential small lot, should be included in the Preferred Alternative of the FEIS.

## Greenhouse Gas Emissions and Climate Impacts

We believe that the DEIS understates the climate change benefits of Alternatives 2 and 3 relative to Alternative 1. As the analysis notes on page 448:

“While the variation among the alternatives’ projected emissions in Seattle is minor, the same amount of growth in other jurisdictions in the area would result in very different results.... VMT per population/job is nearly 55 percent higher outside of Seattle [] than inside Seattle. This suggests that the same amount of development outside Seattle would result in substantially higher emissions since 2035 fuel economy would remain equivalent across jurisdictions.”

We expect that vehicle miles traveled (VMT) per person and job is even lower in Seattle’s urban villages, where MHA will add the most capacity, than in the rest of the city. Furthermore, we know that in some cases, added density in urban villages can lead, not just to relatively fewer emissions, but also to absolute reductions in transportation emissions, as frequent transit service becomes more viable and more goods and services locate within walking and biking distance of more people.

Seattle enjoys similar climate benefits with regards to energy use in buildings relative to our suburban neighbors. The additional multi-family buildings allowed through MHA, by their geometry, have a lower surface area to volume ratio than suburban single family homes, making them easier to insulate, heat, and cool. People living closer together are also more likely to share resources, reducing greenhouse gas emissions from consumer goods. Overall, the FEIS should better reflect the full climate change benefits of citywide MHA.

## Housing and Socioeconomics

Of all the issues addressed in the Affected Environment, Significant Impacts, and Mitigation Measures section of the DEIS, we believe the Housing and Socioeconomics analysis is the most important and deserves special attention in our comments. MHA should be designed to maximize affordability and minimize displacement. The DEIS analysis can help the City determine the best Preferred Alternative for achieving these goals. We believe there are several areas in which this analysis could be significantly improved.

- Getting the Subsidized Affordable Housing Data Right

This section conducts a regression of housing production relative to loss of low income households and finds that increased production in a neighborhood reduces the loss in that neighborhood. However, as noted in the analysis, the DEIS lacks comprehensive, comparable data on subsidized affordable housing (page 150). The inadequacy of data on affordable housing investments and lack of adjustments for the impacts of those investments undermines the credibility of the connection between housing production and preventing displacement. For example, South Lake Union is highlighted as an example of a neighborhood that both produced large quantities of new housing and increased the number of low income households (page 153). This ignores the massive investments in affordable housing made in South Lake Union by the Office of Housing over the last decade to achieve this outcome. Not only will including subsidized affordable housing data make the analysis more credible, it will also make the

analysis more relevant to MHA. The true question the DEIS should be asking is what will the impacts be of increased housing development *and* increased investment in subsidized housing.

The Federal Department of Housing and Urban Development (HUD) data that was used (<https://www.huduser.gov/portal/datasets/assthsg.html>) does not include low income housing tax credit (LIHTC) funded projects unless the LIHTC projects also received direct HUD subsidies (page 150). To correct this, the FEIS should, at a minimum, include HUD's LIHTC database as well (<https://www.huduser.gov/portal/datasets/lihtc.html>). Addresses should be tracked in each dataset to prevent double counting of projects with both LIHTC and direct HUD funding. Preferably, these HUD data sources should be replaced by more comprehensive Seattle Office of Housing data that are already available and presented for 2016. MFTE units, which do not receive either HUD or LIHTC funding, should also be included. Additionally, Hope VI sites should be excluded from the regression analysis. Many of the outliers in the regression analysis appear to be Hope VI sites that have unique affordability and development trajectories during the study period.

- Addressing Race and Racial Displacement

The displacement analysis also fails to look at displacement by race. Racial displacement, regardless of the connection to income, should be a concern for the City given the history of racially biased land use policy in Seattle and the US generally. People of color have too often been displaced and excluded from many parts of our city, including Capitol Hill. Furthermore, race, unlike income, does not change for a person over time. A neighborhood can lose low income households because previously low income people achieved greater economic success. In contrast, the loss of a particular racial group can mean only the loss of people from that group. An analysis of racial displacement should be added to the FEIS.

- The Displacement Risk Index and Double Counting

Much of the DEIS displacement analysis relies on the Displacement Risk Index. The Displacement Risk Index, developed for the Seattle 2035 Comprehensive Plan update, assumes that neighborhoods with more zoning capacity for new housing are at greater risk. The DEIS then finds that more zoning capacity does not increase displacement risk, while simultaneously relying on an index with a contradictory assumption. This leads to circular conclusions such as the finding that higher displacement risk urban villages are more likely to experience more development (page 149). They are more likely to experience more development because development capacity is part of the criteria for being high displacement risk. While we do not believe that the FEIS should be required to develop a new displacement risk index, we do think it should acknowledge the inherent contradiction in assumptions. Eventually, the displacement risk index should be updated to be agnostic regarding the displacement impacts of zoning.

We appreciate that the displacement analysis was conducted separately for the different urban villages by the displacement risk and opportunity access categories. However, the DEIS should look at the displacement risk of these urban villages at the beginning of the study period, in 2000, not today. These urban villages are categorized as high displacement risk today in part because they have more low income people. It is therefore not surprising that low income people were more likely to move to these urban villages over the past 10 years. Again, this logic is circular and undermines the credibility of the

findings. While a new displacement risk index for the year 2000 should also be outside the scope of the FEIS, the causation problems in this analysis should at least be acknowledged. (page 155)

- The Benefits of a Coordinated Citywide Upzone

The citywide MHA process is unique in Seattle's recent history. It has been a long time since Seattle has made zoning changes that affect so many parts of the city. Instead, Seattle has tended to upzone individual neighborhoods one-at-a-time. Some of the most consistent findings connecting increased development capacity to lower housing prices, referenced in the appendices, are based on findings at the regional level. When an individual neighborhood receives an upzone, the regional capacity implications are generally small and the benefits of increased supply are less likely to be felt. Instead, the main effects come from the increase in new housing, which is generally more expensive. By changing this pattern and upzoning citywide, the benefits of the regional increase in housing capacity are likely to be more tangible. The FEIS should take this benefit into account and distinguish between the affordability and displacement impacts of changes in one neighborhood and the impacts of simultaneous changes in many neighborhoods.

This distinction can be seen in the impact on land values. The DEIS notes that upzoning a particular parcel can increase that parcel's land value (though also decrease the land costs per housing unit). What the DEIS does not acknowledge is that upzoning many parcels at one time can diminish the increase in land value of each individual parcel by making the increase less rare. A broad citywide upzone, therefore, is likely to increase land values less than a small neighborhood upzone. (page 162)

- Types of Buildings

We appreciate that the DEIS acknowledges that certain construction types are more expensive than others and estimates which alternatives will allow more construction of each type by looking at the capacity within zoning categories. Alternatives 2 and 3 allow significantly more development of low cost wood frame construction in residential small lot and lowrise zones, a component of these alternatives that should contribute to affordability. This analysis would benefit from breaking apart midrise and highrise capacity. While both require construction costs higher than lowrise projects, midrise construction is still mostly wood frame, while highrise construction is entirely concrete and steel. (pages 160-163)

- Tenant Relocation Assistance

As renters, we know the burden of being forced to move. As rents go up on Capitol Hill, many of us are on the brink of being priced out of the neighborhood. The tenant relocation assistance data shows the limitations of the Tenant Relocation Assistance Ordinance (TRAO) and indicates the greater need to address economic displacement. Only 698 households were eligible for assistance between 2013 and 2016 (page 145). The increased development under Alternatives 2 and 3 is expected to result in, at maximum, 76 additional households displaced by demolition (page 172). Partially, this data reflects the unfairly strict income and household thresholds of the TRAO. However, this data also reflects the small scale of direct displacement from demolition relative to economic displacement. Economic

displacement appears to be much more widespread with fewer remedies. Low income households experiencing economic displacement deserve access to relocation assistance as well as more focus in the DEIS.

Direct displacement from demolition and economic displacement are also distinguished by where people go after they are displaced. Demolition or renovation does not inherently imply that a household can no longer find housing in that neighborhood. In contrast, when a household must move because of rent increases, other rents in that neighborhood are also likely to have increased, resulting in displacement not just from a particular unit, but from an entire area of the city. Unfortunately, the DEIS displacement analysis acknowledges that it does not look at where people go after they are displaced, an important component of fully understanding the problem.

- Regional Data and More Recent Data

The economic displacement analysis compares the City of Seattle to the Rest of King County. A comparison to the metropolitan region would be more appropriate. Anecdotally, we hear that middle and working class people are getting pushed out of all of King County and moving increasingly to Pierce, Snohomish, and Kitsap Counties. Looking at household data at this regional scale would provide a better understanding of where lower income households are going when they leave Seattle. (page 148)

The data comparison in this section is for 2000 to 2009-2013 (effectively 2011). This period is one of remarkable stability in rental housing cost relative to the following period 2011-16, when rents spiked upwards. More recent data, such as the 2011-15 American Community Survey and city and county-wide data from the 2015 American Community Survey would be more relevant to our current affordability challenges. (pages 148-151)

## **Conclusion**

Seattle's affordable housing crisis requires rapid responses including speedy implementation of citywide mandatory housing affordability. Our comments are not intended to delay the DEIS process. In fact, we have taken care to identify several of our criticisms as beyond the scope of the EIS in order to prevent unnecessary delays. We hope that our comments on the DEIS will help inform an effective FEIS and Preferred Alternative, as well as future thinking about how we analyze the impacts of land use decisions in our city. We look forward to engaging with the remaining final steps towards implementation.

Sincerely,

The Capitol Hill Renter Initiative

**From:** [Wentlandt, Geoffrey](#)  
**To:** [Peggy Cahill](#)  
**Cc:** [PCD\\_MHAEIS](#)  
**Subject:** RE: COMMENTS ON HALA RECOMMENDATIONS IN THE VICINITY OF 20th and 21st BETWEEN MERCER AND ROY  
**Date:** Thursday, June 29, 2017 3:12:08 PM  
**Attachments:** [2017\\_06\\_28\\_Bricklin\\_to\\_Planning\\_and\\_Community\\_Development.pdf](#)  
[image002.jpg](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Peggy,

Thank you for these comments. We are carefully considering them.

Sincerely,

Geoffrey Wentlandt AICP LEED ap  
Strategic Advisor  
City of Seattle Office of Planning & Community Development  
P.O. Box 34019, Seattle, WA 98124-4019  
O: 206.684.3586 | [Geoffrey.Wentlandt@seattle.gov](mailto:Geoffrey.Wentlandt@seattle.gov)



---

**From:** Peggy Cahill [mailto:cahill@bnd-law.com]  
**Sent:** Thursday, June 29, 2017 8:51 AM  
**To:** Wentlandt, Geoffrey <Geoffrey.Wentlandt@seattle.gov>  
**Subject:** COMMENTS ON HALA RECOMMENDATIONS IN THE VICINITY OF 20th and 21st BETWEEN MERCER AND ROY

Dear Mr. Wentlandt:

Attached please find a letter from David Bricklin to you regarding the above-referenced matter.

Thank you for your attention to this matter.



Peggy S. Cahill  
Legal Assistant  
Bricklin & Newman, LLP  
1424 Fourth Avenue

Suite 500  
Seattle WA 98101

ph.: 206.264.8600  
fax: 206.264.9300

Spokane Office:  
25 West Main  
Suite 234  
Spokane, WA 99201

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BRICKLIN & NEWMAN LLP  
lawyers working for the environment

Reply to: Seattle Office

June 28, 2017

**Office of Planning and Community Development**

PO Box 34019  
Seattle, WA 98124-4019

Re: *Attn: MHA Draft Environmental Impact Statement (DEIS) Comments*

Dear Planning and Community Development Staff:

I represent a group of homeowners at the northeast corner of the Madison-Miller Residential Urban Village, who have concerns about the proposed rezoning of their properties. My clients understand the need for more affordable housing and the premise behind the Grand Bargain that requires increased density. They support increasing density on their blocks to allow for the lowest tier of multi-family zoning. I sent a letter detailing their concerns, including their proposed revisions to the zoning maps to the HALA website, City Council, the Mayor, and City staff in May. Those comments are attached and incorporated herein by reference.

We have reviewed the DEIS for the MHA proposal and generally find that, overall, the analysis adequately discloses the impacts. Potential impacts not addressed in the DEIS are discussed below. The DEIS identifies significant adverse impacts for both Alternative 2 and 3, highlighted below, for which the analysis of proposed mitigation is insufficient, vague, unmeasurable, and speculative. This is of particular concern for Alternative 3 given the significantly greater impacts of this alternative compared to Alternative 2 to the homeowners I represent. A brief description of the Madison-Miller area and the block of greatest interest to my clients is below, followed by a discussion of concerns related to impacts and mitigation on specific topics.

**Madison-Miller**

Homes in the Madison-Miller area are relatively small compared to “Millionaire Row” and areas north of Aloha, and many remain intact, providing a consistent representation of the early 20<sup>th</sup> Century architectural period (see attached). Net density of the area of greatest interest to my clients is approximately 17 units per acre, or 10.5 units per acre gross density when including everything except the public roadway between the curbs. The area already supports a variety of housing types, including duplexes and triplexes in older homes that are consistent with the area’s architectural character. Madison-Miller Urban Village has already seen a lot of new units added, with 778 housing units built ~~in the~~ between 2005 and 2016, and, as of January 9, 2017, 681 housing units

**Office of Planning and Community Development**

June 28, 2017

Page 2

are either permitted or under review. The area has numerous subsidized units which fit into the character of the community in form and scale.

In our previous letter, my client proposed that the area depicted on Figure 1, bounded by the west side of 20<sup>th</sup> Avenue E, the west side of 21<sup>st</sup> Avenue East, the south side of Mercer Street, and the south side of Roy Street be rezoned not to LR1 and LR2 as currently proposed, but to Residential Small Lot (RSL). Alternative 2 in the Draft EIS is consistent with that proposal. A key aspect of this proposal was the inclusion of design guidelines and a design review process that is effective at addressing form, bulk and design issues to a far greater extent than the current process.

RSL is characterized as “multiple bedroom family-sized homes”, “near existing single-family zones and edges of urban villages”, and “similar in scale to single-family homes.” *See Example Housing Options*, City of Seattle, 2016. My clients’ area fits this description. They are at the very northeast corner of the Residential Urban Village, adjacent to and of the same character as single-family zones to the north and east.

Given its location at the edge of the urban village and adjacent to single family zones, this area would appropriately serve as a transition between the single family and the multifamily areas. There are two nearby public schools; Stevens Elementary at the very north end of 19<sup>th</sup> Avenue E. by Interlaken Park, and Meany Middle School, reopening in Fall of 2017. With close proximity to schools and parks, this area should provide for family-sized housing rather than smaller apartments. RSL also provides for more open space on lots, which is important for families with children. In addition, Miller Park facilities are already heavily utilized and will become more crowded with the reopening of Meany Middle School.

**Draft EIS Alternatives**

My clients feel that Alternative 2 best represents the comments and proposal they submitted previously. In addition, Alternative 2 generates slightly more housing, jobs, and affordable housing than Alternative 3. While Alternative 3 distributes the growth differently based on displacement potential and opportunity areas, the location of future affordable housing within this or any particular neighborhood is highly speculative. Developers will not easily assemble multiple properties, and, therefore, the area would be more likely to see numerous smaller townhome and apartment developments that would be too small to economically include the affordable units. Instead, developers are much more likely to pay the fee, especially in an area that has high property values and currently supports high rents. The document further explains that the City’s ability to provide affordable units is opportunistic based on property availability and cost. In addition, the Draft EIS notes that the increase in units for each unit demolished greatly offsets the displacement and identifies specific and measurable mitigation for displacement. Therefore, the allocation of growth in Alternative 2, which better reflects existing character of the affected neighborhoods, including Madison-Miller, while providing more units than Alternative 3 is the preferred approach. Furthermore, increasing the zoning in an area with already high property values may further increase the value of some properties, impeding the ability of the City and other non-profit housing providers to purchase property in the area.

**Office of Planning and Community Development**

June 28, 2017

Page 3

Alternatively, the City could adopt Alternative 2 for all the areas with the exception of those identified as High Displacement Risk and Low Access to Opportunity. By adopting Alternative 3 for the High Displacement Risk and Low Access to Opportunity, that area would have reduced displacement and only decrease the total housing unit increase compared to adopting Alternative 2 throughout, by 620 units. Given all alternatives meet the projected demand and the decrease in affordable units would be a small percentage of this number, such a hybrid approach may make sense.

We also note that other urban villages categorized as Low Displacement Risk and High Access to Opportunity have smaller percentage increases in units than Madison-Miller. For example, West Seattle Junction and Ballard are both hubs and identified as locations for future light rail extensions. Roosevelt currently has a light rail station under construction. These areas are proposed for 10 – 30% less growth than Madison-Miller which does not have direct light rail access. These areas also already provide for a greater mix of uses with existing commercial development, including easy access to larger grocery stores, than most of Madison-Miller, particularly the north end.

**Design Review**

Design review is cited as mitigation throughout the Draft EIS. As noted below, design review is not sufficient mitigation, especially given the current proposal that exempts almost all development within urban villages from formal design review unless the project is directly adjacent to single family zoning or is a large property. Formal design review, at a minimum, should apply when it is adjacent to a single-family use or on a block where single family use predominates. In addition, the changes give the authority for setting guideline priorities to the Board/Director rather than the neighborhood, and relies on an undefined public outreach plan, to which compliance is also undefined. No justification is provided for exempting urban villages from design review, and relying on it as mitigation seems disingenuous.

The DEIS fails to describe the limited benefit of design review. Deficiencies in the current system are referenced in our earlier letter. The DEIS is misleading, at best, when it states that design review is used to protect private views and that it effectively addresses the aesthetic impacts created by new development that looks nothing like its surroundings. The DEIS says that the design review process “considers” various issues, but there is no effective mandate to the boards or staff to assure that discordant designs are avoided. Experience with the existing program demonstrates there is a large gap between the program’s ostensible aims and its results. None of this is acknowledged in the DEIS. The DEIS is misleading in suggesting that the program in its current form will provide effective mitigation for any of the alternatives.

**Historic Resources**

The Draft EIS notes the potential for development to indirectly impact the setting of historic areas and the historic fabric of neighborhoods. While not a formal historic district, no context statement has been prepared for this area. This area is the edge of what was known as “Catholic Hill,” where in the early 1900’s Catholic families located, drawn by the large Catholic churches and schools

**Office of Planning and Community Development**

June 28, 2017

Page 4

built at that time, including Holy Names Academy and St. Joseph's Church and School (a City of Seattle Landmark). The block bordered by East 20th, East 21st, Roy Street, and Mercer Street forms one corner of what is an intact frame around Holy Names. While not a designated landmark, Holy Names Academy, built in 1908, is the oldest continuously-operating school in Washington State, and it is a major piece of Seattle architecture. Designed by C. Albert Breitung, architect of numerous historic buildings in Seattle, much of its impact and grandeur arises from its setting in a neighborhood of one- and two-story homes all built within the same short period of time. Modern multi-family buildings allowed by the proposed zoning would irrevocably destroy its setting.

Alternative 3 would have the potential for more change to historic character. The Draft EIS discloses that Madison-Miller is one of the two oldest urban villages that would have over 50% growth increase with Alternative 3. The proposed mitigation is vague. Mitigation consists of policies in the comprehensive plan regarding consistency of new development with existing setting. Most developments, even in LR1 or LR2, would be under thresholds and not subject to formal design review. RSL as proposed in Alternative 2 would provide the opportunity for increased density with less destruction of existing historic era housing. For example, as shown in Figure 2, RSL would allow existing homes to be subdivided into multiple units that maintain architectural character. In contrast, LR1 and LR2 would encourage the demolition of these homes that represent craftsmanship that we no longer see today.

**Aesthetics**

Exhibit 3.3-14 and 15 of the Aesthetics section depict an example of Alternative 3 in existing single family, reflecting a significant adverse impact. Comparable examples for Alternative 2 also have aesthetic impacts, but to a lesser degree than Alternative 3. Exhibits 3.3-14 and 15 show a dramatic change in character even though they minimize the true effect of Alternative 3 on Madison-Miller, because the added units are shown adjacent to much bulkier structures than currently allowed within the single-family areas. The proposed mitigation is vague and inadequate. "Privacy Standards" would "address the placement of windows", but this is vague and does not address overall aesthetics. Upper level setbacks and side modulation provide negligible relief from a dramatic increase in bulk adjacent to one and two story homes with pitched roofs and large windows, and already small side setbacks. The Draft EIS notes this is a "substantial" change, but indicates this change is not a problem due to the "urban context of a rapidly growing city." What must be remembered at the same time is that the massive increase in units is not needed to accommodate growth. Existing zoning provides the necessary capacity. This proposal is intended to address affordability, but there is no evidence that bad, incompatible design is the price we must pay for affordability. The DEIS leads decision-makers and the public in the wrong direction by masking the aesthetic consequences of allowing the higher density without a concomitant improvement in design criteria.

Modifications to design review and "Other Potential Mitigation Measures" are not in effect nor are they a required mitigation or guaranteed to occur. Instead, the Draft EIS provides language such as, "for example, design review could include. . ." Under the current requirements and the proposal, many of the developments would be below the threshold for formal design review and

**Office of Planning and Community Development**

June 28, 2017

Page 5

do not require SEPA review. Therefore, the conclusion in Section 3-3 that “aesthetic impacts should be reduced to less than significant levels,” is incorrect.

**Parks and Open Space**

As described in the Draft EIS, Madison-Miller currently has approximate 0.16 acres of open space per 100 residents (1.6 acres per 1000 residents). That is already an inadequate number, below the Parks Plan standard of 9.34 acres per 1000 residents. Alternatives 2 and 3 decrease Madison-Miller parks and open space level of service to 1.2 and 1.1 acres per 1000 people, respectively. While Madison-Miller is not identified as having a gap, the open space per 1000 people is low compared to most other urban villages. In addition, much of the park space in the village is associated with Meany Middle School, which will reopen in the fall of 2017. Because it will be a fully utilized public school, access to park facilities is more limited than a standalone park or community center. Again, mitigation is not provided, only alluded to as potentially addressed under future City planning and analysis efforts. Given the lot sizes in the area, it is unlikely that developers will be incentivized to provide open space within their projects, which would primarily be small apartment complexes and townhomes. The DEIS fails to adequately disclose the project’s negative impact on park usage and open space.

**Public Services**

The Draft EIS notes the potential for increased impacts in areas with informal stormwater drainage. The Madison-Miller area currently has flooded street intersections and alleys that will be exacerbated by dramatic increases in impervious surface, which will be worse with Alternative 3. Because the alleys are not maintained by the city, residents will be forced to address the flooding in whatever means they can rather than holistically.

Garbage, recycling, and compost pick up is not discussed in the Draft EIS. However, given the small lots and extremely narrow alleys that do not allow for garbage truck access, collection for larger buildings will be forced to the street edge, creating unsightly and unhealthy dumpsters adjacent to single family homes, blocking traffic and parking, and obscuring sightlines. These are significant adverse impacts which should have been disclosed in the DEIS and mitigation considered.

**Parking**

The Draft EIS identifies significant parking impacts for Alternatives 2 and 3. For Madison-Miller, impacts would be more severe under Alternative 3. Our streets are inadequate for current commercial, educational, institutional and residential parking needs. No off-street parking is required for new development. The residents of the new apartments have not been discouraged from owning cars. My clients regularly witness many of the new apartment residents parking on the adjacent single family residential streets, which is the only parking for those single-family residents (many of whom are in single-car households and use transit frequently). In addition, people primarily drive to the restaurants, yoga studio, and other businesses. The new Meany Middle School opens soon, and it has inadequate on-site parking for faculty, staff and volunteers.

**Office of Planning and Community Development**

June 28, 2017

Page 6

Providing incentives for reduced single occupancy vehicle use, reducing parking requirements in new developments, and increasing transit is not sufficient mitigation. These measures may reduce traffic, but they will not reduce parking demand. New residents in the area will continue to own cars and park car share vehicles. The EIS should disclose this adverse impact and discuss possible mitigation measures.

**Conclusion**

As stated in the Draft EIS, MHA will not provide enough affordable units while the rezoning will substantially exceed the projected growth demand, indicating the need for other solutions. The Draft EIS notes that the increased capacity provided by zoning changes to support the additional costs borne by developers and states it is unclear whether additional costs will be borne by developers or passed along to users. Market and economic forces are such that developers will not bear any additional costs and are more likely to benefit financially. The recent decision by developers with approved projects to give up their permits, redesign their projects, and resubmit for permits under the new zoning that has already passed in other areas is proof that MHA is a boon for them, with the costs, economic and otherwise, borne by existing residents. Nevertheless, my clients support the development of more affordable housing and would welcome more affordable units in the neighborhood if they are at an appropriate scale and consistent with the character of the neighborhood. We appreciate the immense effort that has gone into trying to solve what is a real problem. We look forward to reviewing the Final EIS and proposed legislation.

Very truly yours,

BRICKLIN & NEWMAN, LLP



David A. Bricklin

DAB:psc

# Madison–Miller Residential Urban Village

## DRAFT ZONING CHANGES to implement Mandatory Housing Affordability (MHA)

Bricklin, David

HALA.Consider.it Interactive web map seattle.gov/HALA October 19, 2016

### proposed zoning

white labels identify changes:

existing zone | draft MHA zone

Solid areas have a typical increase in zoning (usually one story)

Hatched areas have a larger increase in zoning or a change in zone type.

### MHA requirements

vary based on scale of zoning change (residential proposal shown)

(M) 7% of homes must be affordable or a payment of \$20.75 per sq. ft

(M1) 10% of homes must be affordable or a payment of \$29.75 per sq. ft

(M2) 11% of homes must be affordable or a payment of \$32.75 per sq. ft

### zone categories

follow the links below to see examples of how buildings could look under MHA

**Residential Small Lot (RSL)**  
cottages, townhouses, duplexes/triplexes similar in scale to single family zones

**Lowrise (LR)**  
townhouses, rowhouses, or apartments

**Lowrise 1 (LR1)** max height 30 ft.  
**Lowrise 2 (LR2)** max height 40 ft.  
**Lowrise 3 (LR3)** max height 50 ft.

**Midrise (MR)**  
apartments with 7-8 stories

**Highrise (HR)**  
apartments with heights of 240-300 ft.

**Seattle Mixed (SM)**  
buildings with a mix of offices, retail, and homes

**Neighborhood Commercial (NC)**  
mixed-use buildings with 4-9 stories

**Commercial (C)**  
auto-oriented commercial buildings

**Industrial Commercial (IC)**  
MHA applies only to commercial uses

### urban villages

areas designated for growth in our Comprehensive Plan

Existing boundary

Proposed boundary

Seattle 2035 10-minute walkshed

Open space

Public school

Light rail

Bus stop

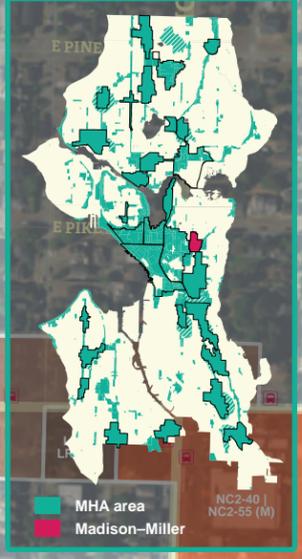
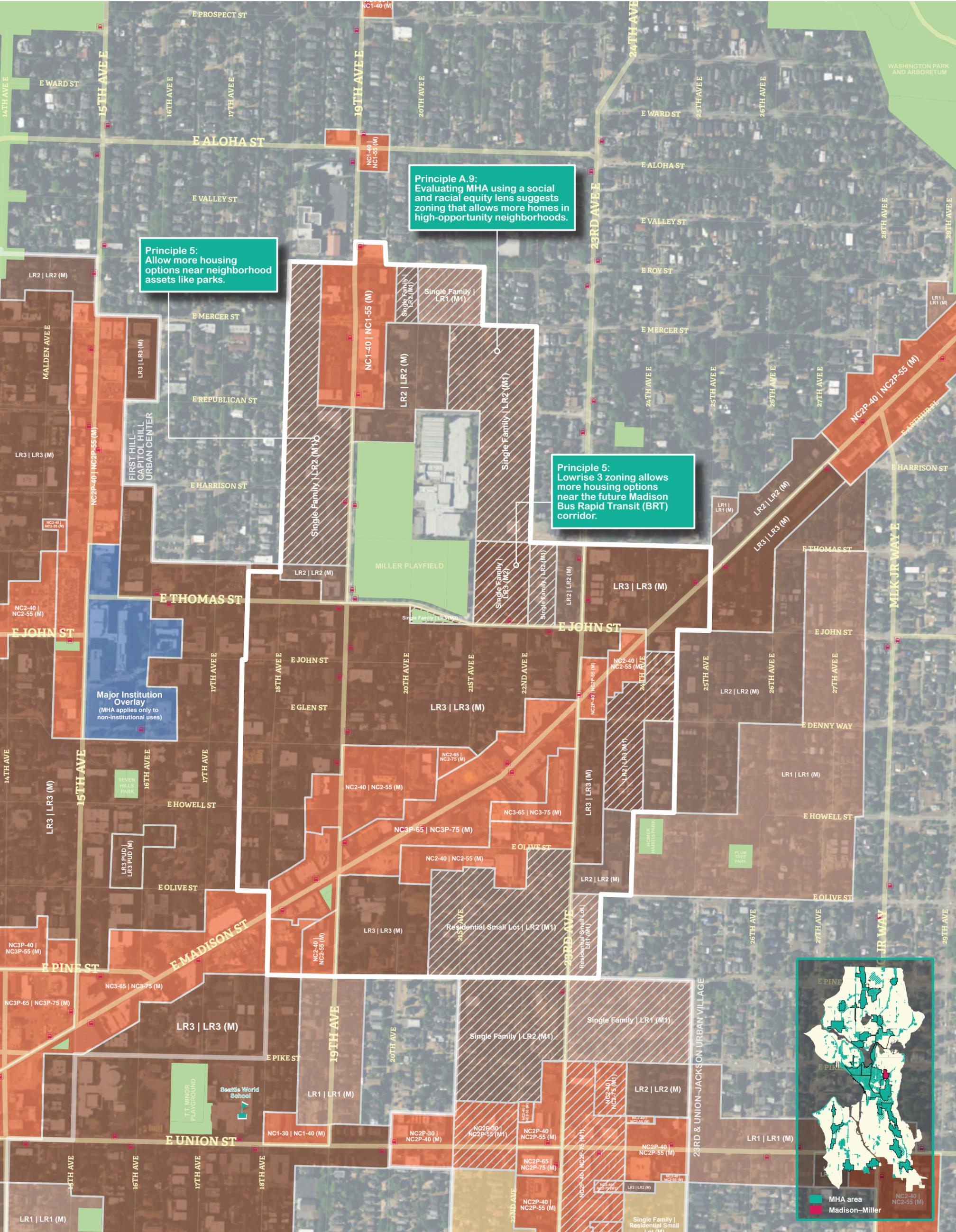




Figure 2: Subdivision of existing single-family homes consistent with architectural character

<b>Name</b>	Kyle Brooks
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 We need to reduce restrictions in high-income neighborhoods like Montlake and Queen Anne
<b>Aesthetics</b>	2 Big buildings are pretty. Cars are ugly.
<b>Transportation</b>	3 Please eliminate street parking on Aurora Ave N and allow for full-time bus-only lanes
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you resided in the city of Seattle? (total number of years)</b>	

**Do you work in  
Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person with  
a disability?**

**Are you a U.S. Military  
veteran?**

<b>Name</b>	Cynthia Brothers
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 Please extend the comment period to end of August to allow more time for the public to digest the info and provide comment, and for additional needed analyses.</p>
<b>Housing and Socioeconomics</b>	<p>2 I believe the displacement analysis &amp; methodology is incomplete, misleading and inaccurate and requires further consideration. Increasing development capacity and encouraging market rate development in high displacement risk areas is NOT an effective anti-displacement strategy- it will cause more displacement. This analysis failed to consider racial dimensions of displacement by using low income households as a proxy for race . There also needs to be a consideration for indirect and economic, not just physical displacement. The number of households living in units subsidized through non-HUD programs, such as projects developed with funding from the Office of Housing, was not accounted for and likely skewed the analysis of the changes in the number of low-income households in areas with more housing production. The analysis is deficient in that it did not include the last 5 years of growth. The analysis also failed to measure increased speculative activity in high growth areas, like rapid turnover and increases of sales and resales of existing older affordable apartments - and how that might increase due to upzones.</p> <p>3 I urge the city to conduct additional analysis that includes examining how different race and ethnic groups might be impacted differently by the three alternatives proposed in the DEIS; and whether the action alternatives introduce a new trend or accelerate a existing trends that displace vulnerable populations to the extent that the socioeconomic character of a neighborhood would change; and whether there is a pattern or potential for different racial groups to be displaced at different rates and/or do they resist displacement with different degrees of success. I also urge the city to extend the comment period to end of August in order to complete additional analysis &amp; give the public more time to digest the info and comment.</p>
<b>Aesthetics</b>	<p>4 Preserve existing livable and affordable housing stock.</p>
<b>Transportation</b>	<p>5 Transit Oriented Development needs to include a racial justice and anti-displacement analysis and measures.</p>
<b>Historic Resources</b>	<p>6 More resources for preservation of historic buildings and landmarks, especially for community use.</p>
<b>Open Space &amp; Recreation</b>	<p>7 More green space for high displacement risk areas that are meant for the health of elders, children &amp; existing</p>

residents...NOT more dog parks.

<b>Name</b>	Scott Brown
<b>Email address</b>	
<p><b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b></p>	<p>3200 Block of NW Market St</p>
<b>Comment Form</b>	
<p><b>Description of the Proposed Action and Alternatives</b></p>	<p>1 Upzoning the 10 single family lots on the 3200 block of NW Market St to low rise multifamily should be included in all Alternatives, not just Alternative 3, because it is a uniquely win-win opportunity for the city and our community:</p> <ul style="list-style-type: none"> <li>* Upzoning these lots rectifies Inequitable property rights and Social Inequality on our block where we ten single family homes are surrounded on three sides by 26 LR-1 townhomes, 19 LR-1 duplexes and triplexes, 33 LR-2 apartments, and one NC-1 senior center. These ten homeowners originally had the same property rights as the rest of the block, but those rights were taken away in an unfair downzoning of just these ten lots around 1990.</li> <li>* Upzoning these lots supports Economic Opportunity and Security through additional density immediately adjacent to the Ballard Urban Village. Our block ends on the western boundary of the BUV.</li> <li>* Upzoning these lots supports Environmental Stewardship by providing additional housing next to the high volume bus routes that stop at the end of our block, including the 44, 17E and others.</li> <li>* Upzoning these lots reinforces the multifamily Community that exists on our block and immediately next to us in the BUV, the Ballard Community Center, the Ballard Locks, and the Burke-Gilman Trail.</li> </ul> <p>We propose to HALA to recommend a rezone of our 10 single family to multifamily to provide equitable property rights with the rest of the block for owners and provide additional housing for the city at no taxpayer cost. This is one of those rare occasions when two serious problems connect with a near-perfect win-win solution. There are a few homeowners that are on the next block up the hill that oppose this because we are currently a buffer for their view down and across lower Ballard, but the vast majority who actually live and own on our block support it, and the city needs the housing. Our block was</p>

originally zoned consistently multifamily, but a homeowner on the next block just up the hill worked within the city government to have just these 10 homes down-zoned, to protect his views. There is a copy of the original zoning as of 1980, found by Owen Pickford of The Urbanist in his article on the opportunity we have on this block:

<https://www.theurbanist.org/2017/06/07/predictable-disagreement-and-surprising-agreement-where-single-family-zoning-meets-multi-family/>

We tried to be included in the BUV, but were rejected despite meeting all the main criteria. We have been working with various organizations within city government since 2014 to try to get this done. Now is the time.

### **Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent  
your residence?**

**How long have you  
resided in the city of  
Seattle? (total  
number of years)**

**Do you work in  
Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your  
gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person  
with a disability?**

**Are you a U.S.  
Military veteran?**

**From:** Chris Browning  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Neighborhood Upzoning Plan  
**Date:** Saturday, August 05, 2017 11:00:58 AM

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Regarding: MHA Draft EIS Comments

I support the MHA draft EIS comments from the Madison-Miller Park Community Group dated August 2, 2017

Our neighborhood prefers Alternative 1 (with modifications as stated on the Madison-Miller Community Group August 2, 2017 map). We recommend that MHA (*Mandatory Housing Affordability*) **requirements be implemented into the existing zoning** in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (*Accessory Dwelling Unit*) and DADU's, (*Detached Accessory Dwelling Unit*) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units.

Other issues I support raised by the Madison Miller Group document include:

Other issues raised in the Madison-Miller Park Group document

1. **Housing and Socioeconomics:** Both the "Low Displacement Risk" and the "High Access to Opportunity" designations misrepresent our neighborhood and need further analysis and mitigation. **We are concerned about the displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents,** (a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.
2. **Transportation:** Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk.
3. **Transportation:** The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
4. **Open Space:** We have virtually no neighborhood park or open space, as the vast majority of "Miller Park" is utilized as a regional playfield for league sports and summer sports camps and is not available for public or neighborhood use. This playfield will also be used as the sole recreational field for Meany Middle School starting this fall.
5. **Public Services:** Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded power lines are already compromised due to their age and condition. Garbage pickup on our historic and narrow streets creates traffic backups now, and additional volume of apartment buildings will increase that problem.
6. **Historic Resources:** MMRUV (*Madison Miller Residential Urban Village*) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS does not address the impact of losing this historic housing stock.

Thank you,

Chris Browning  
749 17<sup>th</sup> Ave. East  
Seattle, WA 98112

**From:** Liz Browning  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS Comments  
**Date:** Saturday, August 05, 2017 9:48:59 AM

---

We have been residents of this historic neighborhood (17th and Aloha) for 22 years restoring one the historic 'Catholic Ghetto' homes to its original grandeur. My husband and I are very concerned with the cities plans and how it will affect our neighborhood so please accept the following from us:

We support the *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, submitted on behalf of the Madison-Miller Park Community.

Our neighborhood prefers Alternative 1 (with modifications as stated on the Madison-Miller Community Group August 2, 2017 map). We recommend that MHA (*Mandatory Housing Affordability*) **requirements be implemented into the existing zoning** in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (*Accessory Dwelling Unit*) and DADU's, (*Detached Accessory Dwelling Unit*) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units.

Other issues raised in the Madison-Miller Park Group document

1. **Housing and Socioeconomics:** Both the "Low Displacement Risk" and the "High Access to Opportunity" designations misrepresent our neighborhood and need further analysis and mitigation. **We are concerned about the displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents**, (a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.
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3. **Transportation:** The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
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5. **Public Services:** Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded power lines are already compromised due to their age and condition. Garbage pickup on our historic and narrow streets creates traffic backups now, and additional volume of apartment buildings will increase that problem.
6. **Historic Resources:** MMRUV (*Madison Miller Residential Urban Village*) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS

does not address the impact of losing this historic housing stock.

Liz and Chris Browning

749 17th Ave East

Seattle, Wa 98112

Mobile: [206-409-4000](tel:206-409-4000)

[browningcommunities@gmail.com](mailto:browningcommunities@gmail.com)

[www.browningcommunities.com](http://www.browningcommunities.com)

From: walthorticulture@comcast.net  
To: [PCD\\_MHAEIS](#)  
Subject: Extension for  
Date: Sunday, July 30, 2017 6:32:55 PM

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Dear George Wentlandt: I am adding my voice to asking for an extension until August 28 so that comments on the Draft Environmental Impact Statement can be made. A 400 page document takes some time to analyze if the public is truly to be served.  
Thank you, Walt Bubelis

**From:** Walt Bubelis  
**To:** [PCD\\_MHA/EIS](#)  
**Subject:** MHA DEIS Public Comment  
**Date:** Sunday, August 06, 2017 12:02:31 PM

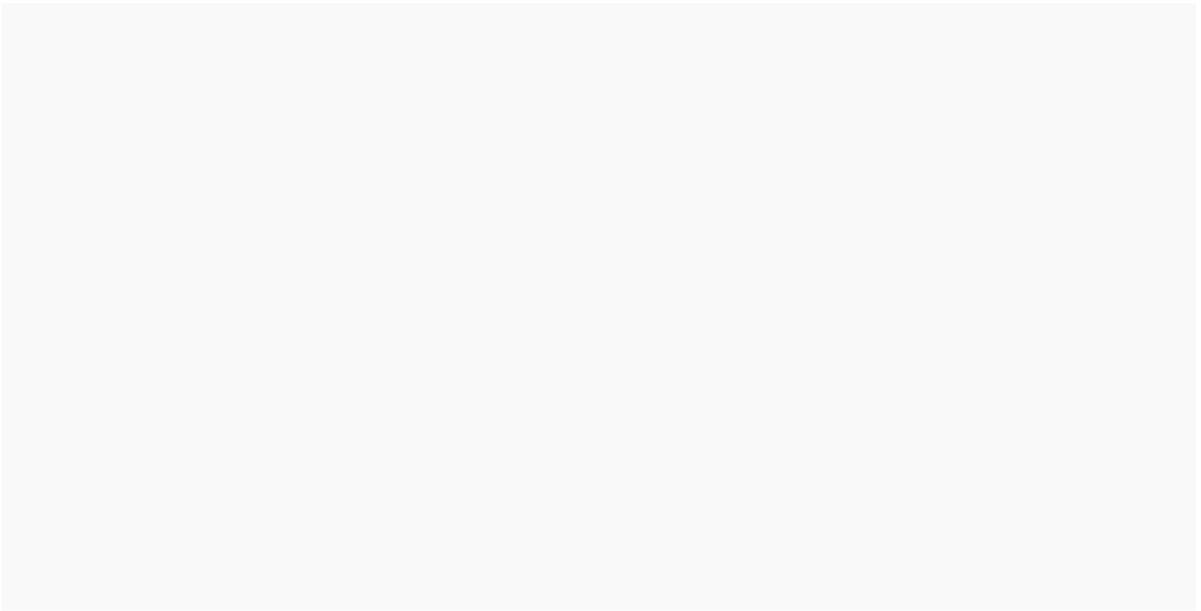
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*"The DEIS is not sufficient to represent all Urban Villages and the City overall. Each Urban Village is unique, with different housing types, cultural traditions, businesses, resources, and growth needs. This DEIS fails to recognize and examine these differences.*

*Each Urban Village and Surrounding Area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.*

*Additionally, the DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined. Seattle residents live in both their own neighborhoods and in the City at large, yet this DEIS has failed to analyze the impacts to both thoroughly and accurately."*

I received the opportunity to respond to this just this very busy weekend. I agree with the above statement and wish the city would do more to notify the public on such matters. Dissolving the neighbor councils was a step in the wrong direction for one. Individual neighborhoods need more opportunity to map out their own future rather than the reverse. Seattle does not have to keep growing at the price of the unique features found in the various neighborhoods.



<b>Name</b>	Christopher Buckley
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 I prefer alternative 3 for the Roosevelt Urban Village, extending more Low-Rise 1 zoning into the Ravenna neighborhood along 65th Avenue NE. As a Ravenna homeowner and a Christian Democrat, I favor policies that promote home ownership and economic diversity while reducing ecological impact of sprawl. Option 3 in this high-demand neighborhood does precisely that.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you resided in the city of Seattle? (total number of years)</b>	
<b>Do you work in</b>	

**Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person with  
a disability?**

**Are you a U.S. Military  
veteran?**

**From:** ktbucy@comcast.net  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Fwd: Please extend deadline for HALA DEIS  
**Date:** Monday, June 19, 2017 8:00:35 PM

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Please extend the July 23, 2017 deadline for public comments on the HALA draft Environmental Impact Statement.

Many are on vacation during the summer and will not have adequate time to review the document and comment.

Perhaps the city isn't serious about obtaining public comment. I hope that isn't true. But unless you extend the deadline, many will assume the city is discouraging public comment.

Please consider my request.

Sincerely,

Katie Bucy

From:  
To: [PCD\\_MHAEIS](#)  
Subject: Comments on DEIS  
Date: Thursday, August 03, 2017 3:39:52 PM

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## Re: Comments on HALA Draft Environmental Impact Statement

- 1 It's my understanding that an EIS is not supposed to be a justification of a decision that's been already been made. Yet, that is exactly what the DEIS for HALA upzoning appears to be.

Upzoning in the West Seattle Junction area would have a tremendous impact on life in this area, and the DEIS has clearly ignored this.

For one, the proposed upzoning would destroy single-family neighborhoods, which is in conflict with the official neighborhood plan.

The plan would increase density without improving already strained transit.

The committee has not done its homework re: the transportation impacts. The report claims the C Line in West Seattle is at 67% capacity, but clearly no one on the committee has had to catch a bus to downtown at rush hour. Standing room only is the soup de jour at that hour.

The claim that the morning commute is a mere 8 minutes and the upzoning would only add 30 seconds is ridiculous. Same with the claim that the evening commute takes 9 minutes and would grow to 15 minutes.

The methodology was looking at Google maps, rather than researching what it's really like to get in and out of West Seattle during rush hour.

West Seattle has endured increased density and we know we have to do our part to help the growth in Seattle. But there are some limits, and the DEIS committee needs to be strongly consider these points:

1. Preserve our neighborhood plan that plans for growth, affordability, livability, and yet still preserves the small-town character that makes West Seattle an attractive place in which to live.
2. Pause MHA/HALA for our area until the above plan is in place...and the gaps in the DEIS are addressed.

3. Redraw the Junction Urban Village boundaries to protect the character and integrity of single-family areas as stipulated in our official neighborhood plan.

Bucy,Katie-2

Thank you for your consideration.

Sincerely,

Katie Bucy  
West Seattle Junction

Katie Bucy

COMMENTS ON DRAFT EIS RE: MHA

X

Overall Analysis

DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3

X

Community Feedback

DEIS fails to take into account documented Junction neighborhood feedback.

X

Lack of Affordable Housing

DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.

X

Neighborhood Plan

DEIS reflects City's failure to honor neighborhood plan.

X

Traffic

DEIS analysis is flawed; Fails to utilize meaningful data.

Green Space

DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.

X

Neighborhood Character

DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.

Loss of Light and Air

DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings

Loss of Views

DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.

Historic Buildings

DEIS fails to recognize historic buildings in Junction.

X

Public Safety

DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.

Utility Infrastructure

DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.

Schools

DEIS fails to note existing lack of school capacity and impact of increased density thereon.

Other

I have other concerns regarding the DEIS including, but not limited to, the following:

X Transportation — no <sup>meaningful</sup> study was done of transportation impact. SRO @ peak times, transp delays

Name: Katie Bucy

Address: 40 West Seattle Junction

**From:** Greta Burco  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [doug Burco](#); [Herbold, Lisa](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, August 07, 2017 5:09:33 PM

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To Whom It May Concern:

I am a resident of the proposed West Seattle Junction rezoning. Upon review of the DEIS, I have the following comments to make:

The DEIS fails to recognize the existing overcrowded neighborhood schools, specifically Fairmount Park Elementary, which has recently been expanded and updated and which has no more available land to house the expected population growth in the Fairmount Springs and Junction neighborhoods.

The DEIS fails to acknowledge lack of adequate infrastructure in the West Seattle Junction to support proposed increased density.

The DEIS shows that the West Seattle Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.

The DEIS fails to take into account the current lack of access to emergency services in the proposed rezone areas. On my street, I have witnessed on more than one occasion fire trucks unable to park in front of someone's home in a medical emergency because of our already overparked narrow street; fire vehicles had to park on the end of the street, 2/3 of a block away to service a house, and first responders had to walk/jog down the block to the house where people required attention. The DEIS does not take into consideration the further impact of increased density on response times and emergency services to populations.

The DEIS fails to take into account documented West Seattle Junction neighborhood feedback, which has disproportionately disapproved of the HALA proposed rezoning.

Finally, the DEIS reflects the City of Seattle's failure to honor the West Seattle Junction neighborhood plan.

Thank you,

Greta Burco

**From:** Susan Burke  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Brand, Jesseca](#); [Staley, Brennon](#); [Welch, Nicolas](#); [Wentlandt, Geoffrey](#); [Assefa, Samuel](#); [Herbold, Lisa](#); [Johnson, Rob](#); [Williams, Spencer](#); [Harrell, Bruce](#); [Sawant, Kshama](#); [Juarez, Debora](#); [O'Brien, Mike](#); [Bagshaw, Sally](#); [Burgess, Tim](#); [Gonzalez, Lorena](#); [chauncey burke](#)  
**Subject:** MHA Draft EIS Comments  
**Date:** Friday, August 04, 2017 5:21:17 AM

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To All,

We are writing to inform you that we strongly support the *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, submitted on behalf of the Madison-Miller Park Community.

Our neighborhood prefers Alternative 1 (with modifications). We recommend that MHA (*Mandatory Housing Affordability*) requirements be implemented into the existing zoning in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (*Accessory Dwelling Unit*) and DADU's, (*Detached Accessory Dwelling Unit*) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units. These recommendations are based on the following:

- **Flawed typology:** We are deeply concerned that the DEIS falsely represents Madison-Miller as “Low Displacement Risk/High Access to Opportunity”. This misrepresentation will result in significant negative impacts if Alternatives 2 or 3 are adopted. Please see our detailed comments below.
- **Density increases not equitable:** Our current zoning in Madison-Miller will exceed HALA density goals without additional proposed zoning changes. Indeed, based on current development and permitted housing units, Madison-Miller density will exceed MHA goals by the end of 2017 with our current zoning. Other urban villages, such as West Seattle Junction and Ballard, categorized as “Low Displacement Risk and High Access to Opportunity” have 10 – 30% less proposed increases than MMRUV (*Madison Miller Residential Urban Village*), despite being designated for more density as Hub Urban Villages and identified as locations for future light rail extensions.
- **MHA process not inclusive:** We do not feel the area-wide zoning changes outlined in Alternatives 2 and 3 reflect adequate neighborhood and stakeholder input. The current zoning, established by the 2035 Comprehensive Zoning Plan, was developed with a more inclusive process and was more responsive to neighborhood input.
- **Concerns for significant negative impacts:** Our request for MHA implementation with Alternative 1 zoning map should not be understood as a resistance to increased density. As we've said in previous correspondence, we embrace increased density in our neighborhood but feel Alternatives 2 and

3 (as written):

1. do not adequately mitigate for displacement of low and middle income residents;
2. do not equitably distribute the density and cost of MHA city-wide;
3. will increase racial and economic segregation;
4. do not match increased density with increased access to green space and recreational opportunities;
5. will burden our already fragile infrastructure; and,
6. pose significant public safety hazards with increased traffic on our narrow streets and heavy pedestrian and bicycle usage (with Meany Middle School and the pedestrian/bike greenway).

The Madison-Miller Park Community could support Alternative 2 with modifications noted in comments below (and is **opposed** to DEIS proposed zoning shown in Alternative 3). Please refer to the **Alternate Proposal Zoning Map** that was included with *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, for specific zoning modifications. As noted in the DEIS, Alternative 2 generates more housing, jobs, and affordable housing than Alternative 3. The allocation of growth in Alternative 2 better reflects the existing character of our neighborhood, and has fewer significant negative impacts on current stakeholders than Alternative 3.

#### **Summary of our detailed comments to follow:**

1. **Housing and Socioeconomics:** Both the “Low Displacement Risk” and the “High Access to Opportunity” designations misrepresent our neighborhood and need further analysis and mitigation. **We are concerned about the displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents**, (a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.
2. **Transportation:** Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk.
3. **Transportation:** The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
4. **Open Space:** We have virtually no neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional playfield for league sports and summer sports camps and is not available for public or neighborhood use. This playfield will also be used as the sole recreational field for Meany Middle School starting this fall.
5. **Public Services:** Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded power lines are already compromised due to their age and condition. Garbage pickup on our historic and narrow streets

creates traffic backups now, and additional volume of apartment buildings will increase that problem.

6. **Historic Resources:** MMRUV (*Madison Miller Residential Urban Village*) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS does not address the impact of losing this historic housing stock.

**Aesthetics:** Alternatives 2 and 3 propose dramatic changes to the character of the neighborhood (in some cases as extreme as SF (*Single Family*) changing to LR3(*Low-Rise3*)). This is in direct conflict with the stated MHA principle to maintain and create appropriate transitions (“between higher and lower scale zones as additional development capacity is accommodated”). The only proposed DEIS mitigation measures for aesthetic changes to the character of the neighborhood is the Design Review process. HALA has requested from OPCD (*Office of Planning and Community Development*) a determination of non-significance for proposed changes to the Design Review process. The HALA proposed changes to modify the Design Review process will further erode safeguards already in place to mitigate these adverse impacts.

Sincerely,

Susan Burke & Chauncey Burke

2201 East Republican St.

Seattle, WA 98112

[sburke906@gmail.com](mailto:sburke906@gmail.com)

[chaunceyburke@icloud.com](mailto:chaunceyburke@icloud.com)

**From:** Burnstein, Daniel  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** comment re MHA-EIS  
**Date:** Saturday, August 05, 2017 2:21:27 PM

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To Whom It May Concern:

I am writing to comment regarding proposed zoning changes in the Draft Environmental Impact Statement for Mandatory Housing Affordability policy. I urge you to consider that the pre-World War II built environment and the social and cultural attributes associated with the warm, friendly, people-scaled qualities of that built environment are supremely important civic assets. Please help keep Seattle beautiful and livable by zoning in such a way that will help ensure as much as possible of the old beloved Seattle remains in place.

I am afraid that the current DEIS proposals will expand housing at the expense of the livability of Seattle's older (pre-World War II) neighborhoods. Perhaps the greatest danger to these neighborhoods is piecemeal demolition of older structures, as little by little the overall ambience of these neighborhoods as a whole is shattered, as often sterile and less human-scaled structures take their place. Hopefully, someday our city will recognize the precious heritage of pre-war era Seattle by granting individual pre-war structures and indeed many whole neighborhoods historic status with zoning protection. Relatedly, it's my understanding that Section 3.5.1 of the EIS, the portion on the Affected Environment, has not adequately assessed the potential of individual properties and of entire neighborhoods to be granted protection via historic status. If we make the sorts of zoning changes envisioned in the current DEIS, we will have preempted the possibility of taking such wise steps in future years.

The architecture of the pre-war era is unique and is rarely if ever being reproduced in the present day. The demolition of these structures cannot be undone once accomplished. Think of the loss to generations hence, how we will one day lament the destruction of the fabric of these neighborhoods, as the people of New York now famously mourn the destruction of the Pennsylvania Railroad Station back in the early 1960s. Now New Yorkers say to themselves, "What were they thinking back then?" Future generations of Seattleites will say the same of us if we do not protect pre-war Seattle. Please, for the sake of a heritage of livable, sweet neighborhoods that we can pass on to future generations, do not seek greater affordability by sacrificing our older neighborhoods. Let's be creative in seeking affordability instead, bearing in mind, for instance, that many older buildings have more affordable units than will actually be the case in newly built developments.

Thank you for your consideration,

Daniel Burnstein, Ph.D. (Professor Emeritus of History, Seattle University)

Address: 2106 48<sup>th</sup> Avenue SW

Seattle, WA 98116

Email: [danielbu@seattleu.edu](mailto:danielbu@seattleu.edu) or [jogdanbu@drizzle.com](mailto:jogdanbu@drizzle.com)

**From:** RHONDA  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Response to MHA DEIS  
**Date:** Sunday, August 06, 2017 2:50:03 PM

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The MHA DEIS is not sufficient to represent all Urban Villages and the City overall. Each Urban Village is unique, with different housing types, cultural traditions, historic assets, businesses, resources, and growth needs. This DEIS fails to recognize and examine these differences.

Each Urban Village and Surrounding Area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.

Additionally, the DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined. Seattle residents live in both their own neighborhoods and in the City at large, yet this DEIS has failed to analyze the impacts to both thoroughly and accurately.”

Rhonda Bush

**From:** RHONDA  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Response to MHA DEIS  
**Date:** Sunday, August 06, 2017 2:55:46 PM

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The response time given, even with a two week extension, was insufficient for city residents to read, digest and respond to a 400 plus page document and huge addendum. This time frame was insufficient, burdensome and seemed meant to overwhelm residents who truly care about their city, and earnestly want to participate in the development plan, while trying to manage jobs, families and other obligations.

Rhonda Bush

**From:** RHONDA  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Response to MHA Deis  
**Date:** Sunday, August 06, 2017 3:11:00 PM

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**Disingenuous, misleading language is used in the MHA DEIS.** On page 3.251 the Deis describes the replacement of single family residences and small buildings with slightly larger residences and buildings. The word slightly is subjective, and should not be part of an objective, analytical analysis to determine effects of planning changes to our city. I have heard city leaders use this word in describing HALA, and I objected then as well. Adding 10 feet to a current zone is an increase of 25-33 %. Not slight. A zone change from single family to M1, M2, or M3, changes the lot coverage from 40% to 80%. Changes set backs to the sidewalk from 20' to 10' and sometimes none at all. Heights will increase from 30' to 40 and even 60' with bonus floors. Defined as an adjective, slight means a small amount, of little importance, trivial. None of these changes are slight. For the city to continue to explain the changes brought to neighborhoods via HALA MHA up zones are slight-- shows that the current administration condones utilizing false and misleading information to promote the 'Grand Bargain'.

Rhonda Bush

**From:** RHONDA  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Historic Resouce DEIS  
**Date:** Sunday, August 06, 2017 3:28:37 PM

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The City of Seattle is fortunate to contain many areas of historically significant architectural assets. The neighborhood of Wallingford is a good example of this. In areas of older buildings, you will find more naturally occurring affordable housing, than you will find in newly constructed buildings. I believe affordable housing is the primary point of these land use issues. The upzone will have direct impact of the scale of commercial and residential neighborhoods. Many of Seattle's neighborhoods are defined by a pedestrian-friendly human-scale commercial corridor with good public transit and easy walking distance to apartments, townhouses, and single-family homes. More of these areas are changing daily with new development typically out of scale with the historic pattern of developments. Historic cultural assets must be protected and preserved --once demolished they cannot be reconstructed. The DEIS should provide substantive mitigation measures--proactively, to protect these assets. Wallingford was mentioned on page 3.249 stating "Other neighborhoods still retain aspects of their historic fabric such as Wallingford, which was noted to contain one of the City's best examples of the early twentieth century Craftsman bungalow neighborhoods". I believe the utilization of this quote in the DEIS points out that every Urban Village brings a different set of assets to the table, and each must be addressed and respected. An EIS must be done for each UV considered for up zone and proactive mitigation must put in place to protect the historic cultural assets of the city.

Rhonda Bush

**From:** Julie Cain  
**To:** [Brand, Jesseca](#); [HALAinfo](#); [PCD\\_MHAEIS](#); [tomhauger@settle.gov](mailto:tomhauger@settle.gov)  
**Cc:** [Julie Cain](#)  
**Subject:** Request for Modification to Green Lake/Roosevelt Residential Urban Village Draft MHA Map Zoning Designation  
**Date:** Monday, June 19, 2017 3:44:00 PM  
**Attachments:** [2017.6.8 Shadow Studies.pdf](#)  
[Green Lake Letter.pdf](#)

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Dear All:

Please see the attached Comment Letter and Shadow Study requesting a modification to the Green Lake/Roosevelt Residential Urban Village Draft MHA Map Zoning Designation.

Thank you for your consideration.

Best regards,

Julie Cain  
Managing Member  
Green Lake North LLC



June 19, 2017

Department of Neighborhoods, City of Seattle

[jesseca.brand@seattle.gov](mailto:jesseca.brand@seattle.gov)

[halainfo@seattle.gov](mailto:halainfo@seattle.gov)

Office of Planning and Community Development

Attn: MHA EIS

[MHA.EIS@seattle.gov](mailto:MHA.EIS@seattle.gov)

Tom Hauger

[tom.hauger@seattle.gov](mailto:tom.hauger@seattle.gov)

**Re: Request for Modification to Green Lake/Roosevelt Residential Urban Villages Draft Mandatory Housing Affordability (MHA) Map Zoning Designation from NC2P-55(M) to NC2P-75(M)**

Dear All:

Thank you for the opportunity to comment on the above-referenced zoning change proposal. My family and I are long-time stakeholders in Green Lake's past, present and future, from our past operation of the Vitamilk Dairy to our present development of the first two phases of the Green Lake Village campus to our future plans to develop a new mixed-use building on our north block, which is comprised of five parcels of land located at the northwest corner of NE 72<sup>nd</sup> Street and 5<sup>th</sup> Avenue NE (the "Site")<sup>1</sup>. We are in the process of submitting an application to rezone the Site to NC2P-65, and we ask that you choose the "Alternative 3" zoning of NC2P-75(M) for the MHA Designation so that the same building can be built on the Site whether via the contract rezone or the legislative rezone.

As shown in the adjacent map, the first two phases of the campus consist of Green Lake Village, with PCC Market and 295 apartment units, and The Eddy, with Bartell Drugs and 130



<sup>1</sup> Parcel #'s 9528101571, -1580, -1510, -1511, -1515.

apartment units. The Eddy is a Multi-Family Tax Exemption (MFTE) project in which 20% of the units are rent restricted. The Site is the last portion of the Green Lake Village campus. Our goal is to redevelop the Site into a mixed-use building of similar scale, with ground floor commercial space and workforce housing residential apartment units above.

The current zoning for the three-phase Green Lake Village campus was approved in 2005 through a contract rezone (Property Use & Development Agreement or PUDA) that increased the zoning on the middle and south phases to NC2P-65 and the zoning on the Site to NC2P-40. While the 2005 PUDA and NC2P-65 zoning provided a good framework to redevelop the first two phases, the current NC2P-40 zoning on the Site presents redevelopment challenges due to changed market conditions and other changed circumstances over the past 12 years. We are currently pursuing an amendment to the 2005 PUDA to rezone the Site from NC2P-40 to NC2P-65 and to remove other restrictions in the PUDA that have been addressed or superseded by the adoption of the Green Lake Neighborhood Design Guidelines and changes to the NC2 zoning standards. We are also pursuing a Master Use Permit to construct a mixed-use project on the Site, consistent with the proposed NC-65 zoning.

Under Alternatives 2 and 3 of the MHA DEIS, as shown in the map insert to the right, the Site (outlined in yellow) is proposed to be rezoned from NC2P-40 to NC2P-55 (M). This would allow one more level of residential units with 5-7% of homes reserved at affordable rents for low-income people. Our pending request to amend the 2005 PUDA to rezone the Site to NC2P-65 will allow two additional levels of residential units, and use of the MFTE will result in 20% of the homes being reserved for low-income people.



The other two phases of the Green Lake Village along with the majority of other properties within the "core" of the Green Lake Residential Urban Village are proposed to be rezoned to MC2P-75 (M). But this increase in zoned density will do little or nothing to provide additional affordable housing as most of these parcels have redeveloped within the last decade or so, and the remainder are broken up into small lots that are unlikely to be redeveloped with high density projects. The Site, however, presents a significant opportunity to provide dozens of additional affordable homes if it is rezoned to either to NC2P-65 or NC2P-75 (M).

As noted in the MHA DEIS, the Green Lake Residential Urban Village has low displacement risk with high access to opportunity, making it a prime area for rezoning under the higher intensity Alternative 3. As shown on the Alternative 3 Map (Exhibit H-28) for the Green Lake Residential Urban Village, the property immediately adjacent to and west of the Site along the north side of NE 72<sup>nd</sup> Street would be

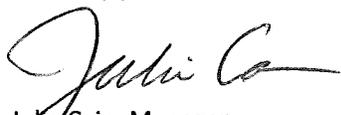
rezoned from C1-40 to NC2P-75 (M). We believe the entire north side of NE 72<sup>nd</sup> Street should be rezoned to NC2P-75 (M), through the MHA process.

The MHA DEIS Alternatives propose height increases to LR3 properties to the north of the Site from 40' to 50'. The neighborhood slopes from north to south and from east to west, and there is an alley between the Site and lower-zoned properties, which provides additional transition. The combined effect of higher heights to the north, the alley and the topography will help to maintain the general massing relationships if the Site is rezoned to NC2-75(M). We have prepared a shadow study to support our proposed amendment to the 2005 PUDA, which shows that a 65' building will have, more or less, the same impact as a 40' (current) or 55' (MHA proposal) building on the Site. We enclose the shadow study for your reference.

In sum, we are applying for a contract rezone to amend the 2005 PUDA to rezone the Site to NC2P-65. We support and request that the City amend the MHA Map's designations for the Site and adjacent property to NC2P-75 (M) per Alternative 3. In that event, if the MHA process is completed prior to the completion of the amendment of the 2005 PUDA, we could withdraw the contract rezone application and build under the NC2-75(M) zoning without having to modify our building design.

We welcome your questions and comments and the opportunity to work with you on this effort.

Sincerely yours,



Julie Cain, Manager  
Green Lake North LLC

Enclosure (shadow study)

40' CODE  
COMPLIANT

JUNE 21

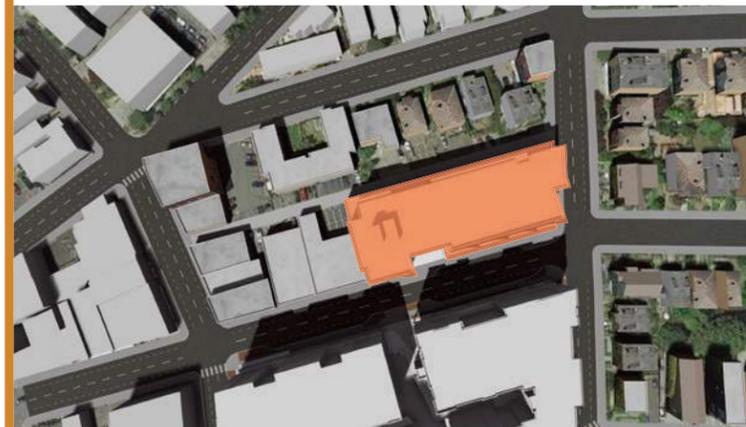
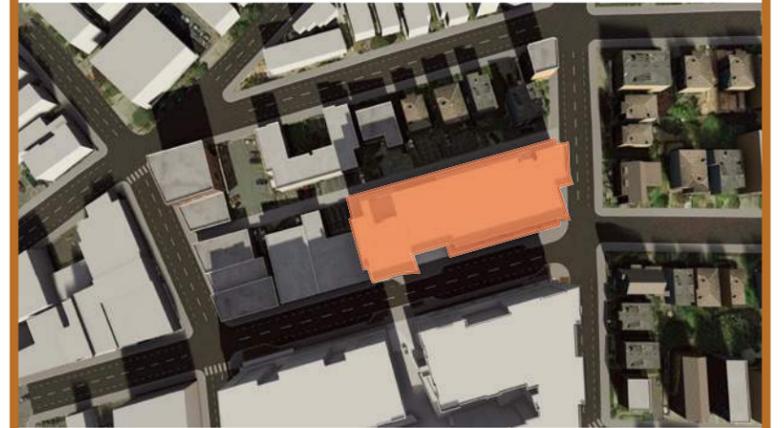
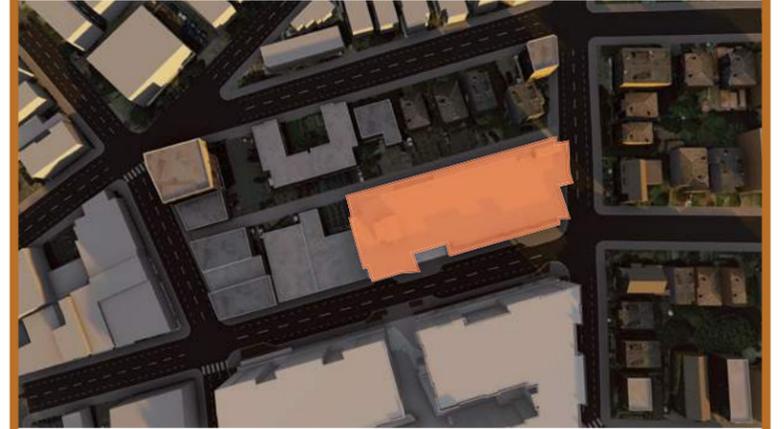
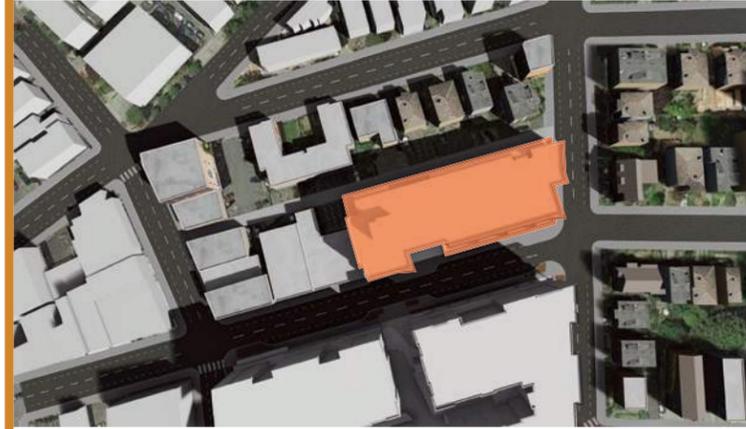
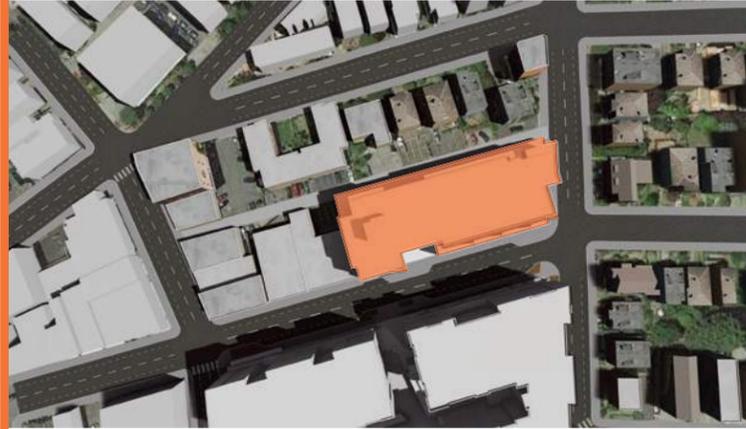
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**55' MANDATORY HOUSING AFFORDABILITY PROPOSAL**

**JUNE 21**

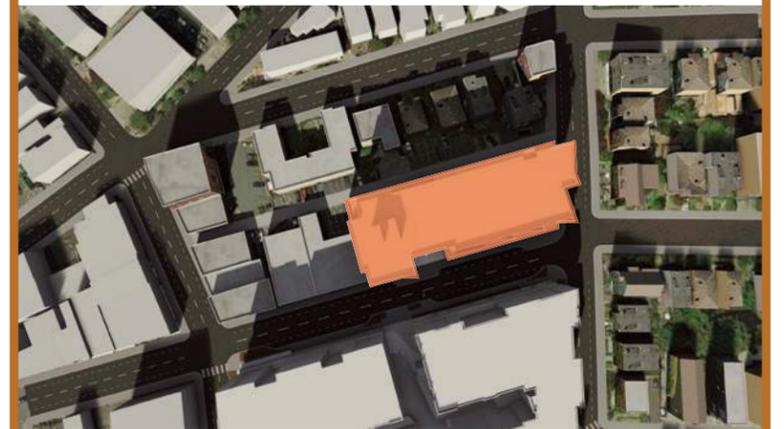
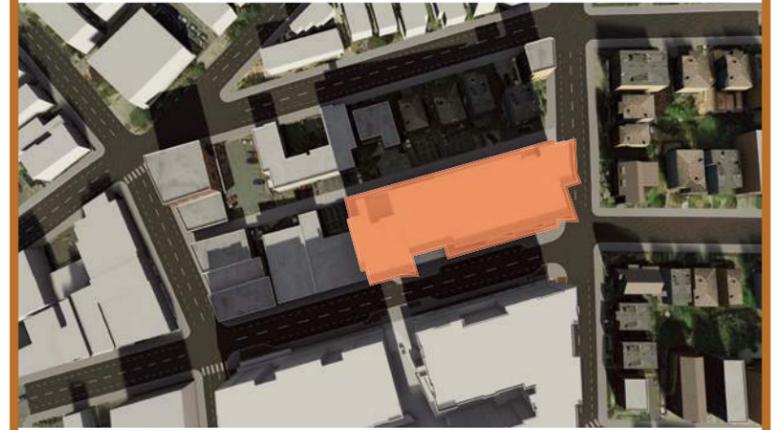
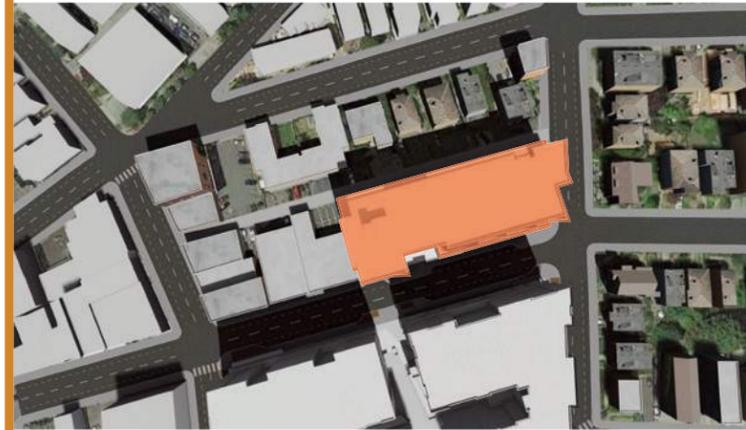
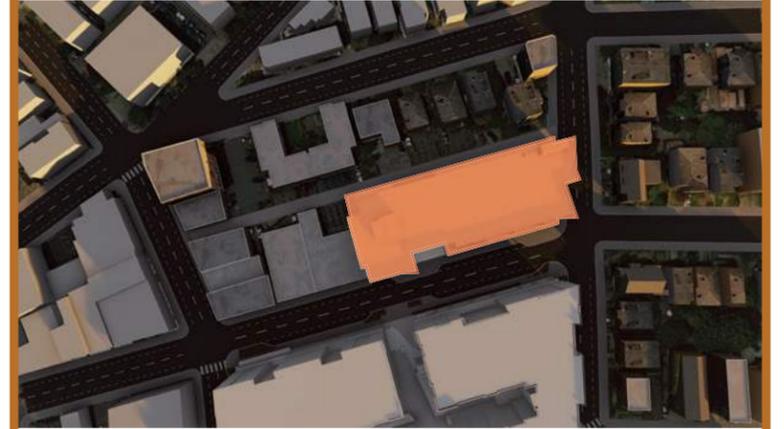
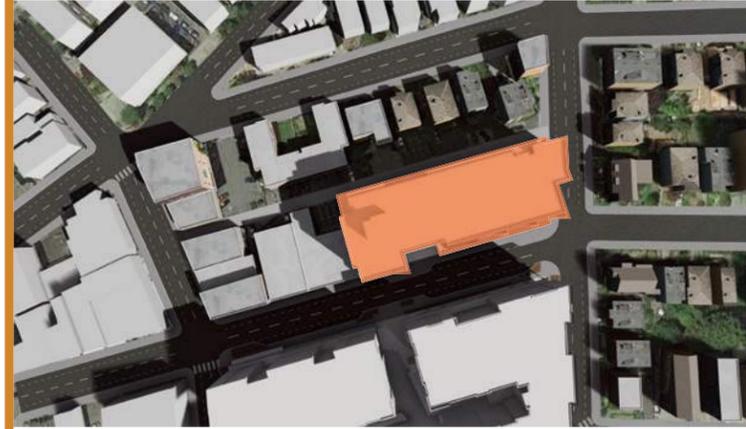
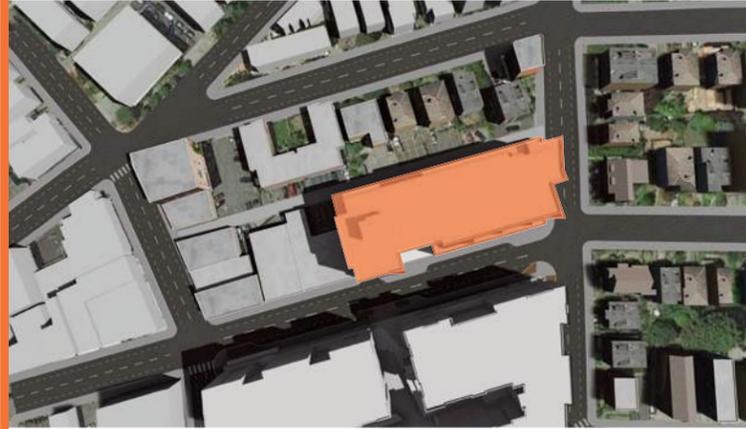
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65' CONTRACT REZONE

JUNE 21

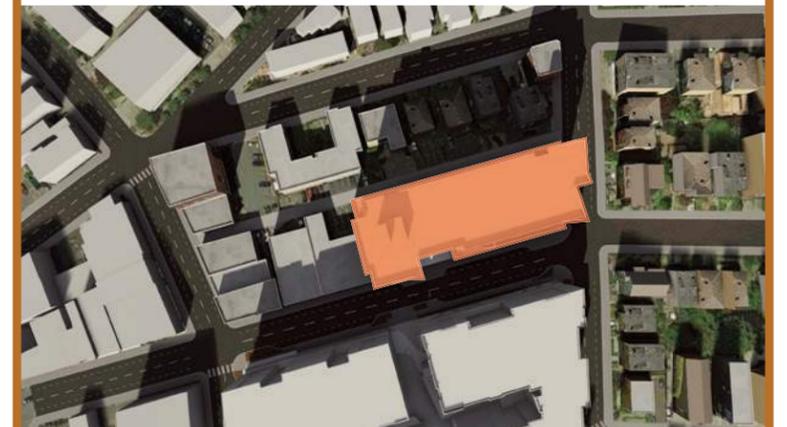
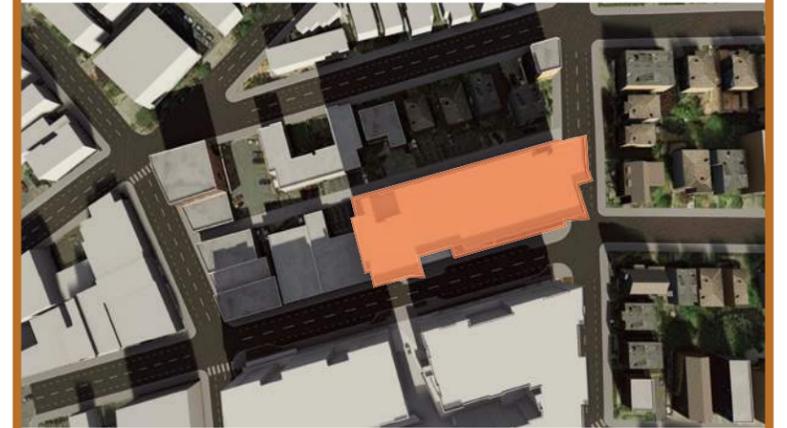
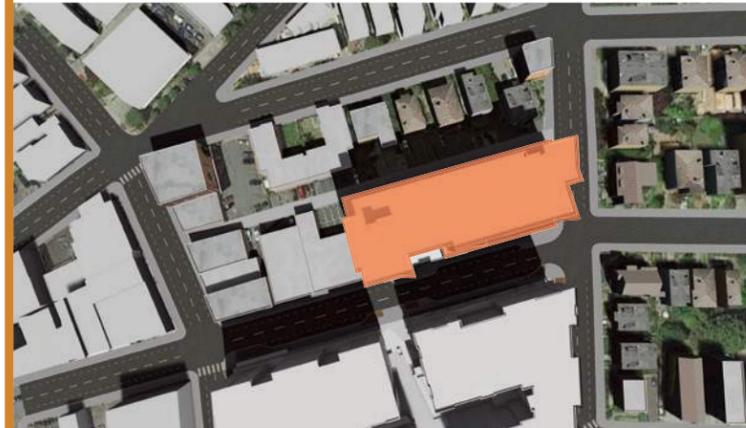
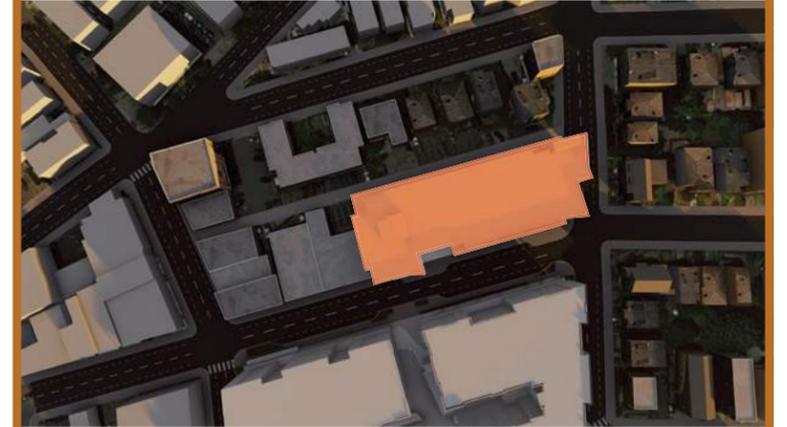
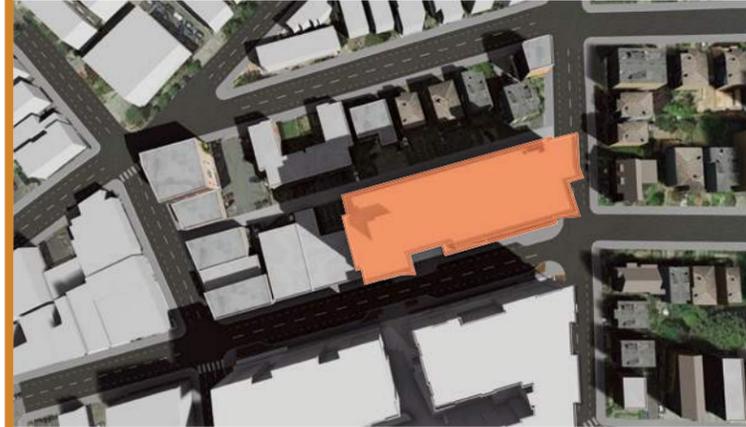
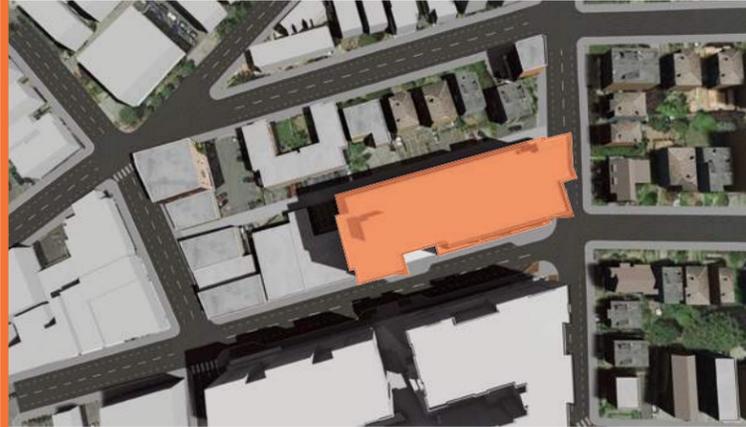
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COMPLIANT

JUNE 21

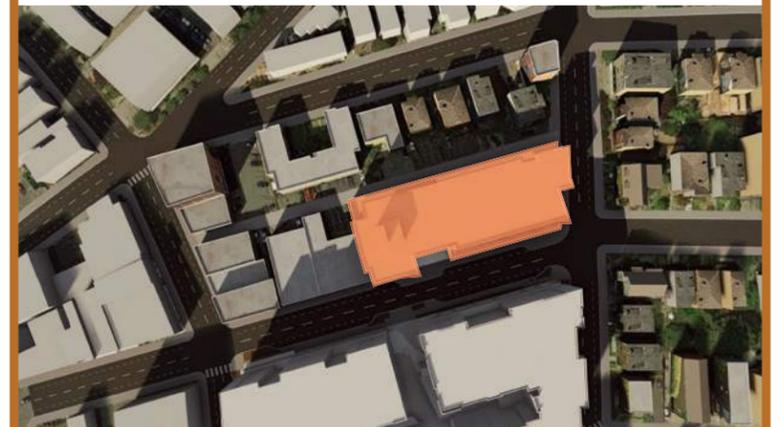
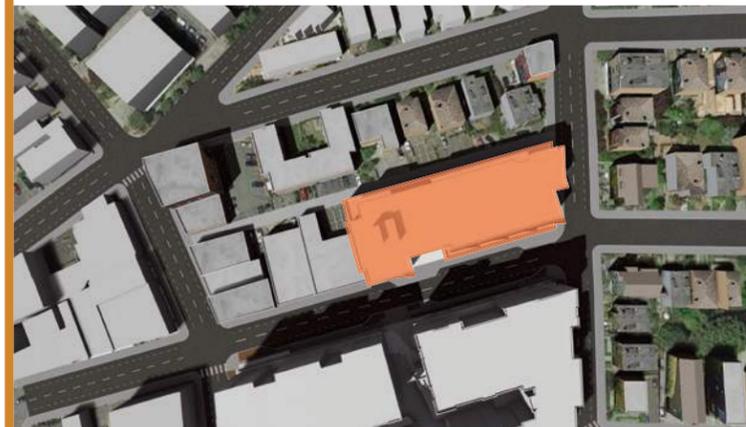
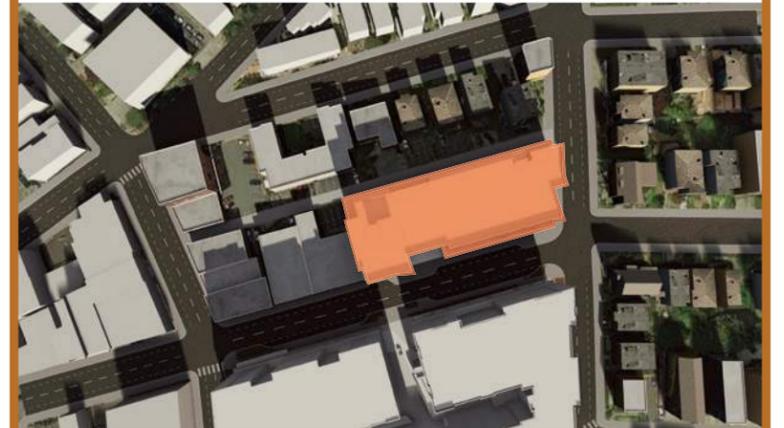
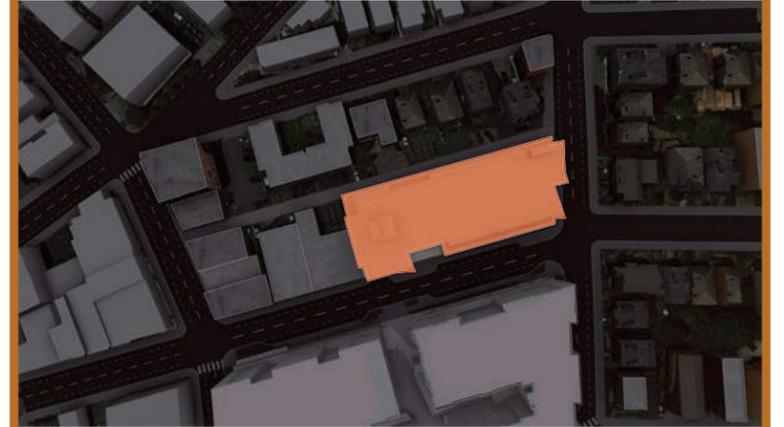
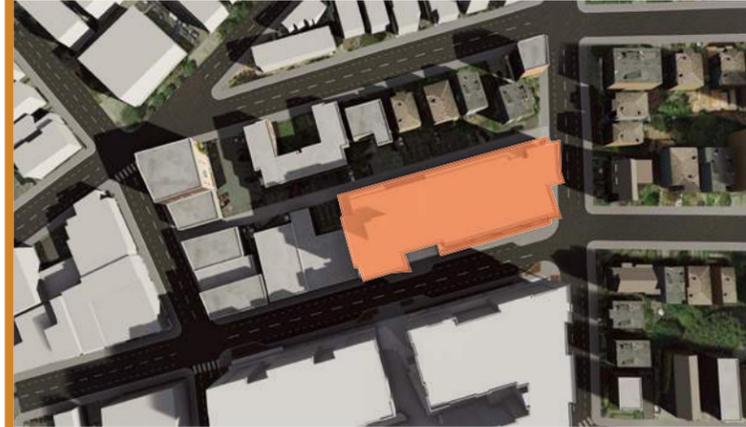
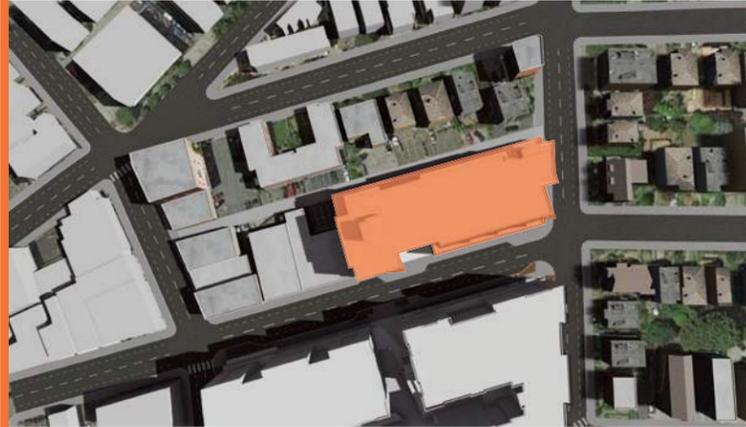
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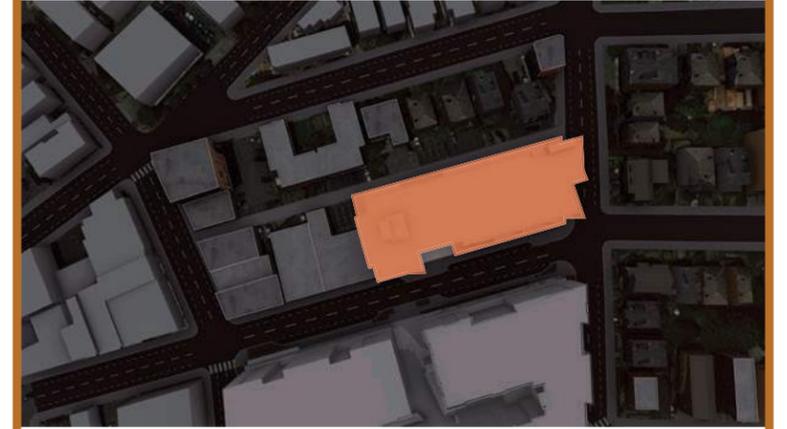
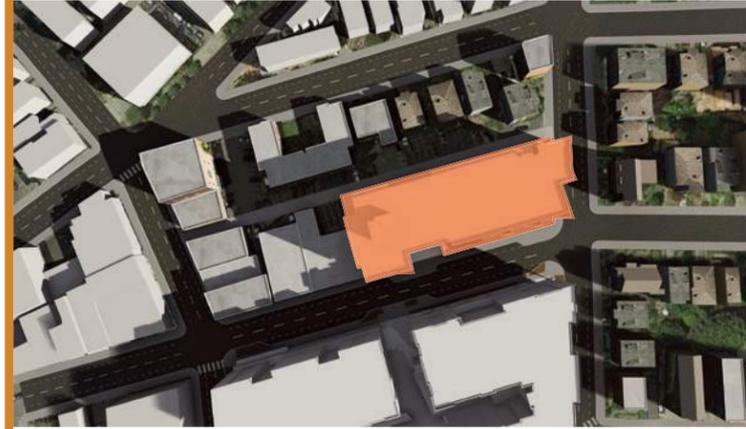
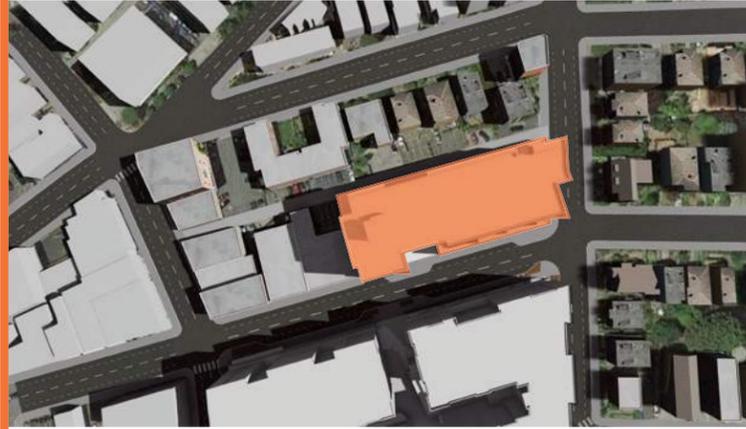
**55' MANDATORY HOUSING AFFORDABILITY PROPOSAL**

**JUNE 21**

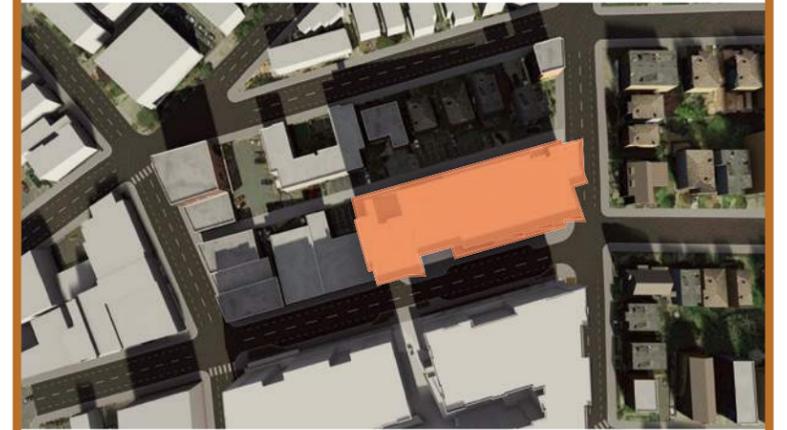
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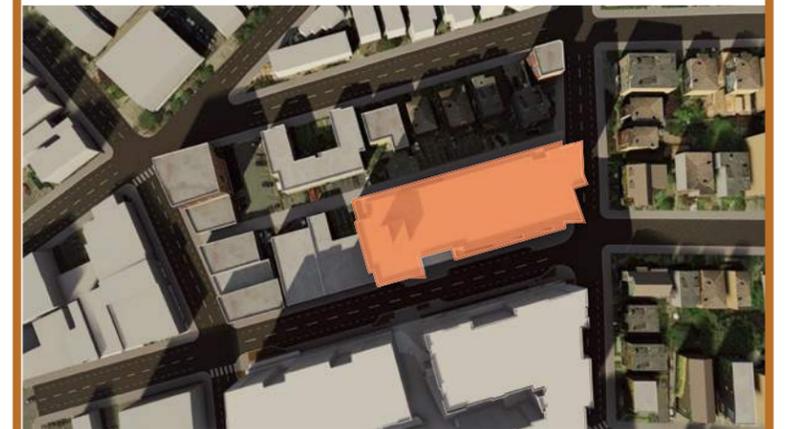
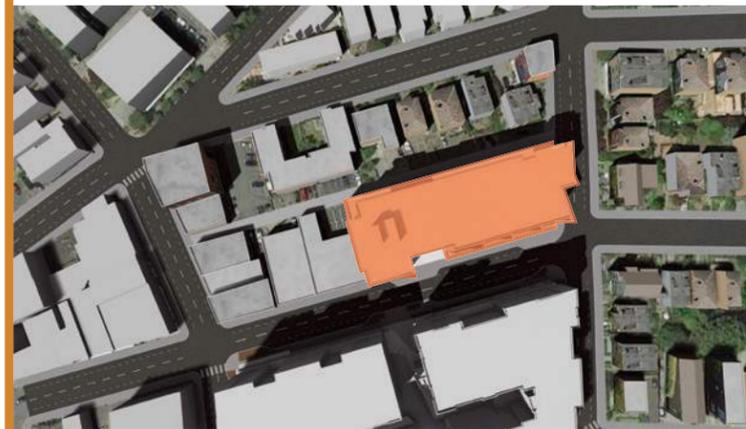
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65' CONTRACT REZONE

JUNE 21

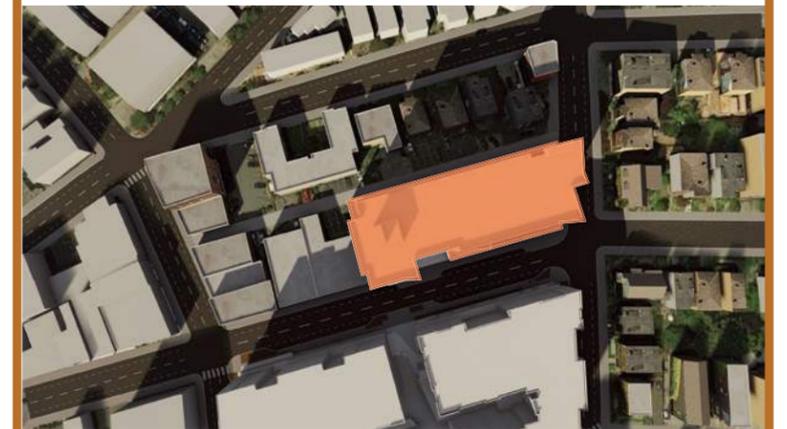
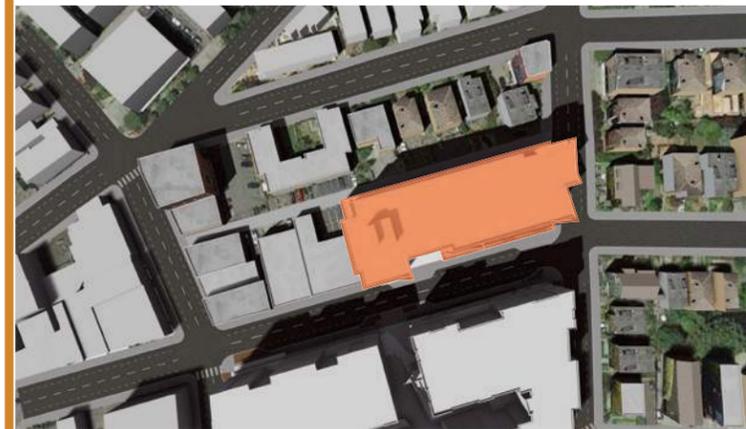
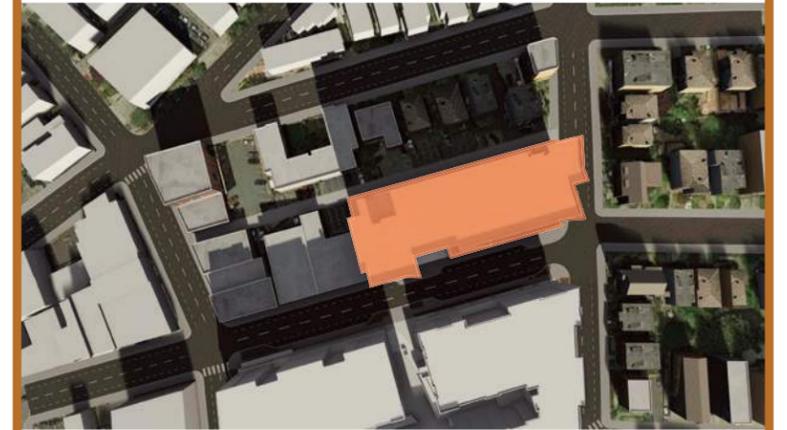
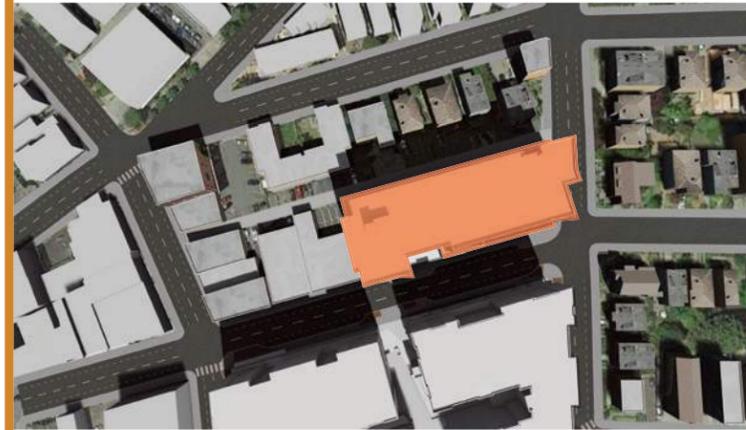
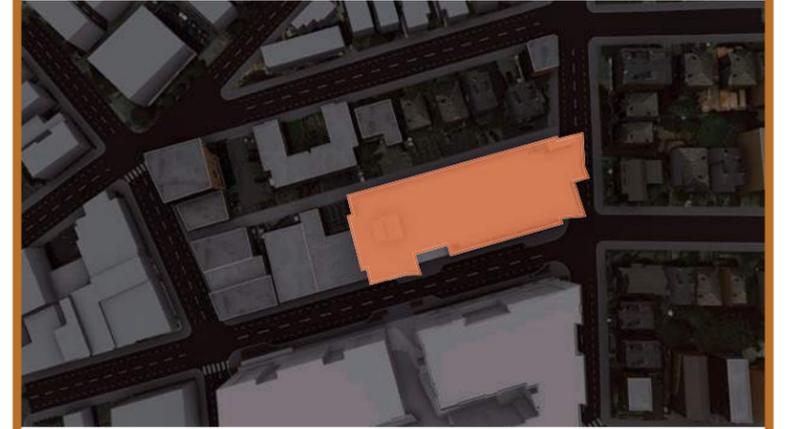
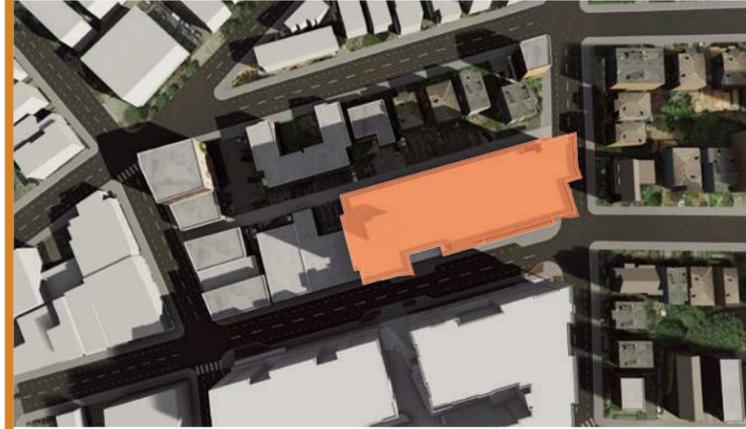
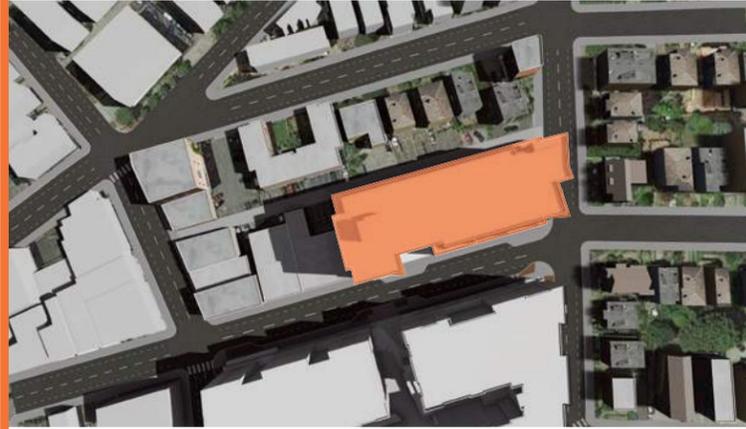
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## MAGNOLIA NEIGHBORHOOD PLANNING COUNCIL

Attn: MHA EIS  
P.O. Box 34019  
Seattle, WA 98124-4019

The first comment on this proposed legislation is that the City City as failed miserably in its outreach and education efforts to the more than 22,000 residents and likewise 2,000 or more stakeholders that work in the Magnolia and Interbay community. Where exactly was the City with its dog and pony show for Magnolia this last year and a half? Why was no forum presented to Magnolians and Interbay interests about the effect of the MHA? Unfortunately we do have the answers to those questions, and that is the

The City mistakenly relies upon the recommendations of a closed leadership organization, the Magnolia Community Council, that fails to inform its claimed members, recalling its specious claim that it represents everyone on Magnolia, that fails to engage its claimed members, its last community meeting on June 20<sup>th</sup>, attended by a smattering of the public, was in reality a board members' meeting, that covered police and public safety, the Fort Lawton Army Reserve property reuse planning, assorted items of MCC internal housekeeping, and a far after the fact update – to the board – not to the public – about how in the future the MCC – not the City – needed to break it to the greater Magnolia community how their neighborhood was going to change – not maybe change if and when the MHA plan was adopted. This was followed by the revelation to many of the non-MCC attendees that months ago the MCC had sent a letter of recommendation to the City, approving of the MHA plans, and affirming its support for the City's/MHA's zoning changes along West Government Way and in the Magnolia Village center.

To say that the attendees from Magnolia neighborhood at large were astounded at what had been done in their name by the MCC, without their knowledge, without there being any kind of public dialog between the MCC and Magnolians, without there being any kind of public notice or otherwise public forum between the City and Magnolians; and in the mix the MCC having spent what became apparent during the MHA/HALA presentation at this meeting – working in concert with the City to grant and bargain away Magnolia's and Interbay's interests in this matter – to say the least it is nothing short of reprehensible, cynical, and disgusting that this behind the scenes scheming and manipulations took place – on both the MCC's and the City's part.

Between January 1, 2016 and June 23, 2017 there have been 20 some meetings on Magnolia, five were community wide meetings which were sponsored by the City of Seattle/one by Sound Transit, all to promote their agendas for public works projects affecting Magnolia and Interbay, then only two MCC community wide meetings, none of which specifically included an agenda addressing the City's MHA planning; and no less than 13 MCC board only meetings ("open" to the public) generally sparsely attended by both MCC board members and the public. With the exception of two of those board member meetings wherein closed loop and information was being circulated from the City about the MHA initiative, there has been zero outreach by either the MCC or the City to engage the Magnolia and Interbay communities about the plans and impact of the MHA programming and zoning on these two neighborhoods. That alone is a noteworthy and objectional oversight in the MHA planning and scoping process, excluding two prominent neighborhoods and constituencies from the City's processes in this matter.

## MAGNOLIA NEIGHBORHOOD PLANNING COUNCIL

## 2016 and 2017 Public Meetings in Magnolia Neighborhood

January 19, 2016	MCC Board Meeting
February 16, 2016	MCC Board Meeting
March 15, 2016	MCC Board Meeting
March 22, 2016	Expedia related expansion at Interbay
March 31, 2016	Sound Transit 3 presentation
April 14, 2016	Magnolia Bridge planning
April 19, 2016	MCC Board Meeting
May	No MCC Meetings
June 21, 2015	MCC Board Meeting
July	No MCC Meetings
August	No MCC Meetings
September 20, 2016	MCC Board Meeting
October 6, 2016	Seattle Parks Smith Cove Park Design
October 18, 2016	MCC Board Meeting
November 15, 2016	MCC Annual Community Meeting
December	No MCC Meetings
January 17, 2017	MCC Board Meeting
February 21, 2017	MCC Board Meeting
March 21, 2017	MCC Community Meeting
March 21, 2017	MCC Board Meeting
April 18, 2017	MCC Board Meeting
May 4, 2017	City of Seattle Magnolia Bridge Study Meeting
May 16, 2017	MCC Board Meeting
June 20, 2017	MCC Board Meeting

Further underscoring the lack of the MCC's representation of and relevancy to the Magnolia and Interbay communities, and more importantly the grossly misplaced reliance by the City upon its cozy relationship with the MCC is the MCC's website and the information it presents, or does not present as the case may be.

Under the MCC's website's page "Current Issues" affecting Magnolia is the headline – "Current Issues as of October 4, 2015", uh, a date over a year and a half ago! And the then "current issue" was about homeless encampments. There are no other entries or other issues listed, zero about a major up-zone that will affect Magnolia's core business district, as well as several of its neighborhoods.

Under the tab "Board & General Minutes: General Meeting Minutes" the last entry is for the September 201, 2016 meeting, now over nine months ago, with a brief nod to City of Seattle land use planning – in the Queen Anne neighborhood! The MCC board was inclined to send \$500 to the Queen Anne Community Council to support the QACC's own land use planning efforts in its neighborhoods. Outside of that and one other very brief discussion about the City's Comprehensive Plan, there was no acknowledgement or otherwise attention given to the ongoing MHA planning effort that was to be visited upon Magnolia and Interbay.

## MAGNOLIA NEIGHBORHOOD PLANNING COUNCIL

At the MCC's November 15, 2016 board meeting likewise there is zero reference to the City's MHA planning – including that it was going through an EIS process, and that the City was holding multiple neighborhood outreach meetings across Seattle.

There are no meeting minutes posted online for the MCC for its May, June, and October 2016 *board only* meetings. Likewise, there are no meeting minutes posted for the MCC's January, February, and March 2017 *board only* meetings. On information and belief, after conducting a broad inquiry – the board engaged one-on-one with the City about the MHA planning, with the goal of the City to gain the MCC's support of the MHA plan, and the board engaged with itself about the same.

At no time has there ever been a meaningful and credible dialog by the Magnolia Community Council or by the City of Seattle about the HALA Agenda and the Mandatory Housing Affordability planning.

## NO URBAN VILLAGE, HUB, OR OTHER URBAN CENTERS IN MAGNOLIA OR INTERBAY NEIGHBORHOODS

The HALA plan and MHA plans are predicated ostensibly limiting its up-zoning, re-zoning or other exceptional land use planning tools and schemes to Seattle's urban villages, hub urban villages, urban expansion areas, urban centers, and existing zones for commercial or multifamily development. While technically Magnolia and Interbay have versions of commercial zones, and some zoning for multifamily use, it is hardly of the scale of those areas in the city that literally host established urban villages, urban expansion areas, urban centers, and the like.

The City should be reminded that unlike those long designated and established areas in Seattle, Magnolia and Interbay opted out of being part of the planning that ushered in those zones of density and rampant development. Neither ever planned for or otherwise undertook the steps that led to local plans and guidelines for accepting growth, density, and now this latest, the usurpation of even those plans.

The City has no basis upon which to layer its HALA agenda and MHA initiative on the areas of Magnolia that it has targeted; not only is there no community planning precedence upon which to base it, but as noted above, the top-down planning and zoning edicts of the City of Seattle as part of its HALA agenda/MHA initiative, complete with engaging in shenanigans with the Magnolia Community Council to gain "Magnolia's approval" delegitimizes the process, the procedures in the environmental review process, brings into question the legitimacy of the scoping process. Pretty hard to participate if you don't know that there is something to participate in, in the first place!

OFFENSIVE PROCESS, CITY OF SEATTLE DECLARING WAR ON PARTICULAR NEIGHBORHOODS,  
INCONVENIENT CITIZENS AND THEIR CONCERNS

Starting with the offensive and clearly confrontational narratives that came out of the HALA report process – that single family homes/homeowners/zoning, to wit, that it has its basis in racism and class exclusion, is a barrier creating equity and affordability in Seattle, and as a class, single family zoning and by its extension that group of individuals should if not outright, at least through a program of ongoing attrition be eliminated.

MAGNOLIA NEIGHBORHOOD PLANNING COUNCIL

While the rhetoric has been toned down, the intention and goals have not. There is no hands-off promises in the HALA/MHA plans to preserve and protect those areas of the city where family's go to thrive, live out their versions of the American dream, where aspiration and inspiration meet, in fact it is the plans of HALA and the MHA component provide the slippery slope to usher in that outcome.

Accordingly, the final charge here is again related to the illegitimacy of the agenda, its conceptions, and the clearly aggressive stance, aims, and process that has unfolded, targeted directly at the socially and culturally popular/valuable housing norm, the single family home/single family zoning in the short and long term.

For all these reasons the Magnolia Neighborhood Planning Council opposes the HALA agenda, the Mandatory Housing Affordability plans, and requests that the City withdraw those on the basis that they have been gained at the end of the public processing sword that the City of Seattle has become so adept at wielding, that it is an illegitimate process on the basis that it gained its "support" from the worst kind of corruption, and that there is no neighborhood planning process or zoning/planning in place that sustains the HALA/MHA project.

Sincerely,

MAGNOLIA NEIGHBORHOOD PLANNING COUNCIL

/s/

Elizabeth A. Campbell, MPA  
Chair

Name

Capitol Hill Happy Dog

Comment Form

Comment 1:

- 1 Your premise that the City intend to address equity and social justice is significantly flawed. By excluding most areas that are single family homes that are high value and high income, you have again protected the rich by not facilitating any development in their neighborhoods but are allowing the greatest development in areas of capitol hill where lower income and more affordable housing (if you can still call it that) is available.
- 2 The resulting development in Capitol Hill will replace almost all affordable properties with new developments displacing the current tenants and owners. Just as in most areas of south lake union, developers will pay their way out of providing affordable housing and instead of achieving your goal the result will be the opposite impact.
- 3 Where will the city use the developer payments to build housing? It will be in an existing lower income, lower cost areas so the City can build more housing with available dollars. The end result is that the City actually lines the big developer's pockets and accelerates the gentrification and corruption of our wonderful Seattle neighborhoods. Doing nothing is a much better option than this option. The up zone will only serve to accelerate and exacerbate the problems that the City pretends to try to address.
- 4 You state: "Neighborhoods with high risk of displacement and high access to opportunity are often highly desirable because of the amenities they contain and the relatively lower cost of housing. The desirability of these neighborhoods attracts new development that could displace marginalized populations in these places. An equitable development strategy for these neighborhoods is to stabilize existing marginalized populations while also providing opportunities for economic mobility"

Really? Capitol Hill and First Hill have "relatively lower cost of housing"? The facts do not support this supposition.

- 5 "In September 2014, Mayor Murray and the City Council gathered Seattle leaders to help develop an agenda for increasing the affordability and availability of housing."

The Seattle time has published what really happened, mayor Murray met with developers in a behind closed door meeting. Yet another smoked fill room deal with the rich and powerful to

their benefit. City officials selling out the little guy.

"The City's public outreach effort for the proposed MHA intends to build awareness of the proposal, identify issues that people are concerned about, and collect feedback on zoning changes and other elements of MHA implementation. The City's engagement has used numerous formats, spanned the entire city, and included both in-person and online engagement. "

## Description of the Proposed Action and Alternatives

- 6 I disagree so strongly that the City has been using appropriate public outreach. I have talked to many neighbors and even realtors that were not aware of hardly any details of this up zoning. I have lived in an area that is being up zoned for over two years and have not received any mailing or notice and my area which is currently town houses is being up zoned to 75 foot plus buildings? WTF does not begin to express my outrage at this in justice? I will be bought/forced out (displaced) and the developers will make big money. My wife and I have lived in the area for a long time and are minorities that own. We are not big time, we are small time.
- 7 There is no measure to protect me or any of my neighbors in this plan - just developers. My neighborhood will transition from a vibrant area where people recognize and know each other to a sterile, faceless wasteland of monolithic buildings. There is no measure in your plan to protect current owners and renters of the places that will be bought out. Next I can see the City declaring eminent domain to allow developers to build and force out people who want to stay -where is the guarantee that this injustice will not occur? Where are the measures to protect me from large developers?
- 8 "Planning Principles and Rezone Criteria
  - Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit."

By ignoring areas that have expensive homes around some of capitol hills largest parks that also have good buss access you have failed in this objective.

### 9 "Planning Principles and Rezone Criteria

- Encourage more small-scale multi-unit housing that is family friendly, such as cottages, duplexes or triplexes, rowhouses, and townhouses."

Really? Your plan replaces my area which is mostly townhouses with 75' or taller developer complexes. You have completely failed in this objective. This objective would be viable if you had opened up all the single family areas and distributed the growth. Why did you not restrict up zoning to commercial or business areas? that would have accomplished this objective. Why not extend this plan to all residential areas (oh, right, that would not make big money for developers. Mayor Murray backed away

from this to protect his ass as he could not handle the pressure because he sold us out). This plan is so flawed in achieving it's objectives.

- 10 "Planning Principles and Rezone Criteria  
• Ensure that, in general, any development capacity increases in urban village expansion areas are compatible in scale to the existing neighborhood context."

Really? Your plan replaces my area which is mostly 2 story townhouses with 75' or taller developer complexes depending on what plan is used. You have completely failed in this objective. How the hell does a high rise compare in scale with the existing neighborhood content. There is nothing more than 3-4 stories for a long way around. the existing zoning is appropriate to the area. You need to work withing that context if you are truly going to achieve this objective.

- 11 I have with held my name and contact information for fear of retribution.

#### Demographic Survey (optional)

Have you been or are you at risk of being displaced from your neighborhood?

Have you been or are you at risk of being displaced from Seattle entirely?

Are you now or have you ever experienced homelessness?

Do you live in rent- and income-restricted affordable housing?

How many people are in your household?

Are there children under the age of 18 in your household?

What is your household income?

Do you own or rent your residence?

**From:** Mel Carson  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Please Extend the EIS comment Period to 90 days  
**Date:** Wednesday, June 28, 2017 4:22:19 PM

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Hello –

Please extend the draft EIS comment period to 90 days. The EIS is very long and detailed, it took the city many months to prepare and as residence we need more time to review and comment. 45 days is not enough time, this is a critical public process and affects our community. the community needs time to review.

Thank you!  
All the best,  
Mel

**Mel Carson** | Founder & Principal Strategist  
[Delightful Communications](#) | [Blog](#) | [Twitter](#) | [Facebook](#) | [My Books](#) | [My Speaking Site](#) | Tel: +1 (425) 780-6242

P.S. Please do sign up for our newsletter > > [The Personal Brand Lab](#)

**From:** Tanya Casey  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [FLSTEAMcom@gmail.com](mailto:FLSTEAMcom@gmail.com); [LEG\\_CouncilMembers](#); [spsdirectors@seattleschools.org](mailto:spsdirectors@seattleschools.org); [Bagshaw, Sally](#); [Burgess, Tim](#); [Johnson, Rob](#); [Harrell, Bruce](#); [rick.burke@seattleschools.org](mailto:rick.burke@seattleschools.org); [Jill.Geary@seattleschools.org](mailto:Jill.Geary@seattleschools.org); [leslie.harris@seattleschools.org](mailto:leslie.harris@seattleschools.org); [sue.peters@seattleschools.org](mailto:sue.peters@seattleschools.org); [scott.pinkham@seattleschools.org](mailto:scott.pinkham@seattleschools.org)  
**Subject:** Homelessness  
**Date:** Thursday, August 03, 2017 11:21:18 AM

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I'm writing with a lack of support to having homeless housing in Discovery Park. It makes no sense for our community in Magnolia OR the homeless in that area. There will be an increase of crime rates since it's a completely inaccessible area compared to other regions of Seattle/outside of the city. It's absolutely unclear to me how this option is slightly sensible to the city. Limited Bus Routes, Family neighborhood, HIGH TAXES (this should be something we talk about explicitly), not many grocery stores, not much work options, one of the most beautiful parks in the city.... the list goes on.

The city's department of Housing Affordability and Livability plans to: require new developments to include affordable homes OR contribute to a City fund for affordable housing. To put MHA into effect, they need to make zoning changes that add development capacity and expand housing choices.

These plans would increase density in Seattle neighborhoods (including Magnolia and Queen Anne). We would like to advocate for keeping school capacity challenges in the forefront of this discussion!

Our committee was shocked to hear at a recent SPS board meeting that the school district has NOT been included in any of the city's HALA planning meetings. Solutions are needed to provide adequate classroom space for a growing Seattle population!

Our hope remains that the City and School District can work together to plan for a school at the Fort Lawton site via a "no cost transfer" from the Federal Government.

So much that we've asked for in Magnolia has fallen on deaf ears. My police response time has been about 5 hours. So, I have low hopes of your attention to these requests. However I will continue charging forward in making requests for logical approaches to this issue that won't push out families in Seattle who pay a premium for safety, cleanliness and response. Please consider this plea.

Tanya Casey  
206.353.4769

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Sunday, August 06, 2017 11:29:45 PM

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Hypothetical renderings intended to portray esthetic impact should not give RSL structures peaked roofs, unless RSL standards require peaked roofs. Current development practice strongly favors a flat roof, and there is every reason to expect RSL structures to follow that trend if not prevented by code.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Sunday, August 06, 2017 11:37:19 PM

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The EIS should clearly note the project size based exemptions from Design Review, when citing Design Review as mitigation for esthetic impact. Many projects in areas upzoned from single family will be exempt from any Design Review, so this clarification is especially important in that context.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Sunday, August 06, 2017 11:45:07 PM

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Mitigation for impact on parking should mitigate, which means to "make less severe." The measures discussed on page 3.239 are clearly aimed at making parking impact more severe. I direct your attention particularly to

"\* Parking maximums that would limit the number of parking spaces which can be built with new development."

First, may I suggest, 'spaces THAT can be built ...', but in any case, it must be clear that this is the very opposite of parking impact mitigation.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Sunday, August 06, 2017 11:52:19 PM

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When the EIS proposes that the city may use the RPZ program in mitigations of parking impacts, as it does on p 3.240, it should be made clear enough about what strategy would be employed, that the reader can begin to guess whether the strategy might be effective.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Sunday, August 06, 2017 11:57:40 PM

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The EIS should consider evergreen trees separately when assessing impact on tree canopy, in view of their significantly superior performance in rain interception. Either evergreen trees in general, or coniferous trees as opposed to broadleaf would be acceptable.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 12:01:53 AM

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It is manifestly incorrect to suppose, as the Draft EIS does on pages 3.309 and 3.310, that "impacts on fire and emergency services as a result of demand increases would be identified and managed." The city does not maintain adequate fire fighter staff levels today, is apparently unable to replace retirees and there is no reason to suppose that the future will be any different in this respect from the present.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 12:09:56 AM

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The EIS should consider a better measure of Police service than average response time. Average response time could - and does - conceal the all too common much longer response times. A better measure would be the maximum time before which 90% of responses occur.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 6:58:56 AM

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Analysis of access to opportunity should favor light rail connectivity, over proximity. Neighborhoods near downtown, for example, still require a bus trip, and the buses downtown from those neighborhoods are over capacity and unreliable, so a light rail connection provides better access.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 7:03:35 AM

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Impacts on views and shading can't be adequately assessed by general statements about urban villages in Seattle. This assessment requires that specific views be identified, and shadows projected for specific areas where dramatic upzones are proposed.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 7:09:28 AM

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The draft EIS calculates a need for 40 additional acres of open space, in Alternative 1, and 434 acres in Alternative 2 and 3. The EIS should either conclude that the difference (394 acres) is at least in part an unavoidable impact, or it should present a plausible way that the 394 acres could be acquired in mitigation, in sufficient detail that the reader can judge whether the proposed mitigation is likely to be accomplished.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 7:11:43 AM

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The EIS should consider the role of traffic congestion, under different alternatives, in their impact on Fire Department emergency and fire fighting response.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 7:16:03 AM

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The EIS should consider local impacts on school capacity, as school attendance is localized and some schools may be over-crowded while others are not. Alternative 3 intends to increase density in different locations than Alternative 2, so the assumption that it would have the same impact (p. 3.310) seems clearly false.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 7:24:10 AM

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The EIS should consider effects of construction activity on public health.

- noise
- diesel exhaust gas pollution from on-site equipment with diesel motors
- diesel exhaust gas pollution from trucks and other delivery vehicles
- particulates from demolition
- asbestos from demolition
- particulates from construction activity, including silica from work with concrete and Hardie panels.

These are point source effects that won't be effectively captured by regional monitoring, but will be significant at ground level in neighborhoods affected by a more or less constant level of development in order to arrive at the proposed density.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 7:27:39 AM

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Where the EIS proposes regulatory standards as mitigation of pollution, for example asbestos mitigation during demolition, it should consider typical levels of compliance with those regulatory standards, in the study area.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 7:32:17 AM

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Renderings for the purpose of gauging esthetic impact should present hypothetical new construction side by side with existing buildings, at the same scale. This requirement is not met by perspective renderings that put the hypothetical new construction in the distance and thus at a smaller scale.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

**From:** Donn Cave  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS comment  
**Date:** Monday, August 07, 2017 7:40:55 AM

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The draft EIS fails to adequately assess impacts of different alternatives on my neighborhood, Wallingford. It presents hardly any information about impacts in Wallingford, and certainly not enough information to understand the impacts of the alternatives.

The EIS must assess impacts on the affected areas, not just present general conceptual information that would allow readers to complete this assessment on their own.

Thank you,  
Donn Cave  
3803 Ashworth Ave N  
Seattle

<b>Name</b>	Celeste
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 Each of these areas is so vastly different they need their own study
<b>Housing and Socioeconomics</b>	2 This area is densely populated by POC who do not necessarily read and write in English. This Information needs to be sent out in multiple languages
<b>Land Use</b>	3 South Park is NOTHING like the ID which is NOTHING like areas in NW Seattle. Again these areas need their own study.
<b>Aesthetics</b>	4 By all means come fix up the buildings. Help businesses clean up their parking lots and get people to stop dumping on our yards
<b>Transportation</b>	5 More bus routes!
<b>Biological Resources</b>	6 Just clean it up, don't dig it up
<b>Open Space &amp; Recreation</b>	7 We have enough thanks
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced</b>	

<b>Name</b>	Mike Cerceo
<b>Email address</b>	
<b>Comment Form</b>	
<b>Housing and Socioeconomics</b>	<p>1 Upzoning of the technically “multi-family” tendrils reaching into clearly single-family neighborhoods is a bad idea. An example of this is the west-side of 11th Ave E between Prospect and Aloha. There are many other similar blocks. The benefit of upzoning here is insignificant, but it's laden with negative side-effects for the residents who live in these family neighborhoods: traffic congestion, parking problems, noise, view obstruction, safety issues. Each of these areas is so small, the payoff is so small, it leads me to think this is part of a longer game where the upzoning wedge extends further into single family neighborhoods. Don't even start to do this.</p>
<b>Transportation</b>	<p>2 MHA upzoning negatively affects traffic and has no coordinated transportation solution for the problems it creates. Assuming new residents won't bring cars is a wish, not a plan. Seattle's geography with hills, ravines, lakes, cuts, and the Sound limits our ability to improve traffic flow with additional arterials, even if we had the will and money and time. Seattle's geography is not like other cities. And our rail projects are coming in very, very slowly. Upzoning increases density which increases traffic because people still drive personally-owned cars. Traffic has already become huge problem in the past few years due to already-occurring increases in density. Someday, I hope, self-driving shared vehicles that dramatically decrease personal car ownership will solve Seattle's traffic problems. Till then, let's not make the traffic problems even worse than they are today. If there were an accompanying coordinated transportation plan with MHA, we could take upzoning seriously, but there is not.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted</b>	

**From:** Sabina Chan  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comment of MHA EIS  
**Date:** Monday, August 07, 2017 8:35:45 AM

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*The following is our neighbors' comments, that represents our as well.*

*The draft EIS acknowledges that among the changes proposed, up- zoning Single-Family-Residence streets to Low Rise 2 would have the “most severe impacts.” (3.90) However, a few pages later, it finds that the impact on the **one and only** street in the Northgate Urban Village that is in this exact situation would be “moderate.” (3.105) That’s the street we live on.*

*There is nothing moderate about up- zoning one side of a residential street to LR2. The population could increase 400%. There is no room for even a dozen additional vehicles to park, but traffic and parking problems on this narrow street would increase exponentially. No data appear in the EIS for street parking or traffic in the Northgate Urban Village. (3.169, 3.195) We are not in a 5 minute walkshed for the transit center, (1.9) even with the planned pedestrian bridge across I-5. Most of the residents on the up zoned side of my street are renters, and all would likely be displaced, because their affordable housing would disappear. Over half of these renters are people of color.*

*There is no sidewalk in this narrow street. With the increase of residents, the degree of unsafe and hazardous environment will be multiplied, especially school kids.*

*One of MHA-HALA’s guiding principles is to provide transitions between vastly different sizes and uses of buildings. Currently, our street provides this transition. Both sides of the street are houses with yards. Directly behind us to the east are LR2 and LR3 apartment buildings and condos, with commercial buildings east of them. Between these multiplex buildings and the single-family houses are back yards, a greenbelt of trees and green space. This transition would be destroyed by re-zoning. Instead, 40 foot high, 4 story boxes could almost completely fill lots, facing and along side small houses. The effect is neither gradual nor moderate. It would be abrupt and severe.*

*The yards and gardens that absorb rainfall would be gone, an issue the EIS fails to address adequately.*

*A “possible mitigation method” listed in the EIS is to “Amend zoning regulations in urban villages to explicitly address transitions to surrounding areas, particularly single-family residential areas adjacent to urban village boundaries.” (1.21)*

*Thank you for your considerations.*

*Yours sincerely,  
Joseph and Sabina Chan*

*We are the owners of 10311 Wallingford Ave N, Seattle, WA 98133.*

<b>Name</b>	Paul Chapman
<b>Email address</b>	
<b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b>	Welcoming Wallingford
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 I am in favor of Alternate 3 because it increases the housing in my neighborhood (Wallingford) over Alt 3 and shapes the investments based on displacement and opportunities. However, I would prefer you study ways to increase housing production further -- both market rate and affordable -- with Alt 3. The EIS should study the impact of increasing the urban village boundaries of at least the Wallingford Urban Village to include 1-2 blocks on either side of Stoneway from 50th to Lake Union and from 40th to 50th along 45th from Aurora to I-5.</p>
<b>Housing and Socioeconomics</b>	<p>2 We need to produce a higher number of Family Sized units (those that are 2-3 bedrooms) in order to retain residents as they age and start families. The EIS has not done enough to study alternatives that increase dramatically the number of family-sized units in Seattle. To bolster this goal, the EIS should also study the impact of rezoning ALL single family lots across Seattle to allow both ADU &amp; DADU, as well as RSL, and L1. The EIS has not adequately studied methods that incentivize a larger number of units available to own rather than rent (including townhomes, stacked flats, and condos). Ownership is the path to household wealth creation and we must ensure that we increase the number of units for purchase a somewhat more affordable price point. The EIS also should study the impact of changing city policy for managing and disbursing public lands in a way that increases the number of affordable housing units. The EIS needs to study more options for landlords that allow them to offer affordable rents, such as increased/extended tax rebates, earthquake renovation assistance, etc. The EIS should also study the impact of various rent stabilization/control models to help mitigate affordability problems. The EIS failed to study the impact of measures that decrease the attractiveness of speculation, particularly by businesses and by non-resident persons.</p>
	<p>3 The EIS should study the impact of increasing the urban village boundaries of at least the Wallingford Urban Village to include 1-2 blocks on either side of Stoneway from 50th to Lake Union and from 40th to 50th along 45th from Aurora to I-5.</p>

<p><b>Land Use</b></p>	<p>The EIS should study the impact of rezoning ALL single family lots across Seattle to allow both ADU &amp; DADU, as well as RSL, and L1.</p> <p>The EIS should study the impact of increasing the Northgate Urban Village -- which is on a major transit line -- from M1 to M2, as well as dramatically increasing the height limits</p>
<p><b>Aesthetics</b></p>	<p>4 The EIS neglected to study the impact of policies enacted by Vancouver BC to produce a well-designed city. The EIS should also study the impact of so-called Live-Work spaces versus commercial or even Vancouver-style townhomes. I am in favor of Alt 3 height increases.</p>
<p><b>Transportation</b></p>	<p>5 The EIS failed to study options for completing ST2 and ST3 faster! 2038 is WAY TOO LONG TO WAIT! The EIS failed to study options for building light rail to the top of Queen Anne, and from Ballard to UW through Wallingford, with a stop at Woodlawn Park and at about Meridian. The EIS did not assess the impact of building (useless) trolleys rather than investing that money into better bus transit. The EIS should study an option of eliminating ALL parking requirements city-wide, and eliminating all free on-street parking! The EIS did not consider improving transit flow by eliminating parking on narrow arterials like 40th St and Latona through Wallingford. The EIS should study the impact of wider sidewalks in Urban Villages. The EIS did not study the impact of Copenhagen-style bike lanes that are separated and NEXT to the sidewalk, not between the parked cars and moving traffic. In order to better understand the options for improving transit speed and reliability, the EIS should investigate the impact of restricting the times during which the ship canal bridges are opened to no more than once per hour, and not at all between 6:30-10am and 3:30-7pm. The EIS should study more the necessary increased investments in transit to support increased development in urban villages.</p>
<p><b>Historic Resources</b></p>	<p>6 Please, let's not keep old shit just because it is old. If it is not distinctive, let it go. The EIS did not study options like transfer development rights to enable historic buildings to be maintained in lieu of development.</p>
<p><b>Biological Resources</b></p>	<p>7 A significant problem in Seattle today is that sidewalks are broken up by trees set in the middle of them. Tree canopy is great! However, there *must* be minimum sidewalk widths in high capacity areas so that there aren't pedestrian choke points. The EIS also did not study enough the impact of water retention and run-off to ensure that our planned mitigations of combined sewers are adequate for the next 40 years of development.</p>
<p><b>Open Space &amp; Recreation</b></p>	<p>8 The EIS did not consider or study the impact of the following to mitigate the increased population and development: purchasing single family lots to convert into pocket parks. Increased transit to major parks to enable broader utilization of those parks. After all, the number of acres per person is in many ways less important than the number of people who make use of the parks we already have.</p>

**Public Services & Utilities**

9 The EIS has at best a cursory study of impact of increased population on the need for schools. More in-depth research is required. The EIS should study the impact of a significant increase in stormwater management across all single-family homes, by incentivizing and/or advising homeowners to increase management of stormwater on their properties. The EIS should also study the impact of increased population on utilities such as internet, including whether the city should adopt its own internet service in order to improve the quality and affordability of this basic service.

**Air Quality & Green House Gas Emissions**

10 Most conspicuous in the entire EIS is the lack of any study of the environmental impact of various efforts to reduce single-occupancy vehicle trips. The EIS \*must\* study various mitigating efforts such as: eliminating parking minimums city-wide, prohibiting parking in some new construction, converting all one-street parking to paid parking, and other measures that change the incentives from people driving cars to people using transit and other forms of transportation. This \*must\* be studied.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of**

**Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Charlotte
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 I live in Othello and I think the alternative 2 expansion may be too aggressive. A lot of people and businesses are already being displaced here. However, I do like the alternative 3 upzones and do think we need more density.</p> <p>2 Many of my friends live in north Seattle and I support aggressive upzoning there; areas such as Wallingford and Ravenna need a lot more density to accommodate demand and homeowners there are generally well off, so I support the alternative 3 plan there. Too many people are already priced out as is. A lot of my friends and co-workers live in Capitol Hill. We need aggressive upzoning and building there to catch up with demand. I think the alternative 2 plan there will provide the least displacement overall.</p>
<b>Housing and Socioeconomics</b>	<p>3 Historically as neighborhoods get development and investment, communities of color, especially Black communities, get displaced. Thank you for being explicit about this and please make sure increased density benefits everyone.</p> <p>4 In particular, rich communities like Magnolia and Queen Anne should have more subsidized housing and density.</p>
<b>Transportation</b>	<p>5 Seattle can't handle more cars in the city center. Please prioritize transit and walking over cars and parking. Aside from disability access, cars should be funneled away from downtown/central areas.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children</b>	

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**From:** mark cherberg <zweipointer@outlook.com>  
**Sent:** Saturday, August 05, 2017 1:28 PM  
**To:** PCD\_MHAEIS  
**Subject:** EIS for MHA upzone

The City's analysis of the impact of growth and mitigations are woefully and deliberately inadequate; they are designed to self-serve the interests of developers and to make things as easy as possible for SDCI land use, OPCD and other City Department staff.

This EIS fails to serve the public interest.

<b>Name</b>	James Chesko
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 Surprising that Option 2 and 3 seem to have about the same predicted effect, both better than Option 1
<b>Housing and Socioeconomics</b>	2 I live in a 'low displacement area' yet have seen 40% of my closest neighbors turn over in the past 3 years. It must be much worse in the 'high displacement' places!
<b>Land Use</b>	3 The statement that single family housing preserves/values low height, bulk and scale is inaccurate. It allows developers to build monstrous, big boxes that are as tall as commercial buildings (e.g, > 40' tall, higher than the telephone poles on our block) and out of place in terms of bulk, scale and character. If you are going to build something that big and ugly at least let it house 4-6 diverse, hard working families rather than a single, pretentious one.
<b>Aesthetics</b>	4 Current system is displacing middle class people in droves and replacing tasteful homes with vain monstrosities that cater to the 1% (rich). If you truly value Seattle Design Guidelines (homes matching the height, bulk and scale of the neighborhood) you should enforce them.
<b>Transportation</b>	5 Putting appropriate infrastructure in place (e.g. public transit, alternatives to cars) is key to avoiding a LA-style mess.
<b>Historic Resources</b>	N/A
<b>Biological Resources</b>	6 The statement 'Seattle values and protects trees' and plans to increase canopy coverage by 30% by 2031 seems at odds with how supportive SDCI is about permanently destroying large, unique residential green canopies, open/green space, and adding large new combined sewers into existing overburdened systems.
<b>Open Space &amp; Recreation</b>	7 Seattle parks are nice and we should have more of them. Soon they will be the primary locations to see greenery (plants, trees) and the sun/daylight.
<b>Public Services &amp;</b>	8 Emergency services are necessary. I live in an area where flooding is getting worse yet they keep adding asphalt and new

**Utilities**

8 combined sewers and taking away soil, trees and open spaces. Millions get paid out in damages while residents prefer more effective management of water issues.

**Air Quality & Green House Gas Emissions**

9 Pollution will get worse if bigger homes and more cars continue to grow. Let's try for more efficient (eg. passiv) houses, transportation alternatives to cars.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of**

**Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Brent Christian
<b>Email address</b>	
<b>Comment Form</b>	
<b>Transportation</b>	<ol style="list-style-type: none"> <li>1 The traffic analysis is inaccurate. The statement that the Rapid Ride C line operates at 67% capacity at peak hours is untrue. Actual riders of the C line, such as those in my household, know that it is overcrowded and skips stops due to being full during peak trips.</li> <li>2 The analysis of traffic over the West Seattle bridge was severely lacking, making conclusions from only a single data point, one evening in March.</li> </ol>
<b>Historic Resources</b>	<ol style="list-style-type: none"> <li>3 The DEIS did not even consider the historic Hamm and Campbell buildings in the Alaska Junction in West Seattle. Nor did it consider the 2016 survey of historic properties along California Ave SW and the 3 streets immediate east and west of it.</li> </ol>
<b>Public Services &amp; Utilities</b>	<ol style="list-style-type: none"> <li>4 The DEIS fails to recognize the lack of school capacity around the West Seattle Junction. The schools are already over capacity, and no proposals have been made to address this issue, let alone additional capacity problems that would come with increased population.</li> <li>5 The wastewater systems in the West Seattle Junction are undersized, most under 12 inches wide. No plan for the needed upgrade is included in the DEIS. The DEIS analysis was faulty, failing to study peak flows.</li> </ol>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	

**COMMENTS ON DRAFT EIS RE: MHA**

Overall Analysis

DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3

~~Community Feedback~~

DEIS fails to take into account documented Junction neighborhood feedback.

Lack of Affordable Housing

DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.

Neighborhood Plan

DEIS reflects City's failure to honor neighborhood plan.

Traffic *measured the wrong way/direction*

DEIS analysis is flawed; Fails to utilize meaningful data.

Green Space

DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.

Neighborhood Character

DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.

Loss of Light and Air

DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings

Loss of Views

DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.

Historic Buildings

DEIS fails to recognize historic buildings in Junction.

Public Safety

DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.

Utility Infrastructure

DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.

Schools

DEIS fails to note existing lack of school capacity and impact of increased density thereon.

Other

I have other concerns regarding the DEIS including, but not limited to, the following:

*West Seattle should be planned around the light rail! New buildings may have to be demolished by poor city planning*

Name: Katharine Christian  
Address: 5033 41st Ave SW

**From:** David Christie  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Herbold, Lisa](#)  
**Subject:** DEIS MHA response  
**Date:** Sunday, July 30, 2017 10:19:44 AM  
**Attachments:** [DEIS Letter sent.pdf](#)  
[our map.jpeg](#)

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Please refer to the enclosures for our thoughts on the DEIS.

We are located on 42nd Ave SW, Seattle in Morgan Junction (see enclosed map)



July 29, 2017

Dear HALA Team,

This letter is in response to the HALA/MHA Draft Environmental Impact Statement and our justifications on why we favor the **"No Action" Alternative 1**.

We have lived in the West Seattle, Morgan Junction area of lower Gatewood for 42 years. In that time we have supported almost every city levy, public school funding proposal, STA and Metro ballot measure, special levy items, the monorail three times, and yes, the most recent housing levy. We understand the importance of managed growth but cannot support the overall HALA/MHA plan. It's not because we don't think managed growth is important, but the HALA plan leaves much to be desired and should be looked at with much more grass roots input from the residents of the city.

This letter is to pinpoint our concerns with one small area in our immediate neighborhood, but we also have concerns about the greater Morgan Junction, and the rest of the city as well. We defer to Morgan Junction Community Association for comments on the entire area of MJ. *Please see the enclosed map* to find our two block long area of 42nd Ave SW and Parshall Place SW in West Seattle, from SW Holly St. to SW Frontenac St. Alternative 2 would mean a double upzone of this SF area due to the fact that it is going from SF to RSL (the old one) and now to RSL (the upzoned one) Alternative 3 would be a quadruple upzone if you consider this progression, SF > RSL Old > RSL New > L1 old > L1 new. To us, this is not a gradual transition by the DEIS' definition. Note: Alt 3 was mis-numbered on the DEIS map as another Alt 2.

Our overall concern is one of simply too much density coming into a Single Family neighborhood, and the fact that "affordable housing" in the HALA plan will yield too little compared to "market housing." Yes, Seattle should do its part in providing affordable housing, but it seems we are bearing the brunt of the zoning changes and costs, both in financial terms and livability, of King County.

***DEIS Page 1.20***

Mitigation Measures

Other possible Mitigation measures

\*Amend zoning regulations in Urban Villages to especially address transitions to surrounding areas, particularly SF residential areas adjacent to urban village boundaries.

\*Consider specific block patterns and access conditions and reduce the degree of land use change.

*Comment:* The alleyway west of 42nd Ave SW (Parshall Place) now acts as a buffer from L3 zoning on California Ave SW. Both Alternative 2 and 3 would create the

need for another buffer 1/2 block east, to the middle of 42nd Ave SW. This creates two transitions within 1/2 block of each other, hardly optimal zoning.

**DEIS Page 1.23**

Other possible Mitigation Measures

\*Work with neighborhood groups to create and codify neighborhood design guidelines.

*Comment:* There hasn't been enough input from neighborhoods, the proposals have been mostly top down.

Transportation

**DEIS Page 1.23**

Autos and Transit

\*Under Alternatives 2 and 3, there would be a potentially significant adverse impact to auto traffic, freight, and transit.

*Comment:* The traffic is already bad, and transit is inefficient at various times of the day, this would make it much worse. Poorly maintained roads and lack of various transit modes, no one even knows where rail will go when it's here.

Parking

**DEIS Page 1.25**

On street parking demand exceeds supply now. Alternatives 2 and 3 will be much higher impact than "No Action" in the future. Significant adverse parking impacts are expected under 2 and 3.

*Comment:* Adequate parking is already a problem in our general area. Some side streets have become one way, being filled by parked cars, and shortcuts taken around Fautleroy, Morgan, and California Aves by traffic to reach McDonalds and Thriftway. The fact that no parking is required for new housing in urban villages, is burying ones head in the sand regarding how many people have cars, and will have cars for the foreseeable future.

**DEIS Page 126**

Implement parking maximums, increase parking fees for residents

*Comments:* Why should residents pay for a problem created by the city? The refusal to mandate parking as part of construction is one of shortsightedness.

Require at least some off street parking for every new unit being built. Some cities have learned how to do this, then later convert the parking area into living space as the transit infrastructure grows to meet demand.

Tax breaks or less impact fees could be an incentive for developers to do this, of course, there would have to be impact fees to begin with, which should be part of any package the city enters into.

Free parking stickers to those who actually park on the street where they live.

#### Historic Resources

##### **DEIS Page 127**

Alternative 2 and 3 would create a greater likelihood that MJUV would suffer a greater chance of impacts to historic resources.

#### Mitigation Measures

\*Comp plan policies that promote any new development consistent with historic character of the neighborhood.

#### Open Space and Recreation

##### **DEIS Page 1.30**

A decrease in availability would be primary impact.

*Comment:* We already have too few green spaces in Morgan Junction.

#### Public Services and Utilities

##### **DEIS Page 1.32**

A general increase on use of existing systems.

*Comment:* These systems are already overtaxed and in need of repair. West Seattle would be in very tough shape for hospitals and emergency services if a major disaster struck. If the West Seattle or 4th Ave. S bridge went down, the closest hospital is Highline in Normandy Park/Burien area. Many streets and sidewalks are in need of major repair.

Significant Areas of Controversy/Uncertainty. Issues to be resolved.

##### **DEIS Page 1.6**

The approach to MHA development capacity increases in Urban Villages of differing displacement risk and access to opportunity.

The intensity of MHA rezones will be higher in areas currently zoned Single Family residential in existing urban villages.

#### Displacement risk

##### **DEIS Page 2.11**

Morgan Junction is considered low for displacement.

*Comment:* Why should there be any displacement? Many current low income residents are at risk of being replaced by future residents who can afford the

housing, even the affordable housing, which would be inadequate in numbers at best.

Morgan Junction does not have as much to offer existing residents from Alternatives 2 and 3, as it does by staying "No Action." There are empty units now that could be rented as "affordable" units paid by impact fees or part of the fees a developer gives up if not building the affordable units himself. There is also room along California Ave SW from SW Orchard to SW Raymond for more new units to be built without having to change the zoning at all.

#### Public Outreach

##### **DEIS Page 2.13**

*Comment:* Many of the examples here were implemented only after *The Seattle Times* outed the mayor's plan. Many meetings we attended were poorly organized, held in venues that were too small, and tightly controlled in the types of discourse that was allowed. This was all done after the mayor had "de-certified" the current neighborhood groups, many of whom have worked very hard to come up with good neighborhood plans. Not a good way to get honest citizen involvement, or perhaps it wasn't wanted. Many residents feel that their voices still have not been heard.

#### Zone Categories

##### **DEIS Page 2.18**

*Comment:* This explanation doesn't really tell the whole story. A current SF zone going to an RSL zone is actually 2 jumps in intensity, not one, as the RSL zone has increased from the original one. A jump from SF to L1 is 4 jumps in intensity. SF >RSL old>RSL new>L1 old>L1 new.

#### Planning Principals and Rezone Criteria

##### **DEIS Page 2.21**

Transitions between higher and lower scale zones.

Ensure that in general, any development capacity increases in urban villages are compatible in scale to existing neighborhood.

#### Demolition

##### **DEIS Page 3.58**

Some but not all demolitions result in displacement of low income households.

#### FLUM

##### **DEIS Page 3.81**

Opportunities for detached SF that have low height, bulk, and scale to serve a broadening of households and incomes.

*Comment:* This could be expanded beyond UV's and provide much more affordable housing than proposed.

Policy LU 1.4

**DEIS Page 3.86**

Provide a gradual transition in building height and scale where they border lower scale areas. Also see policies LU 2.7, LU 7.3, LU 8.4, LU 8.13

Impacts

**DEIS Page 3.88**

Intensification of use, Density increase, Scale Change  
Exhibit 3.2-3 Land use impacts by Zone Changes

Exhibit 3.2-4

**DEIS Page 3.92**

Impacts in SF Zoned Areas

**DEIS Page 3.94**

As noted, regardless of MHA, greatest potential for significant adverse land use impact occurs in SF areas rezoned to higher intensities.

UVs with greater quantities of existing SF, could experience more local land impacts than those with little SF zoning.

Exhibit 3.3-7

**DEIS Page 3.131**

Morgan Junction does have neighborhood guidelines

Policy LU5.15

- Zoning that considers views with special emphasis on shoreline views
- development standards that help to reduce height, bulk, scale, and view corridor provisions.
- Environmental policies that protect specified views including mountains, major bodies of water, designated landmarks, and downtown skyline.

Exhibit 3.3-8

**DEIS Page 3.135**

Land use code amendments Alternatives 2 and 3

*Comment:* LR 1, 2, and 3. These are all too big

**DEIS Page 3.138**

In SF zones (M1) zoning changes apply to L1 and L2. Infill development would likely take on a different character and format than established context. This would increase building bulk and visual prominence due to greater height and more intense building form.

*Comment:* We certainly agree with this! New buildings are covering much more of lot space, and many are squared along the top to adversely affect corridor views!

Affected environmental recommendation:  
DEIS Page 3.153

**Our preference after considering all the options**

**\*Alternative 1: "No Action" in this small pocket of Morgan Junction**

MHA would not be implemented, development would be consistent. No zoning changes would occur and Alternative 1 would not result in any aesthetic impacts beyond those analyzed in Comp Plan EIS.

**Final thoughts:**

--Years have been spent making coalitions and agreements with neighborhoods in the city, now these neighborhoods have largely been left out of the conversation at the most critical first stages. Executive decisions to not recognize existing neighborhood groups have many in our city wondering about real involvement; this doesn't bode well for democratic decision making.

--Deliberate conflicts with neighborhood plans from 1999 (some revised since) reeks of arrogance and social engineering, and does not bode well for future confidence in city government.

--There is still much debate citywide about whether the proposed HALA plan will provide the city with enough "affordable" housing. The lack of requests by the city for impact fees and other developer requirements, show a clear bias against tax paying residents and too much deference to developers.

--While much is said about property values, the truth is no one really knows how upzoning will affect certain neighborhoods. It has the potential to create winners vs. losers, never a good way to do business. Longtime taxpayers within the city could be treated very differently through unintended consequences.

--We've heard a lot about displacement, but the fact is there will be a lot of it. When this becomes a reality, we are in fact trading too many current low income residents for future higher income residents. Whether it is intended or not, this is gentrification and flies in the face of the problems you've pledged to solve.

--There are many units available now at market value. Why can't the city do more to help convert these into affordable housing? Many residents feel that developers are calling all the shots, and the 'Grand Bargain' is neither grand, or a bargain.

--If we are truly in an affordable housing crisis, HALA implementation won't solve the problem immediately, it will take long term. It depends on if and when current owners decide to sell their property. In the meantime, what happens? Seattle seems to be bearing the brunt of the housing shortage; how about more cooperation with cities within King County that are farther out. In many cases, the transit from those areas is better than the transit within Seattle itself. Example: Residents of Kent, Auburn, Sumner etc can catch Sounder and be in downtown Seattle in 30-40 minutes. It takes that long for auto transit to get from West Seattle to downtown during rush hour.

--Many of the growth pocket residents do not even know where their transit stops will be when STA is finished. Why isn't this being coordinated?

--Too many times the affordable housing argument ends up with finger pointing and name calling. "Nimby" vs. "Yimby" is just one example. This does no one any good and simply pushes people away from solving issues. There are legitimate concerns by everyone interested, the more we treat them as that, the more progress we will make toward a solution that can work for everyone. No matter what happens, we should not be creating winners and losers. It may take a bit longer to do right, but doing right should be the goal.

--Many items that may seem small in the context of the bigger picture, actually play a large role in how many residents feel about what's happening. Parking issues, space and greenbelt issues, neighborhood "feel" issues are all important items in making people feel amenable toward new ideas, are downplayed. There is a major cloud of angst and doubt over the city's lack of concern about this and no real attempt to work with those who doubt it.

Thank you for reading this,

Dave and Cinda Christie  
6718 42nd Ave SW  
Seattle, WA 98136  
206 932 9135  
dnchr@earthlink.net



**From:** Brian Chu  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, August 07, 2017 8:18:44 PM  
**Attachments:** [YCC\\_DRAFT\\_EIS\\_Comments\\_Final\\_2017.pdf](#)

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My name is Brian Chu of the Yesler Community Collaborative. Please find our comments of the Draft EIS attached.

Best regards,

Brian

--

Brian Chu  
Operations and Communications Manager for Yesler Community Collaborative  
*Supporting equitable and sustainable community development*  
[www.yescollab.org](http://www.yescollab.org)



yesler COMMUNITY  
COLLABORATIVE

PO Box 25803, Seattle, WA 98165 | YesCollab.org

## YESLER COMMUNITY COLLABORATIVE COMMENTS ON MHA DEIS

August 2, 2017

YCC continues to encourage the City to apply an equity lens in the implementation of MHA citywide based on its 2016 Growth and Equity analysis. Using contrasting Alternatives in the DEIS to investigate displacement risk under different zoning scenarios is an appropriate approach. We recognize that modeling growth and displacement risk is inherently very difficult and that the results of any such analysis should be considered illustrative rather than definitive. Yet, Councilmember Herbold raises many points that might further characterize the displacement risk ([Councilmember Herbold blog](#)). Where good data can be found and a sound analytical method applied, we encourage the City to dig deeper into the questions she raises, particularly concerning the potential impact on neighborhoods such as the Central District and the Chinatown-International District that are trying to preserve their cultural character in the face of overwhelming change.

While MHA is a crucial tool to generate more affordable housing, it cannot be expected to solve the affordable housing crisis by itself. We appreciate the City's commitment to additional measures, such as those included in the companion resolutions to MHA implementation in the Central District and the C-ID. Active and careful monitoring of the effects of MHA on affordable housing production, neighborhood character and displacement will also be necessary. We look forward to working with the City to develop mitigation measures and other tools that will keep Seattle a city for the many well into the future.

**From:** Bill Clark  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comments on draft EIS  
**Date:** Friday, August 04, 2017 2:05:40 PM  
**Attachments:** [MHA.EIS.rtf](#)

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Please find comments attached.

I have three comments on the draft MHA EIS, all referring to the area at the boundary of the Roosevelt and Ravenna neighborhoods . I live in Ravenna.

1. The MHA implementation should respect the natural and traditional neighborhood boundaries, because community engagement in the city's planning processes is organized around the established neighborhoods and neighborhood associations. 15th Ave NE is the natural and recognized boundary between Roosevelt and Ravenna. The expansion of the Roosevelt Urban village into Ravenna would create a sort of no-man's land, which would be extreme in the case of the long salient along NE 65th St proposed in Alt. 3. This is not to say that Ravenna should not contribute to TOD/HALA/HMA in the zone of the Roosevelt light rail station, just that the chosen zoning changes in Ravenna should be adopted without blurring the definitions of the Roosevelt and Ravenna neighborhoods. I'd like to see that alternative considered in the EIS. Failing that, the EIS should point out the problems that the expansion will cause for neighborhood engagement in the planning process.

2. Alternatives 2 and 3 both propose mostly RSL zoning east of 15th Ave NE. It seems to me that this is likely to result in unattractive shantytowns with little increase in housing capacity. Blocks of low-rise buildings (LR-1,2,3) that meet design standards would be better on both counts. A group of Ravenna neighbors has proposed an Alternative 4 consisting of LR-3 on the east side of 15th Ave NE and LR-1 on the west side of 16th NE that would accomplish MHA goals as well as Alt. 2 or 3. This alternative would also exploit the steep slope from 17th Ave NE down to 16th Ave NE to merge the bulkier LR development into the remaining SF neighborhood east of 16th Ave NE. This alternative deserves consideration. As it stands the EIS only considers RSL, which isn't enough alternatives for an EIS.

3. The EIS analyzes a number of urban village expansions but never explains the significance of the urban village designation, nor does it reference any such explanation. Nor could I find any such explanation on the DPD website. As regards regulations (rather than general policy), how does an urban village differ from a residential neighborhood? Does "LR-2" mean something different in an urban village than outside?

The final EIS should contain this information or a reference.

William G. Clark  
6834 19th Ave NE, Seattle

**From:** Josie Clark  
**To:** [PCD\\_MHAEIS](#); [Wentlandt, Geoffrey](#)  
**Subject:** Comments from Columbia City neighborhood group on MHA EIS  
**Date:** Tuesday, July 18, 2017 10:09:17 PM  
**Attachments:** [Col City Neighborhood\\_EISResponse.docx](#)

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Hello -

Thanks for a thoughtful and robust EIS. Please find attached comments from neighbors working together on 33rd, 34th, and 35th Ave S between Oregon and Alaska in the northern corner of Columbia City.

Please let me know if you have any questions.

- Josie Clark  
206-455-5334  
clarkjosie@yahoo.com

July 20, 2017

To: Dan Asefa, Seattle Office of Housing and Development

From: The Families & Neighbors of 33<sup>rd</sup>-, 34<sup>th</sup>-, and 35<sup>th</sup>-Avenues South

RE: Up-zoning Environmental Impact Statement

We are families and residents with homes on 33<sup>rd</sup>, 34<sup>th</sup>, and 35<sup>th</sup> Avenues South, in Columbia City, between Alaska and Oregon. Deeply connected to our neighborhood and committed to our community, we are passionately interested in the proposed up-zoning being considered. After reviewing the Seattle City Master Use Plan and Environmental Impact Statement, we understand that there are three potential directions under consideration:

1. Do nothing - maintain the neighborhood zoning as it now exists
2. Up-zone to L-2, allowing for 4 story apartment complexes in the neighborhood.
3. Up-zone to RSL, allowing for small multiples within lots

Further, per the EIS, the issues impacting which outcome is ultimately selected include:

1. Minimizing displacement of residents here already;
2. Ensuring affordable housing;
3. Traffic congestion and parking;
4. Public safety
5. Accessibility to community resources and public transportation; and
6. Providing access to and economic opportunity for residents, especially low-income people

After considering these outcomes, we strongly urge that our section of Columbia City be up-zoned to L-1, which is consistent with our original ask in our community letter to the Office of Housing and Development, dated May 23, 2017.

An up-zone from single family homes to LR-1 would allow for increased density and more affordable housing in our community while at the same time preserving the vital qualities that make our area so great. Importantly, this minor change would help maintain the diversity of the neighborhood, and mitigate displacement concerns, particularly among long-time neighbors with fixed- and low-incomes. Simply, our recommendation is a compromise between the higher density of LR-2 and the more modest up-zone to RSL.

Up-zoning to L-2 would have serious and detrimental impacts on current and future residents. Our specific concerns, derived from the EIS, include:

1. Increased traffic and parking on small residential streets, resulting in serious safety and maintenance concerns.

2. A net decrease in housing for low- and moderate-income Seattleites.
3. Displacement of current residents, particularly seniors and low- and moderate-income residents.
4. A decrease in the tree canopy that has finally begun to mature.
5. Increased strain on public safety as the south district police precinct is already at capacity
7. Lower air quality and increasing health issues as a result of more automobile traffic.
8. An overall decline in the residential quality of life and closeness of the existing neighborhood
9. The scale of L-2 zone is not in keeping with the existing residential quality of the neighborhood and does not provide the appropriate transition from the adjacent and existing multi-family housing.

Also, consistent with our original community letter, we also ask that the up-zone be extended one block north of Oregon, across our three blocks. To sustain growth and provide additional opportunities for affordable housing and increased density, the blocks just north of Oregon, from 35<sup>th</sup> to 33<sup>rd</sup>, sorely require improved infrastructure for walkability and street safety. Just west of Rainier, this area is an important residential hub near mass transit – including a less-than-10-minute walk to light rail, and commercial resources. The area desperately requires sidewalks and walkways for safe pedestrian access.

Finally, we want to underscore our request that that the City take measures to guarantee performance affordability (housing) remain in Columbia City. We understand that the redevelopment under consideration will contribute to an affordable housing fund, however there is not sufficient current language that guides the siting of affordable housing to the impacted communities, including ours.

Please contact us with any additional questions. We look forward to a resolution of this zoning issue that satisfies Seattle's south end residents and allows for responsible urban growth that maintains and supports a family-friendly, diverse, inclusive and safe, environmentally sustainable solution for current and future residents alike.

Sincerely,

Families & Neighbors of 33<sup>rd</sup>-, 34<sup>th</sup>- and 35<sup>th</sup> Avenues South

Spokesman: Josie Clark, 4528 35<sup>th</sup> Ave S, 206-455-5334, [clarkjosie@yahoo.com](mailto:clarkjosie@yahoo.com)

cc: committee members

<p><b>Name</b></p> <p><b>Email address</b></p> <p><b>Comment Form</b></p> <p><b>Description of the Proposed Action and Alternatives</b></p> <p><b>Housing and Socioeconomics</b></p>	<p>Karen Clark</p> <p>1 My preference would be Alternative 1, no upzone, but second choice would be Alternative 2. Alternative 3 is completely unsustainable. Please see my comments below.</p> <p>2 I am writing to express my support for affordable housing in Seattle AND my deep concern about the way the Upzone and other development plans are being implemented. My concern is that too much is being given away to developers as “incentive” at too high a cost with too little benefit for our Seattle communities. I am specifically responding to the EIS that was recently released.</p> <p>Although I’m a 20-year resident of Seattle, I’m relatively new to the issues of city planning. I’ve watched my beloved Seattle being dismantled and replaced with 6-story city block wide condo and apartment buildings. The justification we’ve been hearing for this is that more affordable housing is needed. So I’ve been shocked to discover that these human cubicles are not actually affordable to people who make a regular wage. I’ve been really shocked to be told by councilmembers that there is a state law prohibiting the city from requiring developers to make a percentage of their developments affordable or low-income housing. (I’ve also been told by other city planners that there is not such a law, so I’m confused about this.) The HALA proposal has the appearance of addressing the affordable housing issue, but I have learned that the developers in neighborhoods like mine will most probably just pay a fee to get out of making affordable housing in our neighborhood. What this looks like to me is that our neighborhoods are being given away to make income for the city which isn’t even guaranteed to be spent on affordable housing.</p> <p>3 In the Crown Hill neighborhood specifically, an undue burden is being placed on our area which has been historically working- and middle-class single family homes. Crown Hill Urban Village is designated a Residential Urban Village, but annotations on Appendix H maps show CHUV is assigned more M2 zoning changes under Alternative 2 than all but one of the six Hub Urban Villages. In Alternative 3 CHUV has more M2 zoning than most of the six Hub Urban Villages.</p> <p>The EIS is based on unrealistic projections for growth. For example, assumptions applied to Alternative 1 conclude that CHUV will add only 700 new housing units by 2035. In June of 2017, the City of Seattle Permitting process identified 21 development projects already under permit that include over 600 new housing units. Alternative 1, 2, and 3 scenarios should be reassessed with growth projections that are in line with the development occurring now and readjusted throughout the DEIS for their impact.</p>
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I am VERY worried about the displacement of our longtime elderly and single residents who live in the 16th Ave area.

Re: the concern for providing affordable housing to the poor, I am concerned that the lack of standards in our rezoning will lead to inhumane warehousing of the poor and working class. I was shocked when I read the article about the \$750/month prison cell apartments that were just built in the University District. I've heard we have a building proposed like this in my neighborhood. I assume we are not proposing to house the low-income Seattle residents in rooms so small they don't have separate bathrooms. That would be considered inhumane. But then we are asking that the working poor live in inhumane isolation. At what point do we say that the developers have to forgo some of the extremely high profits they are making in order to preserve acceptable standards of living for our residents?

**Land Use**

4 I am specifically concerned with the following:  
1) 55 ft. heights are TOO HIGH (and 75 ft. heights are ridiculous). These massive buildings will overshadow and block the light from the single-family homes on the other side of the street. This is particularly a concern on 16th Ave and Mary.

**Aesthetics**

5 The excessive heights of the buildings along 15th will create a tunnel effect like there is in some previously pleasant sections of the U District. Without set-backs and some space between buildings, the aesthetic effect is damaging to the neighborhood value.

**Transportation**

6 2) Transit and infrastructure in this area is severely under strain from the current level of population increase. Transit, schools, police and fire services will require significant mitigations to accommodate new growth within CHUV. Given the lack of light rail service, overcrowded buses, existing sewer and drainage problems, lack of sidewalks or safe pedestrian paths north of 85th, overcrowded schools, slow police response, and other critical infrastructure and service deficits; Alternative 2 is very likely to overtax an infrastructure and transit that's already under strain.

a. If this plan goes through, there will not be sufficient bus transportation for the number of people and developers should be REQUIRED to provide parking. Not all people can take the bus. The elderly and those with back and mobility difficulties are especially impacted since the quality of roads are so poor and the bus is a jarring experience. Families also often need cars. If we don't plan for families, they will move to the suburbs and drive in to their jobs.

7 3) The environmental impact of the loss of trees and greenspace is too heavy for our climate and will increase the level of run-off and pollution for the watershed. I strongly feel that the way development is happening in our city, with no requirements for setbacks and environmental mitigation, is creating a concrete jungle where we once were an 'emerald city.' I believe the environmental damage from this type of mass development is

**Biological Resources**

outweighing the generalized benefit that density (vs. sprawl) is supposed to provide. The DEIS does not evaluate the impact of tree removal and replacement with impermeable surfaces in areas that will experience acres of rezoning from single family to RSL zones. Nearly all of the single-family properties are categorized as 5,000 feet by MHA. Tree removal for lots under 5,000 square feet is exempt from the city's tree ordinance; meaning there are no protections for these trees whatsoever in the DEIS. Additionally, there is no mitigation strategy for Piper's Creek watershed, which is at the base of Crown Hill and is impacted by runoff from CHUV.

- a. Developers should be required to have setbacks with garden space and porous surfaces. These design standards are not only for aesthetics but also for the sake of having a clean Puget Sound and for our environment. This neighborhood is full of conscientious people who have made rain gardens and changed their driveways to porous surfaces, and it seems a crime that the new development is just concrete from the street to the building.
- b. There should be a mitigation strategy for the Piper's Creek watershed.

**Open Space & Recreation**

- 8 The Crown Hill park has been a great asset for the community, but neighborhood families RELY on the Holman Rd. overpass to travel safely to the park. Holman is an extremely dangerous road, especially in that curved section. I am afraid if the overpass is removed there will be more tragic injuries and fatalities. PLEASE KEEP THE OVERPASS!

**Air Quality & Green House Gas Emissions**

- 9 Please see biological resources section. I feel that not requiring parking from the developers is creating the very problem that the city is trying to avoid: traffic congestion. This is because families and people who require cars are forced to move farther out of the city to places where there are no other transportation options and then drive farther into the city.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted**

**affordable housing?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Kevin Clark
<b>Email address</b>	
<b>Comment Form</b>	
<b>Land Use</b>	<p>1 I support the Alternative 2 upzone to L1 of SF5000 land southwest of Beacon Avenue South and north of South College Street along I-5. This area is within a 10-minute walking to the light rail station. This proposed upzone excludes Parks Department open space/greenbelt purchases. I own two parcels in this area where I have lived since 1978.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you</b>	

**resided in the city of  
Seattle? (total  
number of years)**

**Do you work in  
Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your  
gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person  
with a disability?**

**Are you a U.S.  
Military veteran?**

**From:** Linda Clifton  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** "[Jenny Brailey](#)"; [Johnson, Rob](#)  
**Subject:** Comment on City of Seattle Draft EIS on HALA-MHA  
**Date:** Monday, August 07, 2017 7:38:29 PM  
**Attachments:** [2017 HALA-EIS on MHA comments ljc jsb FINAL 8-7-17.docx](#)  
[2017 HALA-MHA-FNC letter FINAL 31March2017-and-web-4-4-17.pdf](#)

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**Office of Planning and Community Development**

*Attn: MHA EIS*

PO Box 34019

Seattle, WA 98124-4019 via [MHA.EIS@seattle.gov](mailto:MHA.EIS@seattle.gov)

Attached please find:

1. Our comments on the DEIS on MHA implementation in urban villages with particular attention to East Fremont in the Wallingford Urban Village
2. As referenced our comments, the Fremont Neighborhood Council comments on HALA

Thank you for consideration of our concerns as the City moves forward on this process.

Sincerely,

Linda Clifton and Jenny Schulstad Brailey  
East Fremont



March 31, 2017

City of Seattle  
 Ed Murray, Mayor  
 Sam Assefa, Director OPCD

Re: Fremont Neighborhood Council Position on City Proposed MHA Zoning Changes

The Fremont Neighborhood Council (FNC) has spent the past year considering the implications of the HALA driven MHA zoning proposals while actively engaging, and listening to, Fremont residents who will be most directly impacted by them. We offer the following comments on both systemic and Fremont-specific concerns as the City considers these substantial changes to the way we live together in this urban setting.

Land use planning, and especially zoning, is a very site-specific process with site-specific impacts. Wholesale changes in zones throughout the city such as are proposed under the MHA program can create significant unintended consequences. To avoid these consequences neighborhood-specific needs and impacts need consideration. Because the Wallingford Urban Village overlaps the Fremont neighborhood east of Aurora and west of Stone Way N., we have heard many concerns voiced by residents of East Fremont/West Wallingford (many of whom are FNC members). We attach the document prepared by them after several community meetings and intense research on the MHA proposals and their potential impacts, and ask that their comments be given serious consideration as the views of Fremont residents most dramatically impacted by the City's current proposals.

**FNC supports livability, diversity, inclusion and affordable housing for all.**

The FNC supports HALA's goal of addressing the housing affordability crisis in Seattle. For decades the FNC has supported efforts to increase the ability of moderate and low income people to live in Fremont while also working to further diversify our neighborhood in order enrich the community. Numerous reports and studies indicate that to accomplish this goal multiple policies need to be used: construction of both new market rate and subsidized housing, and conservation of existing "naturally affordable" housing.<sup>1</sup>

FNC has pursued these goals by actively participating in many land use decision-making processes, including:

- Negotiations over zoning in the 1980s that provided significantly greater development capacity below 39th/Bowdoin/40th (the area that later became the Fremont Hub Urban Village)
- Participation in neighborhood plan development in the 1990s
- Facilitation and financial support for a low-income housing project in East Fremont in collaboration with Capitol Hill Housing in the 2000s
- Engagement in design review board review of specific projects

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<sup>1</sup> E.g., "Housing Production, Filtering and Displacement: Untangling the Relationships," Zuk and Chapple, 2016. [http://www.urbandisplacement.org/sites/default/files/images/udp\\_research\\_brief\\_052316.pdf](http://www.urbandisplacement.org/sites/default/files/images/udp_research_brief_052316.pdf)

- Negotiation with developers of specific changes to improve projects in Fremont, sometimes leading to active support for high-quality development projects, particularly those that are aligned with our residents' values including Living Building Pilot Program projects such as Stone 34 and the Watershed Building at Troll Ave N and N 34<sup>th</sup>.

In addition, in order to maintain and improve the quality of life in our neighborhood, we consistently advocate for inclusion of infrastructure to accommodate the resulting growth in population; we advocate for and put resources into improved pedestrian and bike safety, P-Patches and parks, open space, public safety improvements, neighborhood art, and improved transit access, routes and capacity.

### **FNC shares the doubts of many Fremont residents that the MHA zoning proposal will bring promised diversity and affordability**

Residents of Fremont have repeatedly expressed doubts that the City's MHA zoning plans will add diversity or affordability within our neighborhood. Those doubts are based on several factors:

1. FNC's experience that the City's support for broad and inclusive engagement in major decisions affecting both affordability and livability ("quality of life") in Fremont has significantly diminished over the past few years. This troubling trend culminated in the appointment of the HALA committee with inadequate inclusion of residents' interests.
2. The HALA report includes numerous provisions that are intended to promote the goal of "housing affordability and livability," but in application will not actually accomplish those goals. Worst of all, the report contained an allusion to traditional single family zoning (SF) as a construct of past racism that needs to be eliminated from Seattle's zoning code. This action has led to a highly polarized dialogue throughout the city over the past year; that dialogue has not contributed to the identification of solutions acceptable to all communities of interest.
3. The HALA "focus group" process allowed very limited meeting time, and lack of participation meant that neighborhood-specific impacts were not well vetted. Fremont had five representatives selected by OPCD, but only two attended after the first two meetings—both are now members of the FNC board. Our selected representatives as non-participants have not been heard from since but took places in the focus group, and the City did not replace them from the long list of eager Fremont residents wishing to participate. In comparison to the validation process that accompanied the mid-1990s neighborhood plans, the 2016 HALA focus group process only succeeded in informing a very few people from around the City who were not already engaged.
4. The actual financial estimates for payments by developers under MHA do not promise either enough affordable units within new Fremont buildings nor enough resources to build separate affordable and low income units in our neighborhood. Neighborhood-specific data raises concerns about the definitions of "affordability" in the HALA plan:
  - a) Median household income (for 98103 per City-Data.com adjusted for 2015) is \$80,349
  - b) The median home value for 98103 is \$662,000 (per Zillow); based on median household income, the average 98103 household could qualify for a \$241,000 home loan (using 3x income rule of thumb)
  - c) Zillow's rent index for 98103 is \$2,716, which is \$32,592 or 40.5% of the median household income
  - d) Single family houses in Lowrise (LR) zones are being replaced with multi-unit condos or rowhouses or townhouses at a much higher cost to buyers. Case study: 3653 Albion Place N was sold by long-term residents (1987-2014) for \$420,000 (8/2014). The home was acquired by MRN Homes, a local developer, who tore down the existing SF home and replaced it with three condos, which sold for \$772,000 (3651a 8/2016 sale); \$769,950 (3651b 9/2016 sale); and \$870,000 (3653 7/2016 sale). All three units sold at well above the current median. LR zoning enabled greater density but not affordability.

As a result of increased awareness of the monumental impact of the city-wide zoning changes proposed to implement the MHA program, the City appears to be increasing its engagement with impacted neighborhoods. We do appreciate the efforts made so far, and as the City proceeds with this process, we invite more direct engagement with the FNC, other neighborhood and community councils, impacted residents in Fremont and every other affected community.

### **FNC is concerned that city-wide zoning actions ignore neighborhood specific issues**

To avoid impacts on specific neighborhoods such as Fremont, consideration of highly localized effects must be part of the process.

Under the proposed MHA proposal all of Fremont's Lowrise zones (LR), Neighborhood Commercial (NC), and Commercial (C) zones will see increases in allowed height, scale, and bulk. Since the 2010 up-zones of numerous blocks in our LR zones we have experienced significant changes including considerable loss of tree canopy and existing affordable housing. While the MHA program proposes to produce revenue to help pay for new subsidized affordable housing, the existing community is experiencing significant physical and economic displacement right now. Moreover, most of the new affordable housing is not likely to be built in Fremont; resulting in the neighborhood being further gentrified into a less diverse community. The affordable housing mitigation is likely to be sited elsewhere and not close to replacement in either quantity or quality.

### **FNC offers the following location-specific comments on behalf of Fremont residents**

1. Many new residents do appreciate their apartment dwellings and, like those here much longer, appreciate the opportunity to live in such a vibrant neighborhood close to many of Seattle's best attractions. FNC works hard to enhance the livability and vibrancy of the neighborhood.
2. Neighbors express great concern about a loss of livability as density increases while infrastructure is not improved. Transit is currently at or over capacity. Fremont's sewage and drainage systems are a century old and the center of the SF zone in East Fremont sits only a few feet above the water table.
3. There is no plan in HALA for more schools, more parks or open space, or more walkable access to parks north and east of Fremont which are currently cut off by dangerous arterials in all directions. HALA lacks any provision for funding these needs.
4. The specific level of up-zoning proposed for the SF zones in East Fremont, located west of Stone Way in the Wallingford urban village is inappropriate. The upzoning of numerous blocks of SF to LR 2 and LR 3 on Midvale and Woodland Park Avenues is in direct contradiction of the specific principles vetted in the focus group process. Our experience has been that the proposed changes will lead to dramatic design, construction and gentrification impacts. In addition, continued block-busting and rapid redevelopment are significant concerns, as the neighborhood has already experienced on Linden, Woodland Park, Albion, and Stone Way south of Bridge Way as a result of rezoning in the 1990s and again in 2010. The loss of the SF zone will result in the decimation of much of the tree canopy and the gardens that afford the entire neighborhood of East Fremont its "breathing space."
5. The MHA driven redefinition of LR zones in East Fremont will add significant height, bulk, and scale where there is now light, air and tree canopy to soften the experience of added density. Much of the building in these zones to date has not added dwelling units but has subtracted affordability and even destroyed the charm of the streetscape.
6. The MHA program cannot possibly replace the existing affordable housing stock in East Fremont.

7. Even though MHA rezones are limited to urban villages, a large part of Fremont outside the urban village but zoned for multi-family and commercial development will also be affected. The area called "Upper Fremont," from North 40th up to North 50th, is proposed for additional density as part of the MHA program. Outreach to, and City engagement with, the impacted residents and others in this area has been close to nonexistent.

**FNC offers the following specific suggestions to add density to Fremont while enhancing livability, diversity, inclusion, and even affordability.**

We recommend the following changes and improvements to the MHA program in order to ensure affordability and improve livability in Fremont:

1. Zoning changes of the proposed scope and magnitude must be done with far more direct involvement and engagement by the people who live in directly impacted communities.
2. Release projections for MHA performance and payment amounts and affordable housing gain in every urban village. The "Affordable Housing Production Model Summary" that the city has released is inadequate—it does not break down MHA performance and payment generation and affordable housing unit production by neighborhood. As part of the Seattle 2035 Comprehensive Plan the city released a Development Capacity Report that measured development capacity in each urban village, but the city has not released development estimates on a per-parcel basis. We urge the city to release all of its data so that neighbors can better understand where and how much affordable housing will likely be built in their neighborhoods.
3. Add density and even affordability by changing the Commercial (C) zoning designation on Aurora Avenue N to Neighborhood Commercial (NC). After years of active participation by Fremont and Wallingford Neighbors (F.A.W.N.), we have come to the conclusion that Aurora between the ship canal and Woodland Park needs an urban planning solution to reduce crime and improve livability and walkability along Aurora and adjacent streets (particularly Linden and Winslow). A change in zoning from C (which encourages car-oriented development) to NC will provide a better connection between both Fremont proper and East Fremont; it will extend through Fremont the positive changes already occurring along this corridor. Aurora has split Fremont since it was constructed in the early 1930s. Aurora is currently slated for 15 more feet of height; residential density offering great views and the same neighborhood amenities as in the SF zones would be possible where existing land is underutilized by empty lots, a car lot, and single-story buildings. Eventually the Fremont portion of Aurora could take on more of a "boulevard character" like that immediately north between the zoo and Winona Ave. N. The redevelopment of Aurora in East Queen Anne demonstrates that 99 and residential development can co-exist.
4. We support the proposed change of the C zone along North and Northwest 36th/Leary Way to NC. However, the zone boundary follows lot lines on its north side and the change should be accompanied by provisions to reduce impacts on adjacent housing especially in the LR 1 and SF zones west of Phinney.
5. To obtain buy-in from Fremont residents, it will be important to prepare a realistic projection of the number of affordable units that will be built in or near Fremont as a result of revenue generated from the MHA program. This analysis should include work-force/middle income housing, MHA percentages and assess the lack of replacement of housing affordable to households making less than 60% AMI. Other critical issues for Fremont residents that will need to be studied and resolved include:
  - a. Impact on quality of life
  - b. Imposition of "edge" lot by lot with blocks in East Fremont that are 100% SF to avoid allowing lots to be blocked by large buildings without setbacks erected next door
  - c. Mitigating ongoing construction and disruption, including by elimination of Saturday construction in residential zones.

- d. Inadequate infrastructure for all forms of travel and for stormwater/drainage
- e. Provision for light, air, trees and greenscape: include setbacks that provide vegetation/gardens that enhance the street-level experience for all residents.

In conclusion, the Fremont Neighborhood Council finds that the failure by the City to conduct appropriate engagement with this community is clear and that zoning changes of the proposed scope and magnitude must be done with far more direct involvement by, and collaboration with, the FNC and residents who live in the directly impacted communities.

We look forward to the City's meaningful engagement with Fremont so that together we can develop a more thoughtful plan that will yield a better outcome when applying HALA (and/or rezoning) to our neighborhood both east and west of Aurora.

Thank you for considering our comments arrived at after much discussion.

Sincerely,



Toby Thaler on behalf of the Fremont Neighborhood Council  
Vice-President and Chair, Land Use and Transportation Committee

Cc: City Council

**Attachment:** Statement from East Fremont/ West Wallingford residents on proposed rezoning inside Wallingford Urban Village

**EAST FREMONT/WEST WALLINGFORD (EF/WW) RESIDENTS** on the proposed rezoning of Wallingford Urban Village between Stone Way and Aurora

HALA and MHA-driven up-zones have a laudable purpose: to add badly needed low income housing in Seattle. However, no data has shown that the up -zones will produce any significant stream of revenue or actual housing, but the data we do have shows that displacement will be MORE than the amount of new housing.

Our neighborhood meetings, discussions and survey revealed broad agreement on the following response to the City's proposed up-zoning under HALA:

1. **The “L” in HALA – Livability – is missing from the proposal.** The proposed up-zones sacrifice livability by bringing significant increases in the bulk and height of buildings in every part of our neighborhood. We want to keep the front-porch character of our neighborhood, with greenery, yards, access to sunlight, etc.
2. **Slow Down!** Quality planning is being sacrificed for speed. Several once-in-a-generation, interconnected efforts are going on in parallel: HALA, 2035 Comprehensive Plan, rezoning of urban villages, overhauling the design review process. This is too complex for citizens or City officials to navigate thoughtfully. Slow down!
3. **Put neighborhood plans and design review procedures in place to guide development inside urban villages** — to ensure HALA principle of urban design quality, and assure quality construction and harmonious transitions between existing and new buildings. No plan, no design review, no HALA!
4. **Limit up-zones in Single Family zones.** Maintain lower heights by keeping SF as Single Family or Residential Small Lot. These family homes provide a greenbelt buffer from our main transit and commercial corridors, offering tranquility, relief from concrete, greenery, yards for families, sunlight, and homes for birds and wildlife.
5. **Keep Lowrise 1 and Lowrise 2 zones at currently defined limits and heights.** Redefining these zones to add 10+ feet in height without changing their name is the same as creating “hidden up-zones” that are unnecessary and undesirable in our neighborhood. Also, scrap the proposal to change LR1 to allow developers to cram in as many units as possible (like LR2 and 3); doing so will mean each unit is tiny -- the opposite of family-friendly.
6. **Require concurrent infrastructure and transit improvements, preservation of tree canopy and green space, park improvements and other infrastructure support** where up-zones happen. Added density must have commensurate investment; City assurances that these improvements will come along later are insufficient; tie plans for housing growth together with plans for needed infrastructure improvement.
7. **Incentivize density on Aurora and appropriate arterials**--Stone Way N, 45<sup>th</sup> Street east of Stone Way N, Bridge Way. Development should go on underutilized arterials before sprawling into adjacent parts of the neighborhoods. Require this development to meet *minimum* density requirements to make the most of valuable space along our main pedestrian and transit corridors.
8. **Preserve affordability and encourage diversity in Wallingford.** The proposed rezoning is accelerating the loss of affordable housing already, driving down diversity and affordability for homeowners and renters with low or fixed incomes. Preserving single family zoning will help as many people even now share their homes by renting out rooms, ADUs and DADUs. Catalogue and protect currently affordable rentals.
9. **Require off-street parking as part of new multi-family and commercial development** to support the added cars and drivers development brings, especially since Wallingford will not be on either planned light rail line.
10. **Consider rezoning in phases to offer a stepped process** that prioritizes up-zoning first along the main transit and commercial corridors, and only later on adjacent blocks if needed to meet actual growth.
11. **Encourage commercial spaces to be designed, built and leased to support, rather than displace, small, locally owned businesses.** Keep what makes our business district attractive and unique.
12. **Be transparent with the data and citizen dialogue.** Provide a concrete, realistic target for how much housing the City wants to add here; measure affordable housing loss/gain in Wallingford; notify people in a professional way that you will be changing their property; be honest about public feedback you're hearing.
13. **Impact Fees – Where are they?** Other cities impose impact fees to fund improvements in parks/open space, schools, transportation, and public safety that are associated with new development. Seattle should do the same.

**EF/WW faces the most dramatic up-zones in the urban village.** The most drastic changes in the Wallingford Urban Village will hit EF/WW, by proposing complete conversion to multifamily, forcing our main SF streets to up-zone to LR2 and LR3 and adding height increases in our LR 1 and LR2 zones as well. These changes turn EF/WW into a high-density area, despite its designation as a “low density residential urban village.” Yet EF/WW lies furthest from the center of the urban village near QFC & Wallingford Center on N 45<sup>th</sup>, where new housing should be prioritized. We maintain we offer ample density already, with capacity under current zoning in SF and LR to meet growth targets.

### **The proposed rezone of EF/WW violates the “Principles for MHA Implementation:”**

- 1. Housing Options. Encourage a wide variety of housing sizes including family-friendly units;** EF/WW has this now! We would lose family-friendly SF housing under the proposed rezoning.
- 2. “Urban Design Quality: Encourage publicly visible green space and landscaping at street level.”** Up-zoning and lack of design guidelines such as required setbacks will cause loss of green space and landscaping, especially in SF areas but even in multifamily areas that now include SF-style structures that would get redeveloped or overshadowed by 55’ neighbors.
- 3. “Transitions. Plan for transitions between higher- and lower-scale zones...”** This calls for stepping down from higher to lower zones, but the City has turned this principle on its head by instead calling for all EF/WW low zones to dramatically rise to meet taller buildings in nearby NC zones!
- 5. “Assets and Infrastructure: Locate more housing near assets and infrastructure such as parks, schools and transit.”** Compared to the rest of Wallingford, EF/WW has no parks, no schools and overcrowded transit, lies farthest from the true heart of the urban village at N 45<sup>th</sup> and Wallingford Avenue N, but is seeing the biggest up-zones and complete conversion to multifamily (no SF or RSL).
- 8. “Neighborhood Urban Design: Consider local urban design priorities when zoning changes are made.”** Wallingford has detailed urban design priorities in its current Neighborhood Plan and that should be honored, including its priority to preserve SF zones, including in EF/WW.

### **EF/WW residents offer 3 specific recommendations:**

- 1. Preserve Single Family Zones OR remove them from the urban village.** It is not appropriate to eliminate the most family-friendly, green part of our neighborhood in exchange for concrete-dense up-zones that will turn our streets into a patchwork of small homes and large apartment buildings. At most we would accept RSL in SF areas. We emphasize that Midvale Ave., a narrow street lined with small one-story craftsman homes, situated at the lowest elevation of our neighborhood with an underground creek a few feet below, is completely unsuited to be up-zoned to LR3.
- 2. Adjust the commercial zoning on Aurora Ave between 39<sup>th</sup> Street and 46<sup>th</sup> Street to allow for tall apartment buildings that will add significant density in East Fremont in its most transit-friendly location where there is ample housing capacity and easy connection to Fremont.** This is prime territory for additional housing density, and it’s currently being wasted. Up-zoning here will further improve the Aurora streetscape which has been getting better for a number of years; witness the new Staybridge Suites hotel there.
- 3. Cancel Hidden Up-zones.** Areas already designated as multi-family Lowrise 1 and 2 should not be forced to accept higher heights, bigger footprints and smaller setbacks through the City’s proposed redefinition of zoning terms. These hidden up-zones are not needed to achieve growth targets. Hidden up-zoning here compromises livability unnecessarily, in an area of Wallingford that already lacks the amenities of the rest of the neighborhood.

To: Office of Planning and Community Development  
Attn: MHA EIS  
PO Box 34019  
Seattle, WA 98124-4019  
Via email: [MHA.EIS@seattle.gov](mailto:MHA.EIS@seattle.gov)

From : Linda J. Clifton, 4462 Whitman Ave. N – Upper, Seattle, WA 98103 [lclifton1@mindspring.com](mailto:lclifton1@mindspring.com)  
Jenny S. Brailey, 4260 Woodland Park Ave N, Seattle WA 98103 [jenniferbrailey@yahoo.com](mailto:jenniferbrailey@yahoo.com)

### **COMMENT on City of Seattle’s Draft EIS published June 8, 2017 by the Office of Planning and Community Development**

Seattle faces a dramatic need to accommodate growth and add density as more and more people choose our city as their base for building their future. As individuals and as members of the Fremont Neighborhood Council we have repeatedly expressed our willingness to help with accommodating density and growth in Seattle, in accordance with the following goals:

- support livability, diversity, inclusion and affordable housing for all, including workforce families and seniors;
- add MHA-promised diversity and affordability in our neighborhood;
- continue the Seattle tradition of neighborhood planning and involvement while enhancing outreach to and inclusion of those who’ve been left out in the past

In line with these goals and as laypersons—not lawyers nor architects nor urban planners nor developers, but as residents of the westernmost section of the Wallingford Urban Village which lies within the Fremont Neighborhood Council’s boundaries as well, we have attempt a review of the City of Seattle’s June 8, 2017 Draft Environmental Impact Statement (EIS) on Citywide Implementation of Mandatory Housing Affordability (MHA) and offer the following comments and critique of the EIS and the City’s process in issuing the DEIS:

1. We find the process extremely frustrating and the time too short for detailed technical response:
  - a. The document is unwieldy and the maps exceedingly difficult to read, even on a laptop;
  - b. The language is dense and technical but the City has not reached out to residents in the affected neighborhoods to explain what the impacts on the ground will actually be.
2. We believe that land use planning and zoning are very site-specific with site-specific impacts. Wholesale changes in zones throughout the city such as are proposed under the MHA program and evaluated in the EIS can create significant unintended consequences. To avoid these consequences neighborhood-specific needs and impacts need consideration. Further, because the Wallingford Urban Village overlaps the Fremont neighborhood east of Aurora and west of Stone Way N., we have heard many concerns voiced by residents of East Fremont/West Wallingford (EF/WW). We attach the letter sent by the FNC evaluating the MHA proposal for your consideration as it applies to all three alternatives discussed in the DEIS.
3. As residents of a neighborhood identified as having “low risk of displacement and high access to Opportunity” we agreed that these “ are desirable and generally have fewer marginalized populations. These neighborhoods generally already offer good access to economic and educational opportunities. Accordingly, market-rate housing in these neighborhoods tends to be

unaffordable to lower-income households. With relatively few marginalized populations, these areas may also lack the cultural services and community organizations geared to those populations. An equitable approach for these neighborhoods would expand pathways into the neighborhood for people who currently cannot afford to live, work, or operate a business there.” **However, we find that many in our pocket neighborhood are being displaced by either rising rent costs or higher property taxes that are proving unsustainable, and that the HALA proposals will not result in mitigation of either condition; MHA dollars are unlikely to be spent in our neighborhood to increase affordability and property taxes will not be mitigated for most homeowners here on fixed incomes.**

4. Of the long list of areas of consideration to be explored in an EIS, we find the following to be most relevant to our immediate neighborhood of East Fremont/ West Wallingford between Aurora Avenue North and Stone Way North, N 50<sup>th</sup> and N 38<sup>th</sup>:

- |  |   |
|--|---|
| (1) Natural environment  | (ii) Housing                                |
| (a) Earth  | (iii) Light and glare                       |
| (i) Geology; (ii) Soils; (iii) Topography; (iv) Unique physical features;              | (iv) Aesthetics                             |
| (b) Air  | (v) Recreation                              |
| (i) Air quality  | (vi) Historic and cultural preservation     |
| (c) Water  | (c) Transportation                          |
| (i) Surface water movement/quantity/quality; (ii) Runoff/absorption; (iii) Floods;     | (i) Transportation systems                  |
| (iv) Groundwater movement/quantity/quality; (v) Public water supplies                  | (ii) Vehicular traffic                      |
| (d) Plants and animals   | (iv) Parking                                |
| (i) Habitat for and numbers or diversity of species of plants, fish, or other wildlife | (v) Movement/circulation of people or goods |
| (2) Built environment  | (vi) Traffic hazards                        |
| (a) Environmental health   | (d) Public services and utilities           |
| (i) Noise  | (i) Fire                                    |
| (b) Land and shoreline use   | (ii) Police                                 |
| (i) Relationship to existing land use plans and to estimated population                | (iii) Schools                               |
|  | (iv) Parks or other recreational facilities |
|  | (v) Maintenance                             |
|  | (vi) Communications                         |
|  | (vii) Water/stormwater                      |
|  | (viii) Sewer/solid waste                    |

In regard to these items, we believe that the EIS does not account for the specific features of our pocket neighborhood in both Alternatives Two and Three. For example:

1. the DEIS states that “Despite smaller front and rear yard setbacks, RSL retains the same height limit and introduces an FAR limit. RSL buildings would not alter the land use pattern and do not present a scale impact.” In fact, the claim of no scale impact by removing setbacks is completely untrue—it is the setbacks that create gardens and space for tree canopy, birds, air, and aesthetic relief for the eye.
2. Displacement and Alternative 2 ( p. 3.101) : “Wallingford. Blocks of existing single-family zoning in transition areas at the edges of neighborhood commercial corridors would be changed to lowrise multifamily resulting in some moderate land use impacts. Impacted locations include the south frontage of N. 47th St., the west frontage of Meridian Ave. N., the east frontage of Midvale Ave. N., and the west frontage of Interlake Ave. N. Much of the residential portion of

the village would have no changes to scale, and height increases would be no more than 15 feet along Stone Way Ave. N. and N 45th St.” This mere 15 feet will significantly cut off both air and light, shading out what now gives the neighborhood its sense of openness. Further, shade created by taller buildings here will significantly impact the bird and plant life that now gives our neighborhood its park-like qualities despite the lack of any actual park here.

3. The water table in the middle of our neighborhood, at Midvale, is a mere three feet below the surface; the impact has not, as far as we can tell, been addressed in the DEIS.
4. Transit access has always been assumed in all the MHA documents, but the fact is that our neighborhood lies at least a mile east and west to the two light rail lines while bus connections between them are slowed even now by current automobile and small freight traffic, which will worsen with the proposed density. Current Rapid Ride and other transit options from here are increasingly overburdened; buses pass us up all the time during rush hours and are full most times of day.
5. Pedestrian and bicycling alternatives within our neighborhood work well only to its borders on the arterials that mark its boundaries—to cross Aurora, N. 46<sup>th</sup>, Stone Way N, and Bridge Way has become increasingly difficult over the years, and we have had to press hard for the safe pedestrian crossing of Stone Way N. at N. 40<sup>th</sup> where pedestrians were severely injured. The other arterials cut us off from both parks and schools nearby.
6. The MHA DEIS does not recognize the density currently and potentially provided in our neighborhood by ADUs and DADUs, which not only can provide housing, often more affordable, but also can preserve current building envelopes and the garden amenities we now enjoy.

We urge the City to pay close attention to the neighborhood plans in existence and to build on those existing documents as planning goes forward. They should be used to customize plans to the specifics in SEPA and the EIS requirements, rather than implementing upzones across many neighborhoods as if they were all alike.

We attach the Fremont Neighborhood Council statement on HALA, with which we agree.\*

Thank you for your attention to these concerns; we hope to see a plan going forward that responds to these issues.

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\* FNC statement a separate pdf attachment to email 8-7-17

**From:** phil c3  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS comment  
**Date:** Monday, August 07, 2017 3:58:10 PM

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When the city talks about the rezoning single family neighborhoods to “multi-family,” that’s deceptive. You are basing your criteria on the number of units built, not on the number of PEOPLE who will live in those units. What’s going to be built are mostly small studios for single people, and little in the way of actual family sized housing. If the city was honest, it would call it “multi-unit” housing, not multi-family. Family sized housing would be preferred, because people will stay in the neighborhood. Those studios apartments will serve as short term housing for newcomers who will move after a year or two and have no lasting connection or involvement in their neighborhood. Our neighborhoods will suffer and be irrevocably damage under alternatives 2 and 3.

It’s also ironic that the city concedes some neighborhoods are more at risk of displacement if HALA passes. But gee, I thought all those new apartments were supposed to be about creating affordability? Am I missing something here? So thanks for acknowledging that we neighborhood advocates are right about the need to preserve “naturally affordable” older structures, which will be the first to be torn down for new construction. Each neighborhood needs a separate EIS, period. No two neighborhoods are alike.

Lastly, it’s ridiculous to exempt structures in the Urban Villages from on-site parking requirements. What about the need for deliveries, plumbers, construction workers, etc? And you say you want to do this in areas of high transit service, and you base that measurement on Metro schedules instead of actual headway data? Hah!

Phil Cochran  
1418 N. st.  
Seattle, WA 98103  
Sent from [Mail](#) for Windows 10

**From:** penni cocking  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Fwd: Extension of comment period  
**Date:** Friday, June 16, 2017 11:32:40 PM

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----- Forwarded message -----

**From:** **penni cocking** <[artpcocking@gmail.com](mailto:artpcocking@gmail.com)>  
**Date:** Friday, June 16, 2017  
**Subject:** Extension of comment period  
**To:** "[MHA.EIS.@seattle.gov](mailto:MHA.EIS.@seattle.gov)" <[MHA.EIS.@seattle.gov](mailto:MHA.EIS.@seattle.gov)>

Dear Office of Planning and Community Development,

Please extend the comment period for appropriate comment to the extensive, all neighborhoods included, really big DEIS you have released June 8, 2017. By the time we can read and study it all, the comment period time will have gone by without us being able to comment. I think a proper time for comment would be at least, if not more, 180 days for this big document.

Furthermore the City Planning office should hold scoping public MEETINGS with education for the public that are well advertised by placards in each neighborhood posted in prominent areas, by flyers and posters announcing such public scoping meetings in public libraries, recreation centers, senior centers, community colleges, etc. and by letters of invitation sent to each and every household and business owner in all of the neighborhoods affected by proposed MHA land use changes. The City Planning Office should hold at least three scoping and educational meetings in each and every neighborhood affected, with extensive outreach to the public to advertise them.

This effort may take longer than 180 days, even years and that is ok. It needs to be done to be fair in this way. Open and transparant.

There is so much confusion at this time and people are so left out of the process that panic is setting in which may lead to serious security problems. The way this has been handled thus far is frightening to everyone because no public outreach has reached the public. Most everyone doesn't know what MHA is, or what it could do if approved and when they are told (by not public disclosure methods) the shock factor of City actions against the citizenry in this way is in poor judgement by the City. More time to study in an honest, non-hurried way and including everyone is the way to go.

Thank you, Penni Cocking, Seattle

**From:** penni cocking  
**To:** [PCD\\_MHA/EIS](#)  
**Subject:** Historic Resources Protection Law for Development  
**Date:** Sunday, August 06, 2017 1:00:19 PM

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<http://www.doh.wa.gov/CommunityandEnvironment/DrinkingWater/WaterSystemAssistance/DrinkingWaterStateRevolvingFundDWSRF/HistoricalCulturalReview>

Submission for MHA EIS public comment from Duwamish Valley Neighborhood Preservation Coalition and South Park Land Use Committee  
August 6, 2017  
Concerning Historic South Park.  
Penni Cocking, South Park resident.  
And City of Seattle resident, sharing all Seattle neighborhoods.

**From:** penni cocking  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Fwd: Exhibit A  
**Date:** Sunday, August 06, 2017 3:31:31 PM  
**Attachments:** [Exhibit A.docx](#)

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----- Forwarded message -----

**From:** "Artistic One" <[powerfullart@yahoo.com](mailto:powerfullart@yahoo.com)>  
**Date:** Aug 6, 2017 3:03 PM  
**Subject:** Exhibit A  
**To:** "Penni Cocking" <[artpcocking@gmail.com](mailto:artpcocking@gmail.com)>  
**Cc:**





**From:** penni cocking  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Fwd: DEIS impacts of MHAchanged land use on historic resources  
**Date:** Sunday, August 06, 2017 4:04:28 PM

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----- Forwarded message -----

**From:** **penni cocking** <[artpcocking@gmail.com](mailto:artpcocking@gmail.com)>  
**Date:** Sunday, August 6, 2017  
**Subject:** DEIS impacts of MHAchanged land use on historic resources  
**To:** [MHA.EIS.@seattle.gov](mailto:MHA.EIS.@seattle.gov)

To the attention of the Office of Planning and Community Development:

Historic architectural, archaeological, culturally significant properties can be lost forever to the region, city, nation and world if not carefully recognized and protected. Actions by development brought in by current governing entities (in charge) will bring destruction to our historic resources because of lack of knowledge about the importance of these resources. This is done by putting goals of one group (MHA) at cross purposes with the preservation of the historic resources. MHA implementation has a great potential to destroy our historic inventory (whether surveyed or not). This is why the GMA has made protection of our historic resources a goal which the MHA EIS must address in a complete way. The current DEIS addressing historic resources being impacted by actions of MHA legislation does not do this. The most egregious proposal is threat of MHA rezoning the existing land use that will allow demolition of an unrecognized historic resource (or resources) before the cumbersome process of landmark designation has been activated to legally protect it (them). How to better protect our historic resources would be to assess how the current system of land use (zoning), education and advocacy of benefit, brings about the desired protection. Keeping the existing land use(alternative 1) protects, to a better degree, what could be lost due to greedy development through upzoning in the MHA. If any zoning changes are to be made they should enhance the current zoning for more historic preservation opportunities. Has the draft EIS done that? No. You have put current surveys and assessments of historic properties in some areas into the deis document but you have not made provisions for future surveys and yet-to-be discovered important cultural, historic and/or archaeological sites, properties, things, dwellings, buildings, roadways, channels, settlements, art, sculpture, icons, and more. You have not included historic preservation education as a goal in the neighborhoods. DEIS must single out each and every neighborhood (the so called Urban Village) for expanded opportunity from every possible avenue to research the history of the neighborhood before any MHA decision is attempted!!! And that the historic resources of that neighborhood must be brought to the residents of the neighborhood in every way possible so the residents can fully understand their community and Seattle can fully understand the communities it possesses. Seattle has been blinded in its panic over pleasing developers and will regret it by loss of its historic appeal.

All the neighborhoods now under development threat, the so called "urban villages"... should be called Seattle's HISTORIC VILLAGES. Developers have already torn down much of the built historic buildings with the marketing of the "housing crisis" as Ballard suffers, thus never to be put back. What used to be a lovely Market Street is now being erased. No one wants to go there anymore. You see this in front of your eyes and with rezoning it only gets worse. How does the MHA DEIS address what has already happened to our historic old towns that

Seattle annexed? Where is your assessment of how Seattle is enabling development to demolish existing historic main streets and surrounding homes that tell our city's history? More simply put, the plans to implement MHA have not put historic preservation valuation in the deserved highest priority; the MHA has proposed to sacrifice historic significance by throwing it out in favor of increased new, high-rise poor quality housing as the gist.

The DEIS does not answer to the creative course so many other cities in the eastern and southern U.S. have taken in protecting their historic, cultural and archaeological inventories-- that is, to house the people in the historic buildings; to restore, reuse, rehabilitate, educate about, appreciate and treasure WHAT IS ALREADY HERE (for benefit for Seattle's residents, not developers).

This is a win, win and must be planned for and assessed in the MHA EIS. This is an alternative that has not been considered. It must be.

Recently I went to shop at the new and what looks like all the other cheaply-hastily-made developments, the PCC in "historic" Columbia City off Rainier Ave. S. WOW was I disappointed in how this new store did not fit in with the historic look that old Columbia historic district is supposed to celebrate!!! It was the ugliest store crammed into the highrises taking up land and space. The store was cold feeling, the "new urbanist colors" of grey, stainless steel and granite countertops were everywhere. The lighting was pure "1984", penetrating optic nerves with invasion of privacy. Any feeling of the past or human endeavor in what had been made before was not present, not recalled. I will never go back there. What has been done? New developments bring in the wiping-out of historic record from our legacy of the people who built Seattle in the first place! I am asking that you and the EIS study the social impacts that new development has allowed (through MHA) to demolish the collective neighborhoods' past and EACH neighborhood's past. Housing more people should never sacrifice our historic built environment, culturally significant properties, whether built or landscape or archaeological sites. Up above the PCC store, bytheday, were the same apartments, the same apartments, the same apartments, the same apartments. Boring. Uninviting. Please see photos of the incompatible land use of Columbia City development which degrades the historic presence and saddened me greatly. These are sent following this discussion.

Please note, we are the people whose lives are affected by land use. You have taken the responsibility to study the effects of the MHA proposals onto our lives. Our history is of prime importance for the future. We are visual creatures and can not understand something unless we see it and the story behind it. I want to point out the tourism goals of (King County, City of Seattle, Washington State and Federal) financial gains that a city makes from preservation of the historic resources not yet lost, but revered. The EIS needs to address specific economic assessments of what revenue is brought to a city by keeping its old building stock (history). I want to remind you of the near loss of the Pike Market years ago...such an effort to keep it and what a tourist revenue source it has become. If it had been left up to city planning it would be gone.

Another component of the MHA planning is the "quick fix" that needs to be explored in depth in the EIS. I am requiring the EIS to tell us the difference between the true need of housing and the housing "hype" bantered about by city planners, news people, city council, new mayoral candidates, etc. You have told us that the housing needs can be met with what we have now (summary) so dear EIS you must follow GMA mandates in making the historic resources we have as a priority in planning. The DEIS has not presented this criticism of MHA as the MHA alternatives allowing rezoning do not offer any creative planning but instead pit their land use change against the current one. The DEIS should be critical of allowing MHA alternatives (2,3) which it says are not needed and send the MHA plans back to the planners to be creative, truly progressive, to house folks in reused historic resources, underutilized

existing storefronts, abandoned Seattle buildings that bring a real opportunity for Seattle to be unique. The EIS should force new ways of looking into housing that will not JUST bring in destruction by new development. The EIS is the vehicle to say, whoa folks, MHA plans might be missing what is right under our noses. !?! As a part of an EIS study there should be a call put out for a more inclusive, more complete solution for housing that really fits Seattle. So far that has not been done.

The EIS should be impartial and state that historic resources can enable the housing goal by utilizing the historic resources, education about them, and gain revenue, livability because of the historic resources. As it is, the EIS seems partial to a developer's goals, just because the developer provides a hurried, not well-thought-out plan through the MHA alternatives 2, 3 which takes out and threatens our historic resources.

It is not "rocket science" to see the destruction around us and think there could be a better incentive for a developer to house folks in a historic building, rather than tear away the built history. "Affordable" housing doesn't need to be the only goal put onto a developer. "Reuse" could also be within the criteria for a developer to create housing, business space, etc. There are developers who know how to work with historic properties and respect the historic architecture. MHA goals are flawed in that they do not include this as a housing incentive. EIS should put this fact into the face of the MHA proposals.

EIS study must also include personal preference in wanting to live in a charming older neighborhood with well kept older homes, or in an older and historic community of first-settled pioneer architecture with early immigrant exploration as its heritage-More Historic Districts, easy to make a new zone for. People who recognize these areas as their choice to live in and thrive in because of the history which has NOT been destroyed should be allowed to do so. This is a choice that MHA has not offered because it presents destruction and takes the living choices out of possibility by not supporting historic resources in its alternatives 2, 3, of rezoning, changing land use in a great old community (that got that way because of the current land use)!!!! "Don't throw the baby out with the bath water," the EIS should insist. And each Seattle neighborhood's personality is based on its history you know. Did the MHA.EIS know that? EIS needs to include every neighborhood's personality and describe that.

Sincerely,

Penni Cocking,

President, Duwamish Valley Neighborhood Preservation Coalition,

South Park Land Use Committee,

Resident of South Park and Seattle

August 6, 2017

**From:** penni cocking  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Fwd: Columbia City old and new  
**Date:** Sunday, August 06, 2017 4:35:06 PM  
**Attachments:** [20170805\\_192607.jpg](#)

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One of three photos showing the invasive new development, with poor planning and housing design pitted against old, historic, human-scaled historic district across street.

Thanks, Penni Cocking

----- Forwarded message -----

**From:** **penni cocking** <[artpcocking@gmail.com](mailto:artpcocking@gmail.com)>

**Date:** Sunday, August 6, 2017

**Subject:**

**To:** penni cocking <[artpcocking@gmail.com](mailto:artpcocking@gmail.com)>

**From:** penni cocking  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Fwd: old, historic building in Columbia City  
**Date:** Sunday, August 06, 2017 4:36:53 PM  
**Attachments:** [20170805\\_192708.jpg](#)

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Another example which is inviting and has personality in Columbia City, Seattle

----- Forwarded message -----

**From:** **penni cocking** <[artpcocking@gmail.com](mailto:artpcocking@gmail.com)>  
**Date:** Sunday, August 6, 2017  
**Subject:**  
**To:** penni cocking <[artpcocking@gmail.com](mailto:artpcocking@gmail.com)>

**From:** penni cocking  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Fwd: what has been allowed because of development hyped market  
**Date:** Sunday, August 06, 2017 4:40:26 PM  
**Attachments:** [20170805\\_192523.jpg](#)

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Doesn't match with the historic district or any district. Oh well, the developer got paid, and we are left with this to affect our lives. Feeling cheated. Could have done better.

Thanks,

Penni Cocking

----- Forwarded message -----

**From:** penni cocking <[artpcocking@gmail.com](mailto:artpcocking@gmail.com)>

**Date:** Sunday, August 6, 2017

**Subject:**

**To:** penni cocking <[artpcocking@gmail.com](mailto:artpcocking@gmail.com)>

**From:** penni cocking  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Native soil and the Duwamish River  
**Date:** Sunday, August 06, 2017 9:27:42 PM

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Dear MHA DEIS: The archaeological significance of the Duwamish River flood plain and what this floodplain soil contains must be a part of the EIS concerning possible MHA development rezoning in South Park. Although there has been clean up on the river itself, it is by no means pristine and pockets of toxicity continue to be mitigated. What has remained as more pristine is the actual topsoil of historic yards of the historic homes along the river with the archaeological and environmental importance of this soil.

Many of the homes in South Park were built as pioneer homes in the 1890's and have continued as single family residential homes with yards. Impacts to the yard soils (originally, river deposited for hundreds of years) in the river's pathway have been relatively minor in change because they have remained the same single family homes with yards for over 130 years.

Original shells are commonly found when gardening in the topsoils in South Park yards. River rock from the original river bed is also found. I am bringing this important environmental condition to the awareness of the EIS study. To allow development that removes the single family yard (original)soils in the Duwamish River region will not serve to further mitigate the river health or of the Duwamish valley. The potential for archaeological finds encased in the yard soils could be significant as well.

The yards of the historic homes, along with the street trees and in-tact single family uses in South Park are what keeps the toxicity levels in the Duwamish region at lower levels than if they had not been kept as yards and gardens.

The EIS must recognize this fact in its study. South Park's valiant single family use in spite of years of industrial pollution surrounding it must be left to guard the river future and health of the single family residents as well as the industrial neighbors.

Because South Park offers a pocket of "undisturbed"soil and lack of toxicity from continued historical use of single family homes, surrounding toxic issues have less negative impacts. South Park started out as a farm and garden town BECAUSE of its fertile topsoil, a gift of the river floodplain. Where there is an old South Park home, there is beautiful, healthy garden soil.

Single family land uses are the savior of Duwamish region where industrial uses came after the building of the homes.

The timeline of zoning history must be another factor in any EIS study. To put potential development into a heavily used industrial corridor where South Park sits is foolish. The environmental mitigating service the single family residential community of South Park serves should be studied and brought forth in the EIS. This is one community, whether labeled an urban village or not, that must keep the single family zoning it has earned and hung on to so that the Duwamish valley continues to find more health for the larger region.

Please address the environmental damage done to the Duwamish River and the Duwamish region, its long toxic legacy due to bad planning from Seattle and the Port of Seattle. The healthy land use of truck farming was taken from the region because of the wrong zoning. The homes hung on and dug in to prevail. Now inappropriate development is once again planned in South Park because of MHA. This will take away the real protector of the Duwamish-----the single family residential land use of South Park! Please look at this reality in the MHA EIS.

Sincerely,

Penni Cocking, president

Duwamish Valley Neighborhood Preservation Coalition

South Park Land Use Committee member  
Resident of South Park  
Land owner of South Park  
Aug 6, 2017

**From:** penni cocking  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Participation in the MHA  
**Date:** Monday, August 07, 2017 2:03:18 PM

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Dear Office of Planning and Community Development,

I live in a nation of individuals (United States of America) that are given the opportunity for participation in our own government. I want to ask the MHA EIS to address how the community has been engaged by the elected officials and the OPCD to participate in this sweeping land use plan the OPCD has put forth that affects me and my family in South Park. There has been no information given to the residents of my community to participate in their destiny. Nothing. This is against our constitutional rights. Perhaps we are not in America after all? Such actions by the current Seattle government cause us to wonder. We shudder and shake our heads.

I only heard about the plans for South Park from a neighbor who, by a fluke, realized this rezone action by you was indeed serious, very serious. We have cried and had many nightmares over your plans for our lives, which we have wrapped up in ownership in our single family neighborhood of homes. The love and sacrifice and very hard work that we went through to EARN ownership of our properties, which are single family zoned--WE WANT TO KEEP THAT WAY. Your plans jeopardize our enjoyment of our properties. We want to keep our little neighborhood as free, healthy, livable, beautiful, protected, vital, and happy as possible. The only way that can prevail is through our single family zones!! The plans of what YOU think we should endure through the MHA rezones are cruel. In South Park we already know what is cruel.

South Park has suffered and had to put up with many ill-advised, hurtful plans from Seattle for a very long time, because you think you can get away with abusing us for your gain. It is time that your fancy Office of Planning and Community Development got a real look at the real way South Park has been treated by Seattle over the many years it has been here.

The EIS must address the abuse South Park has had to go through over the years that Seattle has planned for us with improper, poor zoning. Here are some poor planning EIS impacts needing study.

1. How many good homes has South Park lost to senseless demolition because of the industrial zones imposed by your past Seattle plans? How many have been displaced because of that? Just look on 8th Ave. S. to see the horrible land use allowed by Seattle that took away four good homes on the western side for a metals recycling business that brought thieves and all kinds of junk haulers parked to roam our yards as they looked for our metal outdoor furniture, electrical cords, car parts, fence gates and then went bankrupt, leaving a yard of toxic metal bits in every nook and cranny of the ground. & Lots of drug dealers and druggies crawling our street everywhere just to sell metal there. We endured years of metal dust spewing from them without buffer or protection if the wind blew it into our kid's yard or to the childcare home in the next block. Nice planning land use, Seattle. Your track record here isn't very good. On the other side of 8th Ave. S. you allowed the demolition of seven good homes, and our neighborhood historic store. All for the benefit of Long Painting that was also allowed to poison us with paint fumes because you let them get away with sandblasting, laquer paint spray in illegal paint sheds, you name it, Seattle, you allowed it in your industrial zones without any care for the people living here in South Park! To add even more insult, you let Long Painting operate from a buffer zone! Can the MHA EIS please study why we have been so mistreated in South Park? It seems you don't really care about us or even like us. Why should we trust your plan this time? Do you like to play the "bully"? I think the answer is yes.
2. How many farms have been cemented over because of industrial zones put in South Park on

agricultural land? Historic Japanese and Italian (Joe Desimone's pike place market farm) --to name a few. Nice work Seattle. Once again we lose in South Park because of your great vision for us!

3. How much toxic waste has South Park had to swallow into the very soils that once were native river-peoples' homes and now we are left with the horror and poison because of YOUR poor planning?

4. Once industry was given priority over our residential single family homes and the lives within those homes. That was in the 1960's and South Park said "NO" to a sweeping rezone then. You wanted the industrial zones, you really did want them badly. But we stood up to you then and we will simply not allow anymore of your nonsense this time either! Actually the City council's decision at that time to make our community single family zoned was permanent and that stands up to your new plans to change it to anything else because of that once-and-for-all single family residential zone put in place then. Listen up here and heed these words, MHA rezoning does not apply to South Park.

It is a historic zoning law decision and it holds up over your plans through MHA alternatives 2, 3.

South Park has seen the way you operate. The MHA EIS must address the hardship South Park has endured because of past abuse from city planning. Our very own neighborhood plan clearly states to protect our single family residential land use zones!!!! And please address why you want to rezone South Park for more density when our plat sizes allow what you want anyway? Leave our beloved single family residential zoning!!!!!!!!!!!!!! We won't be fooled again by Seattle.

5. How has the MHA EIS studied the effects of all the industrial poisons which are in the industrial zones surrounding South Park's single family residential zones? South Park has fugitive toxic dust everywhere as the industrial uses travel back and forth through the streets carrying industrial poisons and petroleum particles with them. The truck and vehicle tires carry all these over and over.

The runoff from rain pushes these into the river from the drains in the street. The EIS must study these problems in South Park!

6. South Park has a drug and prostitution problem. The MHA EIS must completely study this and how to fix it in South Park. There are many industrial workers that travel into South Park. They are followed by drug pushing pimps and the prostitutes that go after the working men in South Park. Seattle turns its head away at this problem that has been in South Park for decades. Our children endure the shame of prostitutes walking South Park streets. Does Seattle just think it is funny or what? There are other marginal characters which follow this sort of activity and make it unsafe for us all. Please look at this social problem in South Park in the MHA EIS.

7. Traffic problems in South Park are on all the approaches and outways, on the freeways and on both bridges that cross the river. Workers in South Park are impacted as they try to get to work and home because there is so much traffic traveling THROUGH South Park! Most of the South Parkers (residents) now wish there was NOT a new bridge as it was quiet without one and far less congested. The MHA EIS must study the traffic patterns in South Park.

8. Safety and quality of infrastructure is missing in South Park. Recently a new gas pipe was laid into the side streets near 8th and 10th Avenues S. The company that did this work has torn up the streets and made holes which make travel difficult. They have not fixed the streets for 5 months! We all worry as to the safety of their shoddy work, especially since it has to do with gas. The sewer overflow shares the street drains in many South Park areas. The MHA EIS must study the specific infrastructure problems never really brought up to standard in South Park. Once again South Park is left to solve the problems it never created. Seattle shoves South Park into the cold every time. It makes for a demoralized place to live. We expect

Seattle to mistreat us.

9. South Park should have never been an Urban Village. There is not enough business to support an urban village. Perhaps 20 years ago there was a feeling that South Park could achieve the growth necessary to bring in amenities but that was a wish that has never become reality. South Park has too many problems; not enough people; it is surrounded by other jurisdictions and up against the marine corridor, the Duwamish Waterway. It doesn't have any Seattle land which joins it on 75% of its boundary. One must have a car to live in South Park in order to find life's necessities. Burien is where South Parkers travel after having our neighborhood sliced in two by the 509 which directly connects us via car.

In conclusion, the MHA EIS must study South Park and look into the reality of the neighborhood. South Park is not a land-grab as many think, as the Office of Planning and Community Development, you think. In spite of the severe problems, most brought by the city of Seattle, South Park has endured over the decades. South Park is a solid residential single family in-tact neighborhood stuck way away from the other Seattle neighborhoods that deserves to keep itself as a single family residential zoned place. Please give us the respect of letting us be what we have earned, through much pain, moreso than other places, and to decide what works best for us by ourselves--our right to protect our property! The MHAEIS needs to look at how the little scrappy, tough neighborhood of South Park has survived with all the hardship thrown at us through the poor planning of Seattle. Yes, take a real look. Do your research on South Park. You should be ashamed of yourselves for trying to change us.

Sincerely,

Penni Cocking

I have earned my Single Family Zoned Home in South Park!!

Aug. 7, 2017

SOUTH PARK  
NEVER NOTIFIED.

AUG 9  
2017

Notification to the  
areas affected by the  
proposed Rezone:

We saw this form  
for the first time  
at the public hearing  
at the sign-in table  
at city hall, downtown  
Seattle.

It was not sent to  
me nor my neighbors  
or was it made  
available on-line to copy.  
We were never,

notified of any LAND USE  
CHANGES or EIS commenting  
SCOPING MEETINGS IN OUR  
NEIGHBORHOOD!! How can anyone  
comment if they don't know about it?

MAKE A NOTE OF THIS!  
South Park  
Never Notified by the City!!  
of EIS or MTA proposals.

ment (DEIS)

mail:  
EIS@seattle.gov

mail:  
of Planning and Community  
Development  
MHA EIS  
Box 94788  
Seattle, WA 98124-7088

Members of the public.  
The possession of the City  
records include and are not  
for purposes of individuals or directory  
purposes.

MIST VALLEY  
BORHOOD

on a few topics as you like. In  
of the environment that were  
COALITION

economic. This Chapter  
describes the impacts of the alternatives  
proposed, and it includes a  
summary.

ment (DEIS)

mail:

IS@seattle.gov

ail:

of Planning and Community

opment

MHA EIS

x 94788

e, WA 98124-7088

Thank you for taking the time to provide your valued input.

**Public disclosure/disclaimer statement**

Information submitted through this form may be requested by and provided to members of the public. Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

Name Penni Cocking, President DUWAMISH VALLEY NEIGHBORHOOD

Please provide comments on any of the topics below. Comment on as many or as few topics as you like. In the MHA Draft Environmental Impact Statement (DEIS), these are the elements of the environment that were analyzed. They are organized by chapter.

PRESERVATION COALITION

**Description of the Proposed Action and Alternatives.** This Chapter describes the study area and the proposal to implement Mandatory Housing Affordability (MHA). It describes a No Action Alternative in which MHA would not be implemented, and two Action Alternatives that would implement MHA in different geographic patterns.

**Housing and Socioeconomics.** This Chapter analyzes potential impacts of the alternatives on housing and populations, and it includes a displacement analysis.

June 20,  
2017

2

Dear Office of Planning and  
Community Development,

Comment on the DEIS that  
South Park's air pollution  
is the worst in the whole area

Reference:

Duwamish Valley Cumulative  
Health Impacts Analysis: Seattle,  
WA.

Linn Gould, Just Health Action  
principal investigator

Just Health Action

Duwamish River Cleanup Coalition

Penni Cocking

98108

June 20, 2017

3 Dear Lisa Herbold,

I request that you do everything you can to give the South Park Community the information we need to comment on the DEIS. What I suggest is to notify all the members of our community by U.S. postal mail. No one, I mean no one knows the significance of commenting and that no one even knows about the DEIS or Rezone in South Park and Georgetown. This is completely inadequate! Please help us! Please send us notification and extend the DEIS comment time to at least 180 days.

8206 8th Ave. S,  
Penni Cocking — 98108 South Park 98108

- 4 I am a resident of South Park and request that your office complete an Environmental Impact Statement pertaining to just the South Park Neighborhood addressing MHA. The EIS you have released does not study the impacts to South Park. South Park has serious environmental issues that can't be overlooked.

Furthermore we request the new South Park EIS be sent to all the residents and businesses in the community. Very few people have access to the internet in their homes in South Park.

Thank you.

- 5 I am a South Park resident that would like to raise a family here. I have already been priced out of a lot of Seattle neighborhoods. If this happens everywhere then I will have effectively been kicked out of the city. I only recently found out about the planned changes. There have ~~has~~ not been enough of an effort to inform the community. We have not been able to voice our opinion until now.

Thanks,



Rahn Green  
South Park resident

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

I am a resident of South Park and request that your office complete an Environmental Impact Statement pertaining to just the South Park Neighborhood addressing MHA. The EIS you have released does not study the impacts to South Park. South Park has serious environmental issues that can't be overlooked.

Furthermore we request the new South Park EIS be sent to all the residents and businesses in the community. Very few people have access to the internet in their homes in South Park.

Thank you.

6

In the few years I've lived here I have been priced out of the Central District and Beacon Hill. We have just moved to South Park - the only area left with affordable housing. The environmental impact, neighbor impact and bad timing of this announcement requires more time. Please provide EIS in multiple languages for residents.

Thanks,  
Celeste Pierce  
South Park Resident

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

I am a resident of South Park and request that your office complete an Environmental Impact Statement pertaining to just the South Park Neighborhood addressing MHA. The EIS you have released does not study the impacts to South Park. South Park has serious environmental issues that can't be overlooked.

Furthermore we request the new South Park EIS be sent to all the residents and businesses in the community. Very few people have access to the internet in their homes in South Park.

Thank you.

TERENCE LIPKE

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T Lipke 06/20/17

Trenton M. Nolan  
(206) 841-4461

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 /  
SEATTLE, WA 98124-4019

trentjen@yahoo.com

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Thank you.

7

Real outreach Needs to happen. A Mass Mail  
out, Not Facebook. This is already an affordable  
Neighborhood. Tearing Down currently affordable homes  
in the Name of creating affordable housing is a sleight  
of hand Land grab for and by Developers. Reference  
Emmett Watson. What is being attempted here has been  
tried in the Pike Place Market. The market would be Apartments  
Now if MHA was in charge in the 90's

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

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Thank you.

\_\_\_\_\_ Jenn Ross \_\_\_\_\_  
\_\_\_\_\_ Seat 12 \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

Georgetown

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Thank you.

8

I have concerns about the infrastructure  
- sewage, water water.  
- Parking - lack of - Privacy  
- traffic increase - growing food at home  
- air quality - home ownership

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

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Thank you.

9 please extend the comment period so people can think about what the proposals are.

Also - South Park is a historic neighborhood with important education about the early built architecture of the west. South Park was the first town on the Duwamish and must be preserved!

Penni Cocking  
98108

I am a resident of South Park and request that your office complete an Environmental Impact Statement pertaining to just the South Park Neighborhood addressing MHA. The EIS you have released does not study the impacts to South Park. South Park has serious environmental issues that can't be overlooked.

JUNE  
20,  
2017

Furthermore we request the new South Park EIS be sent to all the residents and businesses in the community. Very few people have access to the internet in their homes in South Park.

Thank you. Amber Williams (John Miller) (South Park Resident)

10

- You need to mail out to All residents & industrial properties the EIS.
- You need to put in specific environmental impacts just to South Park.
- I ALSO request that we get more TIME to RESPOND.
- You NOT the residents need to have an OFFICIAL Form to respond to the EIS, that is mailed to All South Park owners
- This is a historic District you can NOT REZONE here.
- We HAVE ~~3~~ very BAD Flooding problems (this is not being addressed)
- We have a lot of trees & endangered species that will be lost with a REZONE (This needs to be addressed)
- We have terrible air quality in South Park because we are in a valley. This needs to be addressed in EIS

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

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Thank you.

- 11 South Park needs to know how upzoning will affect  
our air quality with increased traffic.  
Our precious free canopy.  
Our tiny library + underfunded community center  
our stressed sewer system with overflow issues  
our lack of infrastructure: grocery, drug store, post office  
our isolation (lacking larger group of residents)  
our neighborhood plan

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

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Thank you.

*Tish Johnson*

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Thank you.

*Kathleen Kelly*  
*Kathleen Kelly*

12

*I have serious concerns regarding the lack of specifics for our unique neighborhood. I am a life long resident & homeowner. This zoning will directly impact my property and quality of life with no real benefit to me.*

*~~This~~ This is a neighborhood with a long history and character that needs to be preserved. The planning for our neighborhood needs to be in the hands of our neighborhood residents.*

*Missing from your draft - tree canopy impact in a neighborhood with air quality issues. Lack of parking for apartments, neighborhood. Traffic increase on residential streets. Drainage issues ect.*

I am a resident of South Park and request that your office complete an Environmental Impact Statement pertaining to just the South Park Neighborhood addressing MHA. The EIS you have released does not study the impacts to South Park. South Park has serious environmental issues that can't be overlooked.

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Thank you.

13

Please specifically address how this would impact displacement of residents in buildings smaller than 10 units as we have no ~~no~~ buildings that many units so no real info on the displacement in our neighborhood. Also South Park is a uniquely polluted community & the EIS you provided does not speak to tree loss impacting our polluted neighborhood.

8 yr SP Resident. Rebecca Farnish  
1026 S. Sullivan St  
Seattle WA 98108

I am a resident of South Park and request that your office complete an Environmental Impact Statement pertaining to just the South Park Neighborhood addressing MHA. The EIS you have released does not study the impacts to South Park. South Park has serious environmental issues that can't be overlooked.

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Thank you.

14

Please... please! don't consider our neighborhood using the same methods and approaches that are being used in other areas of the city. Some of our unique challenges: geographic isolation - river, freeway, industrial areas... superfund cleanup areas, high levels of air pollution and legacy industrial pollution... lack of amenities and low walkability.

Ron Hudson  
ohronny@earthlink.net  
736 S Kenyon St.

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

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Thank you.

KARL THOREN 98108

15

THE MHA DOES NOT GO INTO ENOUGH DETAIL ABOUT SOUTH PARK. I WANT TO KNOW MORE ABOUT AIR QUALITY, TREE CANOPY PROTECTION, THE NUMBER OF FAMILIES DISPLACED, PROTECTION FOR HISTORIC HOMES, INFRASTRUCTURE FOR INCREASED TRAFFIC AND DEMAND FOR PARKING



Seattle Office of Planning & Community Development  
PO Box 94788  
Seattle WA 98124-7088

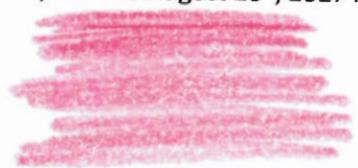
July 29, 2017

Attention: MHA Environment Impact Statement

Dear Seattle Office of Planning & Community Development:

We request an extension of time from August 7<sup>th</sup>, 2017 to August 28<sup>th</sup>, 2017 in order to review and respond to the MHA EIS.

Thank you for your consideration.



Very truly yours,

*Penni Cocking*

Penni Cocking  
President

Duwamish  
Valley  
Neighborhood  
Preservation  
Coalition and  
South Park  
Land Use  
Committee  
1045 S. Sullivan St. Seattle, WA 98108

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / SEATTLE, WA 98124-4019

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Thank you.

Please extend the comment period so people can write about what the proposals are.

Also - South Park is a historic neighborhood with important education about the early built architecture of the west, South Park was the first town on the Duwamish and must be preserved!

Penni Cocking  
98108

**From:** Rene' Commons  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comment on HALA Rezone Proposal DEIS  
**Date:** Monday, August 07, 2017 12:28:39 PM

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Dear OCPD

I oppose the DEIS recommendations. DEIS reflects City's failure to honor neighborhood plan. DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings.

Rene' Commons

**West Seattle Junction neighborhood**

<b>Name</b>	Angela Compton
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 I am in support of Action Alternative #3</p>
<b>Housing and Socioeconomics</b>	<p>2 Action Alternative #3 ensures that there is less market-rate development in areas where there is low economic opportunities and high displacement rates. The same communities continue to experience gentrification. We must ensure that we are intentional regarding how communities will be impacted by zoning changes.</p> <p>3 In addition, we should focus on changing zoning within single family zones. I agree with the HALA recommendation for Family Friendly zones that would promote building family sized units in form of duplexes, triplexes, row housing and other alternative housing that is able to increase density in these neighborhoods without extremely changing the culture of these neighborhoods.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

**From:** Ann Condon  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** My Response to City's MHA Draft EIS  
**Date:** Saturday, August 05, 2017 12:49:07 PM

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Dear City of Seattle DEIS Planners,

I have lived in the Madison-Miller neighborhood for the past 25 years. I am very pleased to have had the opportunity this year to attend numerous Madison-Miller Park Community meetings and to have become informed and enlightened by the thorough, arduous analysis contributed by our Madison-Miller Park Community Group.

I support the *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, submitted on behalf of the Madison-Miller Park Community.

Our neighborhood prefers Alternative 1 (with modifications). We recommend that MHA (*Mandatory Housing Affordability*) requirements be implemented into the existing zoning in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (*Accessory Dwelling Unit*) and DADU's, (*Detached planners,*

*Accessory Dwelling Unit*) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units. These recommendations are based on the following:

- **Flawed typology:** We are deeply concerned that the DEIS falsely represents Madison-Miller as "Low Displacement Risk/High Access to Opportunity". This misrepresentation will result in significant negative impacts if Alternatives 2 or 3 are adopted. Please see our detailed comments below.
- **Density increases not equitable:** Our current zoning in Madison-Miller will exceed HALA density goals without additional proposed zoning changes. Indeed, based on current development and permitted housing units, Madison-Miller density will exceed MHA goals by the end of 2017 with our current zoning. Other urban villages, such as West Seattle Junction and Ballard, categorized as "Low Displacement Risk and High Access to Opportunity" have 10 – 30% less proposed increases than MMRUV (*Madison Miller Residential Urban Village*), despite being designated for more density as Hub Urban Villages and identified as locations for future light rail extensions.
- **MHA process not inclusive:** We do not feel the area-wide zoning changes outlined in Alternatives 2 and 3 reflect adequate neighborhood and stakeholder input. The current zoning, established by the 2035 Comprehensive Zoning Plan, was developed with a more inclusive process and was more responsive to neighborhood input.
- **Concerns for significant negative impacts:** Our request for MHA implementation with Alternative 1 zoning map should not be understood as a resistance to increased density. As we've said in previous correspondence, we embrace increased density in our neighborhood but feel Alternatives 2 and 3 (as written):

1. do not adequately mitigate for displacement of low and middle income residents;

2. do not equitably distribute the density and cost of MHA city-wide;
3. will increase racial and economic segregation;
4. do not match increased density with increased access to green space and recreational opportunities;
5. will burden our already fragile infrastructure; and,
6. pose significant public safety hazards with increased traffic on our narrow streets and heavy pedestrian and bicycle usage (with Meany Middle School and the pedestrian/bike greenway).

The Madison-Miller Park Community could support Alternative 2 with modifications noted in comments below (and is **opposed** to DEIS proposed zoning shown in Alternative 3).

Please refer to the *Alternate Proposal Zoning Map* that was included with *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, for specific zoning modifications. As noted in the DEIS, Alternative 2 generates more housing, jobs, and affordable housing than Alternative 3. The allocation of growth in Alternative 2 better reflects the existing character of our neighborhood, and has fewer significant negative impacts on current stakeholders than Alternative 3.

#### **Summary of our detailed comments to follow:**

1. **Housing and Socioeconomics:** Both the “Low Displacement Risk” and the “High Access to Opportunity” designations misrepresent our neighborhood and need further analysis and mitigation. **We are concerned about the displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents**, (a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.
2. **Transportation:** Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk.
3. **Transportation:** The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
4. **Open Space:** We have virtually no neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional playfield for league sports and summer sports camps and is not available for public or neighborhood use. This playfield will also be used as the sole recreational field for Meany Middle School starting this fall.
5. **Public Services:** Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded power lines are already compromised due to their age and condition. Garbage pickup on our historic and narrow streets creates traffic backups now, and additional volume of apartment buildings will increase that problem.
6. **Historic Resources:** MMRUV (*Madison Miller Residential Urban Village*) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS does not address the impact of losing this historic housing stock.

**Aesthetics:** Alternatives 2 and 3 propose dramatic changes to the character of the neighborhood (in some cases as extreme as SF (*Single Family*) changing to LR3(*Low-Rise3*)). This is in direct conflict with the stated MHA principle to maintain and create appropriate

transitions (“between higher and lower scale zones as additional development capacity is accommodated”). The only proposed DEIS mitigation measures for aesthetic changes to the character of the neighborhood is the Design Review process. HALA has requested from OPCD (*Office of Planning and Community Development*) a determination of non-significance for proposed changes to the Design Review process. The HALA proposed changes to modify the Design Review process will further erode safeguards already in place to mitigate these adverse impacts.

Thank you, all, for your thoughtful consideration.

Sincerely,

Ann H. Condon

434 17th Ave. E

Unit A.

98112

Sent from my iPad

Sent from my iPad

COMMENTS ON DRAFT EIS RE: MHA

Overall Analysis

DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3

Community Feedback

DEIS fails to take into account documented Junction neighborhood feedback. *We are the stakeholders. To call*

Lack of Affordable Housing

DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.

Neighborhood Plan

DEIS reflects City's failure to honor neighborhood plan.

Traffic

DEIS analysis is flawed; Fails to utilize meaningful data. *Really? Google maps? There is a morning rush hour and the evening rush lasts after 6 PM.*

Green Space

DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.

Neighborhood Character

DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts. *According to the Audubon Society 62-67% of the tree canopy is in S.F. yards*

Loss of Light and Air

DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings

Loss of Views

DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation. *Out right theft*

Historic Buildings

DEIS fails to recognize historic buildings in Junction.

Public Safety

DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.

Utility Infrastructure

DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.

Schools

DEIS fails to note existing lack of school capacity and impact of increased density thereon.

Other

I have other concerns regarding the DEIS including, but not limited to, the following:

- 11 *1). Alternate Plan 2 and Alternate Plan 3 are set up to pit neighborhoods against each other which is inherently classist and racist.*
- 12 *2). The entire point of the rezones is to displace the current owners/residents in favor of the "new people" who fit into the utopian ideal. "Areas of opportunity" means rezones to artificially lower property values in order to maximize profits for developers. We, the current residents of this city, know you are lying to us.*
- 3). You are a more clear and present danger to me and my neighbors than Donald Trump. The stain of what you are planning to do to us will never be erased from your soul.*

*To solve the walking and biking / no vehicles utopia which density is supposed to create will eventually require mass exterminations of all the people who don't fit in to this utopia. This is the reality of utopias. Oh yeah, and guess what, millennials are buying cars.*

13 You may be one of those people who think this is a good idea because you have figured out that you will never be able to afford to buy a house in the city. First, destroying our homes to put up market rate apartments will only make it more impossible for you to buy a home in the city. Thousands of S.F. homes will no longer exist which will only make the remaining homes more expensive. Do the math. Second, let's talk about the unintended consequences. In trying to punish the "rich old people" for owning houses, you are targeting people in areas where their house is probably their main asset. Most older people stay in their homes because it is the most economic choice. That is where their support system is. You may say so what. Here's how you will personally pay for this. The rezones happen, there is a glut of property (developable) available and those properties are suddenly valued (artificially) below market rate. That lost equity goes into the developer's pockets. Next, the city tries to force them out in the name of density (see Rob Johnson's "how-to" on the Seattle Channel Oct 2, 2015). The city succeeds and the "rich old people" will not be able to stay in the city becoming suddenly (and artificially) poorer and without a neighborhood support system. This will probably put large numbers of them into subsidized nursing homes. Here's where you come in because guess who is going to be paying for this with increased taxes. Plus you still won't be able to buy a house in the city.

<b>Name</b>	Scott Cooper
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<ol style="list-style-type: none"> <li>1 The alternatives do not study varying the buckets for the proposed affordable housing percentage requirements (the suffixes to the zoning categories - M, M1, M2). While the M/M1/M2 suffixes are varied for specific locations between the alternatives, the DEIS should look at the impacts of changing the percent affordable housing associated with each suffix. For example, what would the impact be of increasing the High Area, Residential/Highrise Commercial requirement from 7%, 10%, 11% (M, M1, M2), to 9%, 12%, 13%? Would that lead to the development of more affordable housing, or would it hinder development overall? And if the percentage buckets studied have been determined to be the "sweet spot" between requirements and development, there should be references to how the percentages associated with the M/M1/M2 suffixes were developed.</li> <li>2 The study area should be expanded to include single family zoning outside of urban villages and proposed urban village expansion areas. The impact of broader but lower level rezoning (i.e. single family to RSL throughout much of Seattle) should be included in this study to determine if that is a viable way to achieve the affordable housing goals laid out by the City.</li> </ol>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children</b>	

**under the age of 18 in  
your household?**

**What is your  
household income?**

**Do you own or rent  
your residence?**

**How long have you  
resided in the city of  
Seattle? (total number  
of years)**

**Do you work in  
Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person with  
a disability?**

**Are you a U.S. Military  
veteran?**

**From:** Marilyn Wilkinson Cope  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA - EIS  
**Date:** Friday, July 28, 2017 12:56:20 PM

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To whom it may concern,

I would like to respectfully request an extension on the MHA Environmental Impact statement until late August. I don't believe there has been reasonable and adequate time to perform necessary due diligence.

Best regards,  
Marilyn

**From:** Sue Corcoran  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MILLER HALA up zoning proposal. MHA with zoning map of alternative 1  
**Date:** Thursday, August 03, 2017 11:40:02 AM  
**Attachments:** [logoPig copy.jpg](#)

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I am extremely disturbed by the HALA up zoning recommendation for the Miller Neighborhood. I live at 1265 23rd Avenue East 98112. Just outside the zone.

Your Upzoning means NO AFFORDABLE HOUSING FOR SINGLE FAMILIES. I moved here 20 years ago from Chicago due to their lack of preservation of single family neighborhoods. Now look at Chicago. People live in the suburbs and business is dying with office buildings having 20% capacity across the board. Chicago kicked out families and gave away neighborhoods to developers.

I want to say that I agree with the Miller Neighborhood Community response to the HALA plan. I have pasted it below. My family (me, my husband and my two children 3.5 years and 15 months) want to live in the neighborhood and be able to enjoy green space and parks and OUR NEIGHBORS without intense parking and traffic impacts.

That is why I worked 10 years to get INTO THIS NEIGHBORHOOD IN THE FIRST PLACE. The character of our neighborhood is wonderful. Change happens but the change your propose is too impactful.

Why aren't you building in the neighborhoods that are less desirable and need to be rebuilt? Because developers don't see enough money there. It's pretty simple.

Enough is enough. BTW — I vote and council members and mayoral candidates who only talk about affordable housing and don't talk about maintaining the character and preserving what makes Seattle special as you expand to include all the people who don't even live here yet is NOT ACCEPTABLE THINKING.

Here is the letter I agree with:

**August 2, 2017**

**TO:** [MHA.EIS@seattle.gov](mailto:MHA.EIS@seattle.gov)

**CC:** HALA Team: (Jesseca Brand [jesseca.brand@seattle.gov](mailto:jesseca.brand@seattle.gov), Brennon Staley [Brennon.Staley@seattle.gov](mailto:Brennon.Staley@seattle.gov), Nick Welch [Nicolas.Welch@seattle.gov](mailto:Nicolas.Welch@seattle.gov), Geoff Wentlandt [Geoffrey.Wentlandt@seattle.gov](mailto:Geoffrey.Wentlandt@seattle.gov); OPCD: Sam Assefa [Samuel.Assefa@seattle.gov](mailto:Samuel.Assefa@seattle.gov); City Council: Lisa Herbold [Lisa.Herbold@seattle.gov](mailto:Lisa.Herbold@seattle.gov), Rob Johnson [Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov), Spencer Williams [Spencer.Williams@seattle.gov](mailto:Spencer.Williams@seattle.gov), Bruce Harrell [bruce.harrell@seattle.gov](mailto:bruce.harrell@seattle.gov), Kshama Sawant [kshama.sawant@seattle.gov](mailto:kshama.sawant@seattle.gov), Debora Juarez [Debora.Juarez@seattle.gov](mailto:Debora.Juarez@seattle.gov), Mike O'Brien [Mike.Obrien@seattle.gov](mailto:Mike.Obrien@seattle.gov), Sally Bagshaw [Sally.Bagshaw@seattle.gov](mailto:Sally.Bagshaw@seattle.gov), Tim Burgess [Tim.Burgess@seattle.gov](mailto:Tim.Burgess@seattle.gov) (Via E-mail)

**RE:** MHA Draft EIS Comments from the Madison-Miller Park Community Group

The following comments and attached Alternate Proposal Zoning Map are respectfully submitted on behalf of the Madison-Miller Park Community Group. These comments have been compiled, reviewed, and agreed upon by our community group, comprised of 200 members who have been involved in our meetings over the past nine months, and close to 300 households who participated in additional community outreach efforts and survey.

### **Overall Comments on MHA Alternatives 1, 2, and 3**

Our neighborhood prefers Alternative 1 (With Modifications). We recommend that MHA (*Mandatory Housing Affordability*) requirements be implemented into the existing zoning in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (*Accessory Dwelling Unit*) and DADU's, (*Detached Accessory Dwelling Unit*) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units. These recommendations are based on the following:

- [if !supportLists]-->• <!--[endif]-->**Flawed typology:** We are deeply concerned that the DEIS falsely represents Madison-Miller as “Low Displacement Risk/High Access to Opportunity”. This misrepresentation will result in significant negative impacts if Alternatives 2 or 3 are adopted. Please see our detailed comments below.
- [if !supportLists]-->• <!--[endif]-->**Density increases not equitable:** Our current zoning in Madison-Miller will exceed HALA density goals without additional proposed zoning changes. Indeed, based on current development and permitted housing units, Madison-Miller density will exceed MHA goals by the end of 2017 with our current zoning. Other urban villages, such as West Seattle Junction and Ballard, categorized as “Low Displacement Risk and High Access to Opportunity” have 10 – 30% less proposed increases than MMRUV (*Madison Miller Residential Urban Village*), despite being designated for more density as Hub Urban Villages and identified as locations for future light rail extensions.
- [if !supportLists]-->• <!--[endif]-->**MHA process not inclusive:** We do not feel the area-wide zoning changes outlined in Alternatives 2 and 3 reflect adequate neighborhood and stakeholder input. The current zoning, established by the 2035 Comprehensive Zoning Plan, was developed with a more inclusive process and was more responsive to neighborhood input.
- [if !supportLists]-->• <!--[endif]-->**Concerns for significant negative impacts:** Our request for MHA implementation with Alternative 1 zoning map should not be understood as a resistance to increased density. As we've said in previous correspondence, we embrace increased density in our neighborhood but feel Alternatives 2 and 3 (as written):
  - <!--[if !supportLists]-->a) <!--[endif]-->do not adequately mitigate for displacement of low and middle income residents;
  - <!--[if !supportLists]-->b) <!--[endif]-->do not equitably distribute the density and cost of MHA city-wide;
  - <!--[if !supportLists]-->c) <!--[endif]-->will increase racial and economic

segregation;

<!--[if !supportLists]-->d) <!--[endif]-->do not match increased density with increased access to green space and recreational opportunities;

<!--[if !supportLists]-->e) <!--[endif]-->will burden our already fragile infrastructure; and,

<!--[if !supportLists]-->f) <!--[endif]-->pose significant public safety hazards with increased traffic on our narrow streets and heavy pedestrian and bicycle usage (with Meany Middle School and the pedestrian/bike greenway).

The Madison-Miller Park Community could support Alternative 2 with modifications noted in comments below (and is **opposed** to DEIS proposed zoning shown in Alternative 3). Please see our attached *Alternate Proposal Zoning Map* for specific zoning modifications. As noted in the DEIS, Alternative 2 generates more housing, jobs, and affordable housing than Alternative 3. The allocation of growth in Alternative 2 better reflects the existing character of our neighborhood, and has fewer significant negative impacts on current stakeholders than Alternative 3.

#### **Summary of our detailed comments to follow:**

--[if !supportLists]-->**1.** <!--[endif]-->**Housing and Socioeconomics:** Both the “Low Displacement Risk” and the “High Access to Opportunity” designations misrepresent our neighborhood and need further analysis and mitigation. **We are concerned about the displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents,** (for example, a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.

--[if !supportLists]-->**2.** <!--[endif]-->**Transportation:** Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk.

--[if !supportLists]-->**3.** <!--[endif]-->**Transportation:** The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.

--[if !supportLists]-->**4.** <!--[endif]-->**Open Space:** We have very little neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional playfield for league sports and summer sports camps and is not available for public or neighborhood use. This playfield will also be used as the sole recreational field for Meany Middle School starting this fall.

--[if !supportLists]-->**5.** <!--[endif]-->**Public Services:** Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded powerlines are already compromised due to their age and condition. Garbage pickup on our historic and narrow streets creates traffic backups now, and additional volume of apartment buildings will increase that problem.

--[if !supportLists]-->6. <!--[endif]-->**Historic Resources:** MMRUV (*Madison Miller Residential Urban Village*) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS does not address the impact of losing this historic housing stock.

--[if !supportLists]-->7. <!--[endif]-->**Aesthetics:** Alternatives 2 and 3 propose dramatic changes to the character of the neighborhood (in some cases as extreme as SF (*Single Family*) changing to LR3(*Low-Rise3*)). This is in direct conflict with the stated MHA principle to maintain and create appropriate transitions (“between higher and lower scale zones as additional development capacity is accommodated”). The only proposed DEIS mitigation measures for aesthetic changes to the character of the neighborhood is the Design Review process. HALA has requested from OPCD (*Office of Planning and Community Development*) a determination of non-significance for proposed changes to the Design Review process. The HALA proposed changes to modify the Design Review process will further erode safeguards already in place to mitigate these adverse impacts.

### **Detailed Comments:**

#### **#1: Housing and Socioeconomics: “Low Displacement Risk/High Access to Opportunity” determination is flawed and warrants further analysis of impacts and needed mitigation:**

--[if !supportLists]-->• <!--[endif]-->Based on the DEIS Figure 1., Exhibit 2.1 and 2.2 the Madison-Miller Residential Urban Village clearly has a Moderate to High Risk of Displacement and Vulnerability and has been misrepresented.

--[if !supportLists]-->• <!--[endif]-->Although Alternative 3 aims to distribute the growth based on the displacement potential and access to opportunity, the location of future affordable housing within this or any particular neighborhood is highly improbable as indicated in the DEIS.

--[if !supportLists]-->• <!--[endif]-->The DEIS notes that the increase in units for each unit demolished greatly increases displacement as established in the 2035 Seattle Comprehensive Plan. This displacement further serves to segregate the displaced population as documented in the 7/2/2017 New York Times article, *Program to Spur Low-Income Housing is Keeping Cities Segregated*, by John Eregon, Yamich Alcindor and Agustin Armendariz.

Specific existing Madison Miller Residential Urban Village assets that have been overlooked in the DEIS “low displacement” determination include the following:

<!--[if !supportLists]-->○ <!--[endif]-->SHA (*Seattle Housing Authority*) and CHIP (*Capitol Hill Housing*) low income housing complexes;

<!--[if !supportLists]-->○ <!--[endif]-->affordable senior housing apartments;

<!--[if !supportLists]-->○ <!--[endif]-->housing for people with physical and developmental disabilities;

<!--[if !supportLists]-->○ <!--[endif]-->existing, historic, affordable apartment buildings;

<!--[if !supportLists]-->○ <!--[endif]-->a secondary treatment housing (half-way house);

<!--[if !supportLists]-->○ <!--[endif]-->a transitional longer term housing for low income women;

<!--[if !supportLists]-->○ <!--[endif]-->the hidden density of many large old single family homes inhabited by multiple tenants.

The proposed up-zones threaten the diversity and affordability of every one of these housing sites. This greatly adds to the High Displacement Risk in Madison Miller.

--[if !supportLists]-->● <!--[endif]-->The designation of “High Opportunity” is flawed, and warrants further analysis:

<!--[if !supportLists]-->○ <!--[endif]-->Madison Miller has no direct access to light rail within a quarter mile or 10 minute walk shed (see detailed comments below regarding transportation).

<!--[if !supportLists]-->○ <!--[endif]-->Madison Miller has woefully inadequate park or open space available for use by the community; this park should not add to the “high opportunity” rating (see comment #4 below).

--[if !supportLists]-->● <!--[endif]-->**Specific Requests:**

<!--[if !supportLists]-->○ <!--[endif]-->Madison-Miller Residential Urban Village should be categorized as Moderate to High Displacement Risk based on the Seattle Comprehensive Plan 2035 Growth and Equity Analysis.

<!--[if !supportLists]-->○ <!--[endif]-->Further data gathering, analysis, and impact mitigation studies should be conducted to accurately understand the scale and negative impacts of displacement.

<!--[if !supportLists]-->○ <!--[endif]-->Existing low income and affordable housing listed above should be protected and designated for affordable housing development exclusively.

<!--[if !supportLists]-->○ <!--[endif]-->The blanket labeling our residential urban village as “High Opportunity” should be reconsidered – we believe we have at most a “moderate access to opportunity” residential urban village, and density increases and mitigation actions should reflect that.

## **#2: Transportation: Link Light Rail is not within a 10 minute walk.**

--[if !supportLists]-->● <!--[endif]-->No direct access to a Link light rail station within a

quarter mile or 10 minute walk-shed. From Madison Miller the shortest walk to the Capitol Hill Link Station is .8 miles or a 17 minute walk and the longest walk is 1.3 miles, or a 27 minute walk.

--[if !supportLists]-->• <!--[endif]-->The future Madison rapid transit line might improve access into downtown, however two buses are still required to reach the nearest Link light rail station.

--[if !supportLists]-->• <!--[endif]-->In our community outreach survey 95% of respondents agreed that, “increased transit and transportation options”, are among most important needs – this is an indicator that while we are well situated for local transit connections, faster, more direct options are still required.

--[if !supportLists]-->• <!--[endif]-->**Specific Request:**

<!--[if !supportLists]-->○ <!--[endif]-->Madison-Miller Residential Urban Village should be categorized as “Low to moderate-Access to Opportunity” with appropriate density increases for a non-Hub residential urban village.

### **#3: Transportation: The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3.**

--[if !supportLists]-->• <!--[endif]-->We believe this will result in unacceptable public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.

--[if !supportLists]-->• <!--[endif]-->Meany Middle School will reopen in the fall of 2017 with a population of up to 1,000 students, and no designated parking lot for parents, volunteers, or staff. School buses will park and travel on our narrow streets. At lunchtime, throngs of students meander through the streets on their way to Safeway and other lunch destinations on Madison and 19<sup>th</sup>.

--[if !supportLists]-->• <!--[endif]-->In our community outreach survey at least 72% of respondents indicated they require on street parking. Included inside our urban village or within a few blocks of its borders are 4 schools: Meany Middle, Holy Names Academy, St. Josephs k-8<sup>th</sup>, and Stevens Elementary, which makes this neighborhood very family friendly. In this family-centric neighborhood, it is unrealistic to think that all new residents, particularly families, will manage without a car.

--[if !supportLists]-->• <!--[endif]-->Miller Playfield is a regional park used almost exclusively for league play. People from all over the city travel to our neighborhood to utilize the park, and current parking challenges in the neighborhood indicate that many playfield users drive and park in the neighborhood.

--[if !supportLists]-->• <!--[endif]-->The pedestrian/bike greenway travels along 21<sup>st</sup> and 22<sup>nd</sup>, and, along with 19<sup>th</sup>, is a major bicycle thoroughfare for families and students biking to the four area schools. Increased traffic and construction vehicles would pose significant safety hazards, particularly on 21<sup>st</sup> Ave East, as it is a one-way street adjacent to the playfield and the primary entrance for Meany, as well as the school bus loading zone. Maximized and illegal

parking on the narrow streets causes blind turns at intersections and traffic circles.

--[if !supportLists]-->• <!--[endif]-->**Specific Requests:**

<!--[if !supportLists]-->○ <!--[endif]-->Further data gathering, analysis, and impact mitigation studies should be conducted to accurately understand the negative impacts to traffic, parking, and public safety.

<!--[if !supportLists]-->○ <!--[endif]-->Within Madison Miller all new development must include onsite parking to mitigate the impacts of higher density on the functionality and livability of this neighborhood.

**#4: Open Space: We have very little neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional play field for league sports and is not available for public use. This “park” will also be used as Meany Middle School’s sole recreational outdoor facilities starting this fall.**

--[if !supportLists]-->• <!--[endif]-->Madison Miller currently has approximate 1.6 acres of open space per 1000 residents, which is below the Parks Plan standard of 9.34 acres per 1000 residents. Alternatives 2 and 3 further decrease by Madison Miller parks and open space level of service to 1.2 and 1.1 acres per 1000 people, respectively.

--[if !supportLists]-->• <!--[endif]-->In our community outreach survey 86% of respondents agreed that, “accessible public green spaces”, are highly important.

--[if !supportLists]-->• <!--[endif]-->The DEIS assumes the entire acreage of Miller Park and Playfield is our open green space. However, the majority of this park is utilized as a very popular regional playfield, used almost exclusively for league play. The playfield is NOT a community asset and league games are often utilizing the playfield until 10 pm most days of the week, year-round.

--[if !supportLists]-->• <!--[endif]-->In addition, much of the park space is associated with Meany Middle School. Meany does not meet Washington State minimum school requirements for on-site outdoor recreational area or on-site parking. Instead it uses Miller Park for school activities and the neighborhood for staff and parent parking.

--[if !supportLists]-->• <!--[endif]-->The DEIS does not take any of these factors into consideration. Mitigation is not provided, only suggested as potentially addressed under future City planning and analysis efforts.

--[if !supportLists]-->• <!--[endif]-->Given the lot sizes in the area, it is unlikely that developers will be incentivized to provide open space within their projects.

--[if !supportLists]-->• <!--[endif]-->**Specific Requests:**

<!--[if !supportLists]-->○ <!--[endif]-->The DEIS should be required to calculate the actual acreage of the park that will be open to the public (and neighborhood) with consideration of Meany Middle School’s use of the park.

<!--[if !supportLists]-->○ <!--[endif]-->Before up-zoning the MMRUV the City of

Seattle needs to procure additional open space within the MMRUV and future development must pay impact fees to cover those costs.

**#5: Public Services: Existing infrastructure, including storm sewers, sanitary sewers, and road ways are already compromised due to their age, overused condition and our narrow streets. Garbage pick-up causes traffic backups, and these will increase with the volume of multifamily units in Alternatives 2 and 3.**

--[if !supportLists]-->• <!--[endif]-->The Madison-Miller area regularly has flooded street intersections and alleys that will be exacerbated by dramatic increases in impervious surface. SDOT (*Seattle Department of Transportation*) and the City of Seattle provides little to no street cleaning services.

--[if !supportLists]-->• <!--[endif]-->**Garbage, recycling, and compost pick-up is not discussed in the Draft EIS. Because of the small lots and extremely narrow alleys that do not allow for garbage truck access, collection for larger buildings will be forced to the street edge, creating unsightly and unhealthy dumpsters, blocking traffic and parking, and obscuring sight lines.**

--[if !supportLists]-->• <!--[endif]-->In our community outreach survey 83% of respondents agreed that, “infrastructure improvements and additions should be made concurrent with increases in density.”e.g. upgrade road surfaces, sewer lines, power lines and storm drainage.

--[if !supportLists]-->• <!--[endif]-->**Specific Requests:**

<!--[if !supportLists]-->○ <!--[endif]-->To mitigate the infrastructure impacts from up zones in both Alternative 2 and 3 development impact fees need to be incorporated into any up-zones to improve existing infrastructure that is in poor condition. Without fees to mitigate these impacts the functionality and livability of neighborhoods are sacrificed.

**#6: Historic Resources: Madison Miller is one of the two oldest urban villages which has experienced some of the greatest growth by percentage and number of households in the past 20 years and will have over 50% growth increase under proposed changes. However, the DEIS does not address the impact of losing this historic housing stock to the changing character of this Urban Village.**

--[if !supportLists]-->• <!--[endif]--> The Draft EIS notes the potential for development to indirectly impact the setting of historic areas and the historic fabric of neighborhoods. Madison Miller is not a formal historic district, so no context statement has been prepared for this area, which is at the edge of what was known as “Catholic Hill.” In the DEIS Section 3.3 the Madison Miller Urban Village is stated “as one of the two oldest Urban Villages that is proposed to have over 50% growth increase”. It is further noted that MMUV will have a 50% density increase in Alternative 1, and higher than 50% in Alternative 2 and 3.

--[if !supportLists]-->• <!--[endif]-->According to the Preservation Green Lab study “Older, Smaller, Better: measuring how the character of buildings and blocks influences urban vitality,” neighborhoods with a smaller – scaled mix of old and new buildings draw a higher

proportion of non-chain shops, restaurants, women and minority owned business than new neighborhoods. The MMRUV has this variety.

--[if !supportLists]-->• <!--[endif]-->The vast majority of the homes and apartment buildings within this urban village were built before 1930, with several built in the 1890's. There is nothing in the DEIS that addresses the impact of losing this historic housing stock.

--[if !supportLists]-->• <!--[endif]-->Alternative 3 would have the highest potential for detrimental change to its historic character. DEIS proposed mitigation measures consist of policies in the comprehensive plan regarding consistency of new development within an existing setting. These measures are vague and not supported by regulations. In fact, the recently proposed changes submitted to OPCD to modify the Design Review process will further reduce safeguards currently in place to mitigate these adverse impacts.

--[if !supportLists]-->• <!--[endif]-->Furthermore, most of the projects that would impact the existing SF zones under new MHA zoning changes would be under Design Review thresholds due to lot sizes and not subject to formal design review. If HALA proposed changes to Design Review Process are implemented, this effect will be more widespread.

--[if !supportLists]-->• <!--[endif]-->RSL (Residential Small Lot) up-zones proposed in Alternative 2 would provide the opportunity for increased density and infill while also allowing for less actual demolition of existing historic era housing.

--[if !supportLists]-->• <!--[endif]-->**Specific Requests:**

<!--[if !supportLists]-->○ <!--[endif]-->Single Family up zones in Residential Urban Villages should be retained as shown in Alternative 1 or limited to Residential Small Lot, as shown in Alternative 2, to assist in preserving the historic character and architectural diversity of this neighborhood.

<!--[if !supportLists]-->○ <!--[endif]-->Standards should be proposed that require more not less Design Review for more Development Projects in Residential Urban Villages.

**#7: Aesthetics: Alternatives 2 and 3 would result in dramatic changes to the character of the neighborhood, are not in alignment with MHA stated principles, and would result in loss of character and livability.**

--[if !supportLists]-->• <!--[endif]-->Exhibits 3.3-14 and 15 show a dramatic change in character even though they minimize the true effect of Alternative 3 on Madison-Miller, because the added units are shown adjacent to much bulkier structures than are currently allowed within the single family areas. Comparable examples for Alternative 2 also have aesthetic impacts, but to a lesser degree than Alternative 3.

--[if !supportLists]-->• <!--[endif]-->Alternatives 2 and 3 propose dramatic changes to the character of the neighborhood (in some cases as extreme as SF changing to L3). These are not in alignment with the stated principles of the MHA to maintain and create appropriate transitions between higher and lower scale zones.

--[if !supportLists]-->• <!--[endif]-->“Privacy Standards” would “address the placement of

windows”, but this is vague and does not address overall aesthetics or privacy.

- [if !supportLists]-->• <!--[endif]-->Upper level setbacks and side modulation provide limited relief from a dramatic increase in bulk adjacent to one and two story homes with pitched roofs and large windows and small side setbacks.
- [if !supportLists]-->• <!--[endif]-->The impact of these changes represent a “substantial” change, but as disclosed by the DEIS is considered not a significant impact due to the “urban context of a rapidly growing city.” “Urban Context of Rapidly Growing City” is the cause of this significant impact. This explanation does not make the impact go away and should not release the preparers of their responsibility to address this significant impact and do they offer any effective solutions to develop effective mitigation measures. There are methods to limit, block by block, the total density that can be constructed or to implement greater requirements for open space to offset density increases. This substantial change is not justified or necessary to implement the MHA program. Under the current zoning, as represented in Alternative 1, density goals will be accommodated. The massive increase in units proposed by Alternative’s 2 and 3 will likely displace existing low income and affordable units and new affordable units are extremely unlikely to be built in the Madison Miller Residential Urban Village.
- [if !supportLists]-->• <!--[endif]-->Proposed DEIS mitigations for aesthetic changes to the character of the neighborhood are vague and inadequate. Modifications to design review and “Other Potential Mitigation Measures” are not required or guaranteed to occur. Instead the Draft EIS couches the mitigation in very non-committal terms such as, “for example, design review could include.” The recently proposed changes submitted to OPCD to modify the Design Review process will further erode safeguards currently in place to mitigate adverse impacts.
- [if !supportLists]-->• <!--[endif]-->Under the current requirements included in the MHA DEIS proposal many of the developments would be below the threshold for formal design review and do not require SEPA review.
- [if !supportLists]-->• <!--[endif]-->We strongly disagree with the conclusion in Section 3-3 that “aesthetic impacts should be reduced to less than significant levels”. This is an untrue misrepresentation that is in fact contradicted by the DEIS Growth & Equity Composite Vulnerability Indicators Figure 4, and Displacement Risk Index Figure 5.
- [if !supportLists]-->• <!--[endif]-->**Specific Requests:**
  - <!--[if !supportLists]-->○ <!--[endif]-->Neighborhood Community Councils need to be reinstated with Architectural Review Panels that create design standards consistent with the character of each neighborhood, All development on lots that represent a change in scale will be required to be reviewed by these neighborhood Architectural Review Panels for compliance with neighborhood design standards.

## Conclusions:

The MHA DEIS reads more as promotional material for the MHA program. It is not an objective evaluation of the significant impacts of the programs implementation, nor a fair attempt to provide measures to mitigate the adverse impacts of the program. The Madison-Miller Residential Urban Village community has responded to MHA DEIS proposals by investing a large amount of time and consideration to provide the most constructive feedback possible to both preserve that which makes it livable, unique, and a part of what makes Seattle great and at the same time add density and MHA contribution. After extensive review of the MHA DEIS we have concluded that:

--[if !supportLists]-->• <!--[endif]-->The Madison Miller Residential Urban Village is and will continue to be highly impacted by a growing Seattle. Both Alternative's 2 and 3 in the MHA DEIS will put at risk this functional, livable, and unique neighborhood;

--[if !supportLists]-->• <!--[endif]-->As a community we support Alternative 1, with the modifications stated previously, which could better meet both density and affordability goals without sacrificing the fabric of this community;

--[if !supportLists]-->• <!--[endif]-->Residents in the Madison Miller Urban Village have been displaced and will continue to be at risk in the future. Residents will be at an even higher risk for displacement with the proposed

future development shown in Alternative's 2 and 3;

--[if !supportLists]-->• <!--[endif]-->Given the over burdened and narrow streets within the Madison-Miller Residential Urban Village on site parking must be required for all single family and multifamily housing development;

--[if !supportLists]-->• <!--[endif]-->Current low income and affordable housing options are at risk for demolition without replacement under the MHA Alternative's 2 and 3 rezones. If affordability is not a false promise of MHA then these complexes, within the Madison-Miller Residential Urban Village, need to be protected;

--[if !supportLists]-->• <!--[endif]-->MHA would be most fairly, equitably, and effectively implemented as a citywide program and as a fee applied to all development in the city;

--[if !supportLists]-->• <!--[endif]-->All development within areas that are rezoned must include developer impact fees to help pay for infrastructure impacts;

--[if !supportLists]-->• <!--[endif]-->MHA should be implemented to all development throughout the city. MHA should also be implemented without citywide rezones as proposed in Alternative's 2 & 3 and without the changes to existing land use zoning i.e. LR1 throughout the city should become LR1(M);

--[if !supportLists]-->• <!--[endif]-->The MHA contribution or percentage of affordable housing should be significantly higher than the current proposed levels;

For these reasons, we prefer implementation of MHA with zoning map of Alternative 1.

Sue Corcoran  
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**From:** Brad Coulter  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Environmental Impact Statement - Comment Period  
**Date:** Tuesday, August 01, 2017 1:53:23 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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FYI: The online form doesn't seem to work. I'm using Google Chrome and the web interface doesn't allow the user to type in the requested fields.

Brad Coulter  
4048 35<sup>th</sup> Ave W  
Seattle, WA 98199  
[brad@concordis.net](mailto:brad@concordis.net)  
206 391 1271

Below are my comments/concerns/questions regarding the HALA proposal:

1. There is no light rail to come to Magnolia – housing changes should be tied to public transportation so there is proper infrastructure. Zoning changes should mirror the light rail path.
2. There is no urban center/village in Magnolia – density changes should be in/near an urban village so that residents can walk to stores/doctors, etc. They should not be randomly placed in residential areas! If the HALA changes go through, an “urban village” in Magnolia should first be designated. And THEN the zoning changes should follow in a way that makes sense and allows for resources for its residents.
3. The West Point Treatment facility in Magnolia cannot handle the increased density: <http://www.seattletimes.com/seattle-news/environment/west-point-treatment-plant-ill-prepared-in-growing-region-contractor-finds-after-flood/>. This is a fact you have not taken into consideration! How does the overloaded treatment plant (and its recent issues with severe pollution) impact the SEPA/EIS process???
4. The public schools in Magnolia/Queen Anne are already AT CAPACITY. Magnolia Elementary is set to open at full capacity, Ballard HS is over capacity with students in portables, etc. Let's find schools for our current kids before adding more to an already over-loaded system.

I would also echo these comments/concerns voiced by a neighbor:

“NO URBAN VILLAGE, HUB, OR OTHER URBAN CENTERS IN MAGNOLIA OR INTERBAY NEIGHBORHOODS

The HALA plan and MHA plans are predicated upon ostensibly limiting its up-zoning, re-zoning or other exceptional land use planning tools and schemes to Seattle's urban villages, hub urban villages, urban expansion areas, urban centers, and existing zones for commercial or multifamily development. While technically Magnolia and Interbay have versions of commercial zones, and some zoning for multifamily use, it is hardly of the scale of those areas in the city that literally host established urban villages, urban expansion areas, urban centers, and the like.

The City should be reminded that unlike those long designated and established areas in Seattle, Magnolia and Interbay opted out of being part of the planning that ushered in those zones of density and rampant development. Neither ever planned for or otherwise undertook the steps that led to local plans and guidelines for accepting growth, density, and now this latest, the usurpation of even those plans.

The City has no basis upon which to layer its HALA agenda and MHA initiative on the areas of Magnolia that it has targeted; not only is there no community planning precedence upon which to base it, but as noted above, the top-down planning and zoning edicts of the City of Seattle as part of its HALA agenda/MHA initiative, complete with engaging in shenanigans with the Magnolia Community Council to gain “Magnolia's approval” delegitimizes the process, the procedures in the environmental review process, brings into question the legitimacy of the scoping process. Pretty hard to participate if you don't know that there is something to participate in, in the first place!

OFFENSIVE PROCESS, CITY OF SEATTLE DECLARING WAR ON PARTICULAR NEIGHBORHOODS, INCONVENIENT CITIZENS AND THEIR CONCERNS

Starting with the offensive and clearly confrontational narratives that came out of the HALA report process – that single family homes/homeowners/zoning, to wit, that it has its basis in racism and class exclusion, is a barrier creating equity and affordability in Seattle, and as a class, single family zoning and by its extension that group of individuals should if not outright, at least through a program of ongoing attrition be eliminated.”

Source: [http://discoveryparkcommunityalliance.com/DPCA\\_Public\\_Docs/COS\\_Re\\_Old\\_BRAC/MNPC%20Comments%20HALA%20Scoping%2006-23-2017%20Final.pdf](http://discoveryparkcommunityalliance.com/DPCA_Public_Docs/COS_Re_Old_BRAC/MNPC%20Comments%20HALA%20Scoping%2006-23-2017%20Final.pdf)

Thank you for your time! [Please confirm receipt of this email.](#)



**Brad Coulter**  
Managing Partner/Co-Founder  
(206) 391-1271



**From:** Sara Coulter  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment  
**Date:** Wednesday, June 21, 2017 11:20:23 AM

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Hello,

I would like to voice my concerns regarding the proposed options on Gilman Ave and Government Way in Magnolia:

- This area borders a natural heron preserve. Increased traffic, etc threatens that habitat.
- The schools in Magnolia / Queen Anne are already at capacity. With increased density, there is no infrastructure for schools to support new families.
- Traffic! Traffic on W Emerson Place is horrible, especially in the evenings. With only 3 ways to get in and out of Magnolia, this poses a huge problem (especially if there is an emergency).

This plan seems like it's great for developers and horrible for community members.

Thanks for adding my comments to the EIS.

~Sara Coulter

**From:** Shane Currier  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Office of Planning and Community Development  
**Date:** Monday, August 07, 2017 11:08:45 AM  
**Attachments:** [EIS one-page comment form \("bg105r06t5"\).doc](#)

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**COMMENTS ON DRAFT EIS RE: MHA**

1

- Overall Analysis** DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3
- Community Feedback** DEIS fails to take into account documented Junction neighborhood feedback.
- Lack of Affordable Housing** DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.
- Neighborhood Plan** DEIS reflects City’s failure to honor neighborhood plan.
- Traffic** DEIS analysis is flawed; Fails to utilize meaningful data.
- Green Space** DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.
- Neighborhood Character** DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.
- Loss of Light and Air** DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings
- Loss of Views** DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.
- Historic Buildings** DEIS fails to recognize historic buildings in Junction.
- Public Safety** DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.
- Utility Infrastructure** DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.
- Schools** DEIS fails to note existing lack of school capacity and impact of increased density thereon.
- Other** I have other concerns regarding the DEIS including, but not limited to, the following:

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Name: Shannon Scott Currier

Address: 5253 42<sup>nd</sup> Ave SW

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**From:** macewan cuthbertson <brewan6@gmail.com>  
**Sent:** Thursday, July 06, 2017 1:49 PM  
**To:** PCD\_MHAEIS  
**Subject:** Affordable congestion

I see where the advisory board has helped push through expanded development in key areas of Seattle. I'm sure they believe it will help ensure mandatory lower cost housing. And it well may but the developers are using this as an excuse to expand development on a parcel of land and that doesn't benefit the existing residents, but it does line the pockets of developers and make some city managers feel they did something to help the city. This is utter nonsense and who fully misguided. There are other options to satisfy the needs of the city and the greeds of development. The huge amount of current construction and the strain it puts on infrastructure is getting out of hand, not to mention the lowering of quality of life for the residents dealing with transport, loss of views, general overcrowding. One great option would be to encourage development along the Aurora corridor, if there was ever a place that needed renovation that is it. The current condition of a main thoroughfare bordered by great neighborhoods is one of virtual blight. There are as you should well know other options. I give you this one as it is by far and away the nose on your face one. You really should be more responsible, take a breath and do a better more thorough study of the impact your decisions are making for the future of this city. I would suggest in fact that you get another professional outside city planning study done before you make another foolish move. For instance any transport person worth their salt would have recommended roundabouts and overhead walk and bike paths to relieve the Mercer mess which you have made worse. Get yourselves some top notch know how instead of the crew you hired so far and try a lot harder to come up with the correct solutions for making Seattle all it can and should be.

MacEwan Cuthbertson. Home builder.

**From:** E C  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Bagshaw, Sally](#); [Burgess, Tim](#); [O'Brien, Mike](#); [Sawant, Kshama](#); [Johnson, Rob](#); [Gonzalez, Lorena](#); [Herbold, Lisa](#); [Harrell, Bruce](#); [Juarez, Debora](#)  
**Subject:** Response to the MHA draft EIS  
**Date:** Monday, August 07, 2017 1:28:18 PM

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The one-size-fits-all approach is seriously flawed. Each Urban Village is unique and should be evaluated separately.

Enclaves for young and affluent singles and couples will be the outcome of adopting either Alternative 2 or Alternative 3 in Residential Urban Villages. Gone will be neighborhoods with a diversity of age levels and income levels. In Wallingford the rents for newly constructed apartments and the prices for new rowhouses/townhouses preclude people of moderate income. The vertical design of the housing does not favor older occupants.

Some of these young affluent people will be adding children and will need larger housing. But they will be looking at depleted inventory because many three, four, and five bedroom homes will have been torn down.

Housing affordability is a problem that the neighborhoods of the entire city should be solving. Why are Residential Urban Villages (6.8% of Seattle's land) bearing such a disproportionate impact? A better and more equitable solution would be to open up the city land-use codes to allow denser, multifamily housing in all the single-family neighborhoods of Seattle.

Mike Cvitkovic  
Wallingford resident

**From:** Seattle Nature Alliance  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comments for MHA, EIS  
**Date:** Monday, August 07, 2017 10:24:15 AM

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Comments for Draft Mandatory Housing Affordability Environmental Impact Statement.

Section 3.7, Open Space and Recreation.

**Comments regarding USE of existing park land:**

Seattle Nature Alliance opposes any policy or “use” changes for natural park lands—specifically the 2500 acres in the Green Seattle Partnership restoration process. These acres must be preserved for passive recreation, wildlife habitat, and scenic beauty. Any future need for park lands for developed recreation or any high-impact/active uses should be accomplished by other means—NOT by “using” these naturalistic, mostly-forested acres. Under no circumstances should city planners expect to accommodate growth by utilizing these Green Seattle acres for anything other than passive recreation/wildlife habitat/scenic beauty.

Sincerely,

Seattle Nature Alliance

Directors: Denise Dahn, Mark Ahlness, and Rebecca Watson

[seattlenaturealliance@gmail.com](mailto:seattlenaturealliance@gmail.com)  
[www.seattlenaturealliance.org](http://www.seattlenaturealliance.org)

**From:** Danna Dal Porto  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** New housing information  
**Date:** Friday, June 30, 2017 11:28:00 AM

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June 30, 2017

I have learned, just yesterday, that the offices in Seattle have new ideas/plans for the housing situation in Seattle. The deadline appears to be very soon. I am requesting an extension to read and consider the extensive adjustments to a plan that will greatly influence Seattle. The tour-around of this plan is way too short for community consideration.

I have been really upset and saddened by the deconstruction of the Seattle I know and love. Historic buildings are disappearing and the small Mom and Pop stores are being replaced by tall, impersonal, ugly buildings. The lack of set-backs to multistory buildings shows that Seattle planners learned nothing from the experiences in New York that resulted in the wind tunnels of that City. Set-backs, open air areas for public use ( at street level) is what makes a great city that is people-friendly. Add these large, impersonal buildings to a lack of parking and the planning in Seattle is terrible for the long-term use of city residents and visitors. Please reconsider the short-sighted planning that is overwhelming Seattle.

Sincerely,

Danna Dal Porto  
16651 Road 3 NW  
Quincy, WA 98848

<b>Name</b>	Jean Davis
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 My comments are specific to the Crown Hill Urban Village. (I realize the DEIS covers all the urban villages.) If either Alternative 2 or 3 is pursued, there should be (a) mitigation specified for displaced small businesses,</p> <p>2 (b) concurrent infrastructure investments in transit, schools, street paving, drainage and sewer systems, sidewalks, and (c) a solution to slow police response times.</p>
<b>Land Use</b>	<p>3 Please note that Crown Hill is already in the midst of huge housing growth. Growth projections used in the DEIS are unrealistically low. The growth assumptions in CHUV exclude current development in the pipeline, and therefore all Alternatives have unrealistically low growth projects. For example, assumptions applied to Alternative 1 conclude that CHUV will add only 700 new housing units by 2035. In June of 2017, the City of Seattle Permitting process identified 21 development projects already under permit that include over 600 new housing units. Alternative 1, 2, and 3 scenarios should be reassessed with growth projections that are in line with the development occurring now and readjusted throughout the DEIS for their impact.</p>
<b>Transportation</b>	<p>4 The DEIS transit analysis and mitigations are inadequate in addressing the increasing need that will come with growth.</p> <p>5 In light of the reduced parking requirements for new development in Urban Villages, there will naturally be significant increases in use of transportation systems other than personal vehicle. There should be specific provision of special parking spaces for "shared vehicles" like Car-to-GO. Imagining that everyone will always take a bus or bicycle is magical thinking. In addition to this type of parking, the document should give data on how frequent bus service should be and when it is likely that Metro will add such service.</p>
<b>Public Services &amp; Utilities</b>	<p>6 The two big inadequacies under this topic are: (1) utilities that address drainage and flooding in much of the community are subpar, with flooding and open culverts the norm north of 85th NW.</p> <p>7 (2) The only school in CHUV, Marcus Whitman Middle School, has 16 ancient portables outside the original school structure. When and how are these facility needs going to be addressed.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your</b>	

**From:** renee  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** EIS comment, Greenlake/Roosevelt Urban Village  
**Date:** Sunday, June 18, 2017 2:12:17 PM

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RE: EIS comment to Alternatives 2 & 3 of the Greenlake/Roosevelt Urban Village

Both alternatives 2 and 3 of the Greenlake/Roosevelt Urban Village, fail to maximize the commercial core and present LR zones, and instead seek to expand lower rise density in an outward sprawl. This results (Alternative 3) in abolishing all the current SF zoning in the Roosevelt neighborhood. By failing to maximize and up zone current LR areas, both alternatives create adverse impacts to the single family neighborhoods and should be reexamined.

As part of the neighborhood planning efforts beginning in the 90's, when the RTA was sold to the Roosevelt and Greenlake neighborhoods, this was NOT what was to happen. Density was to be concentrated and maximized in the commercial core. Both alternatives are in direct opposition of the neighborhood plans that were developed by the stakeholders and community members. HALA's hope by abolishing Neighborhood Councils and calling homeowners names, was to silence the community stakeholders. Review of these "alternatives" confirms that they have succeeded.

Maximization of density needs to occur where density currently exists. This creates the least amount of impacts to current residents and SF zoning. Present LR zoning should be increased, not kept the same, especially when it is abutting NC2P-75 and LR3MR-M1. Looking at the segment of property between NE 71st and Weedin Place (Greenlake area) that abuts the west side of the freeway, the proposed zoning is only LR3 in both alternative 2 and 3. In both alternatives, everything abutting the west side of the freeway is only zoned at LR3 when all the property abutting it to the west (towards the lake) is zoned NC2P-75. This would be the ideal area/areas for substantial up zones. Why was this not zoned NC2P-75? The City's subsidized 12 story apartment tower, known as "Greenlake Plaza" which sits to the south of this segment gets a greater up zone (LR3MR-M1) in alternative 3, including a small chunk of property south of Weedin Place. Why is this little piece up zoned but not the property to the North? I propose that this be reexamined. You have missed a huge opportunity to create density in an area that will not block views or impact SF zoning. To drop from NC2P-75 to LR3 in both of your alternatives, makes absolutely no sense when this property all abuts the freeway and there is no SF zoning within multiple blocks. The entire area that abuts the freeway to the west, should either be changed from LR3 to NC2P-75 or to LR3MR-M1. The city owned tower should not get special spot zoning as it does in alternative 3.

By abolishing the single family homes in alternative 3, HALA is eliminating affordable SF homes of any kind in NE Seattle. This plan will require those with families who can not afford

Ravenna and/or Laurelhurst, to live in a condo, townhouse or an apartment. Middle class families who want to raise their children in a SF home (with a small yard) will move out of Seattle to the suburbs. I guess that reaches the ultimate goal of HALA; destruction of the single family home and the elimination of middle class families from Seattle. You either live in a subsidized apartment because you can't afford market rate, or you live with a lakeview in Laurelhurst if you are wealthy and want a single family home to raise your family.

The current LR3 zones need to be up zoned to meet the density goals of HALA. Doing so will eliminate the need to create LR sprawl in the current SF zones. This will have the least amount of impacts by preserving affordable SF "starter" homes that remain in the Roosevelt neighborhood. There are no adverse impacts to increasing the above mentioned zones to the zoning that abuts them (NC2P-75) because the zones in question are currently zoned multifamily. Increasing the height will not obstruct views or light, since these areas abut the west side of the freeway.

Sincerely,

Renee Davis

Sent from [Outlook](#)

**From:** Derek Deeter  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Please extend the review period for the draft HALA-EIS until September 1-2017  
**Date:** Thursday, July 27, 2017 6:30:05 PM

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Please extend the review period for the draft HALA-EIS until September 1-2017.

Thank you,  
Derek Deeter

Sent from my iPhone

**From:** Aida de la Cruz  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Extend Comment Period  
**Date:** Sunday, July 02, 2017 12:18:24 PM

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Dear Director of the Office of Planning & Community, Mr. Sam Assefa,

Please extend the HALA MHA Upzone Draft Environmental Impact Statement (DEIS) comment period. Released on June 8, 2017, the DEIS is 462 pages long and the appendices are 364 pages long. This is over 800 pages to review within only 32 days which is unrealistic. Seattle citizens and the bright future of Seattle depends on vetted city planning.

Sincerely,  
Aida de la Cruz

**From:** Aida de la Cruz  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS  
**Date:** Sunday, August 06, 2017 5:15:32 PM

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To the MHA committee,

The DEIS is not sufficient to represent all Urban Villages and the City overall. Each Urban Village is unique, with different housing types, cultural traditions, businesses, resources, and growth needs. This DEIS fails to recognize and examine these differences.

Each Urban Village and Surrounding Area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.

Additionally, the DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined. Seattle residents live in both their own neighborhoods and in the City at large, yet this DEIS has failed to analyze the impacts to both thoroughly and accurately.

Sincerely,

Aida de la Cruz

**From:** Kristin deLancey  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment  
**Date:** Monday, August 07, 2017 11:02:33 AM

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1 Overall Analysis DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3

Community Feedback DEIS fails to take into account documented Junction neighborhood feedback.

Lack of Affordable Housing DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.

Neighborhood Plan DEIS reflects City's failure to honor neighborhood plan.

Traffic DEIS analysis is flawed; Fails to utilize meaningful data.

Green Space DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.

Neighborhood Character DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.

Loss of Light and Air DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings

Loss of Views DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.

Historic Buildings DEIS fails to recognize historic buildings in Junction.

Public Safety DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.

Utility Infrastructure DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.

Schools DEIS fails to note existing lack of school capacity and impact of increased density thereon.

Name: \_Kristin deLancey  
Address:

**From:** Seiko Sato  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** HALA/MHA up zone DEIS comment period  
**Date:** Saturday, July 29, 2017 2:53:35 PM

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Please extend the comment period to September.

Thank you.

J. M. De Mocko

<p><b>Name</b></p> <p><b>Email address</b></p> <p><b>Comment Form</b></p> <p><b>Description of the Proposed Action and Alternatives</b></p>	<p>Meyer Denney</p> <p>1 I believe MHA should set a minimum number of units before the fees for not renting out to low income individuals kick in.</p> <p>Example: If I'm a single family home owner and I want to build a duplex in its place, I now need to rent one of the units (half of the total units) for a below market rate. This de-incentives me to building this duplex in the first place.</p> <p>We have a housing shortage and should be encouraging people expand on their single family homes with town homes, row houses, DADUs and more. But if we need to either pay a huge fee or rent our added unit at a lower rate, we might not be so quick to do so.</p> <p>I believe this MHA fee should only kick in on new structures with more than 6 units. That way single family home owners have incentives to tear down their single family building and build a duplex/triplex or 4+ town homes (depending on how big the lot is)</p> <p>More housing = less rental prices.</p> <p>All that said I'm a proponent of upzoning and full disclosure I live in an Urban village that will get upzoned from single family to LR3. When this happens I would love to build a triplex on my lot but if I have to rent 1/3rd of the units at below market rate, then I probably won't do and Seattle will loose out on two more housing units.</p> <p>Thank you,</p> <p>Meyer Denney</p> <p>I believe MHA should set a minimum number of units before the fees for not renting out to low income individuals kick in.</p> <p>Example: If I'm a single family home owner and I want to build a duplex in its place, I now need to rent one of the units (half of the total units) for a below market rate. This de-incentives me to building this duplex in the first place.</p> <p>We have a housing shortage and should be encouraging people expand on their single family homes with town homes, row houses, DADUs and more. But if we need to either pay a huge fee or rent our added unit at a lower rate, we might not be so quick to do so.</p> <p>I believe this MHA fee should only kick in on new structures with</p>
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**Housing and Socioeconomics**

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Thank you,

Meyer Denney

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your  
employment status?**

**What is your age?**

**What is your race or  
ethnicity?**

**What is your gender?**

**Do you identify as  
LGBTQIA?**

**Are you a person with  
a disability?**

**Are you a U.S. Military  
veteran?**

<b>Name</b>	Sigrun denny
<b>Email address</b>	
<b>Comment Form</b>	
<b>Aesthetics</b>	<p>1 My neighborhood (Eastlake) currently has yards, setbacks from the street for many multi-family buildings, etc. - I am concerned that the new rules will greatly reduce or eliminated these make a less green and open neighborhood, less walkable and pleasant to live in. Don't want to see if turn into canyon-like streets between box-like houses.</p>
<b>Public Services &amp; Utilities</b>	<p>2 This plan MUST be amended to address developer fees to be used for the construction of expansion of schools. As I know, having children enrolled in Seattle public Schools, the schools at already at or above capacity, and bringing more families in by increasing the density of the neighborhood will only exacerbate the problem. State guidelines call for not more than 22 student per class in grades k-3; my children have been in classes ranging from 26-29 students at these grade levels. Since the increased housing density will directly affect the continued overcrowding of the schools, it is unreasonable to just leave it all to be fixed by the taxpayers, while the developers profit but do not addresses issues that they are contributing to. The EIS talks about how many expansions are planned as if their is a great deal of space will be available in the near future, without mentioning the current financial crisis in the school district which may defer construction. It is true that new school are being opened, but they are predicted to be at or over capacity almost as soon as the open just with the kids already in the district. They will not have space available for additional children.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	

**How many people are in your household?**

**Are there children under the age of 18 in your household?**

**What is your household income?**

**Do you own or rent your residence?**

**How long have you resided in the city of Seattle? (total number of years)**

**Do you work in Seattle?**

**What is your employment status?**

**What is your age?**

**What is your race or ethnicity?**

**What is your gender?**

**Do you identify as LGBTQIA?**

**Are you a person with a disability?**

**Are you a U.S. Military veteran?**

<b>Name</b>	Lisa k DeWilde
<b>Email address</b>	
<b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b>	South Park neighborhood
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<ol style="list-style-type: none"> <li data-bbox="501 824 1422 1144">1 Quite obviously as South Park is surrounded by industrial businesses, this community is already a desert - compared to the dense, leafy canopies of wealthier communities in the city our polluted air is desperately in need of all green space and new trees it can get. I understand we are one of the most at risk of displacement, with low opportunities. Always. We are a very tight knit community that works together. Developers are itching to mow down our scrappy little neighborhood of hard working families.</li> <li data-bbox="501 1182 1422 1424">2 It is infuriating- as a community WE deserve a voice and it appears HALA doesn't care about this cornerstone of Pike Market and our rich diversity at all. I've owned my little dollhouse of a home here, moving from the cultural wasteland of Silicon Valley, for 16 years as a single mom. WE need a voice in our beloved South Park, filled with hard working passionate people who feel so lucky to be here. NO HALA!</li> </ol>
<b>Housing and Socioeconomics</b>	<ol style="list-style-type: none"> <li data-bbox="501 1462 1422 1637">3 With Seattle welcoming Amazon to spread like a disease with exponential growth creating crippling traffic and this very issue of too many people - geez where do we put them all? It's baffling that they can't spread into Bellevue, or outlying areas where there IS room to grow.</li> <li data-bbox="501 1675 1422 1850">4 It's like an overcrowded classroom of 30 kids adding 23 more and hoping they will survive somehow. Good luck. ! Why aren't these huge corporations and developers putting money back IN instead of continually raping and pillaging our beautiful well seasoned neighborhoods? WE NEED a VOICE!</li> </ol>
	<ol style="list-style-type: none"> <li data-bbox="501 1881 1422 2134">5 As South Park is high displacement, low opportunity... It appears we are yet again getting sand kicked in our faces. We are a multi cultural very hard working neighborhood, I expect the goal of HALA is to erases this diversity to make room for all this rich white yuppies with such excellent jobs. Most of us actually work for them. I, for one clean houses, walk dogs and paint portraits for these lucky sots. We will quickly be erased.</li> </ol>

**Land Use**

- 6 Our community needs a voice in our development- we welcome some changes but are terrified we will be wiped out and really not exist anymore. I am a huge gardener, very passionate about adding spaces that beautify for our families and wildlife. I've added 8 trees over the years... We need more help with the improvement of our high pollution rates -not allowing developers freedom to run roughshod adding concrete and dense buildings and screwing us by removing the little bits of green space that we do have.
- 7 We are not stupid. We don't believe it's fair that we will have our taxes go sky fucking high as a result of being rezoned to multi family. I felt so lucky to buy this house! I thought I'd retire here and my son could buy a house here. We will all get eventually pushed out, it is quite clear. No one in this HALA plan thinks we matter at all. It's horrifying.

**Air Quality & Green House Gas Emissions**

- 8 We share our horrible air quality with poor Georgetown across the duwamish. We need more green space, more TREES! My idiot neighbor next door is a "landscaper" who has carefully filled in his property with concrete. We Were a longtime rich riverfront farm community that has been poisoned by industry and We sincerely don't want the death knell to be people of this city and developers quieting our desperate voices.

**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**How many people are in your household?**

<b>Name</b>	Michael Dey, President
<b>Email address</b>	
<b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b>	Fauntleroy Community Association
<b>Comment Form</b>	
	<p>Fauntleroy Community Association P.O. Box 46343 Seattle, WA 98136-6343</p> <p>August 7, 2017</p> <p>To: Office of Planning and Community Development (MHA.EIS@seattle.gov)</p> <p>Subject: Mandatory Housing Affordability Draft EIS</p> <p>1 The Fauntleroy Community Association (FCA) supports land use policies that:</p> <ul style="list-style-type: none"><li>• retain the character of our Fauntleroy neighborhood and businesses,</li><li>• provide for affordable housing, with equitable allocations for growth and density,</li><li>• concurrently develop infrastructure, including transit, utilities, green spaces, parks &amp; other amenities to serve our growing community and promote urban livability.</li></ul> <p>Founded in 1980, the Fauntleroy Community Association has historically dealt with traffic, pollution, and other topics related to the existence of the ferry dock in our community. Over the years, our activities have expanded to include restoration of salmon habitat in Fauntleroy Creek and the cove, local parks and playgrounds, crime and public safety, traffic issues as they affect all of West Seattle, involvement in transportation-related committees and meetings, and many other topics. We sponsor two local festivals and issue quarterly newsletters for 400 member households, businesses and supporters.</p> <p>Proposed City of Seattle zoning changes for West Seattle and specifically Fauntleroy, violate these common sense principles, and those of any neighborhood plan with respect to incompatibility with existing structures, and neighborhood</p>

parking pressures.

## 2 Incompatibility with Existing Structures

Single family homes are prevalent in the Fauntleroy neighborhood. However small businesses and multifamily areas occupy several block faces in the middle of the Fauntleroy neighborhood along 45th Ave. SW between SW Henderson and SW Brace Point Drive and the Fauntleroy Triangle. These business/multifamily buildings are designated in the EIS as Neighborhood Commercial (NC), Low Rise One (LR1) and Low Rise Two (LR2).

These buildings currently fit within the neighborhood given their current height and density. However the EIS provides that the LR2 buildings would be zoned to add another 10 feet in height and density would be decided by the builder for both LR1 and LR2. The neighborhood commercial building could be zoned to add 50 feet in height up to 80 feet. Fauntleroy is not designated an Urban Village, however we note that the neighborhood is being treated like an urban village for accepting density without support for infrastructure improvement. This does not promote livability or balanced developments.

Uncontrolled density and increased height allowances are not in keeping with the Fauntleroy neighborhood. Hundreds of Fauntleroy homes enjoy views of the Sound. These views will be impacted by the proposed LR2/NC height increases and we would expect property values as well as assessed property tax values to be negatively impacted. In addition, the FCA has worked with SDOT over the last year to reconfigure and improve street use around the business area and planted containers to unify the area. These gains would be diminished with increased traffic generated with the larger buildings.

Fauntleroy is already experiencing development incompatible with the neighborhood. The below photo of a single family (SF) building at the corner of S.W. Henderson and S.W. Barton provide an example. The front of yellow structure faces the western view, the grey house sits to the north, the brick house to the west.

Current, badly-conceived zoning allows a developer to ignore the neighborhood character (two-story brick dwellings with hillside views), and build a three-story, view-blocking, SF structure, that:

1. occupies square footage equivalent to two townhouses,
2. negatively impacts surrounding property values: lost view for the brick house reduces its value by at least \$50,000,
3. allows building height be measured from grade to height of house uphill.

## Aesthetics

## 3 Parking Pressures

To achieve the maximum density limit under existing regulations a builder must meet standards for the location and configuration

of parking, and achieve green building performance. In the proposed, builders must achieve green building performance standard. This means that residents with cars but without driveways will have no choice but to park on the street. This is particularly egregious for the Fautleroy area as street parking is already limited.

Residents compete for parking with users of the Fautleroy Ferry and the Rapid Ride C Line. This includes ferry crews, Car2Go, foot passengers wanting to avoid the auto charge and the bus commuters all looking to park their cars in the Fautleroy neighborhood. In addition, the ferry queue uses Lincoln Park street parking as the means to wait for the ferry in the afternoon and evening. Once the Lincoln Park parking lots are full, visitors park in the neighborhood. Although Fautleroy is designated a Restricted Parking Zone allowing permitted resident only parking between 2:00 a.m. and 5:00 a.m., permits were also issued to the crews and Car2Go, and resident parking in certain areas was adversely impacted.

#### 4 Summary

The Mandatory Housing Affordability (MHA) proposal in the City's Housing Affordability & Livability Agenda (HALA) conflicts with the Neighborhood Plan, and allows buildings that are out of scale with their surroundings and streets. An already tight street parking situation will be exacerbated as driveways may no longer be required. It encourages speculative development, and fails to create an affordable housing framework.

The city's two up-zoning options use superficial analyses that understate actual impacts of development, and fail to address how to offset those impacts. They do not reflect community input, are deeply flawed, and needlessly complex.

Thus, the Fautleroy Community Association strongly urges city leaders and planners to pause MHA/HALA development effort until they can incorporate community input, do in-depth analyses, and present well-considered recommendations. Until we develop a new plan, the FCA recommends abiding by our current Neighborhood Plan.

Just as other West Seattle Peninsula neighborhoods, we want to see a plan that encourages creation of livable, affordable communities; a plan that preserves the small town character that keeps West Seattle such an attractive place to work and live.

Thank you.

Sincerely,

Mike Dey, President  
Fautleroy Community Association  
Msdey50@aol.com

[lisa.herbold@seattle.gov](mailto:lisa.herbold@seattle.gov)

Planning, Land Use & Zoning committee

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- . Lisa Herbold - [lisa.herbold@seattle.gov](mailto:lisa.herbold@seattle.gov)
- . Lorena Gonzalez - [lorena.gonzalez@seattle.gov](mailto:lorena.gonzalez@seattle.gov)

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- . Rob Johnson - [Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov),
- . Mike O'Brien - [mike.obrien@seattle.gov](mailto:mike.obrien@seattle.gov)

Sustainability & Transportation committee

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- . Rob Johnson - [Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov),
- . Mike O'Brien - [mike.obrien@seattle.gov](mailto:mike.obrien@seattle.gov)

Fautleroy Community Association  
P.O. Box 46343  
Seattle, WA 98136-6343

August 7, 2017

To: Office of Planning and Community Development  
([MHA.EIS@seattle.gov](mailto:MHA.EIS@seattle.gov))

Subject: Mandatory Housing Affordability Draft EIS

The Fautleroy Community Association (FCA) supports land use policies that:

- retain the character of our Fautleroy neighborhood and businesses,
- provide for affordable housing, with equitable allocations for growth and density,
- concurrently develop infrastructure, including transit, utilities, green spaces, parks & other amenities to serve our growing community and promote urban livability.

Founded in 1980, the Fautleroy Community Association has historically dealt with traffic, pollution, and other topics related to the existence of the ferry dock in our community. Over the years, our activities have expanded to include restoration of salmon habitat in Fautleroy Creek and the cove, local parks and playgrounds, crime and public safety, traffic issues as they affect all of West Seattle, involvement in transportation-related committees and meetings, and many other topics. We sponsor

two local festivals and issue quarterly newsletters for 400 member households, businesses and supporters. Proposed City of Seattle zoning changes for West Seattle and specifically Fauntleroy, violate these common sense principles, and those of any neighborhood plan with respect to incompatibility with existing structures, and neighborhood parking pressures.

#### Incompatibility with Existing Structures

Single family homes are prevalent in the Fauntleroy neighborhood. However small businesses and multifamily areas occupy several block faces in the middle of the Fauntleroy neighborhood along 45th Ave. SW between SW Henderson and SW Brace Point Drive and the Fauntleroy Triangle. These business/multifamily buildings are designated in the EIS as Neighborhood Commercial (NC), Low Rise One (LR1) and Low Rise Two (LR2).

These buildings currently fit within the neighborhood given their current height and density. However the EIS provides that the LR2 buildings would be zoned to add another 10 feet in height and density would be decided by the builder for both LR1 and LR2. The neighborhood commercial building could be zoned to add 50 feet in height up to 80 feet. Fauntleroy is not designated an Urban Village, however we note that the neighborhood is being treated like an urban village for accepting density without support for infrastructure improvement. This does not promote livability or balanced developments.

Uncontrolled density and increased height allowances are not in keeping with the Fauntleroy neighborhood. Hundreds of Fauntleroy homes enjoy views of the Sound. These views will be impacted by the proposed LR2/NC height increases and we would expect property values as well as assessed property tax values to be negatively impacted. In addition, the FCA has worked with SDOT over the last year to reconfigure and improve street use around the business area and planted containers to unify the area. These gains would be diminished with increased traffic generated with the larger buildings.

Fauntleroy is already experiencing development incompatible with the neighborhood. The below photo of a single family (SF) building at the corner of S.W. Henderson and S.W. Barton provide an example. The front of yellow structure faces the western view, the grey house sits to the north, the brick house to the west.

Current, badly-conceived zoning allows a developer to ignore the neighborhood character (two-story brick dwellings with hillside views), and build a three-story, view-blocking, SF structure, that:

1. occupies square footage equivalent to two townhouses,
2. negatively impacts surrounding property values: lost view for the brick house reduces its value by at least \$50,000,
3. allows building height be measured from grade to height of house uphill.

### Parking Pressures

To achieve the maximum density limit under existing regulations a builder must meet standards for the location and configuration of parking, and achieve green building performance. In the proposed, builders must achieve green building performance standard. This means that residents with cars but without driveways will have no choice but to park on the street. This is particularly egregious for the Fauntleroy area as street parking is already limited.

Residents compete for parking with users of the Fauntleroy Ferry and the Rapid Ride C Line. This includes ferry crews, Car2Go, foot passengers wanting to avoid the auto charge and the bus commuters all looking to park their cars in the Fauntleroy neighborhood. In addition, the ferry queue uses Lincoln Park street parking as the means to wait for the ferry in the afternoon and evening. Once the Lincoln Park parking lots are full, visitors park in the neighborhood. Although Fauntleroy is designated a Restricted Parking Zone allowing permitted resident only parking between 2:00 a.m. and 5:00 a.m., permits were also issued to the crews and Car2Go, and resident parking in certain areas was adversely impacted.

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Thank you.

Sincerely,

Mike Dey. President  
Fauntleroy Community Association  
Msdey50@aol.com

cc: Councilmember Lisa Herbold, West Seattle District 1 -  
lisa.herbold@seattle.gov

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**Demographic Survey (optional)**

**Have you been or are you at risk of being displaced from your neighborhood?**

**Have you been or are you at risk of being displaced from Seattle entirely?**

**Are you now or have you ever experienced homelessness?**

**Do you live in rent- and income-restricted affordable housing?**

**From:** Mary Pat DiLeva  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment  
**Date:** Monday, August 07, 2017 3:11:52 PM  
**Attachments:** [MHA\\_DEIS\\_Comments.docx](#)

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*August 7, 2017*

*Via Email - [MHA.EIS@seattle.gov](mailto:MHA.EIS@seattle.gov)*

To Whom It May Concern:

Thank you for the opportunity to comment on the MHA Environmental Impact Statement (EIS). My comments are below:

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1 In the analysis of access to opportunity, schools are apparently considered when they aren't  
2 actually neighborhood schools that neighborhood residents are automatically entitled to  
attend. In the analysis of access to opportunity, access to the University of Washington is  
3 apparently a factor for adjoining neighborhoods – but light rail directly to campus makes that  
irrelevant, as distant neighborhoods served by light rail will have equal or better access. When  
assessing access to employment, light rail service should be weighed above proximity to  
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### Section 3.3 Aesthetics

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Sincerely,

Mary Pat DiLeva  
712 15<sup>th</sup> Ave  
Seattle, WA 98122

**I have decided to stick with love. Hate is too great a burden to bear. - Martin Luther King, Jr.**

August 7, 2017

Via Email - [MHA.EIS@seattle.gov](mailto:MHA.EIS@seattle.gov)

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MHA DEIS Comments

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Sincerely,

Mary Pat DiLeva  
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Seattle, WA 98122

**COMMENTS ON DRAFT EIS RE: MHA**

**Overall Analysis**

DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3

**Community Feedback**

DEIS fails to take into account documented Junction neighborhood feedback.

**Lack of Affordable Housing**

DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.

**Neighborhood Plan**

DEIS reflects City's failure to honor neighborhood plan.

**Traffic**

DEIS analysis is flawed; Fails to utilize meaningful data.

**Green Space**

DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.

**Neighborhood Character**

DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.

**Loss of Light and Air**

DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings

**Loss of Views**

DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.

**Historic Buildings**

DEIS fails to recognize historic buildings in Junction.

**Public Safety**

DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.

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DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.

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DEIS fails to note existing lack of school capacity and impact of increased density thereon.

**Other**

I have other concerns regarding the DEIS including, but not limited to, the following:

\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

Name: Andrejs Dimbirs  
Address: 4111 SW Hudson St  
Seattle WA 98116

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I have other concerns regarding the DEIS including, but not limited to, the following:

*There needs to be a specific EIS for West Seattle we want to keep the single family neighborhoods. The upzone should have been combined with light rail plan. Significant accesses are not available - parking, transit, green space, community center, library, schools, jobs, medical hospital. The bottom line is MHA will destroy vibrant neighborhood for only 40 units of affordable housing and maybe less, as affordable apartments will be also replaced with new expensive ones.*

Name: Shirley Dimbirs  
Address: 4111 SW Hudson St  
Seattle WA 98116



August 6, 2017

Mr. Sam Assefa, Director  
Office of Planning and Community Development  
*Attn: MHA EIS*  
PO Box 34019  
Seale, WA 98124-4019

SENT VIA EMAIL: [MHA.EIS@seale.gov](mailto:MHA.EIS@seale.gov)

SUBJECT: Citywide Implementaon of Mandatory Housing Affordability (MHA) - Dra`  
Environmental Impact Statement (DEIS)

Dear Mr. Assefa:

The Aurora Licton Urban Village (“ALUV”) thanks you for the opportunity to comment on the Dra` Environmental Impact Statement (“DEIS”) for the Mandatory Housing Affordability (MHA) Program.

As you may be aware, ALUV’s mission is to build a pedestrian-safe, visually vibrant, economically sound, livable and welcoming urban village using sustainable-growth principles. This reflects the vision of the 1999 Aurora Licton Springs Neighborhood Plan that is sll relevant today.

ALUV’s mission is therefore closely aligned with the core values of Seale’ s Comprehensive Plan including:

- **Community** - developing strong connecons between a diverse range of people and places
- **Environmental Stewardship** - protect and improve the quality of our global and local natural environment

- **Economic Opportunity and Security** - a strong economy and a pathway to employment is fundamental to maintaining our quality of life
- **Social Equity** - limited resources and opportunities must be shared; and the inclusion of under-represented communities in decision-making processes is necessary.

With respect to the MHA program draft EIS, ALUV offers the following comments.

### **AURORA AVENUE NORTH ZONING**

We support those elements of HALA which move ALUV toward the vision of the City of Seale 2035 Comprehensive Plan and 1999 Aurora Licton Springs Neighborhood Plan. As it relates to Alternatives presented in the DEIS, we are pleased to see that both Alternative 2 and Alternative 3 include the rezoning of property along the Aurora Avenue Corridor from “Commercial 1” and “Commercial 2” to “Neighborhood Commercial”.

As background, Aurora Avenue is approximately 1.25 miles in length within the Aurora Licton Urban Village. One mile, or 80%, of the 1.25 mile corridor is zoned either Commercial 1 (C1) or Commercial 2 (C2). The remaining quarter mile is zoned Neighborhood Commercial (NC).

We support this zoning change along the Aurora Avenue corridor for several reasons including:

- **C1 and C2 zoning perpetuates auto-oriented regional serving land uses in the Aurora Licton Urban Village.** The C1 and C2 zoned areas are characterized by low density, auto-oriented land uses such as auto repair, used car lots, service stations and suburban style motels. Current land use proposals include two separate mini-storage proposals, one four (4) stories in height and the other six (6) stories in height. Mini-storage uses are not pedestrian oriented, active uses, employment generators nor neighborhood serving, yet are allowed to develop and take up valuable land in the Aurora Licton Urban Village under the existing C1 and C2 zoning.
- **Needed Neighborhood Serving Land Uses** - NC zoning permits land uses that better serve neighborhood, rather than regional, needs. With HALA’s proposed removal of off-street parking requirements for residential development in urban villages, more residents may lack motor vehicles in the future. NC zoning encourages uses that can be accessed on foot rather than by motor vehicle. Just as important, NC zoning would prohibit the loss of prime commercial properties along Aurora Avenue to

regional serving, auto oriented, low employment uses like multi-story mini-warehouses.

- **Supports Pedestrian Orientation** - The design, character and scale of NC zoned land uses and buildings better supports pedestrian orientation and walkability. Neighborhood serving building and site design encourages pedestrian activity, shopping, and social interaction. Urban Village residents and employees can walk, rather than drive, to nearby neighborhood serving uses. This also contributes to healthy communities. In contrast, C1 and C2 zoning encourages auto-oriented uses which fosters motor vehicle conflicts with pedestrians and bicyclists.
- **Improved Public Safety** - The design of NC zoned buildings and sites create an urban form and public realm supportive of public safety. Pedestrian orientation is emphasized. The streetscape is activated with pedestrians. Buildings, with street facing entrances and ample street facing windows, are brought close to the street. There are more “eyes on the street” to discourage and reduce crime.
- **Improved Economic Development** - The NC zone facilitates residential development, ideally in a mixed use format. More residents in the urban village will drive market demand for neighborhood serving uses and services.

As for proposed HALA zoning changes affecting residentially zoned properties within ALUV but outside of the Aurora Avenue commercial corridor, we believe these proposals need to be subject to a robust public outreach process so that residents and property owners in those areas can provide input on proposed zoning changes. In general, though, for areas outside of the Aurora Avenue commercial corridor, Alternative 2 is preferred over Alternative 3 in terms of transitioning urban village properties at the perimeter of the urban village to those lower density properties outside of the urban village.

We request that the MHA fee on all development in the Neighborhood Commercial area be waived or significantly reduced to begin this urban village’s welcomed land use change. In waiving the fee, the city will guide development to Aurora’s excellent transit line where the urban village has its highest unit capacity for growth. This will encourage development specifically along this corridor and help revitalize the area by creating market based affordable living for Seattle’s vanishing middle income. At point of meeting the city may choose to increase or include MHA fees once revitalization achieves desired goals.

### **NEIGHBORHOOD DESIGN GUIDELINES**

The DEIS includes a section on neighborhood design guidelines.

As background, the Aurora-Licton Neighborhood Plan, which set forth the design and vision of the Aurora-Licton Residential Urban Village, was adopted in 1999 (City of Seale [Comprehensive Plan Ordinance #119538](#)). The Neighborhood Plan identifies a series of policies and recommended actions to implement the Aurora-Licton Residential Urban Village.

Included amongst the Aurora-Licton Neighborhood Plan are the following Policy and Recommended Action:

**Policy**

“A-6. Encourage development to enhance the neighborhood’s visual character through use of City-wide and Aurora-Licton neighborhood specific design guidelines.”

**Recommended Action**

“A-4 Develop Aurora-Licton neighborhood design guidelines to be applied to new commercial and multi-family development through the existing city design review process.”

Unfortunately, as with most of the policies and recommended actions in the Aurora-Licton Neighborhood Plan, Policy A-6 and Recommended Action A-4, have never been implemented.

As stated in the DEIS on Page 3-130, under the heading “DESIGN GUIDELINES”

**“DESIGN GUIDELINES**

The Design Review process evaluates new development according to citywide and neighborhood design guidelines..... Many Seale neighborhoods also have neighborhood design guidelines, which work in tandem with the citywide guidelines. ....Neighborhood-specific guidelines identify priority design issues and seek to ensure that new development is compatible with specific local neighborhood character. 14 of the 27 urban villages in the study area have adopted neighborhood design guidelines as shown in Exhibit 3.3-7 at right.”

While the above section states that many Seale neighborhoods also have neighborhood design guidelines, Exhibit 3.3-7 “Urban Villages with Neighborhood Design Guidelines” on Page 3-131 specifies that Aurora Licton Springs Urban Village is one of those urban villages that does not.

The Draft DEIS includes a section entitled “REGULATIONS AND COMMITMENTS” (Page 3-164) which states,

“Chapter 23.41 of the SMC establishes citywide requirements for Design Review. “

In including this, the City is acknowledging that the citywide design review program is a means of code based mitigation for HALA.

The DEIS then continues on to discuss other potential mitigation measures. Under the heading of “OTHER POTENTIAL MITIGATION MEASURES” (Pages 3-164 and 3-165), the DEIS states,

“Aesthetic and urban design impacts could be further mitigated through implementation of the following or similar measures:

...

#### Neighborhood Design Guidelines

As discussed in 3.3.1 Affected Environment, some but not all urban villages that the proposal would affect have neighborhood design guidelines. Working with neighborhood groups to create and codify neighborhood design guidelines could mitigate localized aesthetic impacts for urban villages that do not currently have them. “

Neighborhood Design Guidelines are therefore identified in the DEIS as other “potential” mitigation measures, and not as a requirement. This means that there is no commitment to the implementation of Neighborhood Design Guidelines as a mitigation measure, even though it (design guidelines) frames much of the discussion around HALA.

Neighborhood design guidelines need to be considered a **required** mitigation measure, not just as “OTHER POTENTIAL MITIGATION MEASURES”.

Please note that “Urban Design Quality” is a MHA Principle. The MHA Principles involved considerable input from the HALA Focus Group and other public processes that took place for almost a year from 2016 to 2017.

MHA Principle 2 related to “Urban Design Quality” states,

#### **“2. Urban Design Quality**

**Address urban design quality, including high-quality design of new buildings and landscaping.**

- a. Encourage publicly visible green space and landscaping at street level.
- b. Encourage design qualities that reflect Seale's context, including building materials and architectural style.
- c. Encourage design that allows access to light and views in shared and public spaces. "

As a MHA principle, urban design quality is clearly a key component to the successful implementation of the MHA program and to mitigate significant adverse environmental impacts resulting from the HALA zoning proposals.

Further, the "HALA Community Focus Groups Synthesis of Principles Input Urban Design Examples Summary of Zoning Map Input 2016-2017" report indicates that one of the Focus Groups' "Areas of general agreement" included,

"Many participants expressed support for updated Design Guidelines or new guidelines for neighborhoods that do not have neighborhood specific design guidelines."

The "HALA Community Focus Groups Synthesis of Principles Input Urban Design Examples Summary of Zoning Map Input 2016-2017" report also states that the Medium Sized Urban Village HALA Focus Group (Aurora Licton Urban Village was part of the Medium Sized Urban Village HALA Focus Group) specifically mentioned the following,

**"Medium Density Urban Villages:** Urban villages where multi-family and mixed-use buildings comprise a substantial portion of the neighborhood. These villages generally have little or no single-family zoning within the urban village boundaries. Key issues or areas of interest for this Focus Group include:

...

- Desire for preparation of plans and design guidelines in areas that do not yet have them as well as updating guidelines in areas that do ensure new projects align with community objectives. "

The desire for preparation of neighborhood design guidelines in areas that do not yet have them, as well as updating guidelines in areas that do, ensure new projects align with community objectives. This is compelling. It is a reason that

neighborhood design guidelines should not be considered optional, but should be a required mitigation measure as part of HALA. Otherwise, certain urban villages in the City will have new development reflective of community objectives while others will not.

SEPA seeks the public input to identify environmental impacts. To implement these purposes, the SEPA Rules direct agencies to:

**WAC 197-11-030**

**Policy.**

(2) Agencies shall to the fullest extent possible:

...

*(f) Encourage public involvement in decisions that significantly affect environmental quality.*

The public has, through the MHA Focus Group and other processes, expressed a desire for high quality development. The public has also expressed the need for neighborhood design guideline updates and new urban design guidelines in urban villages that do not have them. This process should be respected in the DEIS process.

This is important to the Aurora Linton Urban Village. ALUV has seen development proposals attempt to justify its design to be consistent with the industrial character of ALUV's Aurora Avenue corridor or by including large signs seeking to honor the auto oriented character of the Aurora Avenue corridor. These characteristics are not consistent with a residential urban village, yet are being proposed. Absent neighborhood design standards, increase density through the MHA program cannot be adequately addressed.

Neighborhood design guidelines are essential as the City moves into increasing density in urban villages. Citywide design guidelines are too broad, do not allow for addressing unique characteristics of the neighborhood, and are often merely not administered consistently to adequately mitigate the HALA program.

As stated on page 3-130 of the DEIS

"...Neighborhood-specific guidelines identify priority design issues and seek to ensure that new development is compatible with specific local neighborhood character."

In keeping with this statement from the DEIS, neighborhood design guidelines are therefore an appropriate means of identifying “priority” issues that “ensure” new developments compatibility with neighborhood character.

**CONCLUSION**

ALUV thanks you again for the opportunity to comment on the draft EIS for the mandatory Housing Program.

Sincerely,

David Osaki

**From:** Ryan DiRaimo  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Kevin Whatley \(Kevin.auroralictonuv@gmail.com\)](#); [Susan Larrance \(susan.auroralictonuv@gmail.com\)](#); [Sharon Holt](#); [Leah Anderson](#); [Jan Brucker](#); [dg17pagoda](#); [Zach A](#); [Ian Whyte-gmail](#); [rob.fellows@mac.com](#)  
**Subject:** HALA MHA DEIS ALUV comment  
**Date:** Monday, August 07, 2017 1:10:09 PM  
**Attachments:** [ALUV-MHA-DEIS-Comments-2017-8-7.pdf](#)

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Dear Seattle OPCD HALA Team,

Please find Aurora Licton Springs Urban Village (ALUV) Community Council's formal comments on the MHA DEIS. These are the reflected views of the community group that aligns with shared goals for improving this urban village. We encourage the commercial zoning changes and how they can revitalize an area of Aurora Avenue for the better.

Thanks,  
ALUV CC  
[ryan.auroralictonuv@gmail.com](mailto:ryan.auroralictonuv@gmail.com)

**From:** Sarah Ditty  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Extension Request  
**Date:** Wednesday, June 28, 2017 12:48:39 PM

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PLEASE EXTEND THE DRAFT EIS COMMENT PERIOD TO 90 DAYS. THE EIS IS MASSIVE. THE CITY TOOK MONTHS TO PREPARE IT. WE NEED MORE TIME TO REVIEW AND COMMENT ON THE CONTENT. EXPECTING RESIDENTS TO REVIEW IN 45 DAYS IS UNFAIR AND ESSENTIALLY SHUTS US OUT OF WHAT IS SUPPOSED TO BE A PUBLIC PROCESS.

<b>Name</b>	Deborah Dlugosch
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 Please consider the feedback from the Crown Hill Urban Village Committee for Smart Growth; I know they have sent detailed comments for this section and I agree with the concerns they have raised. I also add my own comments:</p> <p>2 The upzoning plan for CHUV really only makes sense for an area that has a light rail station. Without one, there simply isn't enough public transportation infrastructure to handle the extra population, especially if residents are expected to do without cars.</p> <p>3 The commercial space that would be added on side streets also doesn't make sense without the heavy foot traffic that a light rail station would bring. The significant upzoning that would occur under Alternatives 2 and 3 should not take place until much closer to the time when a light rail station will be added here.</p> <p>4 Good urban planning should ensure that density is accompanied by the infrastructure upgrades that are required to support the density. There also needs to be a concrete plan for funding the infrastructure, which is very expensive. There are no concrete plans for funding the light rail, bus, school, park, and sidewalk expansions that would be needed in an upzoned CHUV, so I assume these needs will go unmet for quite some time. This will have a negative impact on almost every aspect of the environment in CHUV.</p>
<b>Housing and Socioeconomics</b>	<p>Please consider the feedback from the Crown Hill Urban Village Committee for Smart Growth; I know they have sent detailed comments for this section and I agree with the concerns they have raised. I also add my own comment:</p> <p>5 I think that the division of the city into Low/High Opportunity and Low/High Displacement Risk groups is too crude. Crown Hill is actually intermediate in each of these areas and if the city is going to treat neighborhoods very differently depending on category, then there need to be intermediate categories that would more accurately reflect the reality of the neighborhoods in the middle.</p>
	<p>Please consider the feedback from the Crown Hill Urban Village Committee for Smart Growth; I know they have sent detailed comments for this section and I agree with the concerns they have raised. I also add my own comments:</p> <p>6 The upzoning for the side streets just off 15th and 85th in CHUV (i.e., on 16th and Mary) is far too drastic and would result in poor quality of life for existing residents and also for new residents who would live in the proposed taller buildings. These are the</p>

reasons:

1. The streets are too narrow to allow enough light if buildings are 4 stories or higher. Light levels would be too low both inside buildings and on the street. Narrow side streets should have buildings no higher than 3 stories.
2. The streets in this area are oriented North<-->South, so a tall building at the south end of the street could block 100% of the light to the building next to it in the winter months. This is unacceptable for human health and wellbeing.
3. The narrow streets would make it difficult to accommodate delivery, service, and emergency vehicles given that there will be almost no available on-street parking after upzoning. These vehicles would end up blocking the street entirely and frequently.
4. Car traffic to commercial areas on side streets would be awkward, since there is no room for two cars to pass on these streets when parking spots are full.

## Land Use

- 7 The city should also consider that there is less demand for commercial space than there used to be, in this age of internet shopping. The commercial space in new buildings often seems to remain unleased for long periods of time, especially on streets that are not part of an established shopping/eating area.

Please consider the feedback from the Crown Hill Urban Village Committee for Smart Growth; I know they have sent detailed comments for this section and I agree with the concerns they have raised. I also add my own comments:

- 8 Citywide, the height of buildings should be in proportion to the width of the street, and step-backs of the upper stories should also be used to increase light penetration. Done right, these measures should allow some increase in density without resulting in the "urban canyon" effect. A higher priority should be given to avoiding this canyon effect; otherwise some neighborhoods will start to look like barracks.

## Aesthetics

In a city with long, gloomy winters, it is very important to have light as well as evergreen trees to enjoy in the winter. Both of these things require buildings to be set back more from the lot edge (in the case of evergreens, this is due to the conical shape of the trees which requires more space at ground level).

Please consider the feedback from the Crown Hill Urban Village Committee for Smart Growth; I know they have sent detailed comments for this section and I agree with the concerns they have raised. I also add my own comments:

- 9 As I noted above, Alternative 2 for Crown Hill won't work well without light rail and Alternative 3 would be completely untenable without light rail. Existing bus service is not adequate to serve the number of new residents that would be added. And very few people will choose not to own cars if bus service is the main alternative form of transportation, which means parking will be a serious problem.

## Transportation

The lack of sidewalks in parts of CHUV is also a problem.

Citywide, large-scale upzoning should be timed to coincide with the arrival of nearby light rail stations, and other amenities such as sidewalks.

Please consider the feedback from the Crown Hill Urban Village Committee for Smart Growth; I know they have sent detailed comments for this section and I agree with the concerns they have raised. I also add my own comments:

### Biological Resources

- 10 The estimates of tree canopy loss as lots are redeveloped from SFH to LR are implausibly low. The DEIS states that tree canopy will decrease from 25% to 23% as this redevelopment occurs. This does not fit with what I see in real life when single-family homes are replaced with townhouses or apartments: many SFH lots have one large tree, and most LR developments don't have room for any large mature trees. At best, they may have room for miniature trees, but these don't provide the same benefit as full-sized trees. I believe that the tree canopy data, despite being provided by the latest LIDAR technology, is wrong. Technology can sometimes be wrong.

Many studies have shown that greenspace contributes to human psychological wellbeing, and trees also obviously clean the air and intercept stormwater, so the city should take concrete steps to minimize tree loss.

Please consider the feedback from the Crown Hill Urban Village Committee for Smart Growth; I know they have sent detailed comments for this section and I agree with the concerns they have raised. I also add my own comments:

### Open Space & Recreation

- 11 As thousands of new residents who don't have yards of their own are added to the city, there will be a need to add major new park space for these residents. Yes, this will be expensive. No, curbside seating areas and microparks are not enough. The city needs to be realistic about the cost of all the infrastructure needed to support density, and large parks are one of these costs.

Adding parks in the upzoned areas of the city is especially important if many people in the future are expected to be carless. The DEIS seems to acknowledge this, but city officials don't seem to be on board with that idea.

A parks employee recently told me that the window for adding major new park space is closed. In that case, the window for adding major new density should be closed also, and the city should shunt growth towards cities like Tacoma, Everett, Olympia, and others that may be able to accommodate it better.

### Public Services &

Please consider the feedback from the Crown Hill Urban Village Committee for Smart Growth; I know they have sent detailed comments for this section.

**Utilities**

12 Increased hardscape can result in drainage issues in some areas, and this impact isn't given adequate attention in the DEIS. Drainage issues can be expensive to deal with, so the city should have a concrete plan for dealing with this expense.

**Air Quality & Green  
House Gas Emissions**

13 Air quality could suffer if too much tree canopy is lost, so the city should take concrete steps to minimize or replace lost trees.

<b>Name</b>	Stephen Dooley
<b>Email address</b>	
<b>Comment Form</b>	
<b>Housing and Socioeconomics</b>	<p>1 I am commenting on the newly approved Beacon Crossings on 2505 Beacon Ave. I have followed the project and the parking spots and the affordable units have been substantially lowered. We need a higher number of affordable units in the building above 3%. And zero parking has a huge impact on the neighborhood with its very tight streets and heavy traffic.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you resided in the city of Seattle? (total number of years)</b>	
<b>Do you work in</b>	

<b>Name</b>	Jason Dougherty
<b>Email address</b>	
<b>Comment Form</b>	
<b>Biological Resources</b>	<p>1 I am very concerned about the loss of tree canopy to development. The number of large, mature trees already lost to development is significant, and the loss will only accelerate if current practices are allowed to continue as development increases. Standard practice for developers in to clear a lot of all its trees in order to maximize the building footprint.</p> <p>The Draft EIS seems to downplay the loss of tree canopy, characterizing it as only a few percent change. There are two problems with that: first, a loss of tree canopy is going in the wrong direction; we need to be increasing the tree canopy. Second, the loss of trees will be concentrated in the neighborhoods where people actually live and will therefore be much more significant. The metric to consider isn't the percentage of overall canopy lost, it's the percentage of neighborhood canopy lost. Large parks and greenspaces, while very important, aren't the same as neighborhood trees.</p> <p>Large trees lost to development are irreplaceable. Please include strong protection for trees on both public and private lands in the HALA plans.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-</b>	

**From:** Nancy Driver  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment  
**Date:** Monday, August 07, 2017 2:48:41 PM  
**Attachments:** [Ltr re MHA DEIS 8-07-17.docx](#)

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Dear Sir/Madam

Please find attached my letter regarding the MHA DEIS.

Thank you,  
Nancy L. Driver  
4740 38th Avenue SW  
Seattle, WA

**NANCY L. DRIVER  
4740 38<sup>TH</sup> AVENUE SW  
SEATTLE, WA 98126**

**August 7, 2017**

**Office of Planning and Community Development**

*Attn: MHA EIS*

PO Box 34019

Seattle, WA 98124-4019

Re: Draft MHA EIS for West Seattle

Dear Sir/Madam:

I live in West Seattle and own a home that I purchased there in 1997. I'm quite concerned about the diminishing quality of living in West Seattle. It's always been a place I really loved but it's rapidly becoming a place losing its charm and character, and I'm beginning to feel that decisions being made by the City of Seattle and King County will soon drive me out.

My comments on the draft Environmental Impact Statement are as follows:

- Firstly, the DEIS does not honor the urban village plan that was put into effect in the 1990's for the Admiral/California Junction area: this plan emphasized the preservation of single family home enclaves.
- The DEIS does not address the issue of lack of adequate infrastructure to support increased proposed density. I have a particular concern on my street regarding the ability of the sewer system to support increased usage. The home on the east side of the 4700 block of 38<sup>th</sup> Avenue SW were mostly built in the late 1920's. I know, based on sewer problems I have experienced that the sewer lines are quite old and in bad repair.
- The DEIS does not propose mitigation for the negative impacts to the character of the Junction urban village. There is no recognition in the DEIS related to historic buildings in the Junction.
- The DEIS proposes no meaningful mitigation for the loss of light and air for ground floor buildings. The DEIS fails to address protection of public views or private views that will be lost nor does it propose any meaningful mitigation for same. The view from my picture window is now nothing but a wall of apartment buildings.
- The DEIS does not address the lack of capacity in public schools in this area to support increased density.
- The DEIS does not address adequately address the issues with traffic and parking in this area.

- Additionally, the DEIS fails to propose mitigation for loss of greenspace in an area that is already lacking in greenspace. I do not agree with the City that the golf course off 35<sup>th</sup> Avenue SW can be considered public green space.
- Finally, the DEIS does not take into account the documented feedback from the neighborhood – from the people who actually live there and care about our neighborhood.

Thank you for your attention to my comments. It would be great to feel like, for once, the City was paying attention to what the neighborhood wants instead of their usual habit of just checking off the required boxes and then proceeding to do what they intended to do in the first place irregardless of the input from the people affected by their decisions.

Sincerely,

Nancy L. Driver

**COMMENTS ON DRAFT EIS RE: MHA**

Overall Analysis

DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3

Community Feedback

DEIS fails to take into account documented Junction neighborhood feedback.

Lack of Affordable Housing

DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.

Neighborhood Plan

DEIS reflects City's failure to honor neighborhood plan.

Traffic

DEIS analysis is flawed; Fails to utilize meaningful data.

Green Space

DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.

Neighborhood Character

DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.

Loss of Light and Air

DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings

Loss of Views

DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.

Historic Buildings

DEIS fails to recognize historic buildings in Junction.

Public Safety

DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.

Utility Infrastructure

DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.

Schools

DEIS fails to note existing lack of school capacity and impact of increased density thereon.

Other

I have other concerns regarding the DEIS including, but not limited to, the following:

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Name: NANCY DRIVER  
Address: 4740 - 38TH AVE SW  
SEATTLE, WA 98126

<b>Name</b>	Jeff Dubrule
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 I'm very much in favor of both expanding urban village boundaries and increasing height limits. Alternatives 2 &amp; 3 are both acceptable to me, although I would lean towards alternative 3, as it will help break the cycle of racial exclusion from heavily single-family-zoned areas with low diversity, particularly in North Seattle.</p>
<b>Housing and Socioeconomics</b>	<p>2 Ultimately, I don't feel that either alternatives 2 or 3 go far enough, given the rate that people are moving to the area. If we can't build housing at a rate that keeps up, new and existing residents won't be able to live and work in this city. I want to see Seattle grow and become a model of urban livability. We're already doing well, thanks to our commitment to the integration of nature and city, which combine to form the Emerald City. We need to make this available to as many people as possible, and by doing so, we will be rewarded by a more diverse, more prosperous, and more culturally significant great city.</p>
<b>Transportation</b>	<p>3 Seattle is very mobility-bound, and our transportation infrastructure is behind. We can't solve this by adding more room for cars, and building more parking just means more cars clogging our roads. We need to invest in high-capacity transport, as quickly as possible, and make sure that everyone can get around safely.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	

**From:** Alice Duff  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comments on DEIS  
**Date:** Monday, July 24, 2017 8:27:12 PM

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TO: City of Seattle Office of Planning and Community Development

I agree with Historic Seattle on the issue of Mandatory Housing Affordability policy. We all know there is insufficient affordable housing. However, the proposed MHA could have devastating impacts on the livability and quality of Seattle's neighborhoods, especially those that contain older buildings. You need to achieve density without demolition. Portland has been going through the same growing pains as Seattle; and just recently managed to avert a House Bill that could have had disastrous effects on neighborhoods – all in the name of affordable housing.

I completely support **requiring new development to include affordable housing units – right then and there. Whatever percentage of the total units the City decides is necessary to be affordable – whether that be one unit out of 10 or one unit out of two – make the developer design some units to meet the definition of affordable.** This is much more sensible than a City fund; more affordable housing 10 years from now does no good to homeless people today, or those spending 2/3 of their income on housing.

Also, make note of the following paragraph:

The DEIS does not connect MHA to URM. Unreinforced Masonry (URM) buildings are mentioned in both Affected Environment (3.5.1) and Mitigation Measures (3.5.3), however, the DEIS does not refer to the Seattle Department of Construction and Inspection's (SDCI) list of over 1,100 URM properties in the city. The analysis should include the number of URMs in each of the study area neighborhoods in order to understand how MHA might impact these properties. These buildings, if preserved and upgraded, can provide affordable housing units: Offer financial incentives to their owners.

Thank you for the opportunity to comment.

Alice Duff

<b>Name</b>	Kimberly Dunn
<b>Email address</b>	
<b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b>	<p>1 There is no area to leave a comment?! I would like to ask that you change the Crown Hill Urban Village Zone only by 1 alley. Your plans have 20th Ave NW listed as the border, but what your planners neglected to see is that this is actually a single lane alley - with no fire hydrants or easy access for emergencies. Please move the border to 19th Ave NW where there is a 2 lane street. Thank you.</p>
<b>Comment Form</b>	
<b>Housing and Socioeconomics</b>	<p>2 Please move the Crown Hill Urban Village border from the alley of 20th Ave NW to the street 19th Ave NW. Your planners must not have come out to review the borders prior to making the plans. 20th Ave NW is not a street. It is a one-lane alley without fire hydrants. When the fire truck has come down our alley, it blocks the entire way. There is no way to move around in case of an emergency. And the closest fire hydrant is on 19th Ave NW. We have no side walks in this area. Please move the border from 20th to 19th. This is a safety concern. Thank you.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your</b>	

**Herbaugh, Melinda**

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**From:** Pamela Dunn <pam@pameladunnlaw.com>  
**Sent:** Sunday, August 06, 2017 7:28 PM  
**To:** PRC  
**Subject:** crown hill upzone  
  
**Categories:** Melinda

**To Whom It May Concern,**

**My name is Pamela Dunn, my sister Debra Stevens and I own and live in a home at 7748 16<sup>th</sup> AVE NW which is in an area being considered for upzoning as part of the Crown Hill Urban Village. I write to express concern regarding the recent MHA EIS and the myriad problems it brings to light. In brief, I support the comments outlined by the Crown Hill Urban Village Committee for Smart Growth (<http://crownhillurbanvillage.org/wp-content/uploads/2017/08/CHUV-MHA-EIS-Summary-final-073117.pdf>) which clearly call out the need to keep zoning as it is.**

**Your plan does not include accurate information with regard to mass transit, parking, or the fact that there are already 5,000 units already permitted for this area. We are not opposed to growth, we are opposed to this particular plan.**

**My sister bought this house more than 30 years ago. She has a disability called Primary Lateral Sclerosis. Because of the remodeling she has had done to the house to accommodate her disability it would be impossible to move elsewhere. At the same time, it is already becoming extremely difficult to access parking on the street.**

**The existing Crown Hill Urban Village has significant capacity for development. I'm in the area every day. It is not an area of urban density. It looks far more suburban than urban. Spend 10 minutes driving through the area and do the same in Belltown, Pioneer Square, Capitol Hill, Upper Green Lake, Ravenna...it is not at all similar. Build up in the area already zoned for it.**

--  
Pamela J. Dunn WSBA #38800  
Attorney at Law  
2400 NW 80th St. #120  
Seattle, WA 98117  
206-261-5105

This message may contain confidential information meant only for the intended recipient. If you receive this message in error, please reply to this email indicating you are not the intended recipient and delete this message.

<b>Name</b>	Michelle Dunn Marsh
<b>Email address</b>	mdunnmarsh@pcnw.org
<b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b>	Photographic Center Northwest
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 I am most interested in Alternative 3, which takes equity and opportunity into consideration. Our institution has staff and faculty who earn less than \$50,000/year, and it is becoming increasingly difficult for them to live and work in Seattle. We hope to ultimately develop our site to offer greater housing opportunities in the Capitol Hill-First Hill area.
<b>Housing and Socioeconomics</b>	2 This is an issue of importance for our institution and the community we serve.
<b>Land Use</b>	3 PCNW currently occupies 4 separate land parcels between 12th and 13th Ave. along Marion Street. We would like to consider development in future that could accommodate affordable housing, and request zoning of NC2P-75 for all 4 parcels in order to maximise our opportunities as an educational institution and cultural contributor to the city of Seattle.
<b>Aesthetics</b>	4 NC2P-75 zoning for our current site, which is adjacent to Seattle University, will not be the tallest zoning in the area, and will balance with the surrounding environment.
<b>Transportation</b>	5 We would encourage the city to consider busses along 12th Ave; currently Madison Ave. is the closest public transportation. Our existing site includes a paid parking lot that provides much-needed revenue to our institution; in addition to greater public transportation we intend to have some parking should the property be developed in future.
<b>Open Space &amp; Recreation</b>	6 Ours is a publicly-accessible cultural institution open 6 days a week, outside of traditional office hours, providing free access to the contemporary art form of photography. As housing density increases, our exhibition space will continue to be a place of inspiration and contemplation for the public.
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being</b>	

**From:** Michelle Dunn Marsh  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Board](#); [Terry Novak](#)  
**Subject:** EIS Plan Comment from PCNW Executive Director  
**Date:** Monday, August 07, 2017 12:38:47 PM  
**Attachments:** [PCNW EIS Comment MDM 07082017.pdf](#)

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To the Planning Committee for Seattle's MHA Plan:

I am writing on behalf of Photographic Center Northwest (PCNW) to offer comments to the City of Seattle's EIS plan for the First Hill-Capitol Hill neighborhood.

PCNW is a nonprofit, publicly-accessible, accredited educational institution dedicated to the artform of photography. It has been located at 900 12th Avenue and Marion Street for twenty years, and in Seattle for nearly thirty.

PCNW's site, which we own and hope to pay off fully within the next 5 years, is comprised of four real estate parcels underlying our building and parking lot on the corner of Marion and 12<sup>th</sup> Avenue, and between 12<sup>th</sup> and 13<sup>th</sup> Ave.

Our site currently consists of both NC2P-40 and LR3 designation. **We would like the entire site to be zoned NC2P-75, so that if we are able to develop our site in future, we can dedicate 10% of the residential component to affordable housing**, occupy a desired 20,000 square feet (doubling our existing usable space) to provide more art and education to the community, and create a value proposition that supports a community-minded development partner to work with PCNW in this process.

PCNW's staff of 12 part-time and full-time employees is 80% female, and women-led. In light of Seattle's efforts for equity and inclusion, I am one of the only mixed-race executive directors of arts institutions in Seattle. No-one on our staff earns more than \$50,000 a year; that is true for most of our adjunct faculty.

It is becoming increasingly difficult to maintain cultural institutions in highly-desirable areas of the city; our presence here will only continue to be a benefit as Seattle expands. Additional housing in this area means new populations to serve; we look forward to supporting that presence on multiple levels.

If Seattle can designate NC2P-75 zoning for our site now, it will expedite our ability to act on future development opportunities that can include an affordable housing component.

Thank you for your consideration of this request as part of the EIS Plan.

Michelle Dunn Marsh

--

**PCNW Thesis exhibition: June 29–August 16th, 2017**

Michelle Dunn Marsh  
Executive Director, Photographic Center Northwest  
[www.pcnw.org](http://www.pcnw.org)  
(206) 720-7222, x 12  
(206) 856-6595 mobile  
*Hours:* Monday afternoons, Tuesdays, Thursdays

PHOTOGRAPHIC  
CENTER  
NORTHWEST

7 August, 2017

To the Planning Committee for Seattle's MHA Plan:

I am writing on behalf of Photographic Center Northwest (PCNW) to offer comments to the City of Seattle's EIS plan for the First Hill-Capitol Hill neighborhood.

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If Seattle can designate NC2P-75 zoning for our site now, it will expedite our ability to act on future development opportunities that can include an affordable housing component.

Thank you for your consideration of this request as part of the EIS Plan.



Michelle Dunn Marsh, Executive Director

**From:** Karen Earl  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Anita And Janine ReesJones \(ajreesjones@icloud.com\)](#)  
**Subject:** West Seattle Junction - EIS review - extension request  
**Date:** Friday, June 30, 2017 1:17:04 PM  
**Attachments:** [image001.jpg](#)

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PLEASE EXTEND THE DRAFT EIS COMMENT PERIOD TO 90 DAYS. THE EIS IS MASSIVE. THE CITY TOOK MONTHS TO PREPARE IT. WE NEED MORE TIME TO REVIEW AND COMMENT ON THE CONTENT. EXPECTING RESIDENTS TO REVIEW THIS IN 45 DAYS IS RIDICULOUS AND ESSENTIALLY SHUTS US OUT OF WHAT IS SUPPOSED TO BE A PUBLIC PROCESS.

*Karen Earl, IIDA*

NCIDQ Certification No. 5366



**KE Interior Design**

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Suite C

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**(NOTE-New address as of 12/1/15)**

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## Seattle Urban Forestry Commission

Tom Early, Chair • Steve Zemke, Vice-Chair  
Weston Brinkley • Leif Fixen • Reid Haefer • Craig Johnson  
Joanna Nelson de Flores • Sarah Rehder • Andrew Zellers

August 2, 2017.

Samuel Assefa  
Director - Office of Planning and Community Development  
600 4<sup>th</sup> Ave  
Seattle, WA 98124

RE: MHA Draft EIS

Dear Sam:

As the City of Seattle drafts policy that seeks to increase urban density and affordable housing to accommodate more people and jobs, protecting and enhancing Seattle's urban forest is needed more than ever to abate the biological, visual, and health impacts of this measure.

The Urban Forestry Commission commends the MHA Draft EIS for stressing the importance of tree coverage for Seattle, specifically citing the goals outlined in the 2013 Urban Forest Stewardship Plan (UFSP), as well as incorporating the most recently published 2016 canopy cover assessment results.

The Commission, however, disagrees with the MHA Draft EIS determination of no significant impacts to the city's tree canopy and requests clarification regarding methodology and mitigation measures proposed in the MHA Draft EIS, specifically:

1. What is the projected tree loss in the No Action Alternative of the MHA Draft EIS?
2. Please explain in more detail the methodology used to estimate the projected tree loss in Alternatives 1 (No Action), 2 and 3 of the MHA Draft EIS.
3. How would a mitigation measure be actionable or enforceable when the UFSP is a policy document and not a required ordinance?
4. Why is a 0.5% loss of tree canopy considered not significant? The MHA Draft EIS does not cite any authority or precedent for that conclusion.

In addition, the Commission requests a response to the following additional comments regarding the MHA Draft EIS:

### **Underestimation of tree canopy impacts:**

The MHA Draft EIS states that there will be less than a 0.5% decrease in the tree canopy for both Alternatives 2 and 3 compared to the No Action Alternative. The Commission questions the methodology used in the MHA Draft EIS for calculating this assessment for the following reasons:

1. The MHA Draft EIS states, "Tree cover for a given zone was assumed to remain constant over time if the zoning designation stayed the same." [Page 374] The Commission recommends that the MHA Draft EIS should account for some increase in tree canopy loss in zones that stay the same. MHA will likely incentivize developers to maximize gross floor area (GFA) on a

redevelopment sites, and one way a developer can maximize GFA is to develop the site to its fullest development potential.

The MHA Draft EIS does not take into account the effect (i.e. enhancement or increase) of the development potential of a lot in MHA areas when calculating tree canopy loss. We request that the final MHA EIS include a calculation of tree canopy reduction using the full development potential of each lot within MHA areas even if the zoning is not changing.

2. The MHA Draft EIS calculates that 0.5% decrease in tree canopy would result in up to a 5 to 16-acre loss in tree canopy associated with Alternatives 2 and 3. While a 0.5% reduction in canopy seems like a low percentage of loss, in real terms it would generally equate to a loss of 173-555 trees (assuming a typical tree canopy has a radius of 20 feet (1,256 square feet)), which is a potentially significant number of trees. Citing tree canopy loss using an estimated number of trees that are lost would more accurately communicate the likely impacts of the MHA policy to the neighborhood tree canopy.

The MHA Draft EIS does not cite any authority for the assertion that a loss of 0.5% tree canopy (i.e., 173-555 trees) is not significant. The Commission believes a loss of this many trees is a significant impact under Alternatives 2 and 3 that should be mitigated, and that the MHA Draft EIS is unsupported as written.

#### **Inadequate Mitigation Measures:**

The MHA Draft EIS states no significant, unavoidable adverse impacts to the tree canopy have been identified, but does list some mitigation measures that would help to avoid and minimize tree canopy loss. The Commission thinks the current mitigation measures are inadequate, and need to be expanded and strengthened.

1. The MHA Draft EIS recommends the City evaluate future urban forestry policies as part of the 2018 UFSP update, but does not include mitigation measures within the context of existing policies such as updating Seattle tree protection code, Seattle Green Factor guidelines, or the Seattle Street Tree Manual. Mitigation measures for tree canopy loss should deal with changing or updating existing regulations and not just recommending evaluation of future policy, which is not enforceable.

Specifically, the Commission recommends requiring mitigation for tree loss to include replacement of equivalent canopy on- or off-site or paying into a City tree replacement and maintenance fund.

2. A healthy urban forest can have an outsized impact on reducing the negative effects associated with increased development intensity, as trees (especially street trees) help to mitigate the visual impacts of density and create a more human-scaled environment, as well as providing important ecosystem and public health benefits. While the MHA Draft EIS documents multiple negative aesthetic impacts associated with increased development intensity, the plan does not recommend any mitigation measures focused on increasing or improving the urban forest to mitigate aesthetic impacts of density.

The Commission recommends including stronger, more binding requirements to promote and improve tree coverage in urban village areas. These recommendations could include but are not limited to the following:

1. Expand incentives and development standards to promote street trees in Urban Villages;
2. Update the interim tree protection ordinance to account for the impact MHA will have on development;
3. Reduce conflict between power lines and street trees;
4. Modify the Seattle Green Factor guidelines to give higher score to preserving healthy existing site vegetation;
5. Assess, monitor, and tally tree loss in the permitting process; and
6. Update the tree code to require retention, replacement, or payment into a City tree replacement and maintenance fund for all removed trees, including hazardous trees, or trees which die as a result of development impacts or that are planted as project mitigation.

Thank you for your attention. The Commission looks forward to your response.

Sincerely,



Tom Early, Chair

cc: Mayor Edward B. Murray, Council President Harrell, Councilmember Bagshaw, Councilmember Burgess, Councilmember Gonzalez, Councilmember Herbold, Councilmember Johnson, Councilmember Juarez, Councilmember O'Brien, Councilmember Sawant, Jessica Finn Coven, Nathan Torgelson, Scott Kubly, Larry Weis, Rodney Maxie, Michelle Caulfield, Robert Stowers, Michelle Vargo, David Bayard, Darren Morgan, Mike Podowski, Geoffrey Wentlandt, Maggie Glowacki, Brennon Staley, Vera Giampietro, Dionne Foster, Aaron Blumenthal, Peter Lindsay

Sandra Pinto de Bader, Urban Forestry Commission Coordinator  
City of Seattle, Office of Sustainability & Environment  
PO Box 94729 Seattle, WA 98124-4729 Tel: 206-684-3194 Fax: 206-684-3013  
[www.seattle.gov/UrbanForestryCommission](http://www.seattle.gov/UrbanForestryCommission)

**From:** Malaika M. Eaton  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Extension  
**Date:** Wednesday, June 28, 2017 2:48:46 PM

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Please extend the comment period for the draft EIS -- there is too much to review in such a short time for such an important issue.

Malaika Eaton

**From:** bruce ecord  
**To:** [PCD\\_MHAEIS](#)  
**Date:** Wednesday, August 02, 2017 9:32:07 PM

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- 1 I understand your desire to make living affordable for city residents by doing an up-zone. However, why is it that urban villages are the only ones being targeted to solve this? What about the neighborhoods with single family dwellings?  
Personally I think the whole city should be designated an urban village. Wouldn't it be neat to see apodments being built alongside mansions?  
Bruce Ecord

Sent from [Mail](#) for Windows 10

<b>Name</b>	Nicholas Efthimiadis
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 Virulently against the No Action Alternative. It would lead to an enormous increase in already high living costs. Seattle would then truly become the next San Francisco and that is not something the city should emulate!</p> <p>I voice my complete support for the premises of both Action Alternatives. I think the MHA upzones and rezones need to be maximized, but with particular attention to marginalized communities who are at a higher risk for displacement. Perhaps the best solution is somewhere in the middle? Expanding urban village boundaries in high-risk displacement areas would ensure more development within the walkshed of frequent transit and contribute to affordability, but more measured changes (i.e. perhaps LR2 instead of LR3) might lessen the displacement pressure.</p> <p>2 I also think it's also important to "shuffle" the housing capacity lost by implementing lower intensity zones in such neighborhoods to the so-called "high-opportunity, low-displacement risk" areas (I'm thinking Ballard, Fremont, Eastlake, Alaska Junction, etc). That way the MHA upzones can maximize housing development in areas with the highest opportunity and attempt to minimize displacement in Seattle neighborhoods with the greatest number of low-income and marginalized people.</p>
<b>Housing and Socioeconomics</b>	<p>3 Yes, displacement analysis should occur- but it should not become a tool for anti-development and anti-housing types to take over and prevent needed development.</p>
<b>Land Use</b>	<p>4 Pilfered from the Urbanist, but I agree with these recommendations for Alternative 2/3 for land use:</p> <p>Alternative 2 for Northgate would provide greater zoning capacity at the County-owned parking lot where a large affordable housing complex is planned right outside Northgate station. Alternative 3 scaled down the upzones in Northgate to reduce displacement risk, but parking lots have no displacement risk.</p> <p>Alternative 2 for Capitol Hill would provide more housing capacity to help absorb the neighborhood's incredible housing demand, which is spilling into neighboring areas like Central District. With light rail already in Capitol Hill, we need zoning that unlocks a virtuous cycle of transit-oriented development!</p> <p>Follow the Rainier Beach Neighborhood Plan, which encouraged mid-rise multifamily development near Rainier Beach Station and recommended an 85-foot height limit for commercial and mixed-use areas there—similar to Alternative 2. Alternative 3 undercuts the neighborhood plan near the station area, but may well be appropriate in other parts of the neighborhood in order to reduce displacement pressures.</p>

**From:** Michelle Ellis-Bevil  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comments for MHA, EIS  
**Date:** Monday, August 07, 2017 1:57:33 PM

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Comments for Draft Mandatory Housing Affordability Environmental Impact Statement.

Section 3.7, Open Space and Recreation.

**Comments regarding USE of existing park land:**

I oppose any policy or “use” changes for natural park lands—specifically the 2500 acres in the Green Seattle Partnership restoration process. These acres must be preserved for passive recreation, wildlife habitat, and scenic beauty. Any future need for park lands for developed recreation or any high-impact/active uses should be accomplished by other means—NOT by “using” these naturalistic, mostly-forested acres. With the growth in population that is forecast, even more parkland should be created. Don't reduce the few natural areas we already have by developing them.

Sincerely,  
Michelle Ellis-Bevil

1. My comments are primarily about the analysis of the Census data for 1990-2000 and the ACS data for 2009-13, along with net new housing units also for Census Tracts for 2000-11 (pg. 3.4, pp. 3.37-3.44, p. 3.60) and thus how Alternative 2 and 3 downplay the displacement effects.
2. The DEIS includes research that claims to show that Census tracts with more new housing production (i.e. 'development') also saw significant gains in numbers of low-income households (and apparently, the opposite applies neighborhoods with less new housing production are supposed to have lost low-income households). This level of numerical analysis doesn't include the lived complexity of actual housing development –especially that those 'high growth' Census Tracts have also included a substantial, indeed disproportionate amount of the subsidized housing built in this time period.
3. Adding footnotes such as "Unfortunately, this data does not reflect the most recent years of accelerated housing development, during which communities have increasingly elevated displacement as an urgent issue" doesn't mean its OK to make claims about the last few years based on older data.
4. The analysis also does not adequately breakdown what is meant by 'low income households' – for instance there is likely a different story for those households earning LT 30% of the median, compared with those earning 31%-50% of the AMI. In other words, what is happening with the very low income households – those who eke out a living working in car washes, restaurant kitchens and hotels (many commuting long distances to those jobs).
5. Also the analysis does not address the proportion of the low and very low income households' income that goes toward housing. Robust, peer reviewed include this measurement – yet the City side-steps this in their analysis. This is pivotal in addressing how an upzone may drive up costs and push more people out of their neighborhoods.  
Why not conduct an actual inventory of existing housing stock to determine where turnover and the sale/resale of older affordable apartment buildings has occurred – as was done latterly for the UDistrict.
6. The DEIS also downplay the lasting impacts of demolitions and renovations on displacement. Using the TRAO data as a proxy for this is problematic because only a limited number of very low and low income households claim it, either because they don't know (or weren't notified) about their potential or actual eligibility, are unaware of the process or move (or feel coerced to leave) before the developer breaks ground – and as such don't get counted as 'displaced' under the TRAO.

**From:** chuck fanucchi  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comments on HALA  
**Date:** Monday, August 07, 2017 12:07:44 PM

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Hello,

- 1 I am a resident of West Seattle. West Seattle does not seem to have fared well with the the increase in density that has already taken place over the last few years.. Two things in particular seem detrimental--the destruction of green space and the way traffic has become a rather huge mess.

A plan to increase density without making far better improvements to public transport appears to be a rather inadequate plan.

- 2 Additionally it appears that in the grand bargain, that the number of units set aside for affordable housing is low--and I would support the efforts of some of the city council who support increasing the number of housing units set aside for affordable housing in the HALA plan.

Just to be clear--while I a recognize a need for increasing density in the city--the plan as presented appears to come at too high a cost to neighborhoods--without doing enough for affordable housing. I would hope for a giant pause to this plan. I would hope for a plan that would allow for a slower rate of increasing density. Along with this more investment in improving public transportation and better protection of open and green spaces.

thank you,

Chuck Fanucchi

**From:** Frank Fay  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment #1  
**Date:** Sunday, August 06, 2017 8:50:21 PM  
**Attachments:** [image002.png](#)

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The MHA DEIS did not study whether the in-lieu fees collected by the City could produce the same number of units as on-site requirements. Calculations of redevelopment costs indicate that in-lieu fees would produce many fewer units than on-site requirements. The percentage of in-lieu fee units per on-site units is:

41%-to-45% for RSL,  
52%-to-59% for LR1,  
55%-to-61% for LR2,  
65%-to-72% for LR3,  
77%-to-85% for MR,  
71%-to-78% for NC-40,  
75%-to-82% for NC-55,  
80%-to-88% for NC-75, and  
79%-to-89% for NC-95.

The MHA DEIS did not study the effects of delay in building affordable housing units dependent on in-lieu fees. Redevelopment would displace existing affordable units, but the City could not build new affordable units until in-lieu fees have been collected from a great many projects. In the meantime, the number of affordable housing units would be reduced. Calculations of redevelopment costs indicate the number of identical projects that would have to be built for enough in-lieu fees to have been collected by the City to fund one identical project of affordable units:

37-to-41 projects for RSL,  
28-to-32 projects for LR1,  
27-to-30 projects for LR2,  
23-to-26 projects for LR3,  
20-to-22 projects for MR,  
21-to-24 projects for NC-40,  
20-to-22 projects for NC-55,  
19-to-21 projects for NC-75, and  
19-to-21 projects for NC-95.

Submitted,  
Frank Fay

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## Calculations of Redevelopment Costs



These calculations of redevelopment costs are based on a straight-forward cost model.

(See definitions for  $f$ ,  $p$ ,  $c$ ,  $m$ , and  $y$  above.)

Lot size	$L$	$\text{ft}^2$
Gross floor area	$G = fL$	$\text{ft}^2$
Cost of purchase	$C_p = cL$	\$
Cost of construction	$C_c = cG$	\$
Cost of MHA fee	$C_m = mG$	\$
Subtotal cost	$C_s = C_p + C_c + C_m$	\$
Total cost	$C_t = C_s + yC_s$	\$
MHA factor (subtotal)	$M_s = C_s / C_m$	See note 1 above.
MHA factor (total)	$M_t = C_t / C_m$	See note 1 above.
Redevelopment ratio	$R = C_t / C_p$	See note 2 above.

Using substitution and rearranging the terms gives the equations for  $M_s$ ,  $M_t$ , and  $R$  used in the calculations above.

**From:** Frank Fay  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment #2  
**Date:** Sunday, August 06, 2017 8:57:17 PM

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The MHA DEIS did not study alternatives to in-lieu fees by square footage for off-site affordable housing. The San Francisco incentive housing policy uses a fee schedule based on the type of housing unit being built. This more closely reflects the market valuation of housing units.

Submitted,  
Frank Fay

Reference: The Final Report of the San Francisco Inclusionary Housing Working Group (<http://openbook.sfgov.org/webreports/details3.aspx?id=2413>, 2017-02-13).

**From:** Frank Fay  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment #3  
**Date:** Sunday, August 06, 2017 8:59:12 PM

---

The MHA DEIS did not study whether an MHA policy that required on-site affordable housing units (without any in-lieu fee option) as an alternative would produce more affordable housing units and more equitable communities.

Submitted,  
Frank Fay

**From:** Frank Fay  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment #4  
**Date:** Sunday, August 06, 2017 9:01:34 PM

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The MHA DEIS did not study the effects of providing affordable housing units at subsidies other than 60% AMI as alternatives. The incentive housing policies of other large cities usually provide affordable housing at three or four levels to cover a broader range of households.

Submitted,  
Frank Fay

**From:** Frank Fay  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment #5  
**Date:** Sunday, August 06, 2017 9:03:46 PM

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The MHA DEIS inadequately considered the fraction of affordable housing units required by MHA policy. A unit requirement of 25% was not fully studied. The Final Report of the San Francisco Inclusionary Housing Working Group (<http://openbook.sfgov.org/webreports/details3.aspx?id=2413>, 2017-02-13) concludes that on-site requirements should be set at 14%-to-18% for rental projects, and at 17%-to-20% for ownership projects. They conclude that fee-option requirements should be set at 18%-to-23% for rental projects, and at 25%-to-28% for ownership projects (although this indicates that the underlying housing unit fee schedule is too low). Their conclusions apply to a real estate market that is at least as challenging as the market in Seattle. They also recommend that these percentages should increase 0.5% each year for 15 years. Given these recommendations, the MHA DEIS did not adequately study affordable housing unit requirements of 15%, 20%, and 25% as MHA policy.

Submitted,  
Frank Fay

**From:** Frank Fay  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment #6  
**Date:** Sunday, August 06, 2017 9:09:42 PM

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No Alternative studied in the MHA DEIS met the City's Objective of 6,200 affordable housing units (at 60% AMI) over 20 years. The DEIS did not consider alternative policies that could have achieved this Objective. These alternative policies include:

- higher MHA affordable unit percentages,
- zoning imposed affordable unit percentages for all multi-family construction (without any in-lieu fee option),
- real estate purchase and real estate redevelopment taxes to subsidize affordable housing, and
- employment payroll taxes to subsidize affordable housing.

Submitted,  
Frank Fay

**From:** Frank Fay  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment #7  
**Date:** Sunday, August 06, 2017 9:13:34 PM

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The MHA DEIS did not study whether any Alternative met the City's Objective of providing affordable housing to a broad range of households.

Submitted,  
Frank Fay

**From:** Frank Fay  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment #8  
**Date:** Sunday, August 06, 2017 9:26:52 PM

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One alternative the DEIS did not study was the imposition of inclusionary housing policies without changing existing zoning (without changing parcel maps and without changing zone definitions). This alternative could produce similar amounts of affordable housing with far less impact on the study areas.

Submitted,  
Frank Fay

**From:** Frank Fay  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA DEIS Public Comment #9  
**Date:** Sunday, August 06, 2017 10:05:10 PM

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## **The DEIS does not meet SEPA requirements for the consideration of alternatives.**

The City's objectives as stated in the DEIS for this proposal are to:

- Address the pressing need for housing affordable and available to a broad range of households.
- Increase overall production of housing to help meet current and projected high demand.
- Leverage development to create at least 6,200 net new rent- and income-restricted housing units serving households at 60 percent of the area median income (AMI) in the study area over a 20-year period.
- Distribute the benefits and burdens of growth equitably.

The DEIS claims to present three alternatives. They are not alternative ways to meet the housing objectives, but only alternative ways to implement the Grand Bargain and the MHA-R framework. The only alternative considered for reaching the objectives of the DEIS is up-zoning under the framework. The DEIS alternatives only consider how much and where to up-zone, not alternative ways to meet the objectives of the DEIS. This is a significant deficiency in the DEIS and a violation of SEPA.

## **The MHA-R framework did not undergo required environmental review, and therefore the framework should be part of the current DEIS or be subject to separate SEPA review.**

The DEIS suggests that the scope of review is limited to the implementation of the MHA-R framework, and that no alternatives other than the framework need be considered. The current DEIS seeks to limit environmental review by relying on claimed environmental review of the framework.

The City's claimed environmental review of the MHA framework is based on a Determination of Non-Significance issued by DPD on June 8, 2015. However, this DNS was for a different proposal that did not include critical elements of what is now known as MHA-R. The proposal which was the subject of the DNS was inconsistent with and contradictory to the provisions of MHA-R. There was never public notice of any environmental review of the MHA-R framework in violation of SEPA. Notice regarding the June 2015 DNS was insufficient, misleading, and contradictory to MHA-R. If applied to the MHA-R framework, the notice provided

regarding the 2015 DNS would be a violation of SEPA and a denial of procedural due process of law.

Submitted,  
Frank Fay

**From:** Phil Fenner  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comments for Draft Mandatory Housing Affordability Environmental Impact Statement.  
**Date:** Monday, August 07, 2017 9:04:46 PM

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Re. Section 3.7, Open Space and Recreation.

Comments regarding USE of existing park land:

I have lived in Seattle for 35 years and witnessed explosive growth. Developers covet the remaining open space we residents treasure, so I oppose any policy or “use” changes for natural park lands—specifically the 2500 acres in the Green Seattle Partnership restoration process. These acres must be preserved for passive recreation, wildlife habitat, and scenic beauty. Any future need for park lands for developed recreation or any high-impact/active uses should be accomplished by other means—NOT by “using” these naturalistic, mostly-forested acres. Under no circumstances should city planners expect to accommodate growth by utilizing these Green Seattle acres for anything other than passive recreation/wildlife habitat/scenic beauty.

Philip Fenner  
735 N 79th St.  
Seattle, WA 98103

**From:** Julia Field  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comment on HALA  
**Date:** Sunday, August 06, 2017 12:52:29 PM

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- 1 *Affordable Housing is a necessity! However, in speaking with a Lowrise zone developer, their idea of an 'affordable' home in Ballard is a 2-bedroom 11-foot wide rowhouse for over \$600,000. That is a 30-year mortgage at \$3,300+ per month... thus, not affordable.*

*The proposed MHA-R "in-lieu of" fees that range less than \$14/sf equates to only small \$20,000 per dwelling buy-off in order for a developer to build more market rate housing without adding affordable unit. Just try getting around affordable housing in San Francisco or Boston --- as the in-lieu-of fee would exceed \$300,000 on a new 3-bedroom townhouse!*

*Let's stick to the Basics and Objectives of the Grand Bargain. Learn from other cities who have been down this path before. INCREASE THE IN-LIEU-OF FEE TO A MINIMUM OF \$200 PER SQ FT and get serious about adding more affordable housing stock.*

Julia Field

<b>Name</b>	Curran Filer
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 Overall, the MHA does not address the impact in existing neighborhoods that additional housing density will create. The MHA also doesn't examine each neighborhood in enough detail to understand or address issues specific to the different neighborhoods.
<b>Housing and Socioeconomics</b>	2 The MHA proposal does not do enough to guarantee that low income and affordable housing is created in the neighborhoods where development is encouraged, rather than in other parts of Seattle
<b>Land Use</b>	3 The MHA does not include enough limits to development in Urban Villages. While some additional density is warranted and desirable, the MHA is too broad and allows more development than is needed or acceptable.
<b>Aesthetics</b>	4 The MHA will allow too much development in existing neighborhoods, making those neighborhoods undesirable to live in. Setbacks are insufficient and will make existing neighborhoods less friendly to residents and shoppers from other areas, hurting both citizens and businesses.
<b>Transportation</b>	5 The MHA will create density in areas that don't have enough transportation resources to support that population and the MHA does nothing to create the transportation necessary. In addition to not addressing the lack of transportation, the MHA will create extreme parking difficulties without addressing that issue either.
<b>Open Space &amp; Recreation</b>	6 The MHA does not address the need to protect existing and create new green spaces for the additional density that it will create.
<b>Public Services &amp; Utilities</b>	7 The MHA does not address the increased demands that density will put on the sewer system. The sewer system is already strained during heavy rains, even without the additional density that the MHA will create.
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	Prefer not to answer
<b>Have you been or are you at risk of being displaced from Seattle</b>	Prefer not to answer

-----Original Message-----

From: Patricia Finlayson

Sent: Friday, June 30, 2017 9:55 AM

Subject: Proposed rezone of Roosevelt-Ravenna

The proposed rezone is inappropriate.

- 1 ..... Destroys existing single family neighborhood ..... Removes ecological assets such as plants, trees, shrubs which currently exist .....Overloads existing open space (Ravenna and Cowan parks) without producing substantially more open space ..... Overloads transportation arteries (Neither light rail nor bike lanes will meet the needs to move people, materials, garbage, emergency vehicles-despite the rich fantasy lives of urban planners)
- 2 .....Has already driven out or is in the process of driving out small businesses ..... Has TOTALLY FAILED in its constantly stated rationale to provide moderate or low-cost housing. TOTALLY FAILED.

Pat Finlayson

<b>Name</b>	Dawn Fitzgibbons
<b>Email address</b>	
<b>If you are commenting here on behalf of a larger organization which you represent (e.g. community group, advocacy group, etc.), you may indicate so here.</b>	Baker Street Community Group
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 Affordable Housing is a necessity! However, in speaking with Lowrise zone developers, their idea of an 'affordable' home in Ballard is a 2-bedroom 11-foot wide rowhouse for over \$600,000. That is a 30-year mortgage at \$3,300+ per month, thus, not affordable.</p>
<b>Housing and Socioeconomics</b>	<p>2 The proposed MHA-R "in-lieu of" fees that are less than \$14/sf equate to only \$20,000 per dwelling buy-off in order for a developer to build more market rate housing without adding affordable units. We should be modeling after affordable housing 'in-lieu of' fees in San Francisco or Boston, which in Seattle would exceed \$300,000 on a new 3-bedroom townhouse giving the fee much more impact on developers. Increase the in-lieu of fee to \$200 PER SQ FT and put some teeth in the commitment to add more affordable housing stock.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	

**From:** Greg Flood  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** MHA Draft EIS Extension  
**Date:** Saturday, July 01, 2017 3:31:25 PM

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Please consider extending the comment period for the draft EIS. The document is quite involved and rather huge. The comment period includes an extensive holiday period, as well as folks winding up at school. An extension to allow public comment seems appropriate.

Thank you,

Greg Flood  
4309 Densmore Ave N  
Seattle, WA 98103  
ggf.greg@gmail.com

**From:** Greg Flood  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** Comments Regarding Draft EIS for MHA  
**Date:** Monday, August 07, 2017 4:50:05 PM

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Greetings

I wish to submit the following comments regarding the Draft EIS for the proposed MHA legislation:

1. I do not agree that adequate time was allowed for the public to review the Draft EIS documents, especially considering the extensive and all-emcompassing proposals and the potential for great damage to the character of our entire City. We should have been allowed a second extension considering how long the City spent developing the proposals and due to the excessive length of the documentation requiring review. We are all volunteers performing the review in our "spare" time, unlike City personnel who are paid (by us) and have all day to work on creating long, obtuse, and confusing documents.

2. The Draft EIS does not adequately address the adverse impacts to the public of the proposals:

- What is the impact to green space by the increased lot coverage and displacement of vegetation?
- What is the financial impact due to increased speculation by corporate agents?
- What is the impact from shading of solar systems on adjacent properties?
- What is the impact from "heat island" effects of less transpiration from displaced vegetation?
- What is the impact to existing infrastructure due to increased pavement and impermeable materials?
- What is the impact to wildlife, particularly birds, due to removal of trees and vegetation?
- What is the impact to traffic and parking due to replacing a SF home with a 32-unit apodment?
- What is the impact from construction equipment and noise when building larger commercial projects?
- What is the impact to quality of life from loss of backyards, front yards and greenery?
- What is the impact to privacy and security caused by increased density, height and proximity?
- What is the impact to affordability, which many believe will only be exacerbated by the proposals?
- What is the impact created by shading of adjacent properties due to increased height and shadow?
- What is the impact to family residents by the policies, which appear to promote micro-apartments?
- What is the impact on housing cost of incentivizing developer investment as proposed?
- What is the impact on neighborhood character and quality of life by eliminating SF parcels?
- What is the impact to transit and zoning when bus routes change after projects are built?
- What is the impact to sewer and uncontrolled outflows during storms due to increased population?
- What is the impact to public schools, which are already stressed to the limit?
- What is the impact to public parks of increased population and potential for overuse?
- What amenities are being proposed to help mitigate the impacts noted above?

3. The Draft EIS fails to address alternatives to the proposals, many of which have been suggested to City Council representatives as a means to help mitigate the adverse impacts of increased density. City staff and Council representatives have turned a deaf ear to neighborhood advocates, many of whom are professionals in their field and who also better understand how the proposals will specifically impact our communities.

4. There is no need to increase the lot coverage, decrease setbacks, increase heights, and increase the FAR for new construction in order to increase density. The Draft EIS fails to demonstrate how the MHA proposals will create housing that is sympathetic to its surrounding environment. Quite the opposite, the proposals appear to actually ENCOURAGE construction that it specifically NOT sympathetic to the surroundings and will CREATE ADVERSE IMPACTS rather than mitigate impacts as required by SEPA.

5. The Draft EIS fails to address WHY the proposals are even needed, as there is already significant underutilized capacity for housing units under current zoning. The Draft EIS does not consider an alternative of increasing density WITHOUT changing existing zoning. This should have been the first consideration before expending all this time on a "solution" that may not even be needed, or worse, on proposals that will not accomplish the stated goals but will create SIGNIFICANT ADVERSE IMPACTS. The City should be required to adequately analyze WHY these proposals are even necessary to realize their goal of increased density. Many feel that much can be accomplished

without any change to existing zoning. Consider pilot projects to demonstrate the effectiveness of the City's proposals. The Draft EIS does not even consider such a scenario.

6. The Draft EIS fails to adequately analyze the financial impacts to existing property owners, many of whom will realize a public "taking" of property value, both financial and in character, due to these proposals. What is the tax impact to existing homeowners? What will be the effect to current property values?

7. Finally, it seems notable that the City representatives creating these proposals all live outside the proposed areas where the policies will be applied. This seems disingenuous, at best, and a criminal "taking" at worst. The City should be required to adequately document the NEED for these proposals, BE SPECIFIC about the adverse impacts of the proposals to the quality of the City that we love, offer clear and discrete ALTERNATIVES to their proposals, and demonstrate CLEARLY how the proposals will resolve the problems that they feel need solving.

I remain convinced that the City is cooking the intelligence on housing by filtering their world-view through preconceived biases and current "trendy" urbanist dogma that has yet to be tested. The Draft EIS should be a document that helps to demonstrate and clarify that the City is approaching housing in a thoughtful and balanced manner. Vacuous meetings with my representatives support the view that this is a "done deal" and that the City government decided first what they wished to do and have spent the last several years trying to come up with vague justification for their ill-conceived proposals.

I see absolutely NOTHING in this document to support that the City is considering any alternatives that might have fewer adverse impacts to our fair City. The potential for longterm damage to City character is very great. The City should be required to be complete, thorough, and objective. This should be reflected in the Draft EIS, but is not.

Please reconsider and review the impacts of the proposals. This is far too important to simply slap a "DNS" without analyzing the potential adverse impacts in an objective and meaningful manner. Start by including the stakeholders in the discussion. We understand our neighborhoods far better than you.

You can do better.

Sincerely,

Gregory Flood, P.E.  
4309 Densmore Ave N  
Seattle, WA 98103

**From:** mark a. foltz  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Assefa, Samuel](#); [Welch, Nicolas](#); [Johnson, Rob](#); [Gonzalez, Lorena](#); [Herbold, Lisa](#); [O'Brien, Mike](#)  
**Subject:** MHA Draft EIS - Comments  
**Date:** Monday, August 07, 2017 12:34:47 AM

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To: Office of Planning and Community Development

I am writing to provide my comments and requests regarding the Draft EIS for the implementation of MHA in Seattle's neighborhoods and urban villages.

First, I strongly endorse upzones described in Alternative 2 and Alternative 3 versus the no-action Alternative 1. Alternative 1 projects only 50,000 of the 70,000 new homes we need by 2035 to accommodate Seattle's growing population. Importantly, Alternative 1 projects far fewer new affordable homes - only 205 versus nearly 6,000 for Alternatives 2 and 3. Alternative 1 does not meet our goals as a city to provide sufficient housing for a variety of income levels.

Alternative 3 proposes more intense upzoning "high access to opportunity areas" like Wallingford. I support this approach as the LR1 and LR2 zoning will activate a higher likelihood of on-site performance for MHA-R. However, page G.9 of the MHA EIS Growth Estimates appendix uses the **assumption of 50/50 performance/payment for all new development, which is obviously wrong**. A developer building at a smaller scale (say 10 units or less) simply cannot or will not perform on-site at an 5-7% performance percentage.

Without modifications, this approach could generate a large quantity of new market-rate housing in the Wallingford urban village - therefore concentrating access to opportunity to those who already have it, and not meeting the equity goals of the HALA program.

**Asks:**

1. For the Final EIS alternative, reanalyze affordable housing production by neighborhood using a realistic model of performance/payment that takes into account project scale, project economics and MHA-R percentage.
2. Adopt Alternative 3 for higher opportunity neighborhoods like Wallingford to activate higher affordability (M2) requirements and larger scale developments which are more likely to perform on-site.
3. If insufficient affordable housing is generated in high-opportunity areas because of these factors, propose mitigation strategies to encourage on-site performance.

Alternative 3 also proposes smaller urban villages around frequent transit hubs in certain neighborhoods. This is short sighted, in that our only hope to meet our mode share and carbon emission targets for Seattle is to transition as many SOV trips to transit as possible; that happens when people live within a walkshed of frequent transit. Also, **access to transit is access to opportunity** and should be provided to as many homes as possible.

Unfortunately, the Draft EIS focuses on car level of service and pollutants other than carbon as the metric to evaluate its alternatives and not the carbon reduction benefits of access to frequent transit.

**Asks:**

1. In the Final EIS alternative, include urban village expansions to the full 10 minute walksheds (Alternative 2) for Columbia City, North Beacon Hill, and North Rainier.
2. Adopt Alternative 3 for Northgate and Roosevelt to allow larger scale transit-oriented development at the M2 level.
3. Focus on the reduction on carbon emissions from increased transit adoption of the final alternative, not just vehicular level of service and non-CO2 pollutants.

Alternative 3 also proposes less intensive upzones in high displacement risk areas, like Rainier Beach and Othello. However, this proposal runs counter to both basic economics and the city's own data.

On page 3.42, the draft EIS concludes that high-displacement-risk neighborhoods with **higher net housing development are correlated with an increase in low income households**. This is because new development satisfies the demand for market rate housing in these neighborhoods and prevents bidding up of existing homes. With MHA-R, this new development will also generate affordable housing in these neighborhoods; greater upzones will create more affordable homes.

Finally, the number of homes delivered by affordable housing projects such as Mercy Othello Plaza should not be hindered by insufficient development capacity.

From an equity point of view, it is important that that new development improve access to opportunity in high-displacement-risk areas, preserve and enhance cultural resources, and build wealth within these communities. **Upzones must allow communities like Othello and Rainier Beach to harness demand for housing for their own benefit**. A model for this kind of development is the Liberty Bank redevelopment in the Central District. The current program of MHA which treats all areas of the city equally does not have enough tools in the toolbox to address this issue.

**Asks:**

1. In the Final EIS alternative, adopt Alternative 2 for Rainier Beach and Othello to generate more affordable units in the walkshed of transit, but see point #2.
2. In the Final EIS, propose mitigation measures specifically targeted at improving access to opportunity in these neighborhoods (possibly through impact fees), preventing cultural displacement, and community wealth building; with the goal that upzones of these areas are gated on implementation of these programs on top of MHA-R.

Thank you for your time and consideration of my comments.

Respectfully yours,  
Mark A. Foltz  
Member, Welcoming Wallingford  
3635 Burke Ave N., 98103  
[markafoltz@alum.mit.edu](mailto:markafoltz@alum.mit.edu)

*CC: CM Rob Johnson, CM Mike O'Brien, CM Lisa Herbold, CM Lorena González, Samuel Assefa (OCPD), Nick Welch (OCPD)*

<b>Name</b>	Mark A. Foltz
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 Alternatives 2 and 3 are preferred over the no-action Alternative 1. Seattle needs as much housing built as possible, and as much affordable housing built as possible.</p>
<b>Housing and Socioeconomics</b>	<p>2 The displacement analysis for the final alternative must focus on economic displacement as that is the dominant form of displacement in Seattle's housing crisis. I am concerned that tenant relocation assistance as a proxy for economic displacement is not accurate. A baseline comparison would examine Seattle's job growth relative to the number of homes built over the last 10 years.</p> <p>3 Upzones in high-displacement risk and low access to opportunity areas, such as Othello and Rainier Beach, deserve additional scrutiny. They should not take place unless they provide significant benefits to those historically marginalized communities. These upzones should be gated on programs that increase access to opportunity, address cultural displacement, and build wealth within those communities.</p> <p>However, upzones must eventually happen in these neighborhoods, following the Alternative 2 proposal. If there is not enough market rate housing to meet demand, rents will rise and economic displacement will fundamentally alter these neighborhoods.</p>
<b>Land Use</b>	<p>4 I am disappointed that the upzones do not include a very logical urban village expansion for Wallingford as detailed in the position paper submitted by Welcoming Wallingford. I ask again that the OPCD review the position paper and include this in the Final Alternative.</p> <p>In lieu of that, Wallingford should be upzoned with the fuller Alternative 3 to generate a higher percentage (M2) of affordable units in a high access to opportunity neighborhood.</p>
<b>Aesthetics</b>	<p>5 Seattle's Design Guidelines and Design Review processes provide a strong framework for ensuring that new developments are high quality and improve the public realm of our neighborhoods.</p>
<b>Transportation</b>	<p>6 To maximize the use of high quality transit, urban villages surrounding light rail such as Capitol Hill, Roosevelt, Northgate, North Rainier Beach, and North Beacon should be extended to the full 10-minute walkshed of Link stations. In addition they should be upzoned to the fuller Alternative 2 proposal.</p>

<b>Historic Resources</b>	<p>7 Upzones in neighborhoods with historic or "character" buildings should be done in conjunction with Transfer of Development Rights (TDR) programs. This gives older buildings the ability to afford seismic retrofits, without losing overall zoning capacity in our urban villages. New development can also be done in a way to preserve the historic parts of landmark structures.</p>
<b>Biological Resources</b>	<p>8 Impacts on biological resources should take into consideration HALA's contribution to reducing sprawl in the GMA managed area. Every home built in Seattle instead of the suburbs or exurbs of the Puget Sound preserves forests, critical habitat and working farmlands.</p>
<b>Open Space &amp; Recreation</b>	<p>9 The Final Alternative should identify opportunities for additional open space in our urban villages, especially areas that are at a deficit for open space. There should be targets for both open space (any public space) and green space (undeveloped space with trees and grass).</p>
<b>Air Quality &amp; Green House Gas Emissions</b>	<p>10 The GHG emissions analysis focuses on car trips, but does not take into impact Transit Oriented Development for the alternatives. Allowing more homes to be built in the walkshed of frequent transit will replace car trips with transit trips and will reduce Seattle's GHG emissions.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	

<b>Name</b>	Ruby Fowler
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	1 I think Rainier Beach urban village area should be upzoned to the highest capacity to stimulate housing opportunities. if you build it they will come and they will revitalize the area.
<b>Housing and Socioeconomics</b>	2 Rainier Beach is a diverse area. Funding needs to occur for the food innovation district ideas that are currently on the table to stimulate this economically dull area.
<b>Land Use</b>	3 I agree with the landuse analysis.
<b>Aesthetics</b>	4 Rainier Beach is in need of revitalization and a good mix of neighborhood commercial zoning will benefit the aesthetics of the neighborhood. Promoting and partnering the food innovation district concepts outlined for this area will help as well.
<b>Transportation</b>	5 the Rainier Beach light rail and transit hub area is already a successful model. most buses and line will need to be considered as the area grows with development.
<b>Historic Resources</b>	No comment.
<b>Biological Resources</b>	No concerns.
<b>Open Space &amp; Recreation</b>	No concerns.
<b>Public Services &amp; Utilities</b>	6 Bury more utilities as this area is vulnerable to power outages.
<b>Air Quality &amp; Green House Gas Emissions</b>	No comment.
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of</b>	

# *Seattle Displacement Coalition*

5031 University Way NE \* Seattle, Wa. 98105 \* 206-632-0668 \* jvf4119@zipcon.net

## **Office of Planning and Community Development**

Attn: SDC Comments on the MHA DEIS

PO Box 34019

Seattle, WA 98124-4019

To whom it may concern,

**The Seattle Displacement Coalition is a 39 year old city-wide low income housing and homeless non-profit organization here in Seattle whose membership includes residents of Seattle and representatives of various church, community, and social service organizations within our city.**

Our members and supporters are directly affected by the proposed Mayor's Housing Affordability and Livability Agenda (HALA), referred herein as HALA, especially the city-wide upzones central to that plan and the Mandatory Housing Affordability (MHA) requirements which accompany and are inextricably linked to the upzones. Our comments include but are not limited to the following regarding the adequacy of the Draft Environmental Impact Statement (DEIS) for the mandatory housing program.

We are extraordinarily disappointed with the lack of adequate or accurate information contained in this DEIS especially with regards to its failure to adequately assess adverse impacts on critical elements of the environment including direct, indirect, and cumulative impacts on the city's transportation systems (including parking, mass transit, roads, congestion etc), impacts on historic structures, impacts on the city's housing stock especially the city's remaining existing unsubsidized and affordable housing stock, impacts on the city's land use systems, aesthetics (views especially from public parks), impacts and demands placed on the city's parks, affects on tree canopy and open space, and impacts of the proposal and increased demands on the city's infrastructure and related systems.

**Given the lack of adequate assessment of these impacts, the document as written doesn't meet legally required thresholds** or provide decision makers with a fair, balanced, or accurate analysis. And thus, it also has led the City's planners to draw up a wholly inadequate set of mitigation measures to address those significant adverse impacts left unconsidered.

**There is a lack of discussion/assessment/study of a true second alternative to 'no action' i.e., there is a need for a "managed growth" alternative to be studied. Lacking it WAC 197-11-442 is violated:** The document in reality offers only one alternative - it's preferred one - and compares it to a no action alternative. There is a so-called second alternative that in reality only a slight variation on the first one and presumes an identical level of overall upzoning,

added density, and development in order to achieve the same mandatory affordable housing targets (ie the underlying goal/objective of the proposal). The variation, again falsely portrayed as a second alternative to 'no action', in reality just slightly adjusts where the same level of growth will occur and hence city-wide impacts very little between both.

**A true second option for study - a managed growth option** - would offer zoning changes at a reduced overall level of growth and increased density while still allowing the proposals overall affordable housing targets to be achieved. This could be done by offering and studying an option that reduced the amount/level of planned upzoning while increasing the mandatory housing requirement - the amount each developer must set aside as affordable. This also would have allowed the city to achieve the proposals underlying goals and objectives (a equal increase in the amount of affordable housing set aside by developers) but with significant less impacts on the city and various elements of the environment required for study. Lacking study of such a managed growth alternative, the DEIS does not fulfill the requirements of WAC 197-11-442 (2) that require a level of discussion of "alternative means of accomplishing a stated objective" and with detail "sufficient to evaluate their comparative merits".

Lacking study of a true second and "managed growth", decision-makers are left with a "stacked deck" - a study that falsely portrays the notion there really are only these two choices - a choice between doing nothing (the no action option) leaving us with no added affordable units vs cramming as much added growth as possible into our city in order to achieve the MHA proposals affordable housing targets. Decision makers are left with this false impression of only these choices when in reality there is another way to achieve the proposal's objective of meeting the affordable housing requirement but under a true managed growth alternative and without the same level of impacts overall on our city.

**Housing and Displacement Effects:** We are especially concerned about the abject failure to adequately assess the significant direct, indirect and cumulative adverse impacts that the HALA Plan (upzones and MHA) will have on this City's existing supply of low income and very low income housing in our City. Under either alternative studied (really it's only one alternative studied) in both cases the document egregiously downplays displacement effects and, like the EIS for the University District upzone, the planners who put this DEIS together are simply abusing the DEIS process and their statutory responsibility and instead misusing it to push, ie, prop up theirs and Mayor's bankrupt supply-side pro-developer prodensity at all cost agenda.

For example, the DEIS points essentially to one piece of research they did which probably took a high school intern a couple of hours to collect purporting to show that from 2000-2011, census tracts with slightly more residential development over that period had slightly greater increases in the number of low income people found in those tracts. Again it's all about proving trickle down and shows absolutely nothing in terms of the significant effects reasonably expected to accompany the proposal studied herein, (the city-wide upzoning accompanied by a minimal HALA mandatory housing requirement).

This above 'research' the planners put forward, does not even come close to showing what planner say it proves. The planners failed to adequately or accurately factor out the enormous amount of subsidized housing disproportionately built in these high growth census tracts over that same period of study. Further, their analysis is dated and does not include the last 5 years of record growth in our city. Nor did the analysis accurately or adequately break out and study what specifically happened to very low income households in those higher growth tracts earning less to 30% of median as opposed to those earning at 50 percent of median.

Instead they've been lumped both groups together ignoring the fact there already is a shortage or gap in the supply of rentals affordable to those at or below 30 percent of median of at least 30,000-35,000 units according to the city's Comp Plan EIS. Their look at changes in households by income level especially this very low income level was not analyzed at all. Without study of a more current era when rapid growth occurred and further study of other indicators of displacement, and this further breakout by income level, the information in the DEIS is useless.

**The analysis ignores other significant factors and trends that would have caused a change specifically in the supply of unsubsidized low income rentals in these high growth areas and give us a means for understanding what future upzoning would do to any remaining affordable stock in these areas slated for upzoning.**

Information from other data sources would be required first before we could draw any conclusions about what any future upzoning as per HALA would do to drive up housing costs and push more people out of their homes - and over a tipping point and displacement. We've attached copies of proper and thorough displacement studies conducted elsewhere which we brought to the planners attention when they began their study and which should have served as models for studies to be included in this DEIS but which were purposely ignored. (See attachment)

**The analysis doesn't look at increased speculative activity in high growth areas,** ie rapid turnover and increases sale and resale of existing older affordable apartments (the single most important reason causing excessive rent increases) and how that would accelerate due to upzones. Such studies by the city have been done in the past and are critical to understanding potential 'indirect and cumulative' losses accompany the HALA-MHA plan as required under SEPA.

Also Inventorying the existing stock and doing a susceptibility to change analysis would reveal this but it isn't in the document. At least this was done (by Heartland and the dept planners) for the EIS in the UDistrict upzone and for Councilmember Herbold later at her request before upzoning decisions were made there. Councilmember Herbold - a decision maker in this instance as well - had specifically asked for this kind of analysis and said it was necessary to understand displacement effects and necessary for her to make an informed decision of displacement effects - yet even she was ignored.

This would involve doing an analysis of how the change in land use would affect development potential on sites where currently low income and affordable rentals are located. This would require inventorying the stock of low and very low income housing in these areas and then counting the number of units on sites now likely to be redeveloped due explicitly to a change in land use and upzoning accompanying the HALA MHA plan

**The EIS also downplays impact of demolitions, renovation/acquisition in causing displacement.** They managed to accomplish that by looking only at the number of low income households receiving relocation assistance as an indicator of how many were displaced due to demo (17 households per 100 demo's). Their 'research' here, which may have taken a half hour to collect, grossly underestimates the impact of demolitions on our supply of existing unsubsidized low income housing and is useless in terms of helping us understand how future upzones will accelerate the loss of units due to demolition and direct displacement.

The TRAO or Tenant Relocation Assistance Ordinance is notoriously flawed as an indicator of how many affordable housing units we're losing due to redevelopment and how many low income households and individuals were displaced by these losses. That's because many eligible low income households either don't attempt to claim assistance under TRAO and move even before the developer applies for permits and before they were aware of their potential eligibility so never get counted as displaced using this method. Or they were illegally forced out before even the developer has notified them of their potential eligibility and again never are counted under this method.

Also, it's the combined income of a household that determines whether they qualify for relocation assistance. So a 2 person household or 3 or 4 of 8 person household as is often case in rental of larger homes and units being demolished, their combined incomes easily exceed the 50% threshold. As many as 8 very low income people sharing the house could have been displaced so all these individuals never get counted as displaced under the method used here in the DEIS. The analysis simply writes off demo of single family homes in single family zones ignoring that a significant percent of these were occupied very affordable rentals. No assessment of this was done and any upzoning of these lower zoned areas will greatly accelerate these losses...

Every past survey we have conducted and including those done by the City shows that at least 80 percent of all demolitions not 17% we're low cost rentals. City data shows a loss of 6500 with applications pending for removal of another 2000 – since 2008. Assuming occupancy of these units of at least the city average (likely more per household displaced since so many where larger rentals that we lost), as many as 12,000-17,000 low income people lost their homes over this period to redevelopment.

In addition our studies show that in periods of high growth, as much as 20 percent of the city's existing rental housing stock turns over or are sold each year (one in five units or 34,000 out of a total of roughly 160,000). Our past studies also show that approximately 20 percent of these are older affordable rentals sold or 6800 units. These sales require refinancing driving rents on

most above low income thresholds. These households then are forced from their homes ie displaced.

This speculative phenomena or trend can easily be studied through an examination of increased sales activity that accompanies rapid growth and how it affects existing low income rental stock. Once completed it could give us a much clear idea of how an upzone stimulating more growth (identified accompanying the alternatives) would accelerate these trends and levels of displacement. Such study is required to truly understand 'indirect and cumulative' effects.

**In sum, this DEIS document grossly misleads in these areas related to impacts on housing.** By referring only to TRAO eligible households and drawing only from that saying only 17 of 100 units demo's were affordable rentals thus dramatically underestimating rates of housing loss edue to demolition. Further there is no study at all of speculative turnover set off by upzoning. And while failing to look at how upzones change development potential on sites containing existing low income rents, the DEIS conversely exaggerates the number of units the MHA would create.

The City is obligated to conduct an accurate study how future upzoning will accelerate these displacement (and loss of low income housing) trends - first by accurately documenting direct losses to demolition over the immediate prior years and then by identifying through a susceptibility to change analysis - exactly how many existing low income and affordable units are put at risk in the future ie on sites likely to be redeveloped and thus demolished due to HALA upzoning. The DEIS is deceptive and wholly inadequate here in the extreme.

**When a correct analysis is conducted here, it will show a dramatic net loss of low income rentals accompanying the HALA-MHA plan.** Losses due to demolition, speculative turnover, and increased rents will greatly out-number the 6200 approximate number of MHA required units serving those below 30 percent of median assumed to be created and assumed for study here in the DEIS). The low percentage requirement will not guarantee even the 6000 very low income added that is projected.

**This is another reason why also a second true or 'managed growth' alternative with a higher mandatory housing requirement up to 25% should have been included for study in the DEIS** - an alternative which would negated or minimize these losses and displacement effects but allowed the city to achieve the underlying HALA goal of increasing our stock of low cost rental housing. Why wasn't this studied and offered as mitigation if nothing else.

(Note also the DEIS - because it trivializes levels of displacement and amounts of existing low cost housing at risk of being lost - it also imagines away the amount of added homelessness that will be caused by the HALA-MHA proposal and thus increase the demand for shelter and other homeless services in our community. There is no adequate study of these direct, indirect, and cumulative effects.)

**In addition, the mitigation strategies offered are minimal and don't address and won't begin to offset existing housing that will be lost as a result of the upzoning.** It does not even include doable and legal tools that could be used to preserve existing unsubsidized rents such as requirements accompany or preceding upzones ensuring developers replace 1 for 1 what they tear down or are lost to resale/speculation leading to higher rents. Or how through use of right of first notice, expansion of an acquisition fund and targeted purchase of vulnerable housing with use of condemnation if needed could mitigate losses to units – made far more vulnerable by the upzones. These strategies could be applied effectively to save hundreds if not thousands of existing affordable units over the planning period we most certainly are going to lose to redevelopment set in motion by these upzones. Our attachments also provide a more thorough discussion of mitigation strategies to ensure no net loss of rental housing due to the HALA upzones - tools also that should have been included in the DEIS as mitigation strategies.

**As explicitly stated, the document also has excluded a study of cultural, historical, and social displacement.** Areas of high concentrations of historic structures and communities with unique racial, religious, or cultural heritage - how the upzones will affect them - is not at all adequately addressed.

This is a gross oversight and thus the document falls far short of any adequate study of significant adverse effects on cultural and historic elements of the environment. The document also wholly lacks compilation of existing inventories nor does it conduct it's own current inventory of historically significant and potentially significant (identified for landmark status) buildings and how they would be significantly and adversely affected in the areas of planned upzoning (often historically and culturally significant buildings also offer space to important small businesses serving minority and low income communities and this should have been studied as well but was not).

In sum, the DEIS makes a mockery of responsible planning and analysis and thumbs it's nose at the City's statutory obligations under SEPA. And it thumbs it's nose to the thousands of low income tenants in our city whose housing is being put on the chopping block due to this HALA-MHA plan.

### **John V. Fox, for the Coalition**

Attachments follow identifying specific tools and methodology to draw up for a accurate and full study of displacement and impacts on existing housing with a full array of mitigation strategies that should have been included in the DEIS.

**Key elements of a thorough displacement risk assessment common to studies previously done here, around the region, and nation-wide:**

There are a number of key elements common to most of these studies which we'll identify below. In point of fact, there's nothing unusual or unprecedented here about doing these kinds of studies as the above referenced material and Seattle's own planning history indicates.

(Below we're referencing specifically the analysis that's needed to assess risk of displacement for existing low cost and affordable units and people who live in these units. Some level of similar analysis should also be done for small businesses potentially impacted. Even though there are fewer models showing/identifying the situation for small businesses, at least a general overview of the mix of small businesses w/in the area of the upzone and how they would be affected due to upzoning also should be done as prescribed by the statute and paralleling the assessment we identify below for existing low income and affordable housing should also be done)

### **Specific Study Elements of a thorough Risk Assessment:**

**1. The study would contain a clear look at existing conditions** including providing a complete inventory of existing low income and affordable units both subsidized and unsubsidized with the areas of the proposed upzones. This would include breaking out units from 0-30 percent of median, 30-50 percent of median and 50-80 percent of median. Some demographics should also be provided here of the population and their incomes, race, gender, size of household etc living in these units in order to get a sense of the number of 'cost burdened' households in the subject area. This should be shown over time as well reaching back at least over the last decade drawing from existing benchmarks and data already compiled.

An overview and summary of past studies such as the PSRC TOD study, prior EIS's for the area, and the 2035 Growth and Equity Report, any other studies containing or referencing/studying/identifying potential for displacement in the UDistrict, and what they show vis a vis the risk of displacement also should be provided in the assessment of existing conditions

**2. Some history of conditions prevailing under existing zoning should be provided, including a review of demolitions, loss of units to speculative sale (sales activity of existing apartments broken down by age of building), condominium conversions, rent increases, etc occurring in the recent past in order to identify existing trends.** Data is readily available to identify these trends.

**3. An identification of properties susceptible to direct redevelopment now and over the planning period in the event of the planned upzoning.** (The Heartland Report and DPD have already undertaken such an analysis with mapping of the University District and properties identified). This analysis and mapping stopped however at the level of mapping the properties. The amounts (with unit counts included) of existing housing on these sites and price of units and a look at the demographics of those and who lives there should be identified with charts and mapping as well. The methodology for this is accessible from Heartland and the City (Hauger). This assessment should include an examination of displacement impacts of growth occurring to full build out or close to full build out to the new maximum densities in the event of the upzone (see special note following #4)

**4. An an assessment of the potential for indirect displacement occurring in short term and over the planning period - i.e., an analysis of how the proposed upzone would affect property values, tax assessments, speculative turnover, land values, and rents of the existing properties with existing housing on those sites and that are not necessarily located on sites subject to shorter term or immediate redevelopment.** Estimates of the number of units likely to be lost to indirect speculative forces identified herein should be included here as well. This assessment should include an examination of displacement impacts of growth occurring to full build out or close-to-full build out (maximum new allowed densities) in the event of the upzone (see special note below)

**Special note relevant to items 3 and 4 above:** Currently City planners generally do not include in their EIS's an assessment of displacement effects in the event of a rezone or change of land use at full or near full build out to the new allowable densities. They begin their assessment with the assumption that new development over a given planning period will match the city's pre-determined residential and job targets identified for a given neighborhood whether that given area is upzoned or not. Hence the amount of growth studied is the same across all alternatives including the no action alternative. By this logic, a highrise designation concentrates more of that set amount of growth on fewer sites and thus leads to "less displacement". Effectively, their assessment and conclusions are pre-determined by their erroneous assumption that the change is zoning and allowed densities will not bring additional growth.

**5. In light of the displacement impacts identified in the analysis, a specific list of legislative strategies should be included as part of the study - that together or singularly could mitigate these impacts on existing housing and guarantee “no net loss” of these units.** This would include strategies and measures that could be implemented and precede or accompany the rezone specifically designed to ensure no losses of units, not just partial replacement of lost units.

The point here is to inform decision-makers before they take action on the upzone of the range of strategies available to them. A full list of preservation strategies, tenant rights, and housing production strategies should be included, and specifically designed to serve each affected income group, from 0 to 30, 30-50, and 50 to 80 percent of median respectively.

Tools should be provided and listed herein “such as” developer compliance with 1 for 1 replacement requirements” upping the linkage fees to ensure no net loss, a special allocation of levy funds or some other new source of revenue to enable purchase of existing housing before units are lost to speculation and redevelopment, expanded and aggressive use of right of first purchase of existing low cost housing by the city, use of conservation or special review districts, etc. should be listed so that decision-makers have this before them and before they consider the upzone.

The lead agency here need not include or offer it’s own recommendations, but providing at least a full list of options available to decision makers that would enable the city to realize no net loss should be included.

**6. At least one public hearing must precede completion of a final draft of this risk assessment and these comments attached as an appendix to the final document**

**Precedents and Elements of a Comprehensive Displacement Risk Assessment applied first to the UDistrict Upzone: “Nothing that’s not been done before”**

**Seattle Displacement Coalition Recommendations - November 2015**

**contact: 206.632.0668 or jvf4119@zipcon.net**

**What we are seeking prior to moving forward with further consideration of the rezone to bring the city into compliance with state statutes:**

There is nothing particularly unprecedented either in Seattle, regionally, or nationally with the idea of cities and other governmental agencies conducting a “displacement risk analysis or study” and utilizing that analysis prior to approval of project specific developments, non-project actions such as the UDistrict upzone, or as a basis for subsequent city-wide legislation.

Seattle planners commissioned what may be one of the nation’s first Displacement Studies as far back as 1979. It was a comprehensive study of amounts of housing the city was losing to demolition, speculation, condo conversion, and other market forces, as well as random interviews to survey Seattle residents. The data indicated that one in five Seattle households were forced to move over an 18 month period due to redevelopment and these market forces. The results led to a moratorium on condominium conversions, and passage of an anti abandonment law, and the nation’s first demolition control law.

[https://seattle.bibliocommons.com/item/show/724943030\\_seattle\\_displacement\\_study#bib\\_info](https://seattle.bibliocommons.com/item/show/724943030_seattle_displacement_study#bib_info)

In 1983, the City undertook another Displacement Assessment entitled “Displacement, Relocation, and Neighborhood Impacts” that became an important basis for development of future neighborhood plans, city-wide legislation, and often cited in project and nonproject specific assessments referenced here. The cities Comp Plan, as far back as the late 70’s has referenced the need “to prevent loss of existing low income housing in neighborhoods where those opportunities currently exist”:

[https://seattle.bibliocommons.com/search?commit=Search&page=2&q=displacement&search\\_category=keyword&t=keyword&utf8=%E2%9C%93](https://seattle.bibliocommons.com/search?commit=Search&page=2&q=displacement&search_category=keyword&t=keyword&utf8=%E2%9C%93)

That year, 1983, the EIS for the new downtown plan included a comprehensive displacement analysis, identifying exactly 7311 remaining low cost units within the area of the upzone and projecting the effect of the various zoning alternatives under study on the existing stock of low income units. *(source: Vol 1 Oct 1983 DEIS Draft Downtown Land Use and Transportation Plan, especially see pages 186 thru p 213 which includes charts 33, 36, and 37 specifically identifying housing losses likely under each alternative with sections following reviewing and recommending courses of action to stem housing losses accompanying each alternative)*

Numerous EIS’s for projects and non project actions, since then, such as for the Washington State Convention Center and numerous upzones that have followed, also included such analysis

with varying degrees of thoroughness. One need only examine some of these for guidance as well.

**More current guides of how to undertake a comprehensive displacement risk analysis:**

We need not look too far to understand where and how to do the prescribed displacement risk analysis - where we can also view and understand the panoply of possible solutions to ensure “no net loss”.

In 2014, the Seattle City Council directed DPD to complete a citywide “2035 Growth and Equity Analysis” to accompany/precede adoption of the 2035 Comprehensive Plan. This study included mapping and thorough assessment of areas of the city placed at ‘high risk’ of displacement under each of the alternatives under study and was subtitled, “Analyzing Impacts on Displacement and Opportunity Related to Seattle’s Growth Strategy” found here:

[http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web\\_informational/p2273984.pdf](http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2273984.pdf)

The Puget Sound Regional Council (PSRC) also has provided some useful direction and impetus towards adoption of an effective anti-displacement policy through it’s subarea work aimed at concentrating growth around rail stops. This has been going on under their banner of “Growing Transit Communities” effort since at least 2012. The PSRC takes some real leadership here.

Unfortunately to date, it does not appear that any of the local jurisdictions including Seattle and other cities participating directly in the process have followed up or implemented the level of analysis and set recommendations they have made. Note Councilmember Michael OBrien was a active member of the regional subcommittee making these recommendations and calling for the risk assessment and measures to mitigate displacement.

Here and now with the UDistrict Upzone, we can begin to apply the PSRC’s recommendations while fulfilling requirements in the SEPA statute.

This is taken from Recommendation #12 of PSRC’s “Growing Transit Communities Strategy Report” 2013 entitled “Minimize Displacement through Affordable Housing Preservation and Replacement” that is accessible here

<http://www.psrc.org/assets/9539/GTCStrategy.pdf?processed=true> . To quote:

*Among the many challenges communities face in pursuing mutually supportive economic development and social equity objectives, the risk of displacement looms large. Many transit communities are home to existing low- and moderate-income households at potential risk of displacement due to increased market strength and gentrification that may accompany transit*

*system development. Strategies to preserve the existing affordable housing stock in good condition or to replace affordable housing demolished due to new development can help minimize these displacement risks while accommodating new market-rate investment. Although preservation and replacement strategies were not a central component of the GTC Partnership work program, they are critical to the long-term success of these communities and should be a focus area for future work. The goal guiding this strategy is to ensure a “no net loss” of existing affordable housing units in transit communities.*

See PSRC site and its discussion here that also includes many helpful links to what other cities are doing around the country:

<http://www.psrc.org/growth/housing/hip/alltools/displacement>

See especially the City of Portland's displacement tool kit here that offers very specific direction on how to do a displacement risk analysis, and what should be included in that assessment:<https://www.portlandoregon.gov/bps/article/454027>

Other precedents and useful guides around the country towards undertaking a displacement risk analysis:

DC Fiscal Policy Institute: [Right of First Refusal Purchase Program in Washington DC](#)

Journal of Race, Poverty, and the Environment: [Combating Gentrification through Equitable Development](#)

Metropolitan Area Planning Council: [Anti-Displacement Literature Review](#)

National Housing Institute: [Managing Neighborhood Change](#)

National Housing Law Project: [State and Local Regulatory Initiatives to Preserve Threatened Affordable Housing](#)

Mitigating Displacement Due to Gentrification: [Tools for Portland Oregon](#)

Seattle Housing Authority: [Replacement Resources](#)

Texas Housers:[Recommendations for State Action to Prevent Displacement](#)

US Dept. of Housing and Urban Development (HUD):[Relocation Assistance to Tenants Displaced from their Homes](#) Washington State Dept. of Commerce: [Mobile Home Park Resources](#)



<b>Name</b>	JAY FREISTADT
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<p>1 We live on 24th between Spruce and Fir, and I will speak specifically to our perspective on the impacts on us. While I recognize the need for generating additional housing within the city, we reside in an area which would be upzoned into LR 1. I would oppose this, either preferring no action alternative or alternative 3. The reason I believe this is in the community's best interest is that we moved to the neighborhood because it was mostly single family housing, as we have a small child. I understand why 23rd is suggested to be upzoned as an arterial (although I am not sure why it qualifies after DOT closed two lanes to slow the traffic down the corridor), but prefer that our street / surrounding areas be retained as residential small lot.</p>
<b>Housing and Socioeconomics</b>	<p>2 As a resident in the Central District, our neighborhood as a whole is rapidly gentrifying, and we have high displacement already happening. Allowing for expansion of denser areas would simply drive further speculation by developers and result in a more rapid exodus of the current demographics in the neighborhood.</p>
<b>Aesthetics</b>	<p>3 As a small house with a backyard, my concern is that having alternatives of 2 or 3 will result in large buildings looking directly into our back yard. Also, we live in a neighborhood full of craftsman / bungalow residences, many built in the 1920s, and the modular / modern new townhomes which would most likely fill up the neighborhood would greatly change the aesthetic / historic character of the neighborhood.</p>
<b>Transportation</b>	<p>4 I am excited and hopeful for additional bus routes to support north- south travel on 23rd. I am unsure again why 23rd was decreased in size and still designated an arterial, and concerned in building density around the street if it was specifically targeted to reduce speed/volume in traffic. Also, with density, houses without driveways will be increasingly challenged to park near our houses. Perhaps the city could work to help with permitting for driveways of single family homes if building density. Additionally, the Red Apple building on Jackson just South is intended to become a massive amount of new housing which would further contribute to parking challenges.</p>
<b>Historic Resources</b>	<p>5 We have multiple churches surrounding us on 24th and Spruce. I am curious if the zoning changes would flush out these churches which contribute to the diverse character of the neighborhood if rezoned.</p>
<b>Demographic Survey (optional)</b>	

From: Kevin Freitas  
To: [PCD\\_MHAEIS](#)  
Cc: [Herbold, Lisa](#)  
Subject: Draft EIS comment period extension  
Date: Sunday, July 02, 2017 2:03:19 PM

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To whom it may concern:

Please extend the draft EIS comment period to at least 90 days. The EIS is a massive document that the City and staff took months to prepare. The citizens of Seattle (especially those directly impacted by the EIS and HALA) need more time to review and comment on the content of the draft EIS. Expecting residents to review and understand such a massive document in 45 days is unacceptable and undermines this being a truly open and public process.

Sincerely,

Kevin Freitas  
4747 36th Ave. SW  
Seattle, WA 98126  
253-229-5093

<b>Name</b>	R David Frum
<b>Email address</b>	
<b>Comment Form</b>	
<b>Land Use</b>	<p>1 Re: rezoning of the Roosevelt Urban Village. I believe that the expansion of the urban village boundaries east of 15th Avenue NE is extremely damaging to the character of the neighborhood. The neighborhood has already accepted the upzoning of the area around the future light rail station, including the currently proposed increase in buildings' height. However, penetrating the single family neighborhoods east of 15th is likely to destroy the character of these streets and impact their adjacent ones. I strongly urge the council to work with the Neighborhood Associations to find methods to increase available housing within the single family zoning code.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you resided in the city of</b>	

<b>Name</b>	Richard Fuhr
<b>Email address</b>	
<b>Comment Form</b>	
<b>Transportation</b>	<p>1 The Ravenna-Bryant neighborhood already has a parking problem, with narrow streets on which it is often very difficult to find parking. Not only that, but thoughtless people often park too close to driveways, or even block the driveways, and often there is no prompt response (or no response at all) from the Seattle Police Department. Increasing housing density in the Ravenna-Bryant neighborhood will just exacerbate an already-bad parking situation.</p>
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	
<b>What is your household income?</b>	
<b>Do you own or rent your residence?</b>	
<b>How long have you resided in the city of Seattle? (total number of years)</b>	

**From:** Comcast  
**To:** [PCD\\_MHAEIS](#)  
**Subject:** DEIS Comment Extension Request  
**Date:** Thursday, July 27, 2017 6:25:02 PM

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Dear Geoff,

I am emailing to request an extension of the comment period for HALA MHA DEIS until August 28th. The document is very lengthy and more time is required to adequately analyze and provide meaningful comments and input back to the city.

Thank you for your consideration.

Joe Fuller  
Seattle resident

**From:** Joe Fuller  
**To:** [PCD\\_MHAEIS](#)  
**Cc:** [Home](#)  
**Subject:** Comments on EIS of MHA  
**Date:** Monday, August 07, 2017 8:29:24 AM  
**Attachments:** [EIS one-page comment form \("bg105r0615"\).doc](#)

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**Attached are my comments on the Draft EIS of MHA. I agree 100 percent with the analysis done by the JuNO Land Use Committee's on the EIS, and agree with all of the comments listed below in every category.**

**Joe Fuller**

**COMMENTS ON DRAFT EIS RE: MHA**

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- |  |   |
|--|---|
| <b><u>Overall Analysis</u></b>           | DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3 |
| <b><u>Community Feedback</u></b>         | DEIS fails to take into account documented Junction neighborhood feedback.  |
| <b><u>Lack of Affordable Housing</u></b> | DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.   |
| <b><u>Neighborhood Plan</u></b>          | DEIS reflects City's failure to honor neighborhood plan.  |
| <b><u>Traffic</u></b>                    | DEIS analysis is flawed; Fails to utilize meaningful data.  |
| <b><u>Green Space</u></b>                | DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.  |
| <b><u>Neighborhood Character</u></b>     | DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.  |
| <b><u>Loss of Light and Air</u></b>      | DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings   |
| <b><u>Loss of Views</u></b>              | DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.   |
| <b><u>Historic Buildings</u></b>         | DEIS fails to recognize historic buildings in Junction.   |
| <b><u>Public Safety</u></b>              | DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.  |
| <b><u>Utility Infrastructure</u></b>     | DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.  |
| <b><u>Schools</u></b>                    | DEIS fails to note existing lack of school capacity and impact of increased density thereon.  |
| <b><u>Other</u></b>                      | I have other concerns regarding the DEIS including, but not limited to, the following:  |

Name: Joe Fuller

**COMMENTS ON DRAFT EIS RE: MHA**

- Overall Analysis** DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3
- Community Feedback** DEIS fails to take into account documented Junction neighborhood feedback.
- Lack of Affordable Housing** DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.
- Neighborhood Plan** DEIS reflects City’s failure to honor neighborhood plan.
- Traffic** DEIS analysis is flawed; Fails to utilize meaningful data.
- Green Space** DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.
- Neighborhood Character** DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.
- Loss of Light and Air** DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings
- Loss of Views** DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.
- Historic Buildings** DEIS fails to recognize historic buildings in Junction.
- Public Safety** DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.
- Utility Infrastructure** DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.
- Schools** DEIS fails to note existing lack of school capacity and impact of increased density thereon.
- Other** I have other concerns regarding the DEIS including, but not limited to, the following:

I agree 100 percent with the analysis done by the JuNO Land Use Committee’s on the EIS, and agree with all of the comments listed above in every category. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Name: Joe Fuller  
 Address: 4843 41<sup>st</sup> Ave SW, Seattle, WA 98116

<b>Name</b>	JR Fulton
<b>Email address</b>	
<b>Comment Form</b>	
<b>Description of the Proposed Action and Alternatives</b>	<b>1</b> Either Alternative 2 or 3 is preferable
<b>Housing and Socioeconomics</b>	<b>2</b> Alternative 2 and 3 are preferable. Option one is a loser.
<b>Land Use</b>	<b>3</b> Alternative 2 and 3 are preferable
<b>Demographic Survey (optional)</b>	
<b>Have you been or are you at risk of being displaced from your neighborhood?</b>	
<b>Have you been or are you at risk of being displaced from Seattle entirely?</b>	
<b>Are you now or have you ever experienced homelessness?</b>	
<b>Do you live in rent- and income-restricted affordable housing?</b>	
<b>How many people are in your household?</b>	
<b>Are there children under the age of 18 in your household?</b>	