

From:
To: [PCD_MHAEIS](#)
Subject: Comment form
Date: Monday, August 07, 2017 9:31:43 PM
Attachments: [DEIS-MHAcomentformNeeson\("bg105r06t5"\).doc](#)

COMMENTS ON DRAFT EIS RE: MHA

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- 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.
- X **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.
- X **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
- X **Loss of Views** DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.
- X **Historic Buildings** DEIS fails to recognize historic buildings in Junction.
- X **Public Safety** DEIS fails to take into account existing lack of access to emergency services and impact of increased density on response times, etc.
- X **Utility Infrastructure** DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.
- X **Schools** DEIS fails to note existing lack of school capacity and impact of increased density thereon.
- X **Other** I have other concerns regarding the DEIS including, but not limited to, the following:

 _It does not acknowledge our already aging sewer system and doesn’t propose a method to overcome this serious shortcoming. _____

Name: _Edith A
Neeson_____ Address:___
Seattle, WA 98116_____

<p>Name</p>	<p>Neighbor</p>
<p>Comment Form</p>	
<p>Description of the Proposed Action and Alternatives</p>	<p>1 I am 100% opposed to the upzone of West Seattle Junction.</p> <p>2 The alternatives to not consider affordability or livability, nor do they accurately take into account current traffic patterns upon which future traffic assumptions are made. Estimates are juvenile and were established based on google searches during 3 different low traffic periods. For West Seattle Junction, the presumption that future residents will not impact traffic is inappropriate and not factually accurate. The extreme option of the newly proposed third and most disruptive alternative does not take into consideration livability issues such as tree canopy, green space that is accessible, or the disruptions to existing fragile infrastructure in West Seattle, such as inadequately sized sewer lines on the north slope between Edmonds and Alaska Avenues in one upzoned area. The description also excludes existing growth potential under existing zoning rules, an intentional oversight.</p>
<p>Housing and Socioeconomics</p>	<p>I am opposed to the upzone of West Seattle Junction. It is a handout to developers.</p> <p>3 The displacement of single family home renters is not adequately considered. Seattle developers are currently building primarily luxury apartments and townhomes that will not address affordability, and the removal of single family neighborhoods around Alaska Junction in West Seattle will further displace families renting single family homes. The EIS does not consider the need for single family homes that provide more than two bedrooms, something generally provided by single family homes but not apartments or condos, in what appears to be an attempt to push families that do not meet narrowly defined definition assumptions (2 adults and 1 child, or 2 adults no children). The EIS appears to take an anti-family approach that asserts that families with children are not welcome in Seattle if they need to occupy more space than a 2-bedroom apartment. Just because Rob Johnson's crony Amy Gore doesn't have children or relationship prospects that may someday require her to seek a larger home, or possibly need a car to transport a child to-from daycare does not mean a person like her should be allowed to dictate policy for the future of Seattle and destroy existing single family neighborhoods.</p>
<p>Land Use</p>	<p>I am opposed to the upzone of West Seattle Junction.</p> <p>4 The EIS does not consider appropriate green space that is actually accessible to the general population without a fee, at varied times of day. Instead it considers pay for use golf courses as green spaces. The EIS does not consider the environmental benefits of tree canopies provided by yards in single family zones, nor does it consider the negative consequences to the</p>

Puget Sound watershed from the concrete canyons encouraged by over-development and higher density zones.

I am opposed to the upzone of West Seattle Junction.

Aesthetics

- 5 The EIS does not consider the aesthetic benefits of green space, views, setbacks from the street that allow for curbside trees and foliage coverage, and transitions between single family zones, residential small lots, lowrise 1 and lowrise 2 zones, which greatly impact livability in a city with extreme sun variation that can lead to excessive winter shadows, mold, mildew, and water pooling from excessive density without adequate infrastructure for drainage, landscaping to address runoff and watershed consideration, etc.

- 6 West Seattle has horrible traffic problems already. I am opposed to the HALA upzone of West Seattle Junction that will only make traffic worse. The EIS makes deliberately false assertions about traffic and is a fraud.

Transportation

The EIS is a complete failure with regard to transportation, particularly from West Seattle. The EIS fabricated evidence for current commute times by selecting 3 low-traffic times upon which to base future projects that are unrealistic and frankly, from an academic and professional perspective, offensive and deliberately false. The transportation impact from Terminal 5 on West Seattle is also negligent and woefully inaccurate, perhaps deliberately at the direction of Rob Johnson, and needs to be revised to include the impact of several hundred container trucks entering and exiting the West Seattle bridge on a daily basis once operational. The transportation EIS also assumes higher than estimated light rail ridership even though that system will not be in place for at least 15 years. The EIS also assumes that existing public transportation is adequate for all residents, and excludes families who may need to utilize privately owned vehicles for childcare purposes. The EIS appears to take an anti-family approach that asserts that families with children are not welcome in Seattle if they need to occupy more space than a 2-bedroom apartment or need single occupant vehicles for special needs.

Historic Resources

- 7 Existing public transportation options from West Seattle are inadequate and are not considered or addressed by the HALA upzone EIS. These resource are used by a diverse constituency. Not all Seattle residents have the elite ability to commute by bike to their workplace, and the EIS does not consider adequately the needs of all people.

Open Space & Recreation

- 8 I am opposed to the upzone and appalled by the complete lack of greenspace/open space and recreation proposed by the HALA upzones in West Seattle Junction. The EIS is inadequate in its assumptions around the availability of green space in that it assumes golf courses are green, and therefore accessible to all for use all day.

I oppose the upzone of West Seattle Junction.

Public Services & Utilities

- 9 West Seattle sewer lines are 8" from roughly High Point down to Alaska, flowing downhill (north) and currently backup on a regular basis because the sewer and rainwater drainage systems are shared. The EIS does not assume any additional infrastructure costs, or impact on existing and future residents, particularly if lots can be upzoned from 1 single family home to 6 townhomes under changes from SF to LR1.

I oppose the upzone of West Seattle Junction.

Air Quality & Green House Gas Emissions

- 10 The EIS does not take into account the need for private vehicles during the 15 years leading up to light rail implementation, nor does it take into account the existing inadequate public transportation from the peninsula prior to the forced influx on West Seattle of residents from additional upzones. The EIS does not consider the need for single family homes that provide more than two bedrooms, something generally provided by single family homes but not apartments or condos, in what appears to be an attempt to push families that do not meet narrowly defined definition assumptions (2 adults and 1 child, or 2 adults no children). The EIS appears to take an anti-family approach that asserts that families with children are not welcome in Seattle if they need to occupy more space than a 2-bedroom apartment.

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

From: Shirley Nelsen
To: [PCD_MHAEIS](#)
Subject: DEIS, MHA comments
Date: Saturday, August 05, 2017 4:02:54 PM

My initial statement and closing statement are the same:

Much more realistic planning is needed before any one-fits-all changes are considered. It is unfair to have one set of guidelines for all urban village definitions. They have radically different needs and resources. The aspect to businesses, present or absent does not seem to be considered.

The following issues that are major. I do not intend to address all of them.

-Public transportation-presence or absence, the distance and access to it.

-

Sewage-we are overflowing with sewage backup if we get a good rain now.

-Population-the addition of condos and apartments contribute to straining the local resources now. -

-We do not have a community center.

-Our parks are full and overflowing now.

-IT is not good for a community have a city plan that decides to change single residential housing to multi-residential and multi-family. There are not resources or space to make these changes.

In summary:

-There is no room for Wallingford to grow in any category. Not any more.

Shirley Nelsen

Name	Tema Nesoff
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<ol style="list-style-type: none"> 1 First of all, I think you could write this in a manner that is clear and understandable to the general public as opposed to planning jargon since this will ultimately impact everyone in Seattle. 2 Secondly, in your earnest efforts to create affordable housing, you continue to give away the city to developers allowing them to build absolute junk that is most definitely not affordable. Just because a developer builds a multifamily dwelling does not mean that it is affordable. I suggest you take this plan and implement it in a couple of sections in Seattle to see how practical it is before dividing up the whole city. I do not see anything that represents an urban plan that creates neighborhoods that are interesting, accessible, aesthetically pleasing, and community oriented. This is just a zoning plan that has little regard for community planning and more concern for how to build more quick and dirty housing units that benefit no one. 3 Also why aren't you looking to build in areas such as Leary Way and SODO? Why are they not included in the plan? These would be great places for housing and restaurants that can be close to transportation.
Aesthetics	<ol style="list-style-type: none"> 4 I do not see anything in here that addresses aesthetics. In my opinion, the city does not care about how housing looks and whether it fits in with the existing surrounding. Why do you allow such substandard structures to be built? Why do you not require setbacks? Why do you allow buildings to be built right up to the sidewalk with no green space?
Transportation	<ol style="list-style-type: none"> 5 You need to plan that people still drive their own cars particularly in areas other than downtown and capitol hill. Bus transportation is not that efficient and encouraging developers to build buildings without parking is impractical. You are not realistic.
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	

Name	Mark Newell
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 My wife and I have been involved with the Madison-Miller Park community group, and helped develop their community response. I submit similar responses as my own personal response to the DEIS:</p> <p>I prefer 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:</p> <ul style="list-style-type: none"> • 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): <ul style="list-style-type: none"> 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 (submitted via email from our community group) 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.

Our neighbor, with whom we share a driveway, is a low income, elderly (80 years old), black, disabled man who has lived in his home for more than 50 years. He has just been displaced; his cousin owns the home, and finally sold it because housing prices on our block are incredibly high, and real estate developers are aggressive in procuring lots. He is the last black man on our block, and now he will be moving next month (and we fear he may become homeless, as he has little to no income, and will not gain anything from the sale of his old home). Displacement is real in this neighborhood!

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 Elegon, 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.

Land Use

Our 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.

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

Aesthetics

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.

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.

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

Transportation

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.

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

Historic Resources

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.

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.

Open Space & Recreation

My block (21st Ave E, between John and Thomas streets) already has overloaded electrical lines. Last year the city

replaced a pole across from our house, and we talked to the technicians. They said they couldn't believe how many houses were running off one transformer, and encouraged us to gather all our neighbors to submit complaints to get more electrical capacity for our street.

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.

Public Services & Utilities

- 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?

From: Sophie Newland
To: [PCD_MHAEIS](#)
Cc: FLSTEAMcom@gmail.com; [LEG_CouncilMembers](#); spsdirectors@seattleschools.org; [Bagshaw, Sally](#); [Burgess, Tim](#); [Johnson, Rob](#); [Harrell, Bruce](#); rick.burke@seattleschools.org; Jill.Geary@seattleschools.org; leslie.harris@seattleschools.org; sue.peters@seattleschools.org; scott.pinkham@seattleschools.org
Subject: Community Feedback: Seattle's Mandatory Housing Affordability EIS
Date: Monday, August 07, 2017 2:08:46 PM

Hello.

I do not envy you the important work of making Seattle a more affordable city, not only for low-income families and currently-homeless, but also for those who provide essential services to our common good. In particular, I am struck by the fact that those who teach our young, both in our public schools and in our early childhood development centers often do not earn sufficient wages to live outside of shared housing in today's housing/rental market.

But I urge you to keep Seattle's public schools capacity challenges high in the list of considerations as you look for MHA options and ways to mitigate environmental impact. >> Seattle Public School staff and board members should be consulted and provided an advisory role in this process. <<

I am a resident of Magnolia and the mother of delightful 7 year old girl who will be a second grader at Queen Anne Elementary in September. I am very lucky. But it has been disheartening at times to see a lack of forward planning for sufficient classroom capacity as well as the other investments/planning needed to prepare our Seattle youth to be successful in the 21st century and to help Seattle remain the commercial heart of the PNW. Therefore, please ensure that SPS planners and board members are part of this MHA EIS evaluation and decision-making process.

Thank you,
Sophie Newland
41st Ave W, Seattle, 98199

From: Liz Nichols
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 for Madison Miller
Date: Monday, August 07, 2017 9:52:10 AM

1 I am writing to you as a 17 year resident of Stevens/Miller Park. With two small boys, I very much appreciate our neighborhood and want to ensure growth is approached in a way that benefits the community and doesn't drive families to the suburbs. I have an ADU in my basement.

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.

Seattle must absolutely address the need for affordable housing IN EVERY NEIGHBORHOOD -- that includes the Madison-Miller Urban Village and this should be a city wide requirement, not just urban villages. I am very much against Options 2 and 3 which do not reflect our input and incorrectly asserts that our community is "Low Displacement Risk/High Access to Opportunity".

Please proceed with Alternative 1 with 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.

Thank you,

Liz Nichols

From: brad
To: [PCD_MHAEIS](#)
Subject: Comment on West Seattle Zoning Changes
Date: Monday, August 07, 2017 9:23:44 AM

COMMENTS ON DRAFT EIS RE: MHA

1

<u>Overall Analysis</u>	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
<u>Community Feedback</u>	DEIS fails to take into account documented Junction neighborhood feedback.
<u>Lack of Affordable Housing</u>	DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.
<u>Neighborhood Plan</u>	DEIS reflects City's failure to honor neighborhood plan.
<u>Traffic</u>	DEIS analysis is flawed; Fails to utilize meaningful data.
<u>Green Space</u>	DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.
<u>Neighborhood Character</u>	DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.
<u>Loss of Light and Air</u>	DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings
<u>Loss of Views</u>	DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.
<u>Historic Buildings</u>	DEIS fails to recognize historic buildings in Junction.
<u>Public Safety</u>	DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.
<u>Utility Infrastructure</u>	DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.
<u>Schools</u>	DEIS fails to note existing lack of school capacity and impact of increased density thereon.
<u>Other</u>	<p>Failure to consider the current single family houses and neighborhood that Already exists.</p> <p>The expectation that people will not have their own personal car which will be parked in nearby neighborhoods is not realistic. I have personally seen complete lack of street parking in the 2-3 blocks surrounding my home just with the opening of the new units near the Junction. People also park in my neighborhood and walk to the bus. The lack of foresight for structured parking associated with mass transit expansion is unforgivable.</p>

Name: Bradley Nicholson

Address:

Name	Dick Nickel
Email address	
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.	Bagley Lofts Homeowners Assn.
Comment Form	
Public Services & Utilities	<p>1 In Wallingford, cease any further development until the capacity of the sewers and wastewater systems can be increased to handle CURRENT volumes, especially during periods of heavy rain. To dump these 2 effluent sources into Lake Union as occurs when it does rain is criminal and totally destructive to the quality of life for those who use Lake Union for recreational purposes. It is also illegal according to state law to continue to build (increase density) without increasing utility capacity to handle it.</p>
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	

Name	Steve Nielsen
Email address	
Comment Form	
Land Use	<p>1 Comment regarding the Northgate Urban Center land use plan. At the Northeast corner of the intersection of Meridian Avenue N. and N 113th Street there is a parcel of land which is 30,784 square feet in size. It is subdivided into 5 separate building lots currently under the same ownership. 3 lots are vacant, 1 lot has an older single family home and 1 lot has an old garage/workshop occupied under legal non-conforming use provisions of Seattle codes. North 113th Street serves developed multifamily projects on both sides of the street and additional multifamily projects along Corliss Avenue and adjacent to I-5 to the East. There are no single-family homes served by N 113th Street except the one house on the subject property.</p> <p>A quasi-judicial review of a zoning reclassification application for 12 townhomes constructed on a site adjacent to the East of the subject property (Hearing Examiner File: CF 307285) held that “none of the 3 locational criteria for Single Family zoning are met”. That statement accurately describes the existing conditions along N 113th Street.</p> <p>Additionally, the unique nature of this large undeveloped site would result in Low Displacement Risk from redevelopment, a unique departure from the High Displacement Risk assigned to the Northgate Urban Center. Coupled with the location of the site being within the 10-minute walkshed of the Northgate light rail station and Urban Center services the future residents of the developed site would have High Access to Opportunity. The Land Use Alternative 2 in the Draft EIS proposes a change in zoning from single family to LR2 in recognition of the multifamily development along this block of N 113th Street. Alternative 3 should also show the same proposal for multifamily residential density on the site in recognition of the Low Displacement Risk associated with this unique property.</p>

From: Nighthawk
To: [PCD_MHAEIS](#)
Subject: No
Date: Wednesday, July 05, 2017 9:50:00 PM

- 1 I oppose HALA unless it is vastly modified. The main thrust of making affordable housing available should be tax incentives and assistance in creating accessory units.

From: Sheena Nikolaus
To: [PCD_MHAEIS](#)
Cc: [LEG_CouncilMembers](#); spsdirectors@seattleschools.org; [Bagshaw, Sally](#); [Burgess, Tim](#); [Johnson, Rob](#); [Harrell, Bruce](#); rick.burke@seattleschools.org; Jill.Geary@seattleschools.org; leslie.harris@seattleschools.org; sue.peters@seattleschools.org; FLSTEAMcom@gmail.com
Subject: Fort Lawton
Date: Friday, August 04, 2017 6:30:08 AM

Regarding 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.

These plans would increase density in already crowded/ expanding Seattle neighborhoods (including Magnolia and Queen Anne). We would like to advocate for keeping school capacity challenges in the forefront of this discussion!

I 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!

My 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"

Regards,

Sheena Nikolaus

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 6:51:43 PM

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.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 6:53:33 PM

The Draft EIS does not meet SEPA requirements for the consideration of alternatives. An essential requirement of an environmental impact statement is that it adequately consider alternative ways to meet the stated goals of the legislation.

The draft EIS 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 EIS. This is a significant deficiency in the DEIS and a violation of SEPA.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 6:55:00 PM

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.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 6:56:30 PM

The historic resources analysis contained in the MHA DEIS should reflect a better understanding of what exists that's currently 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, net gain of housing, and how much is "affordable"?

THE HISTORIC RESOURCES SECTION (3.5) LACKS MEANINGFUL ANALYSIS

The section on Affected Environment (3.5.1) does not provide any real understanding of the study area's history, context, and patterns of development other than describing when certain neighborhoods were formed or annexed to the city. It should include details on neighborhoods to adequately assess potential impacts to historic resources such as potentially-eligible individual properties and future historic districts. Added development pressure will result in increased demolition of potentially historic buildings and neighborhoods and adversely impact the character and scale of neighborhood blocks.

Listing the existing locally designated and National Register-listed districts is a start but there's nothing more. How can impacts be addressed if there's no substance in the Affected Environment section? Seattle is distinguished as a city of neighborhoods—each has its own character and history. A description of all the neighborhoods in the study area should be part of the analysis. This should include a brief historic overview of each neighborhood, periods of development, and types of cultural resources that define the area. Without this basic information, there's no way to assess the impacts of MHA on historic resources including existing and potentially-eligible landmarks.

Exhibits 3.5-1 and 3.5-2 (NRHP Determined Eligible Historic Properties, Alternatives 2 and 3) appear without any context. Tables such as these should be clear in meaning with some explanation in the body of the document or in a footnote. There is reference to the exhibits on page 3.244 but it's not clear what it means to have a count of National Register-eligible properties in the M, M1, and M2 zones in relation to the level of displacement and access. One would have to read the rest of the DEIS and appendices to even understand what M, M1, and M2 refer to and what the descriptors of "displacement" and "access" mean. Additionally, these tables are misleading by crediting the source as the Department of Archaeology and Historic Preservation (DAHP). DAHP did not create these tables; the City of Seattle obtained the numbers of National Register-eligible properties from DAHP's WISAARD database. Furthermore, DAHP does not use displacement and access or the zones to determine eligibility.

Since the City is using an equity lens for its analysis and framework throughout the entire DEIS, then it would be helpful if the Historic Resources section actually looked at the historic context of social inequality in the development of the various neighborhoods in the study area and connect that to historic resources.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 6:57:23 PM

The upzone will have direct impact on 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 and more of these areas are changing every day with new development in which generic six to eight story buildings are constructed, usually out-of-scale with the historic pattern of development. Increasing the height "just one story or two" may not seem to have much impact to the City, but it will have considerable impact to the people living in the neighborhood.

For example, one needs to look no further than the 3800 block of Ashworth Avenue N in Wallingford. Years ago, what was once a single-family neighborhood was rezoned LR1. The block that was once characterized by older houses of different styles, form, and scale (especially bungalows) is now dominated by townhouses that are not "single-family" in character or scale. The remaining few older houses are dwarfed by looming new construction that is generic in design, typifying what's being built everywhere. Not only has the historic character of that Wallingford street been destroyed, but the only more "affordable" housing that exists are the older single-family houses that are retained by long-time owners. This real life example portends the future of this neighborhood and other older communities throughout the city.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 6:59:39 PM

THE DEIS SHOULD PROVIDE SUBSTANTIVE MITIGATION MEASURES

Section 3.5.3 focuses on two mitigation measures that are already in place--Comprehensive Plan policies and City Landmarks process, and proposes a third to continue funding of comprehensive survey/inventory efforts that have been inactive for years. A list of other potential mitigation measures follows in a separate paragraph but it is unclear whether any of these have any import or will be considered seriously. This is a very passive

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Historic Seattle comment letter MHA DEIS, August 4, 2017

approach toward mitigation. Mitigation should actually respond to the potential impacts and not rely only on existing policies, programs, and regulations without ways to implement through added funding and staff resources.

Also, MHA needs to include strategies for adding density and equitable development using vacant and underdeveloped areas. There are numerous opportunities for sensitive and compatible infill that can enhance urban character, rather than detract from it by making it easier to demolish existing housing that is already affordable for more units that will be less affordable.

I believe the City should invest in its future by striking a balance between new development and historic preservation to ensure that how we grow is sustainable and resilient – and retains urban character and sense of place. If we continue the tear-down mentality, then Seattle will lose what makes it a vibrant, livable place for all who call it home.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: EIS
Date: Sunday, August 06, 2017 7:02:11 PM

1. An alternative should be included that is based on use of publicly owned land for affordable housing.
2. An alternative should be included that upzones more land outside Urban Villages and Urban Centers.
3. An alternative should be included that increases development in selected areas, where current zoned capacity is under-utilized, by directing transportation and other infrastructure improvements to those neighborhoods.
4. An alternative should be included that levies impact fees on developers to fund transportation and other infrastructure improvements in neighborhoods where current zoned capacity is under-utilized.
5. The EIS should analyze Alternative 1's compatibility with the 2035 Comprehensive Plan, specifically with respect to development capacity.
6. Historical growth cycles suggest that it is incorrect to base analysis of alternatives on the current growth rates. Each analysis should be repeated for low, middle and high growth trends.
7. One or more alternatives should have been included with incremental upzones over a 15 to 20 year period, allowing more locale-sensitive planning, better course-correction and better targeting of environmental mitigation and concurrent infrastructure.
8. The EIS should present maximum zoned density information.
9. Alternative 1 was not adequately analyzed for sufficiency to meet current and projected demand. Current construction rates of 10,000 new units built per year may well be enough to support the 70,000 estimated in-migration over the life of the 2035 Comprehensive Plan.
10. The Seattle 2035 20-year growth strategy should be used to evaluate Alternatives 2 and 3.
11. It is incorrect to simply assume that MHA subsidized affordable housing will allow low-income households to live in areas with high access to opportunity, near transit centers, or make any assumptions about their location based on zoning decisions. Developers have an in-lieu fee alternative to providing affordable housing on site, and subsidized affordable housing created via that means is not tied to the neighborhood of the building site.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:04:34 PM

1. Graphics misrepresent current and new zoning height and bulk (p. 3.140-3.151), by placing hypothetical new development in the distance where it's diminished by perspective rendering and differences like smaller setbacks are obscured. Side by side comparisons should be rendered from a normal viewing height perspective, but one where both new and old are rendered at the same scale and differences are clearly visible.
2. Graphic presentations should be included that accurately render existing conditions in the historically lower income south areas of the city, where houses rarely attain heights of 30 feet, so that the effect of 30 foot RSL production in those areas can be accurately visualized.
3. In the absence of design standards for RSL that require a pitched roof, renderings should assume current development practice, which is a flat roof deck.
(from analysis by Natalie Williams)
4. Assessment of impact on views and shading requires the collection and presentation of specific view analysis in the affected area, and analysis of shadow effects on the existing landscape.
5. The statement "The proposal includes a variety of features and development regulation amendments to minimize these impacts" (p 1.23) calls for specific identification of those features and amendments, without which it means nothing.
6. Analysis of general urban form fails to account for neighborhood character.
7. Comparison graphics between no-upzone and upzone alternatives, in single family residential, should not feature hypothetical modern single family structures on the assumption that this "infill" is a trend that will reliably produce modern structures in an established neighborhood of older houses. This artificially discounts the visual impact of upzones, in neighborhoods where well maintained older homes are actually highly valued and unlikely to be replaced within the 20 year interval.
8. Where Design Review is cited as mitigation, the EIS should clearly indicate the thresholds, under which projects are exempt from Design Review, or would be exempt after proposed revisions to Design Review. This is particularly significant in areas to be upzoned from Single Family Residential, to low rise categories that would so commonly be exempt that it isn't much of a mitigation at all.
9. Specific public views should be identified, that would potentially be impacted in areas subject to rezones.
10. Design Review should not be cited as mitigation for protection of public views, in areas where most projects will be exempt from Design Review due to small size.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:06:05 PM

Measures proposed to mitigate impacts on parks and open space (section 3.7.3) must be realistically likely and plausibly effective. Developer impact fees have been resisted by the city for many years though adopted in every other major city in the state. Transfer of development rights have not been widely used and evidence should be presented that they can be effective for this purpose. If other incentive programs are supposed to have potential to mitigate impacts on parks and open space, they should be identified in the EIS.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:07:49 PM

1. Libraries should be included as one of the assessed public services
2. The EIS underestimates impact on Police service, by supposing that the city will identify and manage demand as growth occurs, while ignoring reports commissioned by the city that police service is currently inadequate – clearly suggesting that demand will likely not be adequately managed in the future.
3. Average response times are not an adequate measure of Police service. Police response times vary considerably, and are not consistent from one area of the city to another. Timely police response is a critical need, and averaging hides failures – Seattle Times analysis of five years of priority-one 911 data found that 4% took longer than a half hour, despite average response of 7 minutes. This is relevant to the alternatives, in that response times have been slower in the north end – which would grow more in Alternative 3 – due to its geography. Response times should be assessed using 90 th percentile.
4. The Seattle Fire Department does not currently meet NFPA response times for EMS or Fire suppression services. The EIS should account for the role of traffic congestion in this connection, for each alternative, as well as the increase in calls due to growth.
5. The EIS should consider current failure to maintain adequate fire fighter staff levels, which contradict its assertion (p. 3.309, 3.310) that “impacts on fire and emergency services as a result of demand increases would be identified and managed.”
6. If a compact pattern of growth is expected to reduce travel distances for emergency vehicles (p. 1.32), the EIS should explain how it would do that in the context of the alternatives.
7. The EIS should consider impacts on the 911 call center.
8. The EIS should consider impacts on schools in more detail, since neighborhoods are significantly impacted by local capacity problems. This is relevant to Alternative 3’s different distribution of growth – its impact will not be the same as Alternative 2 (p. 3.310.)
9. The EIS should consider the School District’s ability to meet capacity needs more carefully than it does on page 3.310: “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 responses depend on buildings, land and money, and the EIS should present evidence as to whether these resources are likely to be available as required.
10. The EIS should consider the effects of construction activity on sidewalks – heavy equipment traveling over the sidewalks during construction causes extensive damage.
11. The EIS notes (p. 3.302) that “Some parts of the City are served by sewers that are less than 12-inch diameter. These areas are likely at or near their capacity and downstream pipes from new development would have to be upgraded to a minimum 12-inch diameter.” These areas should be identified, along with the extent of the downstream pipes in question.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:13:45 PM

Lack of a neighborhood community center doesn't appear to downgrade access to opportunity as much as it should.

B- PACE IMPACTS– The DEIS explains away impact on Urban Village areas by stating it will be gradual. One instance is 3.2.2 Impacts, stating “changes would result in gradual intensification of density, use and scale in all rezoned areas over time”. Page 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.” The DEIS assumption of “gradual” is used so much it is endemic to the documents perspective, and it is flawed thinking. This assumption is in direct contrast to the astronomical growth rate we are actually seeing, where whole blocks change at once.

If the change is “gradual” you do not produce the housing you advocate you will provide. If rapid change is expected, and indeed required by the proposal to produce the added housing/funding, than the associated severe impacts must be clearly called out specifically. Effective mitigation strategies appropriate to the intensity of the zone change must be identified. From 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 used is not a valid method to establish impact, since it acknowledges rate of change may be unequal, but assesses impacts of gradual change, and provides mitigation that is purely conceptual in the list, example Land Use 3.2.3 pg 44 “The following tools are available if the city wishes to proactively mitigate identified land use impact.” The only real development standard changes the city is pursuing are ones which would remove or lessen restriction, not provide greater protection, an example is proposed changes to Design Review.

C -ASSESSMENT of INTENSITY -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.”

Legitimate mitigation strategies should be identified to mitigate the areas most greatly affected. The DEIs should also provide a clear and consist strategy for assessing multiple and synergistic impacts of combined changes to zoning, setbacks, and lessened Design Review, as these are all proposed to occur simultaneously. The proposal contains conflicting internal approaches to mitigation, and indicates Design Review is as one means to mitigate impacts, in direct contract to the fact that MHA intends to vastly reduce Design Review in Urban Village areas. This conflict within the EIS needs to be corrected, and the proposal made consistent. Design Review cannot be considered mitigation, if it is being eliminated for most areas! The DEIS proposal must project impact of all changes combined, in a consistent manner, to be a valid assessment of impact. It must also not rely on upzone mitigation strategies that do not exist or are being removed.

D -SIMULTANEOUS CONSTRUCTION PROJECTS AND CONCURRENT IMPACTS: The proposal in its advocacy for increasing density in concentrated areas, fails to consider the overlapping impacts of multiple projects in close proximity. If you spread 10 construction projects out over a neighborhood, you dilute some of the impact. If you alternately concentrate all of these projects into a 2-4 block stretch, all permitted and under construction at the same time, perhaps for as long as a year, the impact is much more intense and impactful. The mitigation strategies need to address this critical point and propose methods to ease the impact.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:15:35 PM

UV-specific impacts and mitigations were ignored. The DEIS describes UVs and their up-zone plans at a “micro” level of detail, but it does not address any UV-specific negative impacts or mitigations. Instead, the DEIS uses a “macro” lens which average negative impacts over the whole city (thus minimize any negative effects), or it ignores them altogether. No assessments of individual UV Study Area-specific resources or impacts were conducted, and no mention was made of any UV Study Area-specific mitigations. UV-specific impacts that were ignored in the DEIS include:

- Increased impacts on local transportation modes (bus, bicycle, light rail, pedestrian, or car).

- Loss of UV-specific local cultural resources such as immigrant- and minority-owned small businesses, non-profit community aid organizations, and places of worship.

- Increased school crowding at local elementary, middle, and high schools in or adjacent to each UV. Enrollment in Seattle Public Schools is largely dictated by family address. SPS is already dangerously overcrowded. Dramatically increasing the number of school-age children in a given UV Study Area will increase school crowding in neighborhood schools.

- Degradation of UV resident pedestrian safety, air quality, and noise pollution as demolition, loss of road and sidewalk rights-of-way, and intensified construction activities within the UV.

- Decreased access to local recreational amenities, such as parks, playgrounds, open space, and Community Centers.

- Increased stress on local infrastructure such as water, electrical service, sewage treatment, combined sewer outfall, and surface water management.

- Loss of tree canopy, green spaces, and parks within each UV.

- Increased risk for local heat islands and landslides as the tree canopy disappears and porous surfaces are paved over. Because each UV Study Area contains unique topology and geology, each UV Study Area must be individually assessed for these risks.

Impacts on families with school-age children were not

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:16:35 PM

The DEIS does not adequately address the many negative impacts on UV residents, institutions, and environments. Instead, the DEIS implements a city-wide “averaging”, which minimizes or simply ignores the heavy negative impacts to each UV Study Area and its residents. The City appears to regard the UV Study Areas as ‘sacrificial zones’, assuming any negative impacts suffered by the UVs be forgotten or minimized by the wider benefits enjoyed by the city as a whole. UV residents are expected to either move away from their neighborhood or put up with the increased noise, environmental insults, pollution, safety risks, and disruption.

No alternatives to MHA were analyzed: Nowhere in DEIS Section 1.4 (Alternatives) does the City propose any alternatives to MHA Alternative 1 and Alternative 2. Replacement MHA options could include step-wise approaches to up-zoning along urban transportation corridors and rapid transit lines, or distributing the density increases more equitably and uniformly throughout the City.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:17:15 PM

The DEIS did not address displacement of UV Study Area residents by rising land tax rates. The vast majority (>90%) of MHA-driven new development will be market-rate housing. Up-zoning in the UV “Study Areas” will cause land values and development pressures to increase in those areas. In particular, up-zoned land will be subjected to higher tax rates as local development accelerates. This phenomenon has the potential to drive out middle- and low-income residents, as well as elderly residents, who cannot afford to stay in their own neighborhoods because the land under their homes has risen in value and tax rate as a result of MHA. The DEIS does not address the impact of MHA-driven tax rate increases.

Funding option alternatives to MHA were not explored. MHA relies on increased market-rate development in specifically up-zoned “Study Areas” (UVs) to 1) increase the number of affordable housing units in the UVs, and/or 2) raise revenue for City-managed affordable housing construction. UV-focused up-zoning and increased market-rate development are used by the City to pay for affordable housing. The City did not explore other means, besides UV-focused intense up-zoning and market-rate development, by which funding for the production of affordable housing could be built. For instance, employer head taxes or real estate excise taxes could help facilitate the construction of new affordable housing.

Delayed development of affordable housing was not addressed. The DEIS did not address the time lag between the demolition of existing housing in the UV “Study Areas” and the eventual production of affordable housing units. There is currently a critical shortage of affordable housing units in Seattle. It is therefore given that current UV residents (of all income levels) who are displaced by market-rate housing construction will be left with no options for affordable housing until more affordable housing stock is built. Market rate developers who avail themselves of the payment in lieu option will exacerbate this negative impact of MHA. In addition, the DEIS implies that the City may build affordable housing in affected UV “Study Areas”, but there is no guarantee of a replacement of low- and middle-income housing stocks within the up-zoned UVs.

UV Study Area-specific displacement of businesses and cultural institutions was not addressed. Each UV is unique in its history, built and natural environments, resident history and ethnic makeup, and cultural and civic institutions. The DEIS did not directly assess the loss of these unique local businesses and cultural institutions within each targeted UV Study Area. No inventory of UV Study Area-specific business, non-profits, and cultural institutions was conducted, and no safeguards or mitigations were proposed in order to avoid the displacement of these UV Study Area-specific local resources.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:17:58 PM

The DEIS fails to address integrated planning for concurrent infrastructure improvements. The DEIS describes MHA-driven residential growth in the UV Study Areas, but it ignores the need for city-wide planning for concurrent infrastructural upgrades, as required by the Growth Management Act. In particular, the DEIS fails to consider the need for integrated city-wide infrastructure network upgrades to schools, transportation, fire and police services, and public utilities, as residential growth occurs. These infrastructure networks are interrelated, and must be considered holistically. For example, poor traffic infrastructure impairs the delivery of fire and police services.

No alternatives were considered in the event of a successful court challenge to MHA. MHA and the Grand Bargain were derived with the consent of a small group of developers; however, developers outside that small group have threatened to sue the City of Seattle over MHA. The EIS does not mention what happens if MHA's legality is challenged and overturned. The DEIS should address the UV Study Area-specific impacts if Alternative 2 or Alternative 3 is overturned after UV up-zoning and massive re-development begins.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:21:00 PM

1) No alternative analysis was done on re-purposing (granting) and re-zoning surplus governmental lands for use in building affordable housing.

- a. This alternative would reduce the need for intensive up-zones and would guarantee that affordable housing would be built in desirable neighborhoods.
- b. The current alternatives #2 and #3 allow developers to “buy out” of the requirement to build affordable units in their projects.
- c. In turn, this means it will be highly unlikely that NGO’s (Non-Governmental Organizations) and others entrusted with building affordable housing will be able to utilize the Mandatory Housing Affordability (MHA) taxes to build housing in the most desirable neighborhoods.

2) No alternative analysis was done on spreading rezones outside Urban Villages (UVs) or city wide.

- a. This alternative would mitigate the intense environmental impacts on UVs by spreading development throughout the city.

3) No alternative analysis was made for directing transportation dollars and other financial resources to currently underserved and underdeveloped areas of the City.

- a. Investing capital resources in out-lying neighborhoods would make them more attractive to prospective residents, and increase the demand for builders to utilize the sufficient zoned capacity in alternative #1. This would serve to lessen specific environmental impacts by spreading growth over a larger area.

4) No alternative analysis was made for levying impact fees on developers to improve transportation and other infrastructure in neighborhoods where there is current zoned capacity (Alternative #1) that is under-utilized.

- a. By improving livability in out-lying communities, the City would create a high-demand environment through-out the city and spread the impact of development, hopefully mitigating the need for some neighborhoods to absorb highest impact environmental disruption.

5) No analysis was done of the merits and compatibility of Alternative #1 with the 2035 Comprehensive Plan.

- a. Current citywide zoning has capacity for 3 times the projected growth in residents

6) All of the DEIS Alternatives presuppose the city will grow based upon the current high growth trend.

- a. All of the analyses should have included a low, middle and high growth trend analysis.

b. A simple review of the previous 20 years will show that any of these scenarios are plausible and should be considered before policies that create intense environmental impacts are implemented.

- c. The City is reacting to the current short term trend as if it will continue indefinitely.

7) No alternative analysis was made for a gradual implementation of up-zones.

- a. Alternatives #2 and #3 are shotgun approaches that create significant and possibly unanticipated intense impacts immediately.
- b. The most intense impacts could be mitigated somewhat by spreading out incremental up-zones over a 15 or 20-year period.
- c. A gradual approach would allow the city to pin-point future policies and resources in conjunction with smaller less intensive growth areas. This creates a more precisely targeted balance of environmental mitigation between high impact areas and compensatory city investments.

d. Furthermore, many of the micro-environmental impacts on specific blocks, which are only cursorily discussed in the DEIS, should be given more thought and deeper analysis before implementation. Micro-rezones spread over time should have been included as an alternative to this blanket approach.

8) No statistics of “maximum zoned density” were included in this report.

a. This information would give the public a comparative tool to understand the environment these alternatives would create.

b. In some urban villages, under Alternative 3, a maximum build-out of the proposed up-zones would make the neighborhoods the densest population areas in the world.

9) No analysis of the utilization of current zoned capacity was included in Alternative #1.

a. Current trend of 10,000 + units per year being built in the city will more than address the 70,000 estimated in-migration over the life of the 2035 Comprehensive Plan.

b. Rent increase trend has slowed in 2017 as the apartment building boom is starting to catch up with demand. No analysis was made of the current projects “in the pipeline” for 2018 and 2019.

c. New Units constructed in 2015 and 2016 = 10,000

d. New Units being constructed in 2017 = 10,000

e. New Units being permitted for 2018 = 13,000

f. Rental rate increases:

i. 2015 8.2%

ii. 2016 7.1%

iii. 2017 5.4%

Specific Comments:

10) Policy LU 1.3

a. Alternative #3, where applied to select Residential Urban Villages (RUV), does not conform to a “low to moderate density and scale of development” as found in the 2035 Comprehensive Plan.

i. For instance, the drastic rezone of all single family residential zoning to Low Rise 2 & 3 (LR2 & LR3) in the Stone Way/Aurora section of the Wallingford RUV cannot be considered “moderate”.

ii. A jump from Residential Single Family to Low Rise 3 is a 3 tier increase (M2) – the largest proposed up-zone of any in the plan. This is not “moderate”.

iii. There is no Light Rail Station that would merit consideration of a “higher density or scale” anywhere in the Wallingford RUV.

11) Impacts of Alternative 2

a. Alternative 2 does not use the Opportunity-Displacement concept for allocation of up-zones among neighborhoods, yet it is analyzed under the same methodology when compared to Alternative 3.

b. The DEIS should use the Seattle 2035 20-year growth strategy as the criteria for evaluating Alternative 2 – not just a comparison to Alternative 3 which used the Opportunity-Displacement methodology.

c. Likewise, Alternative 3 should also be analyzed using the Seattle 2035 20-year growth strategy as part of its evaluation criteria.

12) 3.2.3 Mitigation Measures

a. The DEIS states that “The Production of more low-income housing would allow more people including low-income households to live in areas with high access to opportunity.”

b. However, because the MHA program allows the developer the option to pay a fee in lieu of building affordable units, there is no guarantee that a single new low-income housing unit will be built in any neighborhood designated as “high opportunity”.

c. The DEIS should affirmatively state this as a range of possible outcomes, including

“zero” new units built in particular areas.

d. The same goes for most points in 3.2.3. There is no guarantee that any units will be built near transit centers, for instance.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:23:45 PM

The City Acknowledges that the Aesthetics Analysis is Deficient.

The overarching issue is the City's position that, due to the sheer magnitude of its proposed project, it is unable to provide a

comprehensive study of the aesthetic impacts to the impacted neighborhoods and thus, it need only provide a non-specific study that

could apply generically to any urban village.

In reality, the City would certainly be able to provide a village-by- village study but has chosen not to. The reason for this

choice is likely twofold. First, the amount of work, time and costs associated with undertaking a detailed study for this massive

proposed rezone is substantial. Second, and likely more importantly, the City would be forced to disclose specific negative aesthetic

impacts on a neighborhood level and the lack of meaningful mitigation would be more sharply apparent.

The City's dismissive attitude of the individual neighborhoods it proposes to impact is entirely consistent with its lack of any

targeted, neighborhood specific planning or collaboration throughout the entire HALA/MHA process. Residents should not be

required to accept an insubstantial study because the City opted to proceed with a project too large to manage under existing EIS

requirements.

1. Urban Form Analysis Fails to Take Into Account Neighborhood Characteristics

The City takes the approach of describing "common" built forms to provide a "baseline" for analyzing the proposal's aesthetic

impacts on single-family neighborhoods. 3.127. The pictures utilized by the City suggest the proposed changes to the aesthetic

character of all neighborhoods are already happening and thus, its proposed action will have no real impact. The City's cursory

approach willfully ignores the distinct nature of each urban village and the potentially for vastly differing aesthetic impacts resulting

from the proposed rezoning.

The City describes a typical block of "established single family housing" as having "many homes with an age of 50 years or

older." The City then states that "[n]ew single-family homes often replace existing older single-family homes, and many exceed the

scale of older homes nearby, noting that this "infill single-family home development" does not require design review and will proceed

regardless of the proposed rezoning action. The picture of the new infill development is boxy, bulky and extremely consistent with

the lowrise zoned structure pictured directly below it. Notably, the picture of the lowrise structure is taken from farther away so as to

give the impression of compatibility in scale with the infill single family home pictured.

The clear implication is that neighborhoods are going to change to the bulky, boxy structure without any rezoning and thus, the

impacts of the proposed action are inconsequential. This fails to recognize that certain urban villages, such as the Junction Urban

Village have neighborhoods with blocks substantially filled with homes near or over a century old designed in craftsman and other

timeless styles. Homes of this type remain sought after as evidenced by the high prices they continue command in the market.

Consequently, with some exceptions, most of the blocks within certain neighborhoods (e.g., the Junction Urban Village) are not, in fact, significantly transitioning to the style depicted in Exhibit 3.3-3. By way of example, the 4 single-family areas proposed to be rezoned to multi-family within the Junction Urban Village are substantially comprised of very old homes, which give each area a distinct character, which the community has indicated it values.

Design Review Mitigation is Unavailable for Most Proposed Changes to Single-Family

The City describes Seattle's Design Review Program as a tool to consider issues such as proposed project's building and site design, open space, relationship to adjacent buildings, street frontage, relationship to unusual aspects of the site like views or slopes, and pedestrian and vehicular access, among other things. The City states that "the program reviews most new multifamily . . . projects in Seattle." Unfortunately, as the City goes on describe, design review is currently inapplicable to the majority of projects falling within the RSL, LR1, LR2 and some LR3 categories and proposed changes will further reduce the applicability of design review for this zoning type. These are the precise zoning types to which the City proposes to change single family under MHA. Nonetheless, the City cites design review as a mitigation tool for almost every negative aesthetic impact it describes in the EIS, at the same time knowing that this tool will be unavailable for most of the projects that will dominate the single family neighborhoods proposed to be rezoned. The City is willing to make changes to development regulations to further the implementation of the proposed MHA rezones. It should also be required to make changes to the regulations to ensure that design review is available mitigate the impact of those rezones.

3. Potentially Impacted Views are Not Identified and Mitigation is Not Provided.

While acknowledging that the Comprehensive Plan states a policy that public views are protected, the EIS does not identify any of the specific protected public views, or even the general types of protected public views that will potentially be impacted within the areas subject to the proposed rezones. Instead, the EIS simply concludes that, because development regulations do not currently set precise requirements for protecting views within individual development projects, public view protection can be addressed through the design review process. Again, design review will not apply to most of the RSL, LR1, LR2 and LR3 development – all of the new proposed zoning designations for single-family areas. Therefore, essentially no mitigation or protection is proposed for these areas.

The City is willing to make changes to development regulations to further the implementation of the proposed MHA rezones. It should also be required to make changes to the regulations to mitigate the impact of those rezones on public views. As to private views, while observing that they are _____.

3. Describing Aesthetics Impacts by Using (M), (M1) and (M2) Tier Categories is Inadequate.

Rather than undertaking a neighborhood-by- neighborhood analysis, the City simply categorizes the types of zoning jumps that are proposed to occur into three categories: (M), (M1), and (M2) and then generally describes some of the aesthetic changes that may occur.

(M1) encompasses both change from SF to LR1 and SF to LR2. There is a significant difference between LR1 and LR2 in terms of change to neighborhood character, i.e., rowhouses and townhouses versus apartment buildings, yet the EIS lumps them together with no independent analysis.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:26:29 PM

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.”

The City admits the parking crisis, including a number of neighborhoods where parking demand is pre-projects ABOVE 100%! The projects can only exacerbate the crisis.

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 and the City Council has steadfastly refused to reconsider.

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 eliminated 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.

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.”

The City has NOT seriously considered the parking crisis and the effects of upzoning on that parking crisis. 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.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:29:07 PM

Section 3.7.4 Significant Unavoidable Adverse Impacts: This section states that Development under all 3 alternatives which includes the adopted 2035 Plan would have significant adverse impacts to Parks and open Space. It states however that these impacts can be avoided through the mitigation measures described in section 3.7.3. This section of the draft EIS makes reference to mitigation strategies outline in the 2035 Plan EIS and identifies impact fees for open space and transfer of development rights(TDR) as effective mitigation measure. These mitigation measures are also identified in draft EIS to address the two MHA alternative significant adverse impacts to Parks and Open Space. These mitigation measures appear to be grossly inadequate to provide effective mitigation of the significant adverse impacts identified. Impact fees have been discussed for years in the City of Seattle with no action taken. In fact, Seattle is the only major city in Washington state that has not enacted impact fees. There is also the potential legal issue that promises were made by the City Administration to get support for HALA that either prohibited or discouraged the use of impact fees. TDR have not been widely used and evidence needs to be provided that they can in fact deal the reduction in the availability of Parks and Open Space with project growth for all 3 alternatives.

Alternative 1 would require the acquisition of 40 acres of useable land for active park usage. The 2017 Development plan calls for the acquisition of 13.5 acres by 2023, another 13.5 acres by 2020 and the final 13.5 acres by 2013. The plan documents land prices from 2013 to 2015 ranging from \$137 to \$517 per sq. ft. The price of land, given current demand driven by accelerate growth, has most likely increased these acquisition numbers. The low number of \$137 was used and inflated it to \$150 per sq. ft. The \$150 per sq. ft. number would mean that an acre of useable land for active park purposed would cost in today's dollars \$6, 534,000. The only funding source for land acquisition for Parks is in the Park District 2015-2010 spending plan that has provided a little over \$2,000,000 per year starting in 2016. This amount can be matched by King County. This funding source would provide a little more than \$20 million dollars through 2020 and another 13 million if the same amount of acquisition funding is continued into the in the next Park District spending plan That would provide 33 million dollars at today's prices to offset \$88.2 million dollars in estimated acquisition costs just for 13.5 acres. These numbers indicate that there would be a significant short fall in acquiring the needed 40 acres without significant amount of other funding being provided. The Park acquisition needs for the other two MHA alternatives requiring 434 most likely cannot be achieved based upon the previous discussion of acquiring just 40 acres and therefore cannot be mitigated.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:32:07 PM

DEIS Section 1.0 (Summary)

Page 1.7, Alternative 2 Heading

This section reads: “Alternative 2 implements MHA, applying specific zoning map changes based on a set of basic planning concepts, policies in the Comprehensive Plan, and MHA Implementation Principles developed during community engagement.”

Claims of “community engagement” rely heavily on feedback from Focus Groups and the online application Consider. It.

Focus Groups were a Failed Experiment. The concept of the “focus group” has been severely criticized from within by participating members and from outside observers. Our team of residents from Wallingford attended and observed nearly all of the focus group monthly meetings for the 10 months for all the Hub, Low Density, Medium Density and Expansion neighborhoods. (WallHALA observers attendance is documented on city sign ins).

- Focus Group Selection. The members were handpicked by city departments and the Mayor’s office. The city narrowed the applicant pool of nearly 600 (mostly north end residents) to about 140. This experimental method had only 4 or 5 people per urban village who were under no obligation to seek in put from their neighbors nor to share out information they received. These are major flaws in the process. The thousands of people who live in each urban village had token representation in the focus groups. The data shows that 33% were renters, 24% owners and 43% would not identify. Again, no assurance this group was balanced in terms of homeowners and renters which is about 50/50 in Seattle or that the “most impacted” group with proposed elimination of single family properties is represented sufficiently.

- Focus Group “One size fits all” method. The issues of rezoning city wide neighborhoods were discussed in general terms because about 6- 8 neighborhoods were lumped together according to a similar density category such as (hub, low, medium and expansion). The city proceeded with a “one size fits all mentality.” The differences in schools, parks, libraries, community centers, assets or deficiencies, topography, view protection, variances in commercial districts, road widths and arterials, historic properties, race and cultural differences were not addressed. There were no map references for comparisons to differences in individual neighborhoods throughout the meetings so application of “principles” was general and disconnected from specific neighborhood context.

For instance, if a principle says place housing “near” schools, the context for “near” was never defined in terms of distance. However, when translated in Wallingford much of SF (single family) would be changed to RSL(residential small lot) including splitting lots across the street from the school. This has a huge impact on the residents who live there, but they were not invited to share in determining these principles or decisions. The applications were not clearly explained in individual neighborhood context. The Urban Village rezone maps were not presented until the very end of the focus group process. Again, individual neighborhood application of principles were discussed briefly at the end.. A similar case could be made for all the other principles like views, housing choices and transitions that were not applied in the context of neighborhoods.

- Focus Group Attendance drops off. The Low density focus group (Wallingford) near the end in late Sept., 2016, reviewed the Urban Village rezone maps just released. 7 observers from Wallingford witnessed the remaining 12 of 40 focus group members going over 8 neighborhood rezone maps. They would spend about 15 minutes on each rezoned neighborhood map. Only 3 of the 12 remaining members could speak for Wallingford as residents. A resident possesses more of the intimate knowledge needed to recommend decisions of such magnitude for each urban village. In no way, should the city be able to say that the focus groups were effective in having adequate neighborhood representation. The attendance had dropped off in all the density groups significantly, but the city still uses the focus groups as a credible source for decision making. In reference to 1.7, the focus group feedback is not reliable data to shape Alt 2.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:33:21 PM

Page 1.37

A portion of this section reads: “However, substantial community engagement has been conducted already as summarized in Appendix B, and there will be additional opportunities for community engagement through this SEPA process, and at the time of City Council deliberation on the proposal.”

I disagree based on insufficient city actions to date to minimize displacement and homelessness happening now . So far the city is unsuccessful in slowing displacement and homelessness which seems to go hand and hand with new development. It appears that until speculation can be minimized , affordable housing plans that rely on inaccurate community engagement data is insufficient reason to implement MHA/HALA rezoning proposals.

The city has no accurate inventory of existing affordable homes outside of what the city knows are rent restricted homes. The city estimates so far of displacement are very “low ball” when demonstrated by the U District MHA advocate John Fox.. Until the city can be more accurate in terms of displacement risks, the city has no business implementing MHA with developer incentives and should delay implementation until an effective displacement prevention plan and an alternative affordable housing plan offered without up zones is in place. If MHA is further implemented by City Council, there will be little deliberation to address displacement issues.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:34:17 PM

DEIS Section 2 (Alternatives to MHA)

Page 2.12

Murray's Equitable Outreach Order, June, 2016

This section refers to Resolution 31622 which established a two year plan for "community engagement." Murray's executive order called "Achieving Equitable Outreach and Engagement for All" was released in June, 2016. The purpose was to inform possible City Council action on specific implementation actions to address housing affordability. Murray's 2016 Executive Order "stated that doing outreach and engagement differently is a top priority". The Dept of Neighborhood's charge is to bring equity into public engagement. It's effect has had the opposite result. It limits citizen engagement to just a few handpicked by the Mayor and City Council.

To address the changes resulting from the Executive Order, the most shocking news was that the city cut ties with 13 District Councils. Human resources should be valued by the city and not so callously cast aside. Most people's reaction to the discrediting of councils revealed that the city has an attitude that neighborhood volunteers are not really valued unless the city picks them.

Dismissing District Councils in June, 2016 resulted in assigning responsibilities to a 16 member Community Involvement Commission selected by the Mayor and City Council just starting in July, 2017

The District Councils lost their ability to coordinate budgeting neighborhood projects. These responsibilities will now be moved to the "Community Involvement Commission." selection again by the Mayor and City Council. The CIC group volunteers 3-6 hours a month.. Also, DON reduced their staff tied to geographical neighborhoods.

The city's reformed public engagement touts a program of undefined geographic neighborhoods and a more generic approach known as "community". Specific neighborhood empowerment has been deliberately diminished. This is consistent with the city's selective processes to choose the participants for Focus groups, Design Workshops, the Community Involvement Commission and structuring group participation so numbers of participants are limited to suit the city outcomes.

The city is deliberately marginalizing the influence of homeowners who are as single family property owners "most impacted" by proposed elimination of single family zoning in Urban Villages city wide. Supposedly, the city is seeking to expand engagement, but continues to use a very selective process to manipulate public engagement outcomes. The changes proposed in the Mayor's Executive order to reform public engagement are not Inclusive in serving all taxpayers, residents, income levels, renters, homeowners, various age groups, races and cultural backgrounds equally.

From: Barbara Noah
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 7:45:40 PM
Attachments: [Wallingford Capacity Shrink Map \(N 45th only\) 2017-01-17.pdf](#)

The city is not changing or modifying MHA/HALA in response to feedback from the residents. The expectation of taxpayers is that you weigh in on proposed policy and in theory that policy can be modified according to feedback. This is a basic principle of democracy. That is not what is taking place. Criticism is not noted or is deflected. Alternative opinions are marginalized.

Also, many people in the urban villages have not been reached by the city and do not even know what may happen to their properties and lives. The community has not been properly engaged.

There has been documented evidence of a high degree of opposition by Wallingford residents to MHA/HALA's plans to eliminate SF zoning in the Wallingford UV. Residents have repeated these messages at public hearings for MHA and the 2035 Comp Plan, in many resident emails to Council, comments from the Wallingford Design Workshop, the Mayor's Find It Fix It Walk in March, 2017 and the sign protest featured on KOMO TV. Wallingford's opposition to the elimination of single family housing and the lack of confidence in MHA is thoroughly documented.

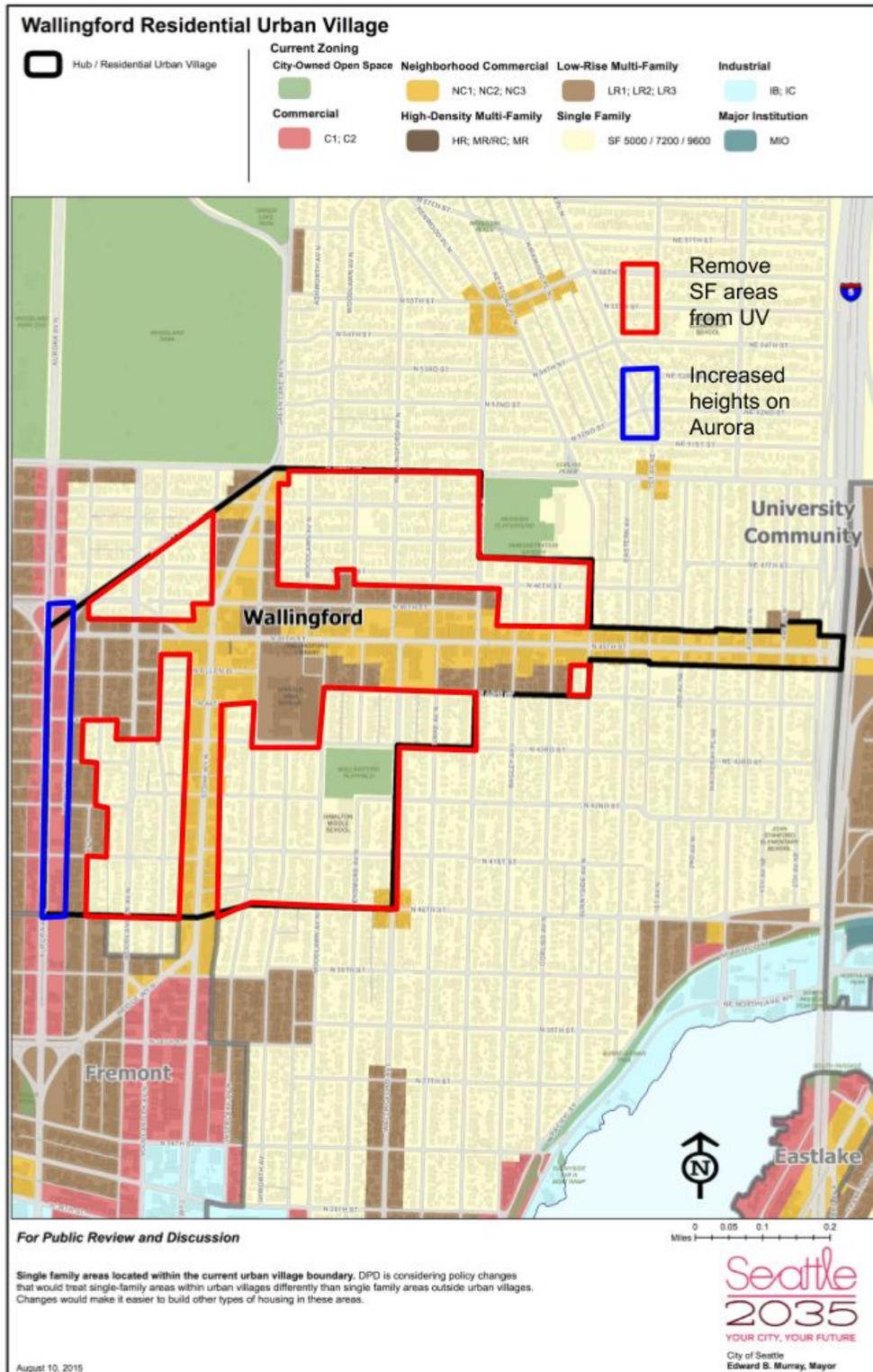
The SF up zones are unnecessary due to existing capacity as in DEIS Alt 1. WALLHALA has distributed hundreds of "NO GRAND BARGAIN UPZONE" signs and residents have voluntarily displayed them throughout the neighborhood. The city does not want to acknowledge the opposition in Wallingford to eliminate 700 single family properties within the Wallingford urban village. Alternatives 2 and 3 in the DEIS do not reflect the desires of Wallingford feedback from public engagement due to dependence on up zones.

Affordable housing can be achieved in Wallingford WITHOUT the developer giveaway grand bargain up zones, but no one in the city government will yield their top-down resistance to that fact. Wallingford has developed a shrunken up zone area map, which is more than sufficient to provide the number of units needed. See attachment.

Furthermore, taking fees in lieu of affordable housing will just make Wallingford more expensive, less inclusive, and serve to build affordable housing off site.

LISTEN TO YOUR RESIDENTS, CITY OF SEATTLE!

Proposal to change the boundary of the Wallingford Urban Village.



Name	Judith and Tom Noble
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 The MHA uses the affected neighborhoods as an ATM to get funding for affordable housing at the expense of neighborhood residents. There EIS should include an alternative that looks at the effects of development in an environment of impact fees rather than selling out neighborhoods.</p>
Aesthetics	<p>2 Graphics in this section distort the real impact of potential changes by using perspective drawings which do not allow real side-by side comparisons.</p>
Transportation	<p>3 Parking impacts are not realistically discussed. There is a lot of wishful thinking. Assuming that transit passes and access to light rail will reduce car travel to downtown is one thing. Assuming that it will reduce car ownership is something completely different. There is NO evidence presented to show that car ownership will be reduced, hence parking impacts will continue and will be more difficult as parking requirements related to development are reduced or eliminated. This section should be redone with some real data related to car ownership, not to transit use or use of other alternative transportation .</p>
	<p>4 Urban Forest and Tree Canopy The City has compiled data about tree canopy coverage across the City and includes significant data within the DEIS to assert that further development would do little to affect this important biological resource. The major flaw in this analysis is that the City fails to distinguish between deciduous trees and evergreen trees. This distinction is important because of the climate of Seattle. The DEIS acknowledges the role of trees in intercepting rainwater. In Seattle, our rainiest seasons are also when many deciduous trees are relatively bare. Thus the role of evergreen trees in rainwater interception, and hence reduction of storm water impacts, is most important and should be included in the analysis. The following citations build the case that: 1. Evergreen trees are significantly more effective at rainwater interception than deciduous trees. 2. In Seattle, the evergreen tree canopy is disproportionately on land currently zoned single family. 3. Seattle does not encourage evergreen trees as street trees, so any increases in street tree canopy will not mitigate for loss of evergreen canopy during development. This is especially so when development is allowed to completely clear a lot and then replant since landscaping requirements do not require using evergreen trees even if evergreens were lost during redevelopment.. 1. Evergreen trees are significantly more effective at rainwater</p>

interception than deciduous trees..

There are several published documents that are of note on this issue.

Siddam, Ravali, "Estimating the benefits of trees in storm water management" (2014). Theses and Dissertations. 1793.

<http://utdr.utoledo.edu/theses-dissertations/1793>

"Average interception of rainfall by a forest canopy ranges from 10-40% depending on species, time of year, and precipitation rates per storm event. In urban and suburban settings, a single deciduous tree can intercept from 500 to 760 gallons per year; and a mature evergreen can intercept more than 4,00 gallons per year." p 26

Using the National Tree Benefit Calculator

(<http://www.treebenefits.com/calculator/>) one can easily determine the relative benefits of various tree types for rainwater interception in the Seattle area. Even a 6 inch diameter western red cedar intercepts 305 gallons of water per year as compared to a linden tree (a common Seattle street tree) which intercepts 232 gallons a year. A western red cedar of 45" diameter (below the regulatory threshold for preservation) intercepts 6,023 gallons per year as contrasted with 4,032 for a similar diameter Bigleaf maple (another common Seattle deciduous tree.) The loss of a single mature Western Red Cedar would require the planting of 26 Linden trees and even then, the Linden trees would not be functioning at capacity during peak winter storm events.

2. In Seattle, the evergreen tree canopy is disproportionately on land currently zoned single family.

"72% of Seattle's tree canopy is deciduous and 28% is coniferous. Most of the conifers are on single-family land (52%).

2016 Seattle Tree Canopy Assessment

pdf available through

<http://www.seattle.gov/trees/canopycover.htm>

3. Seattle does not encourage evergreen trees as street trees, so increases in street tree canopy will not likely mitigate for loss of evergreen canopy during development when zoning increases the buildable footprint in any currently single family area.

"Conifer trees are very desirable, but not generally recommended for street planting. The lower limbs can cause visibility/safety problems at driveways, alleys, intersections, signs, and signals. They may be approved for street planting if the site is deemed appropriated. The planting of Conifers is encouraged on appropriate private property sites.

<http://www.seattle.gov/transportation/treeswithreservations.htm>

The City's DEIS analysis of the impact to tree canopy is cursory and sloppy at best.

Even the City's own urban forestry documents acknowledge the value of evergreen trees over deciduous trees and states that only 28% of the canopy is evergreen and that 52% of these are on single-family land. .Yet the analysis done for the DEIS does not take into account this difference but uses a simplistic measure of tree canopy cover.

A more informative analysis might start with acknowledging the importance of trees in reducing water pollution and retaining rainwater during the month when Seattle experiences the most rain. This would require developing a coefficient to apply to the

Biological Resources

analysis that took into account the length of time in any one year that a tree was providing such a function. For example, if the usefulness of an average evergreen tree was set at 1 per month, that usefulness would be 12 for the year since the evergreens perform their functions at all times of year. If the usefulness of an average deciduous tree were set at 1 per month, that usefulness might be, at best 8 per year since there are at least 4 months of the year where they do not fully perform functions beneficial to handling rainwater within the city.

Combine this type of analysis with the correlation between the timing of rain events in Seattle and the times when deciduous trees are able to perform a function in reducing rainwater effects, and the difference in benefit from evergreen trees versus deciduous trees becomes even greater. These numbers are illustrative only, but such a calculation would significantly change the analysis presented in the DEIS. The City's own study on which the DEIS relies, says that 52% of the City's evergreen trees are located on land currently zoned single family. This key statistic would suggest that the rezoning of currently SF lots to more density would have a significant impact on the City's evergreen canopy because 1) Seattle's tree protection ordinances do not protect the majority of evergreen trees so during development of SF lots such trees are lost and, if replaced, are not replaced with other evergreens; and 2) changes in development standards which have been discussed may, in many cases, increase the buildable footprint of a SF lot when converted to other zoning, hence reducing the room for evergreen trees.

The point here is not the tree canopy per se, but the ecological benefits being lost when SF zoning, which contains 52% of the city's evergreen tree canopy, is converted to other zones which, in aggregate, now host only 8.7% of the city's total evergreens. (see 2016 Seattle Tree Canopy Assessment, p. 2)

The DEIS provides misleading analysis on the impact of the proposed legislation on the benefits of tree canopy. Fuller analysis should be done.

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: Tom Noble
To: [PCD_MHAEIS](#)
Subject: Draft MHA-EIS
Date: Thursday, July 27, 2017 8:51:22 PM

I request that the deadline for comments be extended to at least August 28, 2017. The issue is complex; we need more time to study it and respond. In addition, City departments have not been responsive to our inquiries. Thank you
Thomas Noble

Nolan, Trenton

Trenton M. Nolan
(206) 841-4461

To the OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT / Attn. MHA EIS / PO Box 34019 / trenton@yaho.com
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.

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 slap in the
other hand and grab for a bid by Developers. Refuse
Emmet Watson's what is Reins Attorney here has been
tried in the Pike Place Market. The market would be a partments
now if MHA was in charge in the 90s

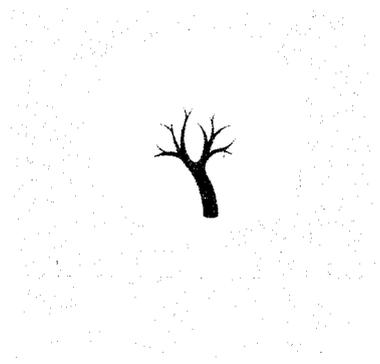
From: Elaine Nonneman
To: [PCD_MHAEIS](#)
Cc: [Brand, Jessecia](#); [Staley, Brennon](#); [Wentlandt, Geoffrey](#); [Herbold, Lisa](#); [O'Brien, Mike](#); [Johnson, Rob](#); [Gonzalez, Lorena](#); [Sawant, Kshama](#); [Harrell, Bruce](#); [Burgess, Tim](#); [Dobora.Juarez@seattle.gov](#); [Bagshaw, Sally](#)
Subject: Madison-Miller Community DEIS response
Date: Friday, August 04, 2017 10:22:55 AM
Attachments: [MHA DEIS Madison-Miller Response.pdf](#)
[MMRUV-MAP-07-31-17 final.pdf](#)

Dear HALA Team:

The Madison-Miller Park Community Group, representing the Madison-Miller Residential Urban Village, submits the attached documents as our official community response to the MHA DEIS issued on June 8, 2017. This body of comments reflects a deep study of the DEIS and rezoning alternatives presented, in relation to this community's guiding principles for development and specific knowledge of the density, diversity and affordability that exist in this RUV.

We thank you for giving these recommendations your fullest consideration.

Elaine Nonneman
Co-Chair
Madison-Miller Park Community Group
(206) 325-6762



August 3, 2017

Office of Planning and Community Development
Attn: MHA EIS
PO Box 34019
Seattle, WA 98124-4019

Dear HALA Team:

I am writing on behalf of the Madison-Miller Park Community group, which has been meeting regularly to address changes to this Residential Urban Village proposed in the HALA plan. Some 200 neighbors have participated in our meetings and/or communicated with city staff involved in the HALA Central District Open Houses of Jan 10 and May 16, and the Miller Park Neighborhood Community Workshop of Feb 28.

Also on May 16, based on neighbors' feedback, we submitted a statement of the community's guiding principles around development, and a map with our recommendations for alternative rezoning to the HALA team. To reiterate, we recognize that there is a crisis of affordable housing in Seattle and need for new solutions. We embrace the move toward increased density, and strongly believe that we can achieve the proposed 2035 density goals in a way that retains the character and diversity of our neighborhood. We want any housing development in this RUV to include affordable housing sited here.

Since release of the DEIS on June 8, we have undertaken an intensive study of that document and Alternatives 2 and 3, led by members of our neighborhood group who are professionals in fields of architecture and development. The enclosed "MHA Draft EIS Comments from the Madison-Miller Park Community Group" and "Alternative Proposal" map are products of that study and discussion in bi-weekly meetings of the neighborhood group. Both received its final approval in our Aug 2 meeting.

We ask that this document be shared with all city departments linked to the HALA process and members of the Seattle City Council.

Thank you.

Sincerely,

Handwritten signature of Elaine Nonneman.

Elaine Nonneman, Co-Chair
Madison-Miller Park Community Group
(206) 325-6762
enonneman@yahoo.com

Encl

August 2, 2017

TO: MHA.EIS@seattle.gov

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:

- **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,** (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 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 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 those 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 Eagon, 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:

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

- The designation of “High Opportunity” is flawed, and warrants further analysis:
 - MADISON-MILLER has no direct access to light rail within a quarter mile or 10 minute walk shed (see detailed comments below regarding transportation).
 - MMRUV 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:**
 - 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.
 - Further data gathering, analysis, and impact mitigation studies should be conducted to

accurately understand the scale and negative impacts of displacement.

- Existing low income and affordable housing listed above should be protected and designated for affordable housing development exclusively.
- 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 bus transfers 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 – this is an indicator that while we are well situated for local transit connections, faster, more direct options are still required.
- **Specific Request:**

Madison-Miller Urban Village should be categorized as “Low to moderate-Access to Opportunity” with appropriate density increases for a non-Hub urban village.

#3: Transportation: Traffic and parking impacts will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.

- 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.
- Meany Middle School will reopen in the fall of 2017 (with a significantly increased student population) which will have a significant impact on our current traffic and parking. The school has no designated parking lot for parents, volunteers, or staff. Buses will travel on our narrow streets. At lunch time, 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 require on street parking. Included in the MMRUV 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:**

- Further data gathering, analysis, and impact mitigation studies should be conducted to accurately understand the negative impacts to traffic, parking, and public safety.
- Within the MMRUV 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 approximately 1.6 acres of open space 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 indicates the entire acreage of Miller Park and Playfield as 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:**
 - 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.
 - 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, road ways, and garbage pick-up are already compromised due to their age and condition and our narrow streets.

- 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 adjacent to single family homes, 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:**
 - 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.
- Preservation Green Lab produced 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 existing setting 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. Even more if the HALA proposed changes to Design Review Process are implemented.
- 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:**
 - 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.
 - 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. They could 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:**
 - 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:

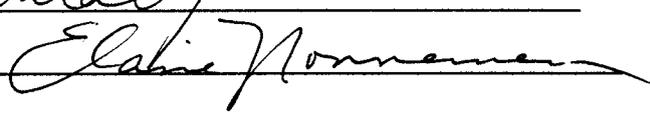
- The Madison Miller Residential Urban Village is and will continue to be highly impacted by a growing Seattle. Both Alternative’s 2 and 3 in the MHA DEIS will put at risk this functional, livable, and unique neighborhood;
- As a community we support Alternative 1, with the modifications stated previously, 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.

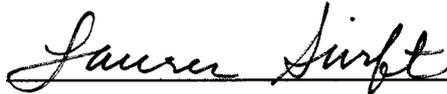
Madison-Miller Park Community Group

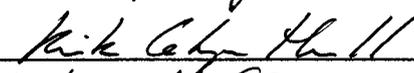
Co-Chairs:

Dara Ayres 

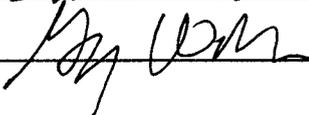
Elaine Nonneman 

DEIS Response:

Lauren Swift, Planner 

K. LeMoyne Harwell, Architect 

Debrah L. Walker, Architect 

Greg Walton, Developer 



MADISON - MILLER PARK COMMUNITY

ALTERNATE PROPOSAL

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

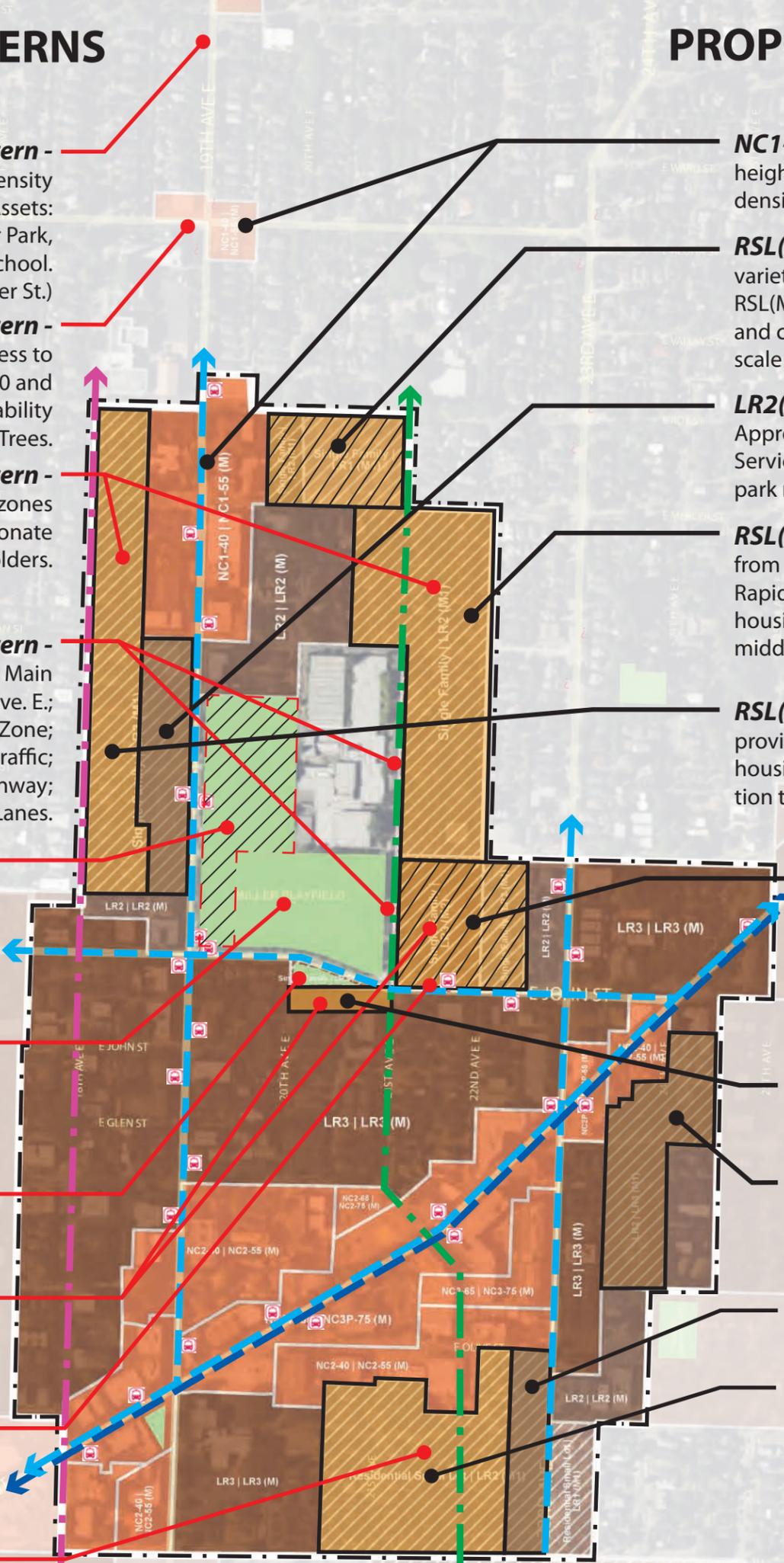
DEVELOPED BY MADISON-MILLER PARK COMMUNITY

SPECIFIC CONCERNS

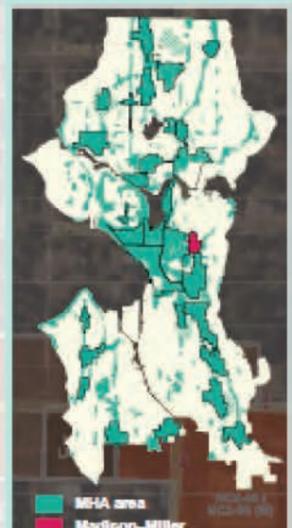
PROPOSED CHANGES

- 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**



<p>Name</p>	<p>Elaine Nonneman</p>
<p>Email address</p>	
<p>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.</p>	<p>I am a member of Madison-Miller Park Community Group, and I fully support its official 8-2-17 MHA EIS Comment document and Alternate Proposal Zoning Map and the Guiding Principles it submitted to HALA on 5-16-17.</p>
<p>Comment Form</p>	
<p>Description of the Proposed Action and Alternatives</p>	<p>1 I own two properties in the Madison-Miller RUV, a 111 yr-old house renovated many times and serviceable for years to come, with yard space that could allow a DADU, and an apartment house I built in 2012, with 3 of 5 units rented between 40-80% AMI, a full ADA unit, solar power and rainwater catchment systems. NONE of the bulky housing Seattle is permitting in this area has any significant sustainability value! At design review meetings they cite things like big windows as "green" features. I call for the No Action Alternative in the Madison-Miller RUV, modified to allow the MHA definitions of Low-rise zones, more ADU's and DADU's, and requiring developer impact fees to be collected city-wide to make the fund generation for affordable units more equitable. Affordable housing MUST remain in this RUV, and Seattle needs to raise its projection for affordable housing needed much higher than its current targets overall.</p>
<p>Housing and Socioeconomics</p>	<p>2 Madison-Miller is not a low displacement risk RUV. I have gone door-to-door in this community and see particularly the area between E Thomas and Madison from 23rd to 17th Ave E to have considerable hidden density, with most single houses accommodating multiple low-income households, many apartment and public housing buildings for seniors and people with disabilities, and considerable diversity across race, gender, age and ability. I noticed Alternative 2 introduced with the DEIS made some zoning improvements north of E Thomas, but not south of there.</p> <p>3 People I spoke with in that area feel this HALA process is overwhelming, too complex to understand, and that the city will do what it wants; their voices won't matter.</p> <p>4 If this mix of residents is displaced, the city must ensure affordable housing is SITED HERE with any new development.</p>
<p>Land Use</p>	<p>5 Please refer to the Alternate Proposal Map developed by the Madison-Miller Community on 8-2-17 for recommendations I support.</p>
	<p>6 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</p>

Aesthetics

transitions. On my block, 21st Ave E between E Thomas and E John, lots are very narrow with no alley, for some no on-site parking. In 4 homes, families have small children ranging 3-10 yo. The one distressed property has recently been purchased by a developer. Should that company wait for the MHA rezone, and should the city choose LR2 or LR3 zoning for this block, such a building would dwarf, shadow, and visually block neighboring houses. 40-50' heights would block sun for my solar roof through much of autumn to spring.

7 I purchased the system through an incentive program of Seattle and SCL. Construction would create severe traffic and parking impacts, and hazardous conditions for children. Smaller-scale construction in the LR1 range, ADU's and DADU's would not have these severe impacts.

Transportation

8 Madison-Miller RUV is not a high opportunity area in terms of transportation. Bus service (Rt. 43) was reduced here when Capitol Hill Light Rail opened. Everyone in this RUV has a long walk or bus ride to reach a light rail station. A survey our community conducted showed a high majority of residents need improved transit options.

9 They have to rely on cars, and street parking is often difficult to find. Our streets are used as park-and-rides for people commuting from elsewhere to downtown, for tenants in new apartment complexes without adequate parking, for construction workers, for staff of institutions like Kaiser on 15th Ave., for 4 schools in the RUV and the Miller Park regional sports field. The streets around Meany MS will again need to accommodate buses, staff, parent and visitor vehicles for up to 1,000 school enrollment. It has no parking on its campus. These streets are also designated as bike routes and pedestrian friendly. Impatient drivers from back ups on the narrowed 23rd Ave divert onto 21st and 22nd Ave at high speeds, with parked vehicles right up to corners blocking visibility of bikes and pedestrians.

Historic Resources

10 Madison-Miller RUV 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. Many of these houses were renovated by residents who bought them in the 80's - 90's and worked tirelessly to transform blighted conditions of the neighborhood into the livable and desirable place it is now. The city owes these people the consideration of input in the up-zoning plans!

Biological Resources

11 Air quality of the MMRUV, like all parts of the city, depends on abundant tree canopy. Development must include protections of healthy established trees and preservation of native species. Elimination of set backs on properties jeopardize these protections. That said, the city must also commit to maintenance of streets and sewer lines, cleaning up the heavy leaf fall each autumn, and pruning to prevent vehicle damage. Wildlife such as migratory birds and bees must have continued habitat and appropriate vegetation for nesting and feeding. Residents of the MMRUV accommodate this wildlife in many ways.

12 Miller Park is mislabeled "Open Space" for the MMRUV because the play field is most utilized by regional teams for league sports

Open Space & Recreation

and summer sports camps and is not available for public or neighborhood use during times when people can relax. The lights are only on in evenings when leagues are playing. This playfield will also be used as the sole recreational field for Meany Middle School starting this fall. If LR2 - LR3 building is zoned for the neighborhood, a great deal of open space of front yard setbacks that now provides green relief from noisy streets will also be eliminated. This neighborhood also has a large assisted living facility and public housing that serves people with disabilities and seniors. The park has been a relatively safe and pleasant walking place for them, but higher demand on it, plus high-scale development construction will eliminate what outdoor recreation they have.

Public Services & Utilities

13 Existing infrastructure, including storm sewers, sanitary sewers, road ways, and overloaded power lines are already compromised due to their age and condition and our narrow streets. The DEIS shows no commitment on the part of the city to upgrade these systems along with development upzones. Curb cuts at intersections are a waste of taxpayers' money if sewer drains are clogged with leaves causing deep pools of muck at the crosswalks. Consider people using wheelchairs and walkers, the blind, small children, etc. Multiply that impact by massive increases in impervious surfaces of high rise development structures that will send much more runoff into the streets and sewers. Our power lines are known to be overloaded now.

Air Quality & Green House Gas Emissions

14 There is nothing apparent in the DEIS that incentivizes new residents to not own cars. Without much better (frequency and connectivity) of transit services, people in the MMRUV will need and have cars. Seattle let a highly valued bike rental service leave 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

From: Bruce Nourish
To: [PCD_MHAEIS](#)
Subject: Comments on HALA DEIS
Date: Monday, July 17, 2017 9:19:51 PM

Greetings,

I write regarding the EIS for the HALA rezone. I am in favor of the greatest zoning density possible through this process. Restrictive zoning is the primary factor driving the cost of market-rate housing in this region. The more that we can loosen this stranglehold, the better. Allowing more people to live near jobs, entertainment, transit centers and shops is the single most important change that Seattle can make to foster social justice and fight climate change.

My primary concern with the HALA proposals is that some of the Mandatory Housing requirements may be uneconomical. In particular, an analysis by Sightline shows that MHA for townhouses may not work.

Bruce

Name	Terry Novak
Email address	tnovak@pcnw.org
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.	Photographic Center Northwest
Comment Form	
Land Use	<p>1 To Whom It May Concern:</p> <p>As the Associate Director of Photographic Center Northwest (PCNW) I am pleased to have the opportunity to offer comments to the City of Seattle's EIS plan for the First Hill-Capitol Hill neighborhood. I have been on staff at this institution for six years and involved for nearly eight years.</p> <p>PCNW is a nonprofit, publicly-accessible, accredited educational institution dedicated to photography. We serve a wide community through comprehensive classes and workshops; diverse exhibitions; robust public programming; and publicly-accessible facilities. We have been located at 900 12th Avenue and Marion Street for twenty years, and in Seattle for nearly thirty.</p> <p>PCNW's site is comprised of 4 real estate parcels underlying our building and parking lot on the corner of Marion and 12th Avenue, and between 12th and 13th Ave.</p> <p>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% 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.</p> <p>PCNW's staff of 12 part-time and full-time employees is 80% female (including both the executive director and associate director). 20% of our staff identify as Latino or mixed race. No-one earns more than \$50,000 a year. Most of our adjunct faculty, a talented co-hort of 20-30 working artists, also fall into this income bracket.</p> <p>If Seattle can designate NC2P-75 zoning for our site now, it will expedite our ability to act on future development opportunities</p>

that can include an affordable housing component. Thank you for your time and consideration.

Best Regards,

Terry Novak
Associate Director, Photographic Center Northwest

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?

From: Cindy O'Brien
To: [PCD_MHAEIS](#)
Subject: Draft EIS Madison Miller
Date: Monday, August 07, 2017 8:43:34 AM

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 stoic

Sincerely,

Cindy O'Brien
723 17th Ave E
Seattle WA 98112

From: Holy Oei
To: [PCD_MHAEIS](#)
Subject: EIS extension!
Date: Sunday, July 02, 2017 7:28:37 PM

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.

H. Oei

HOeiPhone

Name	Erin Okuno
Email address	
Comment Form	
Housing and Socioeconomics	<ol style="list-style-type: none"> 1 In looking at the plan the current number of affordable units is too low. I live and work in the Southeast. New developments going in with 96 units and only three are designated affordable housing is unacceptable. Developers should do better than 3% of their units being affordable. 2 I would rather have no development than inadequate and gentrifying development that pushes out people of color businesses and adds to the push-out of lower income families. 3 More parking should also be included into the buildings. While the Light Rail overlay will encourage transit use a few more spots will help families who need to drive, especially to encourage families with special needs or handicap access the neighborhood more accessibly.
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	

From: dmoleary@mindspring.com
To: [PCD_MHAEIS](#)
Subject: Subject: MHA Draft EIS Comments
Date: Monday, August 07, 2017 8:27:50 PM

To: MHA.EIS@seattle.gov
Subject: MHA Draft EIS Comments

I am writing in alignment with the Madison Miller Park Community Group regarding the Up Zoning of 18th, 19th, and 20th East Avenues in our neighborhood.

I don't know all of the technicalities but I can well imagine the impact of 5 story buildings on this quiet single family neighborhood.

Maybe 5 stories is ok for 19th but even now there are no buildings higher than 4 stories other than at Madison. I have lived in the neighborhood for 52 years and at our 345 17th East home for 48 years.

Raising of the height to 5 stories on 18th and 20th is truly an ASSAULT on the residential character of those streets North of Thomas.

5 Story high buildings will reduce the neighborhood appeal of these streets. With each new building diminishing the neighborhood character ever more, driving families from the neighborhood.

5 Story buildings will overpower and over shadow the homes.

Street parking is near saturation now.

Further, any impact on sewers and utilities should be paid for by developers, not by residents.

I appose any height over 3 stories for 18th and 20th East - north of Thomas.

Dennis O'Leary
345 17th Ave East
Seattle WA 98112

From: dmoleary@mindspring.com
To: [PCD_MHAEIS](#)
Subject: Subject: MHA Draft EIS Comments Madison Miller zone
Date: Monday, August 07, 2017 10:55:32 PM

To: MHA.EIS@seattle.gov
Subject: MHA Draft EIS Comments

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.

I am a voter and tax -payer, I have lived on Capitol Hill since 1963 and in my current home on 17th ave east for 48 years.

Thank you for the opportunity to comment,
Roberta A O'Leary
345 17th Ave East
Seattle WA 98112

From: Alexandra Olins
To: [PCD_MHAEIS](#)
Cc: [Herbold, Lisa](#)
Subject: Morgan Junction HALA concerns
Date: Tuesday, August 01, 2017 3:19:55 PM

To whom it may concern:

My husband or I have attended a few of the HALA listening sessions or community meetings regarding our neighborhood, Morgan Junction in West Seattle. While I am certainly of the mind that Seattle has a severe affordable housing crisis, and know that increased density is part of the solution, I have some significant concerns about the path forward for HALA & how it would impact my neighborhood.

1. I don't see enough focus in the HALA plans on mitigating the impact of increased density on infrastructure, specifically transportation. According to HALA, Morgan Junction is a "transportation hub" perhaps because it is served by the C line, or the "Rapid Ride." However, the transportation hub that is supposedly Morgan Junction is no more than an intersection with three bus stops--hardly a transportation hub by any reasonable standard. Secondly, anyone who has ever ridden the Rapid Ride over the West Seattle bridge and onto 99 during rush hour knows that the commute is anything BUT rapid. It's a slog. My car commute across the West Seattle bridge to my job in South Seattle has increased from 20 minutes to 30 minutes in the last 3 years. That's a 100% increase. There is no car pool or van pool lane on the bridge. We have added thousands of units of new housing in West Seattle over the last four years, very little to none of it affordable, and the traffic and congestion in West Seattle is much, much worse than it was 4.5 years ago when we moved here. I can't even imagine what it will be like if hundreds more units are built in Morgan Junction alone. The bridge is not getting wider, and we are years away from light rail in West Seattle, and I cannot imagine what life will be like on our peninsula if all of these density plans go as planned. There simply is NOT room for so many people.
2. On the subject of infrastructure, it seems that the HALA plans include unreasonable assumptions about limited car ownership and do not plan for two car households. I live four blocks east of California Avenue, and it's getting harder and harder to find parking spaces in my neighborhood, and to navigate the narrow streets safely with cars parked up and down on both sides.
3. One more item on infrastructure planning: where are the plans, and commensurate funding, to build the new schools that will be needed to accommodate all of the new people--many of whom have, or will have school-aged kids--in Morgan Junction? Fairmont Park is already over-crowded, three years after re-opening, and Gatewood will soon be too. Before you allow the developers to come in, where does the planning & budgeting for the need for new schools stand? I never hear a peep about planning for more kids in SPS in conjunction with HALA, and that seems crazy.
4. Finally, and this comment does not make me a selfish homeowner (I work in social services, my husband works in a crisis clinic for the homeless) I think that the HALA plans for Morgan Junction significantly understate the impact on the character of the neighborhood. We have, and continue to see, a dizzying amount of building already going on in West Seattle. Every single time I drive around West Seattle I see new apartments or condos being built. The character of our community has already changed. Why wasn't more affordable housing part of the deals that have already been done for all the building that is already completed or underway? Where are the affordable units in the current projects? I disagree vehemently that the HALA plans will not have a drastic impact on our community. I have already seen drastic changes. Driving up the hill to my house is already like a game of chicken with other drivers. My commute has increased in time by 100%. Every single inch of California Avenue has new, modern-box apartments going up, where single family bungalows used to be. I would call the changes that I have witnessed in the last 4.5 years just that: DRASTIC.

Slow it down. Take time to consider infrastructure supports, transportation impacts, schools, water & sewer, and the character of neighborhoods & communities, which DO matter. Human beings can only take so much change. Please, slow it down and get it right.

Sincerely,

Alexandra Olins

From: Alizah Olivas
To: [PCD_MHAEIS](#)
Subject: HALA rezone proposal comment
Date: Sunday, August 06, 2017 11:00:40 PM
Attachments: [MHA Letter.pdf](#)

Please consider my comments.

Thank you

Alizah Olivas

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:

From: olson910@comcast.net
To: [PCD_MHAEIS](#); [Brand, Jessica](#); [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 6:41:30 PM

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.

We are also particularly concerned about street parking as we are already heavily impacted by living near St Joseph School and Church.

Best Regards,
John and Ellen Olson
910 18th Ave E
Seattle, WA 98112

Name	LEANNE OLSON
Email address	
Comment Form	
Housing and Socioeconomics	<ol style="list-style-type: none"> 1 Using MHA developer fees primarily for build new low-income housing in "less desirable" areas results in segregating lower income residents from the affluent classes in the city. That's bad public policy! Low income residents should be allowed to remain in their communities. Setting aside a few units in a new building does not accomplish this. The City should use MHA developer fees to purchase existing historic housing stock and make renovations to allow lower income tenants to remain in their neighborhoods. This would be a major step toward ensuring diverse and livable communities throughout the city.
Land Use	<ol style="list-style-type: none"> 2 If the legislation is not carefully drafted, it will result in extensive demolition of existing usable and lower cost historic housing stock in order to maximize profits by "building the envelope" in more "desirable" neighborhoods. 3 There are many large parcels in "less desirable" parts of Seattle that could absorb a good deal of this type of expansion. The city should incentivize construction in these areas over the already dense close-in neighborhoods. 4 Land use changes should also allow existing large single family residences to be converted into affordable multifamily housing. As with historic "backyard cottage" development, this type of conversion was successfully done in previous periods of rapid growth in in city's history.
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?	

Name	Maryanne Osaki
Email address	
Comment Form	
Transportation	1 The Crown Hill area has no sidewalks and very little room to put sidewalks in with streets that flood. 20th Ave NW specifically has barely enough room for a single car, let alone sidewalks, street parking or the increased traffic that will come.
Public Services & Utilities	2 The Crown Hill area of expansion already has streets that flood. 20th Ave NW does not have fire hydrants and the street is so narrow that 1 service vehicle barely fits.
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)	

Name	bruce parker
Email address	bruce@microhousenw.com
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.	backyard cottage blog
Comment Form	
Description of the Proposed Action and Alternatives	<ol style="list-style-type: none"> 1 I am architect with 20 years of experience working in Seattle for and with for profit developers and homeowners. I support the Alternative 1 - No Action. Supply and demand is too simple a measure of housing costs. Based on census data, there is a much stronger correlation between increased density and size of a city to increased cost of living both as a total cost and as percentage of household income. 2 Alternative 2 and 3 rely on both zoning increases and MHA to increase allowable density beyond that allocated for under current comprehensive plan and disproportionately impact those earning less than AMI. The former increases land values and ownership costs for existing naturally occurring affordable housing. For investment properties, this ultimately results in increased rent or when the property can no longer remain profitable, redevelopment and displacement for the tenants. 3 This is true for residential tenants but also for small business located in older buildings which are more likely to be locally owned and to hire lower income workers.
Housing and Socioeconomics	<ol style="list-style-type: none"> 4 New construction produced at market prices, results in market rate rentals with pro formas that require a higher rate of rental income to offset financing, taxes and other expenses. Fully depreciated older properties can operate much less expensively. Using MHA to offset the higher cost of new construction may reduce costs for those that ultimately receive subsidized housing. However, the funds from MHA are increasing the cost of development and thereby increasing the costs for the tenants who are not subsidized by an equal amount. The city data suggests that the economic group earning between 30% and 80% of AMI have been and will be most affected by the increase in housing costs. This group, who consists of working poor, have increasingly been forced out of Seattle.
	<ol style="list-style-type: none"> 5 The city, and one would hope with the consent of the people who own the land, dictate land-use and can increase the value of the land by easing restrictions placed on it. Up-zoning properties as proposed under Alternatives 2 and 3 gives away this value and is a mistake. Incentive zoning is better and can be

expanded. It creates funding for affordable housing without necessarily increasing the underlying value of the land. Increased land value increases the cost of ownership for existing naturally occurring affordable housing. For investment properties, this ultimately results in increased rent or when the property can no longer remain profitable, redevelopment and displacement for the tenants.

Land Use

- 6 Single family zones contribute the character and future of our city and should be protected. In single family zones, particularly in those areas with proximity to access to good schools and amenities, single family residences are being demolished and replaced with larger homes, often times by speculative developers. These new houses sell for approximately three times the value of the existing older home. This trend is driven by lending practices and the market and ultimately makes it harder for those even earning AMI to own a home. Under Alternative 2 and 3 the city proposes increased in development in single family zones. This will accelerate this trend unless measures are taken to insure development occurs at a smaller scale and in a way that protects more modest homes from redevelopment. Backyard cottages and ADU's are part of this solution.
- 7 Cottage housing is another tested method that remains largely unrealized. A Seattle demonstration project for cottage housing in single family zones was ultimately discontinued. However, the housing built under the project demonstrate that it can provide attractive affordable housing in a scale with single family neighborhoods. As a building type it provides shared open space which is a real amenity for those with young children and also seniors. Two groups under increasing pressure to leave the city. Currently, cottage housing is allowed in multi-family zones but because they are competing with other forms of multi-family housing with higher allowable FARs they are seldom if ever built. The land-use code should be modified to limit the size of houses built by adding FAR limits in single family zones but also to allow for the division of land given the increased restrictions.

Public Services & Utilities

- 8 None of the alternatives address the need for increased funding for schools. Increasing development under Alternative 2 and 3 will exacerbate the problem. Existing schools are under extreme budget pressure to provide basic services. Additional services are increasingly funded by PTSA's which rely on the wealth of their communities leading to great disparities in resources and student performance throughout the city. Quality education is a key component to upward mobility.

Demographic Survey (optional)

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

Have you been or are

Name	Kristan Parks
Email address	
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.	PCNW
Comment Form	
Land Use	1 Requesting NC2P-75 zoning for all 4 parcels that comprise PCNW, so that if we able to develop our site, we can dedicate 10% the residential component to affordable housing.
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?	
How long have you resided in the city of Seattle? (total number of years)	
Do you work in Seattle?	
What is your employment status?	

Parrish, Rebecca

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.

Please specifically address how this would impact displacement of residents in building 3 smaller than 10 units as we have no other buildings that that many units so no nearby. Also South Park is a uniquely Platined community & the EIS you provided does not speak to

the less impacting our Platined neighborhood

8yr SP resident. Rebecca Parrish

1026 S. Sullivan St
Seattle WA 98108

From: Giulia Pasciuto
To: [PCD_MHAEIS](#)
Cc: [Assefa, Samuel](#)
Subject: Re: MHA DEIS comment letter
Date: Tuesday, August 08, 2017 8:56:14 AM
Attachments: [Sage Comment Letter on MHA DEIS.doc.pdf](#)

Good morning,

Please disregard the previous letter, which was sent in error. The most recent version is attached.

From: Giulia Pasciuto
Sent: Monday, August 7, 2017 11:20:27 PM
To: MHA.EIS@seattle.gov
Cc: Samuel.Assefa@seattle.gov
Subject: MHA DEIS comment letter

Please find attached Puget Sound Sage's comments on the Draft EIS for MHA. If you have any questions regarding these comments, please contact me at your convenience.

Thank you.

- Giulia

Giulia Pasciuto | Policy and Research Lead
She/her/hers pronouns
Puget Sound Sage
1032 S. Jackson St. Suite 203
Seattle, WA 98104
Phone: [206.568.5000](tel:206.568.5000) ext. 17





Seattle Office of Planning and Community Development

Seattle, WA 98104

August 7th, 2018

Dear Director Assefa,

Seattle 2035 (comprehensive plan update) plan represented a turning point in City planning policy. For the first time, the Comprehensive Plan directly addressed the race and social equity outcomes of land use policy by assessing the risk of displacement for communities across the City.

In parallel, the City adopted real inclusionary housing policy for the first time with mandatory Housing Affordability (MHA). MHA is an important tool for creating a broader anti-displacement policy toolkit that aligns City programs and practice with *Seattle 2035*.

The MHA DEIS should have built on the analysis embedded in *Seattle 2035* in ways that create clarity for policy makers about racial and social justice outcomes of MHA alternatives. Unfortunately, the DEIS provides 1) an inadequate assessment of displacement outcomes and 2) limited alternatives for policy makers to compare outcomes and make the best choice. Puget Sound Sage supports MHA policy as a critical tool to stem displacement and stabilize communities, but policy makers must make the best choice of MHA strategy based on adequate information.

As is, we believe the housing and socioeconomic analysis in DEIS is inadequate, and potentially problematic, and recommend significant revision.

Inadequate Racial Equity Analysis

We appreciate that OCPD undertook a major effort to assess the potential displacement outcomes of MHA policy as part of the DEIS process. Many previous City zoning proposals have lacked any analysis at all of how increased development capacity impacts communities of color and low-income households. We also appreciate how methodologically difficult it is to predict displacement outcomes, and understand that it is a work in progress.

In Sage's research (as well as in planning scholarship noted in an DEIS appendix), we find that displacement of low-income households and communities of color results from complex interactions between market and public policy factors. As such, the DEIS's primary focus on household income as a predictor of displacement misses key determinants of who gets displaced and how. Although the DEIS recognizes this in intent, the methods employed to predict create only a partial picture that is inadequate for the task of alternative comparison.

At the very least, "cultural displacement" and institutionalized racism in the housing market must be incorporated in some way. For low-income households, communities of color, immigrants and refugees, social cohesion plays a much bigger role in location decisions than for others. This includes location of cultural anchors, such community service providers, cultural gathering spaces, culturally relevant businesses, and religious institutions. Disruption of social cohesion exacerbates displacement of communities in beyond economic factors. For example, if community-serving businesses are forced out by increases in commercial rent, this will have an impact regardless of residential rents. The DEIS acknowledges these factors, but does not attempt to address them directly.

Also, understanding current displacement patterns and assessing future impacts require a combination of economic and racial demographics, including immigrant status. Relying on income as the main indicator for displacement strains the credibility of the analysis. Race matters more than just who is poor, but for how people of color, immigrants and refugees face additional barriers to funding stability in the housing market. Recent renter's rights policies reflect City intent to address these barriers, so it is curious why the DEIS does not reflect analysis of institutional racism as a contributing factor. We realize it's hard, given available data, but, at the same time, inadequate to simply not try at all. At the very least, the DEIS should acknowledge that it creates tremendous uncertainty in its findings.

Inadequate Analysis

The DEIS alternative analysis concludes that Alternative 2 and 3, (implementation of MHA), will decrease displacement outcomes compared to Alternative 1 (do nothing). This conclusion is based on two premises:

1. More market-rate housing production under Alternatives 2 and 3 will relieve overall housing pressure by providing higher-income households more alternatives, and
2. MHA requirements, combined with additional development capacity, will result in thousands more low-income units.

Holding aside missing race and social cohesion factors, this overall conclusion ignores the effect of the rising speculative land value on displacement. That is, as zoning capacity expands at urban villages, land values will go up from because development and redevelopment will become profitable (a result of building more units on the same amount of land). Increased land value from expanded zoning capacity will have a direct effect on underdeveloped property that becomes feasible for denser development, as well as a ripple effect on surrounding built property. Simple examples of a negative outcome from rising land values is the increase in property tax for seniors on fixed incomes and non-profit developers being priced out of land acquisition. To some degree, the DEIS acknowledges that rising property values will create some economic displacement, but leaves this critical effect mostly unexplored.

So, the ultimate question regarding MHA is this: will the increased production of low-income units offset displacement pressures created by increased zoning capacity, especially in high-risk areas? This includes the combined effects of physical, indirect and cultural displacement.

In the end, the DEIS answer is too simplistic to be useful in deciding between MHA alternatives. For example, public investment in light rail has already pushed up land values out of reach for many low-income housing developers and low-income households near the stations. Will further increases in zoning-fueled land value create a tipping point such that the MHA created units are inadequate to stabilize a high-risk community? For example, will the projected 49 additional units in Rainier Beach, under Alternative 2, really offset a neighborhood-wide escalation of rents resulting from the upzone – especially if low-income housing developers are priced out of the market?

Another example is the factor of time. Given that MHA created funds are available only after a market rate project is built, will non-profit developers be able to afford the land when money is available?

The selection of alternatives in the DEIS reveals its inadequate scope. On page 1.6, the DEIS states: “The intent is to test whether and how the policy objective of growing equitably is achieved by directing more growth to areas of opportunity, and moderating growth in areas at high risk of displacement, as well as measuring other potential environmental impacts associated with the amount and location of additional growth.” This test does seem to not assess which alternative creates less displacement, but where the impacts will occur.

As a result, the DEIS later seems to conclude that while Alternatives 2 and 3 are better than Alternative 1, net displacement of low-income households from Seattle would likely be a wash. On page 3.66, the DEIS states, “However, new growth also has the potential to attract new amenities that could increase housing demand and potentially increase economic displacement in some neighborhoods, even while reducing economic displacement pressures in the city as a whole.”

Why not craft alternatives that attempt to achieve the least amount of overall displacement, particularly of communities of color? We believe that the inadequate racial equity analysis framework resulted in a reduced scope of study.

We urge the City to revise the DEIS to include the following:

- Race and immigrant status as indicators and predictors of displacement impact.
- More robust analysis of economic displacement and addition of cultural displacement indicators.
- Centering community stabilization strategies in the analysis, e.g., zoning choices that maximize locally-driven development and ownership of land. This will reveal the impact of upzones on local capacity for purchasing and developing land.
- Local impacts in addition to city-wide.

Create More Alternatives

As noted above, the draft EIS analysis does not assess the full spectrum of growth strategies, specifically the failure to a nuanced analysis of areas with high displacement risk leads to a false choice between alternative 2 and alternative 3.

We urge the City to create at least one more alternative that both recognizes the need to increase access to opportunity in historically exclusive neighborhoods and supports equitable development in neighborhoods with historic disinvestment and high displacement risk.

The 4th alternative should:

- Maximize growth and production of affordable units in areas with low-displacement risk and high access to opportunity. We need to expand the urban village growth boundaries in exclusive single family neighborhoods and increase density, to maximize on site affordable housing performance and MHA contributions. The 3rd alternative already calls for this.
- Maximize equitable development/ development without displacement in areas of high displacement risk. The 3rd alternative proposes restricting development in areas with high displacement risk. While this approach might protect against direct displacement due to demolition, it certainly will not protect against economic displacement of residents and cultural institutions. We propose studying an alternative that expands the urban village boundaries in areas with high displacement risk, while maintaining modest height increases (RSL or a range of LR zones) in the newly rezoned area. This modest rezone must be paired with strategies to keep low-income renters and homeowners in place and invest in the preservation of community businesses and institutions.
- Any alternative will require robust community engagement and equitable development investments and anti-displacement projects that are driven by the communities most impacted by the rezone—low income households and people of color. Any alternative will require deep, permanent investments in the Equitable Development Implementation Fund to resource communities to be organized and develop projects and strategies to ensure that development benefits existing residents.

Perce, Celeste

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.

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 road impacts this movement requires have not been provided EIS in multiple languages for residents.

thanks!
Celeste Perce
South Park Resident

From: Brook Peters
To: [PCD_MHAEIS](#)
Subject: Extension for comment period
Date: Wednesday, June 28, 2017 3:29:31 PM

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.

Brook Peters
Resident of West Seattle

Sent from my iPhone

From: Brook Peters
To: [PCD_MHAEIS](#)
Subject: Did you intend for us to even. E able to provide feedback?
Date: Friday, June 30, 2017 1:10:45 PM

It seems to me that this is not a well thought out draft. It also leaves us no time to comment...but I am pretty sure that is how you wanted it. No real comments/neighborhood input was wanted, was it? It was already a done deal.

Asking West Seattle to shoulder such a large proportion of the upzone when infrastructure is not in place is absolutely crazy.

I will be at the polls in the fall to make sure that every vote goes against the people that made this happen. It is unfortunate that you are selling this to the public as "affordable" housing...this is not a solution.

Brook Peters
Resident of West Seattle
And owner of one affordable rental house

Sent from my iPhone

From: Brook Peters
To: [PCD_MHAEIS](#)
Subject: Please extend the review period for the draft HALA-EIS until September 1-2017.
Date: Thursday, July 27, 2017 6:09:52 PM

I need more time to review the Environmental Impact Statement.

Please allow until September 1,2017.

Brook Peters
Resident in West Seattle
503-943-0708
Sent from my iPhone

From: Kay and Larry Keil-Peters
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: Sunday, August 06, 2017 2:20:19 PM

As a resident of Capitol Hill for 53 years I have seen many physical and cultural changes in the area, the most obvious being the loss of diversification. I don't want to see this continue, which is why I am writing to try to influence the changes expected with this upzoning. Now we have fewer people of color, artists, lower income folks, even families, due to the high cost of living here. A 'neighborhood' should not be homogeneous but reflect the full range of society. If it is not, we all become more isolated and insulated from others and from ourselves.

I would like to see that developers must include, ON SITE, units available to ALL income levels and not be allowed to pay money to have lower income units built somewhere else. (Where is this 'else' anyway? Will one area of, or outside of, the city become poverty central?) I think we have lost sight of what is good for us as a society. The kind of housing we develop could address this issue but we have to begin now if we are to make a difference. What we are currently doing in this city is just another iteration of gentrification.

Thanks for your attention,
Kay Peters

From: zappakyle@comcast.net
To: [PCD_MHAEIS](#)
Cc: [kp.co.inc@comcast.net](#)
Subject: MHA Draft EIS Comments
Date: Monday, August 07, 2017 10:29:58 AM

Dear HALA Team,

My name is Kyle Peterson and I've lived with my spouse in our home in the Madison-Miller neighborhood for 30 years. We moved into this single family neighborhood that needed people to take pride in their property and community and we have worked very hard to improve our home over the years. We feel the proposal to re-zone the majority of the Miller neighborhood as LR2 is going to radically change what is an architecturally a cohesive neighborhood, and will shoe-horn in inappropriate multi-unit buildings that will not fit the character and utility of the neighborhood. What is particularly galling is that by adopting the LR2 upzone, it appears that the people who have chosen not to improve their properties will be rewarded by selling out to developers who will replace them with boxed multi-unit buildings that WILL NOT add affordable housing in our neighborhood. The developers will pay into a fund for affordable housing elsewhere.

I recognize that Seattle is exploding with growth and that changes have to be made. Dropping a bomb into a great neighborhood is not the way to do it. I support more nuanced development plans for the Miller neighborhood. For example our street, 21st Ave E, has a newly established Greenway for community walking and biking, and has two schools, the soon to be reopened and re-energized Meany Middle School, and Holy Names. And yet the LR2 rezone is being proposed. What about the true environmental impact of this? What about the increased traffic and parking, with the traffic infrastructure being unchanged?

Again, being realistic about the future, I support appropriate change for our neighborhood, so therefore I fully endorse the draft proposals put forth by the people who actually live in the neighborhood:

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.

Sincerely, Kyle Peterson

From: girlpeterson@comcast.net
To: [PCD_MHAEIS](#)
Subject: MHA Draft EIS Comments
Date: Monday, August 07, 2017 5:10:05 PM

Dear HALA,

I live in the Madison-Miller Park Community on 21st Ave E. My husband and I have lived in this area for ~30 years and have raised our 2 children here. We have worked hard to turn our little "fixer upper" house into a home. Now we are being told it is up for re-zoning and you are suggesting units of up to 40 feet tall be placed on our street.

Our street has been designated a Green way and the city spent all sorts of time and money putting in speed bumps and stop signs. Has your department spoken to the transportation department? Why would you up-zone a Green way which is intended for families, walkers, and bikers with 40 foot high density units which create more traffic/parking needs/etc? It seems contradictory.

Also, the up-zoning suggestions from HALA would result in dramatic changes to the character of the neighborhood, and would result in loss of character and livability.

Of course Seattle has a housing crisis and we need to increase density. Both of my children are now in their 20's and will need affordable housing. But in our particular area there are many commercial streets nearby which would better support increased height and more density without taking away any character and livability of the residential streets nearby. I would support allowing more ADU's (Accessory Dwelling Unit) and DADU's, (Detached Accessory Dwelling Unit) in our neighborhood which could better meet both density and affordability goals without sacrificing the character of this community.

Also, years ago the banks of Seattle drew a red line at Roy street, where they refused to provide housing loans to any people of color who wanted to purchase a home north of Roy street. Your "up-zoning" recommendations stop - north of Roy street. This strongly suggests inequity for who in Seattle has to give up their single family zoned neighborhood - and who is not affected at all by this housing crisis.

I 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. They have taken much time and thought to approach this situation reasonably.

Thank you for considering my comments.

-Shawn Peterson

girlpeterson@comcast.net

From: Erik Pihl
To: [PCD_MHAEIS](#)
Subject: MHA EIS Comments
Date: Tuesday, August 08, 2017 12:34:00 AM

7 August 2017

Office of Planning and Community Development
Attn: MHA EIS
PO Box 34019
Seattle, WA 98124-4019
via MHA.EIS@seattle.gov

I have lived in the Fremont neighborhood for 15 years and own a home in East Fremont, between Aurora and Stone Way and Bridge Way N and the Ship Canal. Members of my family have lived in the Wallingford and Fremont neighborhoods for more than 100 years. I am very familiar with the history and growth of both neighborhoods and their context in Seattle.

One of the character defining features of Seattle is its individual and unique neighborhoods. Seattle's neighborhood planning and engagement of its citizens in that process was exemplary in the past. Citizens came together to take on issues of growth, zoning/rezoning and infrastructure; they owned the process and helped to identify opportunities for growth that complemented their neighborhoods. However, over the past fifteen years this democratic engagement of Seattle's citizens has steadily and regressively declined to a point where the current HALA legislation was developed in a seemingly smoke-filled backroom lacking participation from the largest constituencies impacted by HALA—Seattle residents and homeowners. Only one resident was invited to participate and represent the needs and interest of these large constituencies (that participant, and others on the committee did not even sign off on the final HALA proposal.) The process was failed and favored special interests who stand to gain financially from HALA's implementation.

I am not a NIMBYist, growth is happening and we need to embrace it and plan for it. To have ownership and support for this citizens who live and work in Seattle and encounter impacts on a daily basis must have a voice at the table. These citizens can provide meaningful data that can improve planning and outcomes. However, concerned citizens who question aspects of HALA and MHA are labeled NIMBYists and their opinions are immediately dismissed or discounted. Without community ownership, any solution(s) for growth will eventually fail or if not, will fall short of achieving growth while maintaining the quality of life for which all of us choose to live in Seattle.

I am a member of the Fremont Neighborhood Council's Board and have attended numerous meetings throughout the city so that I could develop an informed position on HALA and MHA. I also have the unique perspective of living in an area of Fremont that was upzoned to L-3 when the urban villages were created. I have been able to observe impacts first hand which provide an excellent reference point as I make comments and observations about the proposed upzone of East Fremont/West Wallingford.

New Development in my immediate neighborhood has been constant for the past fifteen years. While new construction has provided much needed additional housing and there has been some activation of the street with new restaurants and retail, infrastructure has not kept pace with the increase in density. There is limited open space particularly in the urban village.

Fremont is a walk-able, liveable, neighborhood, yet pedestrians and cyclists cannot safely navigate the neighborhood amongst the increased vehicular travel—there is a lack of green way, bike trails and crossing facilities nor have reduced vehicular speed limits been implemented in our neighborhood. Vehicles travel at a high rates of speed and do not stop for pedestrians at intersections (marked or unmarked) as required by state law. Even our children cannot safely walk to school (the intersection of 40th and Stone Way has been a site of multiple pedestrian and vehicular collisions.)

Transit maps show numerous routes through Fremont, yet what they don't show is that almost every bus during the morning and evening commute are standing room only--many buses do not even stop because they lack sufficient room to accommodate any more passengers. Transit riders therefore cannot count on Metro as a reliable means of getting to work or home during commuting hours.

Infrastructure must be considered as growth in housing is contemplated. We are already substantially behind in development of open space, safe bike and pedestrian routes and transit. These basic infrastructure needs must be addressed in any current or future urban planning, including the proposed upzones contemplated in HALA—before any changes in zoning are implemented—infrastructure must be in place first and then density can be increased. To-date impacts from development have been born by tax payers and not developers. Impact fees must be a meaningful part of any growth plan moving forward.

SDOT working in partnership with the Fremont Neighborhood Council implemented a road diet on Stone Way and an RPZ with metered parking in Fremont's commercial core within the last decade. These solutions worked well at first but have not kept pace with the significant growth of multi-family housing in Fremont. While it is a noble idea to get people out of their cars and using alternative modes of transportation, Seattle lacks a transportation system that can make that possible. Therefore large developments that do not include parking, or those who build it but charge high fees to their residents for its use, have made the RPZ system in Fremont no longer effective—the ratio of RPZ permits to available parking spaces in Fremont was at 150% two years ago. Enforcement is effective but highly limited due to available PEOs north of the ship canal and as such has limited impact in solving parking challenges.

I have heard the argument by City staff that HALA and MHA will increase affordable housing, yet in my own observation of my L-3 zone, I see the reverse happening. A retired couple lived two doors down from me, one of the last of three remaining early 20th century single family homes on my double-length block; they lived in the neighborhood for over 30 years. Three years ago, they sold their home for \$420,000 (below market) and moved out of the city due to their perceived declining quality of life and the impact of active construction and new construction all around them. Their property was purchased by a predatory developer who is active in this neighborhood and targets older citizens. The home was demolished and three condos were put in its place. Increased density, yes. Increased affordability, no. Each of the three units sold for between \$800,000 and \$900,000. To afford a home at this price level requires an income of \$300,000. The median household income in Fremont was \$90,000 in 2015.

The median rent in Fremont was \$1,300 in 2015, yet the average rent in new multi family construction in Fremont is closer to \$2,500 (or more) causing rent to be 1/3 of the \$90,000 median household income. Increased housing from this urban village upzone whether for rent or purchase is not making the neighborhood more affordable or diverse, in fact it is gentrifying Fremont and causing displacement of those residents who are on fixed income or at an income level below the neighborhood's median household income.

Based on first hand experience over the past fifteen years, the proposed upzone in East Fremont/West Wallingford will not accomplish the lofty goals of HALA to make Seattle more liveable or affordable. Any thoughts of further growth must be put on the shelf until they can be adequately and thoughtfully planned. I am sure this applies to other neighborhoods in the City as well. I can only offer my first hand experiences for my own neighborhood. Moreover HALA's blanket approach to urban planning is flawed. Each neighborhood is unique—as I said in the beginning of this communication, that is a character defining feature of our city, and a quality that makes our neighborhoods liveable and enjoyable—urban planning must be done at a neighborhood by neighborhood level; one size, or in this case, one solution does not fit all.

MHA must be linked to the neighborhood from which the funds/fees are derived. It is the only way to ensure that we can maintain the rich fabric of our individual neighborhoods and the residents that currently live in them. Transferring MHA funds to other neighborhoods only leads to gentrification and the opposite in areas of intensive low to moderate income housing. Diversity of all kinds and types makes our neighborhoods stronger and better; HALA and the MHA as proposed will only make some neighborhoods less diverse and will ultimately change those neighborhoods' identities and character as a result.

HALA and MHA have not been adequately or thoughtfully developed. These plans need more input and ownership from the citizens of Seattle. If they do not achieve their basic goals of livability and affordability, they will not offset the significant impacts of new construction and growth. They will cause a further erosion of quality of life in our

city and region, particularly if transportation capacity, pedestrian and cyclist safety, and open space infrastructure are not addressed first.

Sincerely,

Erik G. Pihl
Seattle, WA 98103

From: Glenn Pittenger
To: [PCD_MHAEIS](#)
Subject: Feedback for HALA EIS
Date: Thursday, July 06, 2017 7:07:40 PM

To Whom it May Concern,

Following is my general feedback to HALA and the HALA EIS.

1. Why are we making such small changes to the urban villages and to present Single Family Zones? To actually make meaningful impacts to housing supply, in all categories of housing (detached houses, triplexes, small lot cottages, townhouses, etc), and to improve affordability across the entire spectrum of income groups, we need far more land rezoned than you are proposing here. You should consider rezoning at a minimum 50% of the current SF5000 areas to something that allows RSL and LR1 and reduces the minimum lot size for SF lots to 3,000 square feet.

This link shows work I produced this year, that contains one proposal for making 50% of our current SF zones more dense :

<http://i.imgur.com/di8IJvR.jpg>

The text in the graphic includes the methodology used for selecting the areas, which includes measure such as: how much of the block has sidewalks, nearness to large parks, nearness to frequent transit, nearness to walkable amenities such as restaurants or stores (anything inspected by king county).

2. For every urban village, and urban village expansion you are considering, you should require sidewalks. I know for a fact that some of the current urban villages or residential urban villages don't have sidewalks. Sidewalks are key to making a dense area walkable, and if you expect people to walk to LINK stations, you should give them sidewalks to do so. Sidewalks cost money, I understand that, but if you allowed more density and building, then you'll have a higher tax base, and will collect more taxes, which will help cover the cost of sidewalks.

3. Even if you decide to limit major changes to only urban village and UV expansion areas, you should consider adjusting the minimum lot size in SF5000 zones to 3,200 or 3,000 square feet. In this day when Seattle has an urgent housing crisis, it makes no sense, at all, for Seattle to continue using a lot size minimum that was set 60 years ago, in 1957. Seattle has many thousands of lots in the 3,000 to 3,500 SqFt size range that were built on many decades ago, which establishes this as part of Seattle's character. Now we should legalize that established character, in at least ALL of the SF5000 areas. DPD code already established guidelines for lots sized 3,200 SqFt, lets put those to use in all of the current SF5000 areas.

Here is a graphic I produced this year on this very topic :

<http://i.imgur.com/Zhuo16H.jpg>

I'm a 3rd generation Seattle resident, and have owned my detached SF home for 24 years. It is time for us to embrace the density that our city needs.

Thank you for your time,

Glenn Pittenger
8267 4th Ave NE
Seattle, WA 98115

(c) 206.228.6564

Name	Marjolijn Plomp
Email address	
Comment Form	
Land Use	<ol style="list-style-type: none"> <li data-bbox="336 443 1445 936">1 I have a comment on the up-zones accompanying Mayor Murray’s MHA in areas currently designated as Urban Centers and Urban Villages. I quote the Seattle Times (Friday June 9: City studies impact of neighborhood zoning changes): “The up-zones would lead to more teardown, but each demolished home would be replaced with 14 new homes, on average”. Are you aware that currently within these Urban Villages developers are allowed to build without providing parking? Replacing one home with a similar home is no problem, as there would still be sufficient street parking. Replacing one home with 14 homes will certainly create a problem. Even with the discouragement of cars, many will still bring one for which there now is no space. The up-zoning changes in Urban Villages will only make sense if the current parking code 23.54.15 in the Land Use Code for Urban Villages is also changed, requiring sufficient parking for all residential unit, including Apodments. <li data-bbox="336 981 1445 1081">2 Choking often narrow streets with parked cars, causing safety hazards for the fire- and police departments, having residents trek out further and further for their car, is not the answer. <li data-bbox="336 1126 1445 1339">3 The often suggested frequent transportation solution is and will remain highly insufficient. Most neighborhoods in the Urban Villages will never get the kind of public transportation that gets you to the grocery store with a stroller and a dog, or gets you out of the city to enjoy the great outdoors, or gets care-givers to those people who are aging in place. Car use will not be entirely eliminated anytime soon.
Transportation	<p data-bbox="240 1473 456 1541">(repeats comments 1-3)</p> <p data-bbox="539 1473 1437 2112">I have a comment on the up-zones accompanying Mayor Murray’s MHA in areas currently designated as Urban Centers and Urban Villages. I quote the Seattle Times (Friday June 9: City studies impact of neighborhood zoning changes): “The up-zones would lead to more teardown, but each demolished home would be replaced with 14 new homes, on average”. Are you aware that currently within these Urban Villages developers are allowed to build without providing parking? Replacing one home with a similar home is no problem, as there would still be sufficient street parking. Replacing one home with 14 homes will certainly create a problem. Even with the discouragement of cars, many will still bring one for which there now is no space. The up-zoning changes in Urban Villages will only make sense if the current parking code 23.54.15 in the Land Use Code for Urban Villages is also changed, requiring sufficient parking for all residential unit, including Apodments. Choking often narrow streets with parked cars, causing safety hazards for the fire- and police</p>

departments, having residents trek out further and further for their car, is not the answer. The often suggested frequent transportation solution is and will remain highly insufficient. Most neighborhoods in the Urban Villages will never get the kind of public transportation that gets you to the grocery store with a stroller and a dog, or gets you out of the city to enjoy the great outdoors, or gets care-givers to those people who are aging in place. Car use will not be entirely eliminated anytime soon.

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?

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)

From: Pollet, Rep. Gerry
To: [PCD_MHAEIS](#)
Cc: [Nyland, Larry L](#); jill.geary@seattleschools.org; [Johnson, Rob](#); [Juarez, Debora](mailto:juarez_debora@seattleschools.org); steve.nielsen@seattleschools.org; flip.herndon@seattleschools.org; schoolboard@seattleschools.org; ["clifford@ctassociates.org"](mailto:clifford@ctassociates.org); [Frockt, Sen. David](#); [Pedersen, Sen. Jamie](#); [Chopp, Speaker Frank](#); [Macri, Rep. Nicole](#); [Valdez, Rep. Javier](#); [Tarleton, Rep. Gael](#); [Frame, Rep. Noel](#); [Carlyle, Sen. Reuven](#); [Ryu, Rep. Cindy](#); [Kagi, Rep. Ruth](#); [Chase, Sen. Maralyn](#); [Santos, Rep. Sharon Tomiko](#); [Hasegawa, Sen. Bob](#); [Fitzgibbon, Rep. Joe](#); [Cody, Rep. Eileen](#); [Nelson, Sen. Sharon](#); [Pettigrew, Rep. Eric](#); [Bergquist, Rep. Steve](#); [Saldaña, Sen. Rebecca](#); [Hudgins, Rep. Zack](#); [Weiss, Angie](#)
Subject: Comments DEIS Mandatory Housing plan fails to consider school capacity
Date: Saturday, July 22, 2017 4:29:18 PM
Attachments: [MHALA fails to consider school capacity. Pollet comments on DEIS 7-17.docx](#)

Please consider and respond to the attached comments on the Draft EIS on the Mandatory Housing Affordability and Upzone changes, which focus on the City's total failure to consider the lack of school capacity in its planning and proposed upzone decisions.

I strongly encourage Seattle Public Schools to comment on the failure of the Draft EIS and planning process to consider the lack of capacity in Seattle Public Schools in the communities for which significant upzones and population increases are proposed. I am urging that the City live up to repeated promises to consider school capacity, and actively helping to add capacity for our children, in the attached comments on the [MHA Draft Environmental Impact Statement \(EIS\)](#).

City officials have touted that the Draft EIS considers "educational opportunity" as a criteria for where upzones and expansion of urban village boundaries would occur, implying that school capacity was a consideration. However, **a detailed review of the DEIS found that it fails to consider school capacity in any fashion.** The proposal would exacerbate our unconstitutional overcrowding without proposing any efforts to collaborate with Seattle Public Schools to mitigate and accommodate the increased student populations which would be driven by the proposals. I am particularly concerned that the City makes no commitment to serve, and failed to show any concern for, the population increase driven by investment of MHALA funds in lower income housing with a higher needs student population in the areas of the City which already lack school capacity.

My comments urge the City to adopt an ordinance requiring consideration of school capacity in planning decisions as well as revising the Draft EIS to include consideration and mitigation plans.

Gerry

Representative Gerry Pollet

46th District (Northeast and North Seattle, Lake Forest Park and Kenmore)

(360)786-7886 Olympia

(206)729-3234 District Office

Gerry.pollet@leg.wa.gov

Subscribe to my email list [here](#)!

Because I know how hard it is to go to Olympia to meet your legislators during the Session, I am committed to holding weekly drop-in, in-district discussion times at different locations around the district on most Saturday mornings from 10-12. After Session, I switch to monthly meetings and welcome setting up advance appointments. Check where upcoming Traveling Town Halls will be on my home page:

<http://housedemocrats.wa.gov/legislators/Gerry-Pollet/>, or email or FB.

Comments of Representative Gerry Pollet (46h District) on the Mandatory Housing / Upzone Draft EIS from the City of Seattle

The City of Seattle has again failed to consider the lack of school capacity to serve our children who suffer from unconstitutionally overcrowded school buildings across Seattle as it proposes to increase density and upzone neighborhoods under HALA and its “grand bargain.”

Rather than considering whether there is any space in public schools to accommodate the massive increase in population proposed by upzones, the City considered standardized test scores as a positive indicator of “educational opportunity” justifying upzones. This continues a sad history of the City of Seattle making decisions on education by relying on standardized testing (even while Seattle Public Schools has joined with most parents in decrying forced use of high stakes tests that diminish instructional time).

I urge the City to withdraw and reissue a new draft EIS on the “Grand Bargain” of Upzoning Neighborhoods to increase density in exchange for developers paying mandatory housing payments or setting aside 5-7% of units as affordable, referred to as MHALA – Mandatory Housing Affordability and Land Use – after properly considering school capacity and educational opportunity and adopting commitments to mitigate the impacts of the proposals. Those commitments should be made in collaboration with Seattle Public Schools.

Across the City, particularly in the extremely overcrowded Northeast, North, Northwest and West Seattle areas, the City claims that extra-large areas of upzones and increased populations are warranted by a designation in the draft EIS referred to as “educational opportunity.”

That sounds, at first blush, that there is school capacity for the increase in children proposed. Indeed, City Council Members and advocates for HALA’s grand bargain are touting it as such.

The reality is that the Draft EIS and the City did NOT consider school capacity in proposing these upzones and massive population increases. The Seattle School District’s capacity analyses – which were readily available, but ignored by the City – show the areas proposed for massive population increases have the most overcrowded schools. The schools in these areas have NO capacity for additional students; much less to meet the constitutional duty to lower class sizes (which requires physical space) or to provide the significant increase in space per student for higher need students with limited English proficiency or special education and tutoring needs.

As a parent advocate and as a legislator, I have worked for over a decade to get the City of Seattle to consider school capacity in its planning and zoning decisions; and, more recently, to have the City join in lobbying for state funding for new school capacity in Seattle to help reduce our severe overcrowding. The City has failed to step up – despite repeated promises.

If the City was serious about working with Seattle Schools and educational opportunity, the HALA proposal would include plans for using city owned properties and other opportunities to provide much-needed land for new schools to accommodate the students who will need schools

from the nearly 100,000 housing unit increase which the HALA plan proposes for Seattle in twenty years (of which the HALA goal is just 6,000 “affordable” units).

For example, the Roosevelt and Ravenna neighborhood urban villages are proposed for additional expansions due to claimed “educational opportunities,” coupled with low “displacement” potential (also, Lake City, Ballard, Crown Hill...). But, as every parent in these neighborhoods knows, there is not space for another student to be crammed into any of the nearby schools; and, the City has already informed the school district that it would violate codes to cram more portables onto local elementary school lots. These upzones would be on top of the massive upzone for the adjacent U District which the City boasts will add thousands of new families. Again, the City refused to consider where those children would go to school - although there is no school in the U District and the nearby schools are all over capacity. The plan could easily consider the City providing the Green Lake Reservoir site for school capacity... but, it fails to even consider that obvious mitigation (mitigation is legally required).

The MHA Draft EIS’ claims of high “educational opportunity” justifying additional upzones are based on test scores, not access to school capacity! (See Tables 4 and 5, “Access to Opportunity Index Indicators,” Appendix A, excerpted below). The Draft EIS fails to consider school capacity to handle to proposed growth in family population from the proposed upzones. The Draft EIS designates numerous areas as “high educational opportunity,” resulting in proposing greater density and increased population of school age children, despite the fact that there is NO current physical capacity in schools serving those areas.

The Draft EIS and HALA plan also fail to consider access to programs serving Limited English Proficiency or high special needs students in Seattle Schools and lack of capacity to serve such students, which require significantly increased physical capacity in a school (physical capacity and instructional capacity do not exist in many of the proposed upzone areas). This failure is shocking given the claimed emphasis on equity and desire to add lower income housing serving higher need students in these areas. The proposal is to increase housing supported with MHALA funds in these areas – which will dramatically increase high need student populations. Thus, the DEIS and mitigation should include – as part of the claimed consideration of educational opportunities and equity – commitments to provide the extra physical space, instructional and wrap-around services capacity needed for high need students in these areas.

The other “educational opportunity” criteria is claimed to be access to **higher education opportunities**. This excited me when I first heard that it was being considered. But, as with access to a public school classroom, this is not what it is being sold as. It is not access to community college job / workplace certification or AA degree programs. It is not access to an affordable four-year degree program while living close to a public institution. It is not whether low income students and first generation students have access to college financial aid and mentoring preparatory programs, or to a free community college program. Instead, all that the Draft EIS considers for this touted “access to educational opportunity” is whether the increase housing density is within a 30 minutes transit ride to the UW/Montlake light rail station.

Do City officials know that most of our Seattle high school graduates can’t go to the UW? It wouldn’t have been hard to examine if the City will commit to providing support for students who

have never had a parent or guardian attend college to have assistance with college applications and financial aid; or, which communities have such mentoring programs or will be served by a free thirteenth year program for free attendance for a student's first year at South Seattle College. What about the reality that, unlike most major metropolitan areas, we do not have a commuter based bachelors' degree granting institution in Seattle?

In sum:

- Do not upzone any area where schools are overcrowded unless the City is committing to specific steps to mitigate and increase school capacity as part of its HALA plan;
- Withdraw the draft MHA EIS and revise it to include commitments by the City to add school capacity for every proposed upzone area where the schools are currently, or projected to be, overcrowded in order to meet our students' constitutional rights to attend schools with lower class sizes and which are not overcrowded;
- The Council should pass an ordinance committing to consider school capacity in all planning decisions;
- Replace test scores as a criteria for educational opportunity with data on school class sizes and capacity in school buildings, including capacity to serve higher need children, such as bilingual education and special education programs;
- Have meaningful criteria for access to opportunities of higher education, rather than claiming that access by light rail to the UW is equivalent to "educational opportunity." Educational opportunity only exists if education is affordable and programs are available. Recognize that, for UW students and classified staff, there is a great need for lower cost housing nearby and great benefit from affordable workforce family and student housing in the U District. Recognize that encouraging students to move south on light rail lines will displace low income families in other neighborhoods.

Submitted by Representative Gerry Pollet

Gerry.pollet@leg.wa.gov

7750 17th Ave NE

Seattle, WA 98115

Below are the relevant portions of Tables 4 and 5, "Access to Opportunity Index Indicators"; MHA Draft EIS Appendix A, "Growth and Equity" pages 16 and 27 (pdf), explaining that the educational indicators used in support of proposing higher density for specific areas are:

- standardized test scores and HS graduation rates, rather than whether there is space in a public school for children; and,
- transit access to the UW, rather than meaningful access to the opportunities of higher education from community colleges or bachelor degree programs for the vast majority of students who either can't afford to attend the UW or who simply can't get in:

Indicator Description Source

1 School performance

Elementary school math and reading proficiency scores by attendance area

2 Middle school math and reading proficiency scores by attendance area

3 Graduation rate High school graduation rate by attendance area

(data for 1 and 2 from Washington Office of Superintendent of Public Instruction (OSPI))

4 Access to college or university

Location within 30 minutes of a college or university by transit (bus and/or light rail)

“Access to college or university

This indicator now incorporates University Link service, which increases the area in certain parts of the city that can access a college or university within 30 minutes by transit.” Table 5.

City of Seattle

King County Metro GTFS

Sound Transit

5 Proximity to a library Location within quarter-mile walking distance to a library City of Seattle

6 Proximity to employment Number of (by census tract centroid) jobs accessible in 30 minutes by transit

Puget Sound Regional Council 2013 Covered Employment Estimates

7 Property appreciation Change in median home value 2000–2013

2000 Census 2009-2013 American Community Survey

8 Proximity to transit

Number of unique transit trips within 0.25-mile walking distance

King County Metro General Transit Feed Specification (GTFS)

9 Proximity to current or future Link light rail and streetcar

Location near a current and future light rail stations and streetcar stops, measured by walking distance

Sound Transit

City of Seattle

10 Proximity to a community center

Location near a City-owned and City-operated community center, measured by walking distance

(Proximity determined by the size of the park. Larger parks have larger service areas.)

City of Seattle

11 Proximity to a park Location near a public open space, measured by as-the crow-

flies distance City of Seattle

12 Sidewalk completeness

Percentage of block faces within a quarter mile missing a sidewalk (excluding those SDOT has not identified should be improved)

City of Seattle

13 Proximity to a health care facility

Location near a health care facility, measured by walking distance

King County Public Health

(2010)

14 Proximity to a location that sells produce

Location near a supermarket, produce stand, or farmers market, measured by walking distance

ReferenceUSA

From: Veena Prasad
To: [PCD_MHAEIS](#)
Subject: Feedback from resident to West Seattle Junction Neighborhood EIS
Date: Monday, August 07, 2017 10:58:39 AM
Attachments: [EIS comments from resident_VP.doc](#)

Hi,

I'm concerned with the developments in West Seattle and the heavy-handed approach the City is taking to increase housing units in the name of providing low income housing. Proposed plans will increase displacement in the long run while adding environmental stress to areas that already have inadequate infrastructure.

Please see attached comments.

A concerned resident,

Veena Prasad

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:
- 1) *32nd Ave SW is already a crowded street. Often, there is no parking remaining and it can be a challenge to find a spot to pull into in order to allow another car to pass. The options proposed all increase traffic on this street, making it difficult to leave / get home but also making the street increasingly unsafe for the many young children walking / playing. This increased traffic and reduced parking means emergency vehicles will not have sufficient access into/out of the street.*
 - 2) *The City has proposed these changes in the name of low-income housing. Your plans don't show any studies of how many will be displaced as a result of increased housing prices / rental units. What is the plan for those just above the cut off for low-income? What about families with kids that need more space than a 400 sqft apartment? ____*

Name: __Veena Prasad_____

Address: _____

Name C W Pratt

Email address

Comment Form

Description of the Proposed Action and Alternatives

- 1 I don't normally respond to land-use proposals, since I'd like to think that the city has experts to analyze the information and make sound decisions. But this time, I am moved to make my voice heard as a property-tax paying citizen who wants to see Seattle preserve existing neighborhoods while allowing sensible growth.
- 2 I'd like to see more affordable housing, especially close to transit nodes, and I'd like to see better integration of low- and high-income options.
- 3 I believe that this can be done only if the city relies more on input from the people who know how this can be done--that is, the people who actually live in these neighborhoods and walk those streets daily.
- 4 The current Urban Village plans just don't make sense, especially the one in the Roosevelt area. Did the City's "experts" actually spend any time on the sidewalks to see where blighted properties are currently located? To see where sub-standard housing should be compassionately replaced? To see where viable family-oriented houses currently stand?
- 5 What could possibly be gained by allowing the rezoning of entire blocks of owner-occupied, well-maintained single-family homes so that they could be replaced with ugly micro-apartments that would not be able to accommodate the displaced families, let alone provide affordable housing for newcomers (not all of whom are young, single, and car-less)? You can't rely just on a map to make plans---this might look good on paper but not in reality.
- 6 Did anyone ask us about OUR ideas for preserving the trees and the architecture of our neighborhood while making room for more people?
- 7 The DEIS seems to use a one-size-fits-all approach that ignores the unique types of housing, existing economic and social diversity, and other factors that are obvious to residents.
- 8 Please spend a tiny bit of effort to examine each Urban Village as a separate entity. A single approach cannot possibly meet everyone's needs.
- 9 One small suggestion: any new development that destroys existing property must compensate by creating new housing opportunities WITHIN THAT SAME NEIGHBORHOOD. Don't allow ugly development to destroy a vibrant neighborhood and then pay for it (or get away with it!) by funding housing in another far-away part of the city. Please let us control our growth where we live! Thank you for listening.

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.
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- 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: Brian Presser
Address: 4832 42nd Ave SW _____

Name

Patrick Prociv, home owner, West Seattl

Email address

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.

west Seattle home owner since 1977

Comment Form

- 1 West Seattle has been repeatedly up-zoned and parcel re-zoned. The wonderful promises and "wishes" presented by developers to make their cases have usually proven to be only "blown smoke" or pipe dreams. The losers for all these failures are the indigenous people of the neighborhoods, not the developers and their real estate agents. The city employees that make the final analysis and go-no-go decisions are not affected by their own mistakes and in competencies, but again the established residences of the affected neighborhoods become their victims. To families and single-dwelling homeowners in our neighborhoods, particularly West Seattle, the term "UPZONE" means this:
- 2 (1)Residents on minimal incomes get kicked out of affordable housing in a location they can only afford in order to keep their housing and job commute costs within low fixed income budgets.
- 3 (2)Developers are going to dump more money into the real estate than any local resident could ever dream of in order to make a comfortable profit- thereby inflating the land values in the vision of city hall, and crushing all the property owners around their development project with perpetually inflated taxes. The neighbors of the developer's project become the VICTIMS of the developer, thanks to city hall's tax structure.
- 4 (3) The new "multi-use" buildings are NOT an enhancement to the neighborhood. The developer ensures his profit by making sure that ALL the spaces in the building demand a higher per-square-foot price than ever before in the neighborhood. So those city-required street-level "retail spaces" are priced too high for any intelligent business to afford. This means those street level storefronts stay an empty blight in the new building, or are sales-pitched to unwitting low-income businesses who will trap themselves into a business failure while trying to pay the developer his high rent, or a shyster franchise pushes un-proven investors into opening in the space and paying the high rents to the developer until they go broke also. Bottom line: The retail rents are greedily inflated and set up to victimize small businesses.

Description of the Proposed Action and Alternatives

- 5 (4) Those so-called "affordable housing" units in the developer's building are a lie. The units are priced lower than the inflated rents of the rest of the building, but are way ABOVE any rent prices that the truly needy can afford-thus the "affordable" means affordable to low middle income renters, but not to those who the sales pitch to city planning were told.
- 6 (5) The developer inflated the tax structures of the entire neighborhood, so with his own high rental prices required for him to have his comfortable profit, all rental properties must increase their rents just to pay the city's higher imposed taxes. This results in low and middle income renters being priced out of their meager homes-again the VICTIMS of the developers and the city's tax structure.
- 7 (6) The city planners have been sold a pipe dream by the developers that is backed up by well wishing (emphasis on wishing) idealists: "apartment and condo dwellers won't have cars." Absolutely a snow-job by those pushing their own private agendas onto city hall. Sooner or later almost all apartment or condo units will have at least ONE CAR assigned to it. 100% parking for living and retail units must be RECOGNIZED and made law. For those units that may not need to park a vehicle in their allotted space, that space could EASILY be rented out, thereby further relieving street congestion.
- 8 (7) Taller buildings means that single family houses immediately nearby now have NO PRIVACY anymore, as towers of people now can stare into their formerly private windows and yards.
- 9 (8) Towers of more people means more trash on the streets and more street damage (over-sized and over-weight METRO buses), and the city services are not increased to handle the developer's imposed load.
- 10 (9) Finally, there is a warning for us to heed: we the people have NO RECOURSE against the lack of integrity and greed of the developer, and against the blundering of city hall and city planners and lobbying groups when a proposed developer's plan goes contrary to the "SALES PITCH". A smart developer fills his new building up ONE TIME any way he can, then sells it to another investment group to clear his own profit. As things crumble for that investment group, they become the unwitting victims as does the whole neighborhood become even more victimized by the towers of greed the city has inflicted onto good neighborhoods. PIPE-DREAMS AND GOOD INTENTIONS? C'MON CITY! WAKE UP AND GET REAL! Patrick Proxiv, asking for competency and accountability in each (taxpayer paid) city employee.

Name	Dwight Proteau
Email address	
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.	N/A
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 In general, I am in support of greater density and MHA overall. My concern is not a "Not in My Backyard" (NIMBY) response as I believe that my overall neighborhood, Crown Hill, can support it. However, extending the western edge to include 20th Ave NW (from 85th NW to 89th NW) poses demonstrably limiting concerns. 20th Ave NW is NOT a full city street; it is approximately 12' wide without sidewalks and no room for expansion. Parking is already at a premium. Additional density, especially with MHA guidelines indicating no parking requirements for new development within an Urban Village, will only exacerbate the problem.</p>
Transportation	<p>2 The sidewalk Priority Investment Network (PIN) is a key concern that I have related to the proposed Crown Hill Urban Village Upzone (both Alt 2 & 3) including 20th Ave NW between 85th NW and 89th NW. 20th Ave NW in this area is NOT a full street. At only (approx.) 12' width, we do not have room to install sidewalks which likely is why not included on the included Exhibit 3.4 - 2.</p> <p>Extending the Upzone westward to include 20th Ave NW allowing greater density, would be difficult to support. Parking would be compromised. Safety would be an (increased) issue for the many small children who play there. And, there is not sufficient room to install sidewalks which, to my understanding, are requirements to any new developments within the MHA guidelines.</p>
Public Services & Utilities	<p>3 20th Ave NW, between 85th NW and 89th NW currently does NOT have a fire hydrant. Additionally, since 20th Ave NW is not a full street in this location, access for emergency vehicles is challenged. Adding additional density becomes and increased safety concern.</p>
Demographic Survey (optional)	
Have you been or are you at risk of being displaced from your	

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 11:02:31 AM

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, businesses, resources, and growth needs. This DEIS fails to recognize and examine these differences.

Each up-zoned Urban Village and Surrounding Area should 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.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 2
Date: Sunday, August 06, 2017 11:20:19 AM

Urban Villages (UV) “Study Areas” were not studied.

The DEIS states that the Study Area consists of many Urban Villages (UVs) slated for up-zoning and redevelopment as part of MHA. However, the DEIS pointedly ignores the Study Area impacts and mitigations, instead averaging all changes and impacts over the entire Seattle land mass. This approach directly opposes and ignores one of the City’s own stated objectives, to “*distribute the benefits and burdens of growth equitably*”.

The City of Seattle has failed to examine the direct impact of MHA-driven changes within each UV. Even when this omission is mentioned in DEIS Section 1.6 (Significant Areas of Controversy), the City declines to address the impacts of massive up-zones within the UVs.

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 3
Date: Sunday, August 06, 2017 11:22:04 AM

Details of UV-specific impacts and mitigations were ignored.

The DEIS describes UVs and their up-zone plans at a “micro” level of detail, but it does not address any UV-specific negative impacts or mitigations. Instead, the DEIS uses a “macro” lens which average negative impacts over the whole city (thus minimize any negative effects), or it ignores them altogether. No assessments of individual UV Study Area-specific resources or impacts were conducted, and no mention was made of any UV Study Area-specific mitigations. Detailed UV-specific impacts that were ignored in the DEIS include:

- Increased impacts on local transportation modes (bus, bicycle, light rail, pedestrian, or car) within the UVs.
- Loss of UV-specific local cultural resources such as immigrant- and minority-owned small businesses, non-profit community aid organizations, and places of worship.
- Increased school crowding at local elementary, middle, and high schools in or adjacent to each UV. Enrollment in Seattle Public Schools is largely dictated by family address. SPS is already dangerously overcrowded. Dramatically increasing the number of school-age children in a given UV Study Area will increase school crowding in neighborhood schools.
- Degradation of UV resident pedestrian safety, air quality, and noise pollution as demolition, loss of road and sidewalk rights-of-way, and intensified construction activities within the UV.
- Decreased access to local recreational amenities, such as parks, playgrounds, open space, and Community Centers.
- Increased stress on local infrastructure such as water, electrical service, sewage treatment, combined sewer outfall, and surface water management.
- Loss of tree canopy, green spaces, and parks within each UV.
- Increased risk for local heat islands and landslides as the tree canopy disappears and porous surfaces are paved over. Because each UV Study Area contains unique topology and geology, each UV Study Area must be individually assessed for these risks.

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 4
Date: Sunday, August 06, 2017 11:27:57 AM

Impacts on families with school-age children were not addressed.

Displacing or crowding out families from UV Study Area schools guarantees that those families will need to enroll their children in new schools and childcare providers, and/or travel greater distances to get to school and/or childcare. The DEIS does not address these UV-specific negative impacts on school-age children and their families, nor does it suggest a mechanism to align and mitigate the effects of increased neighborhood density on school enrollments and childcare facilities. No mention is made in MHA or DEIS of the requirement for maintaining family-scale housing, especially within the up-zoned UVs.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 5
Date: Sunday, August 06, 2017 11:29:38 AM

The DEIS does not adequately address the many negative impacts on UV residents, institutions, and environments.

The DEIS implements a city-wide “averaging”, which minimizes or simply ignores the heavy negative impacts to each UV Study Area and its residents. The City appears to regard the UV Study Areas as ‘sacrificial zones’, assuming any negative impacts suffered by the UVs will be forgotten or minimized by the wider benefits enjoyed by the city as a whole. UV residents, businesses, and institutions are expected to either move away from their neighborhood or put up with the increased noise, environmental insults, pollution, safety risks, and disruption.

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 6
Date: Sunday, August 06, 2017 11:42:59 AM

No alternatives to MHA were analyzed:

Nowhere in DEIS Section 1.4 (Alternatives) does the City propose any alternatives to Alternative 2 and Alternative 3, which are both just slight variations on the MHA proposal.

In addition, although Alternative 1 is described as “No Action”; it would actually result in significant increases in housing and density. The DEIS did not adequately describe (graphically or analytically) Alternative 1.

True MHA alternative options could include step-wise (NOT all-at-once) approaches to up-zoning properties along urban transportation corridors and rapid transit lines, or distributing the density increases more equitably and uniformly throughout the City. These alternative approaches would better serve to more equitably distribute the benefits and impacts of increased density.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 7
Date: Sunday, August 06, 2017 11:45:41 AM

The DEIS did not address economic displacement of UV Study Area residents spurred by MHA-imposed land tax rate increases.

The vast majority (>90%) of MHA-driven new development will be market-rate housing. New multifamily housing development in the up-zoned UV "Study Areas" will cause land values and development pressures to increase in those areas. In particular, up-zoned land will be subjected to higher tax rates as local development accelerates. This phenomenon has the potential to drive out middle- and low-income residents, as well as elderly residents, who cannot afford to stay in their own neighborhoods because the land under their homes has risen in value and tax rate as a result of MHA. The DEIS does not address the impact of MHA-driven tax rate increases.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 8
Date: Sunday, August 06, 2017 11:48:05 AM

Funding option alternatives to MHA were not explored.

MHA relies on increased market-rate development in specifically up-zoned “Study Areas” (UVs) to 1) increase the number of affordable housing units in the UVs, and/or 2) raise revenue for City-managed affordable housing construction.

UV-focused up-zoning and increased market-rate development are used by the City to pay for affordable housing. The City did not explore other means, besides UV-focused intense up-zoning and market-rate development, by which funding for the production of affordable housing could be built. For instance, employer head taxes or real estate excise taxes could help facilitate the construction of new affordable housing. These funding options would more equitably spread the impact and costs for new affordable housing, as compared to MHA, which focuses impacts on current UV residents.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 9
Date: Sunday, August 06, 2017 11:52:01 AM

The impact of displacement, and delayed development of affordable housing, was not addressed.

The DEIS did not address the time lag between the demolition of existing housing in the UV “Study Areas” and the eventual production of affordable housing units. There is currently a critical shortage of affordable housing units in Seattle. It is therefore a given that current UV residents (of all income levels) who are displaced by market-rate housing construction will be left with no options for affordable housing until such time as more affordable housing stock is built. Market rate developers who avail themselves of the *payment in lieu* option will exacerbate this negative impact of MHA.

In addition, the DEIS implies that the City may build affordable housing in affected UV “Study Areas”, but there is no guarantee of a replacement of low- and middle-income housing stocks within the up-zoned UVs. This is a double-whammy to the affected UVs: loss of affordable and middle-income housing, with no guarantee that it will be replaced by the City of Seattle affordable housing development.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 10
Date: Sunday, August 06, 2017 11:54:28 AM

UV Study Area-specific displacement of businesses and cultural institutions was not addressed.

Each UV is unique in its history, built and natural environments, resident experience and ethnic makeup, and cultural and civic institutions. The DEIS did not directly assess the loss of these unique local businesses and cultural institutions within each targeted UV Study Area. No inventory of UV Study Area-specific business, non-profits, and cultural institutions was conducted, and no safeguards or mitigations were proposed in order to avoid the displacement of these UV Study Area-specific local resources.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 11
Date: Sunday, August 06, 2017 11:55:55 AM

Spill-over effects onto adjacent communities were not analyzed.

Density increases in any given up-zoned UV Study Area will have multiple negative impacts on adjacent communities. Community resources such as roads, schools, transit systems, public open spaces, and Community Centers will receive much heavier usage. As a direct result of UV Study Area density increase, adjacent neighborhoods will experience more heavy construction vehicle traffic, crowded buses and public transit, decreased access to parks and open space, more cut-through traffic through adjacent streets, and impaired bicycle and pedestrian safety.

None of these negative impacts on adjacent communities are addressed in the DEIS. An integrated analysis is required that addresses transportation infrastructure, schools, and environmental impacts, on neighborhoods within and between the up-zoned UV Study Areas.

Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 12
Date: Sunday, August 06, 2017 12:00:19 PM

Links between new commercial construction and subsequent housing demand were not assessed.

The DEIS focused on residential up-zoning and development; it ignored the heavy effect of increased commercial development (and the associated increase in employment demand) on housing demand. Software and other well-financed companies continue to develop large commercial buildings in Seattle, but the DEIS (and MHA) did not assess the impact of increased commercial construction on residential demand and housing prices. The massive increase in commercial construction was completely ignored in the DEIS.

Until the explicit relationship between commercial building permits, job creation, and housing demand is established, residential growth planning such as MHA will continue to be retroactive reactive guesswork. The DEIS needs to assess the direct negative impacts of massive commercial construction on the built and natural infrastructure of Seattle, as well as on Seattle's residents and resources.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 13
Date: Sunday, August 06, 2017 12:05:32 PM

The DEIS fails to address the requirement for integrated planning and concurrent infrastructure improvements.

The DEIS describes MHA-driven residential growth in the UV Study Areas, but it ignores the need for city-wide planning for concurrent infrastructural upgrades, as required by the Growth Management Act. In particular, the DEIS fails to consider the need for integrated city-wide infrastructure network upgrades to schools, transportation, fire and police services, and public utilities, as residential growth occurs. These infrastructure networks are interrelated, and must be considered holistically.

For example: poor traffic infrastructure impairs the delivery of fire and police services; increased traffic impairs the safety of pedestrians, especially school children walking to neighborhood schools; increased impervious surfaces exacerbated surface water runoff, which impairs the performance and capacity of sewage treatment plants.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 14
Date: Sunday, August 06, 2017 12:07:35 PM

No alternatives were considered in the event of a successful court challenge to MHA.

MHA and the Grand Bargain were conceived and finalized with input from a small group of developers; however, developers outside that small group have threatened to sue the City of Seattle over MHA. The EIS does not mention what happens if MHA's legality is challenged and overturned. The DEIS should address the UV Study Area-specific impacts if MHA Alternative 2 or Alternative 3 is overturned after UV up-zoning and massive re-development begins.

Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 15
Date: Sunday, August 06, 2017 12:16:25 PM

No alternative funding source for required concurrent infrastructure was considered or analyzed.

The DEIS should have considered alternatives that levy impact fees on developers to fund transportation and other infrastructure improvements. In addition, the DEIS should have considered infrastructural requirements and impacts in both the up-zoned UV neighborhoods, and those neighborhoods where current zoned capacity is under-utilized.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 16
Date: Sunday, August 06, 2017 12:22:22 PM

Alternative sources of property for affordable housing development were not considered in the DEIS.

An alternative that should have been included in the DEIS is based on the development of publicly owned land for affordable housing. This alternative approach would have more equitably distributed the impacts and benefits of increased density (as opposed to extracting affordable housing units from the up-zoning of current UV properties). This alternative source would also result in more (and more permanent) units of affordable housing than those proposed in MHA.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 17
Date: Sunday, August 06, 2017 12:26:27 PM

The esthetics and graphical representations within the DEIS are inadequate.

Graphic presentations within the DEIS should have included those that accurately render existing condition, so that the effect of 30 foot RSL production in those areas can be accurately visualized. This is particularly true in neighborhoods more distant from downtown Seattle, where houses rarely attain heights of 30 feet.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 18
Date: Sunday, August 06, 2017 12:43:35 PM

The DEIS does not provide adequate specifics with regard to MHA impacts on esthetics.

The DEIS statement “The proposal includes a variety of features and development regulation amendments to minimize these impacts” (section 1.23) should require specific identification of those esthetic features and development regulation amendments. Without these details, mitigations will be minimized or ignored.

In particular, the DEIS should have included a more detailed assessment of the impact of MHA on views and shading, which requires the collection and presentation of specific view analysis in the UV-specific affected Study Areas. The DEIS should have also included an analysis of shadow effects, from UV-specific up-zones on increased density and heights, on the existing landscape.

In addition, the absence of RSL design standards requiring a pitched roof, graphical renderings within the DEIS should assume current development practice, which is a flat roof with an added roof deck.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 19
Date: Sunday, August 06, 2017 12:55:00 PM

The DEIS fails to adequately describe Design Review as a mitigation to MHA-imposed increased in density

The DEIS fails to clearly indicate the current Design Review thresholds under which projects are exempt from Design Review. In addition, the City of Seattle is currently proposing Design Review revisions under which smaller low-density multi-family development projects would be exempt from Design Review. The DEIS need to expand on these thresholds and better explain whether and how these regulations could be mitigations to the affected areas.

In addition, the DEIS needs to be more specific about proposed changes to the Design Review regulations. This lack of DEIS detail, and the proposal to exempt small projects from Design Review, is particularly significant in the UV Study Areas to be up-zoned from Single Family Residential to low rise categories. Exempting small infill projects from design review means that Design Review is no mitigation at all.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 20
Date: Sunday, August 06, 2017 1:32:40 PM

DEIS descriptions of Parking Impacts and Mitigations lack adequate detail and rigor, especially with respect to individual UV study Areas.

Section 3.213 of the DEIS states that MHA is expected to create a significant adverse impact on parking, but it fails to adequately describe either the specific impacts or the mitigations. In particular, the first three “travel demand and parking strategies” enumerated on page 3.239 have the potential to make the impact on parking worse, not better.

As an example, the referenced transit pass strategy is wishful thinking on the part of the DEIS authors; there is no documented evidence to prove that people with improved access to transit, especially citizens living in market-rate housing, will abandon car ownership if offered transit passes.

As another example, the DEIS lists Residential Parking Zone (RPZ) program changes as a potential mitigation. However, the DEIS does not state what those RPZ changes would be, nor how they would serve to mitigate parking impact, especially in those UV Study Areas where street parking is already at or near capacity.

The parking Impacts and mitigations need to be detailed for each individual UV Study Area, especially those UVs where street parking is already extremely limited.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 21
Date: Sunday, August 06, 2017 1:43:02 PM

The DEIS fails to adequately describe the current and proposed tree canopies, and the resulting MHA impacts, within and outside of the UV Study Areas

The EIS fails to catalog the tree canopy within the UV Study Areas. In particular, the DEIS fails to distinguish between evergreen and deciduous trees, when considering negative MHA impacts on tree canopy, and the resulting ripple effects from those impacts.

Evergreen trees are more effective overall at intercepting rain, especially more during Seattle's rainy season when deciduous trees lack leaves. This mitigating feature of evergreen tree canopy is especially important when assessing the potential to mitigate rainwater runoff and the risk of landslides, which will be different inside and outside individual UV Study Areas.

In addition, most evergreen trees are located on land currently zoned to Single Family Residential, because the city does not encourage planting evergreen trees as street trees. Therefore, the MHA zoning changes proposed in Alternatives 2 and 3 will have a significantly increased negative impact on the proportion of evergreen trees in the canopy, and thus the risk of increased surface water runoff, sewage treatment impacts, and landslide risks.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 22
Date: Sunday, August 06, 2017 2:00:33 PM

The DEIS fails to adequately analyze the risks, and any potential mitigations, to Parks and Open Space.

The DEIS identified a need for 40 additional acres of open space in Alternative 1, and 434 acres in Alternatives 2 and 3, but it fails to adequately describe any potential mitigations that could supply the needed acreage. In addition, the DEIS also fails to adequately detail all the significant unavoidable impacts in the up-zoned UV Study Areas (such as the decrease in open space in yards and empty lots as properties are developed with increased density, decreased access to current parks and open space, and decreased air and water quality).

The DEIS briefly mentions the potential to impose developer impact fees to help pay for mitigations, but impact fees have been resisted by the City of Seattle for many year (despite the fact that they have been adopted in every other major city in the state). The DEIS also fails to describe how transfer of development rights can be effectively used for the purpose of acquiring new park and open space lands.

The DEIS needs to identify other incentive programs to potentially mitigate and pay for impacts on parks and open space, especially as they might be implemented in specifically affected up-zoned UV Study Areas.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 23
Date: Sunday, August 06, 2017 2:08:54 PM

The DEIS fails to adequately analyze the need for concurrent sewer system upgrades as MHA-driven density increases, inside and outside the affected UV Study Areas.

On page 3.302 the DEIS notes that “Some parts of the City are served by sewers that are less than 12-inch diameter. These areas are likely at or near their capacity and downstream pipes from new development would have to be upgraded to a minimum 12-inch diameter.” These affected areas need be identified in the EIS, along with the extent of the downstream pipes in question, and the level of mitigation required inside and outside each affected UV Study Area.

- Nicole Provost

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 25
Date: Sunday, August 06, 2017 8:36:17 PM

The Community Engagement efforts, cited City of Seattle in the DEIS Appendix, were inadequate and one-sided.

The community engagement events and tools used by the City of Seattle were clearly meant to minimize community input and opposition, and to promote the pro-MHA agenda. To cite one example, the City created HALA Focus Groups that were created using hand-picked HALA proponents, poorly run, and resistant to legitimate questions from Focus Group members. As a consequence, HALA Focus Group attendance quickly dwindled, and nothing was accomplished.

As another example, the City claims to have canvassed the Single Family zones “most impacted” in urban villages, leaving door hanger notices inviting residents to open houses. The distributed door hanger information did not contain a relevant UV map with proposed zoning changes, not did it make clear that the City was planning to eliminate Single Family zoning inside UVs. This was irresponsible, given the drastic changes that were being proposed in the UVs.

Finally, at neighborhood and city-wide engagement meetings, City personnel did not take notes, nor did they clearly commit public comments to a permanent record with fidelity. No alternatives to MHA were offered or entertained. Thus, the Community Engagement efforts by the City were self-serving, insufficient, and tone deaf.

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 26
Date: Sunday, August 06, 2017 9:33:55 PM

The Displacement Risk/Access to Opportunity matrix cited and used in the DEIS is unquantified, unsubstantiated, not statistically justified, and not predictive of “success”. The undocumented matrix calculations, and their focus on existing Urban Villages as the recipients of increased density, are not justified as the basis for UV zoning changes.

DEIS Appendix 2 cites the Displacement Risk/Access to Opportunity matrix calculation as a means of justifying zoning changes in specific UV Study Areas targeted for maximal density increases in Alternative 2 and Alternative 3. The basis for this matrix, however, is unquantified and unsubstantiated; it does not reflect proximal opportunities in nearby UV Study Areas, and it appears to be more focused on reversing the historic trends of neighborhood gentrification.

In particular, the matrix fails to take into account the fact that access to opportunities within an UV are complex and multi-factorial. The Appendix uses vague terms (“very good transit service”) and ignores many neighborhoods and regions that should be more justifiably slated for increased density (such as those within a 10 minute walk path to light rail stations, but which are not within the borders of a UV). Finally, the matrix uses obsolete 2008-2012 community data which were gathered during the most severe economic downturn since the Great Depression of the 1930’s. In short, this matrix is a poor foundation upon which to base drastic proposals for massive UV Study Area up-zones.

From: Nicole Provost
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment 27
Date: Sunday, August 06, 2017 9:55:31 PM

The DEIS does not adequately assess the air quality risks (increased airborne particulates, contaminants, and emissions) to residents as a result of increased building activity in the up-zoned UV Study Areas.

The DEIS should consider the impacts of ground-level air quality deterioration as construction activity ramps up in the affected UV Study Areas. These effects include, but are not limited to:

- Lead and asbestos released from demolished buildings
- NO_x-, hydrocarbon- and sulfur-containing combustion emissions from construction vehicles and equipment.
- Silica and other hazardous dust released from concrete-containing construction materials.

From: Jonathan Pullen
To: [PCD_MHAEIS](#)
Subject: rezoning of wallingford ave between 103rd and 105th
Date: Saturday, August 05, 2017 2:24:17 AM

so, i know this may sound a little like NIMBY, but I am still concerned about the attempt to change the zoning of wallingford to a higher density.

This is a *one lane road*. with cars parked on it, some maneuvering is needed to allow cars to pass each other. it has no sidewalks. It is not a street that is ready to be high density, and it has major parking problems already because of overspill from the university and the health center. There isn't really room to give it sidewalks, and it's nothing approaching level- the street is more or less notched out of a hill. sidewalks would be a major engineering project, widening doubly so. I really think it does not make sense to change this to high density. It's already, in my opinion, over capacity.

I also question whether the power and water infrastructure is up to the challenge without being reworked - especially a storm system for capturing runoff from more cars including more parked cars leaking oil. again, this is a small street, with not a lot of storm drainage. I really feel that the zoning board may have made a mistake, and meant to rezone one street over from ours, where there is storm drainage, sidewalks, a turn lane, and other high-density-favorable features.

Name	Alice Quaintance
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 In general, I favor utilizing distinctions for access to opportunity and displacement risk (Alternative 3).
Housing and Socioeconomics	2 I am extremely concerned that low income people are being pushed out of my neighborhood and our city by income disparity and housing affordability issues. I would hope that the new Affordable Units be focused in high opportunity areas.
Land Use	3 I like the proposed housing density in my neighborhood (Madison-Miller) best under Alternative 3. However, I would suggest that LR1 along 21st & 22nd would make a better mesh with the SF housing to the east and have a more moderate impact on the existing neighborhood. I would propose offsetting that decrease by extending NC further south on west side of 19th E.
Biological Resources	4 For mitigation, development standards should require tree planting or retention in new developments.
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-	

Name	Gregory Quetin
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 Though a good step forward I think we can be more bold in our goals of increasing housing overall and affordable housing in general.
Housing and Socioeconomics	2 I am concerned that the relationship between investment in a neighborhood and displacement is very weak. Rather than sending investment away from neighborhoods that are at risk of displacement, can we learn from cities/neighborhoods that supported the people in the neighborhood while also increasing investment and growth in the neighborhood? Neighborhoods at risk of displacement seem like prime areas for investment in public goods, land trust and affordable housing.
Aesthetics	3 Would it be possible to allow neighborhoods to have relatively strong control over the style of the neighborhood, while supporting greater heights and density at the city level?
Biological Resources	4 I support preserving and increasing tree canopy across the city, but please don't allow a few trees here or there to stop the building of homes for people.
Open Space & Recreation	5 Density near parks will allow for more people to access our green spaces.
Air Quality & Green House Gas Emissions	6 Much more to do to solve these challenges.
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?	

Name	Randy R
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 We can't afford to do nothing - that has too often been Seattle's path. But I'm afraid we're rushing ahead, being much too driven by the money interests of developers. A friend in Eastlake appropriately describes the buildings going in around him as "big ugly metal sani-cans". No one will want to live in an ugly environment, even if they can afford it. Please leave as much of the character in established neighborhoods, as possible. Making money, for a small number of developers, at the expense of people living in the affected areas, is a terrible long-term solution.</p>
Housing and Socioeconomics	<p>2 Pushing low-income people out to Shoreline and Kent has not worked well. Calling a residence "affordable" at over \$500,000 is a joke - I looked at a group of new cheaply-built structures near my home, and that's what they were selling for. I don't know the answer, to our problem with affordable housing, but what I see offered is worse than what was there before.</p> <p>3 I think we need to penalize speculators, who make profits for themselves, but solve nothing for the community. And we need to spread the housing solution into other neighborhoods, ones that have not taken in so many low-income as our Rainier Valley area has. Let us not concentrate demographics.</p>
Land Use	<p>4 Let's make use of the empty/unused areas, already sitting (vacant) within the commercial zones, then later talk about going into residential neighborhoods. There are many many unused lots along Rainier. Improve those, don't tear down existing houses.</p>
Aesthetics	<p>5 This is tricky, because each person's opinion is different. At the same time, it is appalling how cheap and ugly most of the modern structures are. Perhaps, if we could get sensible taxation in WA, we could somewhat subsidize better-looking, and better-functioning, housing?</p>
Historic Resources	<p>6 Once historic structures are torn down, they very rarely are replaced by anything remotely similar - that it, once they're gone, it's forever. And the new places going up do not make this a beautiful city. People move here, in part because it's so attractive. We need to preserve what we have, as much as possible.</p>
Demographic Survey (optional)	
Have you been or are you at risk of being displaced from your	

From: Lee Raaen
To: [PCD_MHAEIS](#)
Subject: Comment to MHA DEIS
Date: Thursday, August 03, 2017 1:02:26 PM
Attachments: [WCCCommentToDEIS.pdf](#)

Attached is a comment from the Wallingford Community Council regarding the Draft EIS for MHA. Please include it in the official comments file.
Thanks.

G. Lee Raaen
Lawyer
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Seattle, WA 98103
Phone: 206.682.9580
Lee@LRaaen.com



Wallingford Community Council
PO Box 31698
Seattle, WA 98103-1698

The Wallingford Community Council presents the following comments regarding the Draft EIS for the MHA-R program.

A. The Draft EIS does not meet SEPA requirements for the consideration of alternatives.

An essential requirement of an environmental impact statement is that it adequately consider alternative ways to meet the stated goals of the legislation.

The lead agency [the city] shall discuss impacts and alternatives in the level of detail appropriate to the scope of the nonproject proposal and to the level of planning for the proposal. Alternatives should be emphasized. In particular, agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC 197-11-060(3)). Alternatives including the proposed action should be analyzed at a roughly comparable level of detail, sufficient to evaluate their comparative merits (this does not require devoting the same number of pages in an EIS to each alternative). WAC § 197-11-442 (2).

Proposals should be described in ways that encourage considering and comparing alternatives. Agencies are encouraged to describe public or nonproject proposals in terms of objectives rather than preferred solutions. A proposal could be described, for example, as "reducing flood damage and achieving better flood control by one or a combination of the following means: Building a new dam; maintenance dredging; use of shoreline and land use controls; purchase of floodprone areas; or relocation assistance." WAC § 197-11-060.

The "Objectives of the Proposal" are listed in the DEIS at section 1.2 on page 1.3.

The City's objectives 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 draft EIS 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 EIS. This is a significant deficiency in the DEIS and a violation of SEPA.

B. 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.

Dated this 3rd day of August 2017.

Miranda Berner, President
Wallingford Community Council

From: Rainier Beach Action Coalition
To: [PCD_MHAEIS](#)
Cc: [David Sauvion](#)
Subject: MHA DEIS comments
Date: Monday, August 07, 2017 5:58:50 PM
Attachments: [MHA_EIS_Comments_RBAC_170807.pdf](#)

Office of Planning and Community Development

Attn: MHA EIS

PO Box 34019

Seattle, WA 98124-4019

Seattle, August 7th, 2017

To whom it may concern,

Rainier Beach Action Coalition (RBAC) is a neighborhood-based coalition that seeks to build a connected, sustainable and equitable community, promoting the “made in Rainier Beach” concept, quality education, living wage jobs, affordable transportation and housing for all. RBAC promotes a safe place where people thrive in a neighborhood the world calls home.

RBAC has been working closely with the City on planning issues since the Neighborhood Plan Update (2010-2012) and the previous 1999 plan, and continues to provide the Office of Planning and Community Development (OPCD) with feedback from Rainier Beach residents as steward of the implementation of the plan and its vision. RBAC advocated and supports the principles of the City Mandatory Housing Affordability and strives for an equitable Seattle.

We would like to submit the following comments regarding the MHA Draft Environmental Impact Statement (EIS) starting with some of the bases for analysis:

- The Draft EIS does not include an alternative where most of the growth would be applied to areas with high risk of displacement and low access to opportunity. This seems to contradict any effort to drive equitable growth in the City. If this alternative isn't even studied, how can we tell that this isn't the best approach to prevent displacement?
- The Draft EIS does not leave room for a potential slow-down or even down turn in activity. Numbers are based on a continued growth trend. Development is not only driven by demand, but also by profit. If profit margins decrease, will construction occur at the same rate? All numbers are speculative, not only by the nature of the analysis, but because of the nature of the market, and the language should reflect this.
- The Draft EIS does not account for a timeline in delivering the projected affordable units. By the time (and if) money has been paid toward affordable units, how much will property value have further increased by? Where will those properties to build affordable housing be located? Will they still be near transit or amenities in an equitable way?

- The Draft EIS does not look at the invisible damage that the draft MHA proposal maps have already done on the ground in cancelling out affordable housing projects for 100's of units by creating a wave of speculation and increase of 50% in property values due to projected additional height.

Furthermore, the Draft EIS makes various statements and assumptions that we would like to address:

- The HALA website states: *"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."* But it doesn't offer a 4th alternative that would look at an alternative where most of the growth would be applied to areas with high risk of displacement and low access to opportunity.
- *"Our intent with this approach is to test whether and how the stated policy objective of growing equitably — by addressing displacement risk and access to opportunity for marginalized populations — could influence MHA implementation, as well as other potential environmental impacts associated with the amount and location of additional growth."* (MHA EIS Web Map). We know for a fact that low-income communities rely more heavily on transit and that displacement will also cause these populations to lose access to public transportation and have recourse to automobile leading to increased pollution. Access to opportunities like local jobs could prevent displacement and transportation burden.
- *"Alternative 3 shows smaller development capacity increases in areas with high risk of displacement as a possible way to minimize the potential for displacement."* (MHA EIS Web Map). What supports this statement?
- *"Compared to Alternative 2, Alternative 3 would have about 14 percent more total housing units in high displacement risk and low access to opportunity areas like Rainier Beach, Othello, and Westwood–Highland Park."* Numbers show the opposite with 5,143 for Alt.2 and 4,520 for Alt.3. (3.64, Exhibit 3.1-42). Which is it?
- The Average Monthly Rent in Rainier Valley is 13% below the City average but has seen the **City's highest increase with 12.7%**. Overall unit rent is still more affordable in University than in Rainier Valley. (Exhibit 3.1-20). Since the increase is the worse, and the cost already higher than in neighborhoods that benefitted from specific MHA rezone, why isn't there more focus on the Rainier Valley?
- *Percentage of changes in Housing units between 1995 and 2015 (Exhibit 3.1-11):*

- South Lake Union	489%
- West Seattle Junction	111%
- Ballard	83%
- Lake City	82%
- Othello	91%

- **Rainier Beach** **9%**
- *Crown Hill* *15%*

Rainier Beach is the neighborhood with the least housing development over the last 20 years and yet displacement has been happening. How is a continued policy of limiting development preventing further displacement? How is this lack of potential private investment equitable? We can all see the opportunities created in South Lake Union. How do the 2 figures (489% vs 9%) compare in terms of access to opportunities?

- Alternative 2, which would create the most units of all alternatives, indicate development of 16 performance units and 67 payment units (a total of 83%). That's 4th lowest only to West Seattle Junction, North Beacon Hill, and South Park, **a contribution of 1% of all new projected affordable City units (7,513)** in one of the urban villages at most risk of displacement. (Exhibit 3.1-36). Again, why are we seeing the lowest number of potential affordable units in neighborhoods with the lowest income population?
- *"Increased production of rent- and income-restricted units would disproportionately serve people of color because low-income households are more likely to be households of color and because subsidized housing programs have historically served high percentages of non-white households."*(p 3.62). If that statement is true, how does the EIS support increased production of rent- and income-restricted units in areas with high percentage of people of color?

The proposed Draft EIS maps for Rainier Beach show a very small area around the light rail station zoned for Seattle Mixed in both Alternative 2 and 3. This does not reflect planning studies done with the community over the past 5 years and does little to incentivize new opportunities in this key Transit-Oriented-Development location. Moreover, the proposed heights of 95' are not economically viable for high-rise developers. There is no benefit between 75' and 125', since the Building Code limits Type V wood construction to five stories over 1 or 2 stories of concrete (Type I construction), and other construction types are too expensive for development under 125'.

In conclusion, the proposed Draft EIS seems inconsistent at best and flawed by strong biases at its worse. Ignoring critical analysis regarding neighborhoods with such high levels of poverty, unemployment, and low access to opportunity, is not only a methodology error, it undermines the potential for disparities to be addressed and for an agenda with an equity lens to start looking at real solutions and stop bending to special interests.

We would strongly recommend OPCD to revisit its assumptions and propose alternatives that support the intent of the Mandatory Housing Affordability.

Sincerely,

Rainier Beach Action Coalition

Rainier Beach Action Coalition (RBAC)
www.rbcoalition.org

Office of Planning and Community Development

Attn: MHA EIS

PO Box 34019

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We would strongly recommend OPCD to revisit its assumptions and propose alternatives that support the intent of the Mandatory Housing Affordability.

Sincerely,

Rainier Beach Action Coalition

From: Helen Rakic
To: [PCD_MHAEIS](#)
Subject: Extend review time for draft EIS Comment period to 90 days
Date: Sunday, July 02, 2017 9:49:43 AM

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.

Thank you
Helen Rakic

From: Hans Rasmussen
To: [PCD_MHAEIS](#)
Subject: MHA Draft EIS Comment
Date: Monday, August 07, 2017 11:19:41 PM

To whom it may concern,

I would like to add my strong support for the concerns raised in the letter sent by The Capitol Hill Renter Initiative on 8/7/2017 regarding the draft environmental impact statement for the citywide mandatory housing affordability zoning changes. The Capitol Hill Renter Initiative has brought together a broad body of voices from the Capitol Hill neighborhood to consider the impact that the MHA would have on us as renters. After careful analysis of the draft EIS, we believe that the MHA program will be a success if the concerns listed in the letter are addressed in the FEIS.

Beyond the concerns of the letter, I would like to add a few points:

-The alternatives of the EIS could do a better job addressing their long term impacts on Climate Change. Living in cities, near each other, utilizing public transit, & in walkable communities is one of the best, if not *the best*, tool we have to address Climate Change.

-The boundaries of various urban villages around the city are being expanded to include areas that fit the criteria of urban village framework and have access to frequent transit service. The draft map does nothing to address the fact that the current gap between the Madison/Miller & Capitol Hill UV's are perfectly urban conditions with great access to transit, and the plenitude of amenities presented by 15th & 19th Avenues. Additionally, the area north of the Capitol Hill UV nearing Volunteer Park benefit from similar conditions. These are areas predominated by large single family houses. In a time that has been declared a housing crisis, it is imperative that the city explores all available lands that could provide added housing capacity. Including these interstitial & truly urban neighborhoods would unlock land for denser uses, and provide more funding for the MHA mechanism. I implore the EIS body to reconsider these areas, if for nothing more than RSL zoning.

Thanks for your work on continuing to make Seattle a great city.

Hans Rasmussen
98122

Name	Trevor Reed
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 The highest density in the most concentrated option should be pursued. This will help maintain a diversity of land usages city wide while creating distinct neighborhoods/nodes that can create a sense of place and identity.
Housing and Socioeconomics	2 There needs to be an integration of incomes in developments.
Land Use	3 A diversity of land-use is needed. However, greatest priority should be to increasing density, public spaces and the provision of non-motorized transport or public transit. Given the premium on land, parking should be disincentivized as should driving. Creating parking maximums, not minimums, reducing the land given to private vehicles and adopting congestion tolling should be pursued.
Aesthetics	4 The city needs to promote densities while create a diverse/interesting built environment. A range of businesses and building typologies are critical. The city needs to work harder in creating appealing spaces by reducing parking, increasing heights/setbacks where appropriate and creating a coherent/contiguous built environment.
Transportation	5 The city must reduce parking, parking requirements and create a connected, multi-modal transportation system. Dedicated bus lanes, congestion/cordon tolling, mixed streetscapes (woonerfs) and dedicated pedestrian/cycle facilities are critical to fostering an improved environment socially, economically and environmentally.
Biological Resources	6 Improving the biological environment connects directly with the promotion of non-motorized transport, open space and recreation. If the city can create more balanced land-usages, the opportunity to expand and create new biological environs is possible.
Open Space & Recreation	7 It is critical the city create 'green corridors' where vehicles are not permitted and pedestrian's/cycles are the only permitted usages on the corridor. Barcelona's 'super blocks' and Paris's creation of new public spaces (the conversion of a highway along the Seine to pedestrian usages). Copenhagen's Stroget and the future pedestrianization of Oxford Street in London also represent strong examples of creating dynamic economic social environments out of the existing urban fabric.
Public Services & Utilities	8 A greater emphasis on 'soft infrastructure' ie rain gardens, permeable pavement and energy efficiency in buildings.

**Air Quality & Green
House Gas Emissions**

9 There needs to be a greater emphasis on trip reduction strategies: density, diverse land-uses (range of amenities) and a focus on an integrated non-motorized transportation network.

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?

From: J Rees
To: [PCD_MHAEIS](#)
Subject: EIS release
Date: Sunday, June 11, 2017 7:41:26 AM

You have not given us nearly enough time to read and comment on this EIS. You released it just at the start of summer when people are getting ready to leave town on vacation. Please extend this comment period to August 30th to allow all residents to read, digest and comment on this EIS.

Janine Rees
5456 40th SW
Seattle, WA 98136

Name John Reigart

Email address

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.

Housing and Socioeconomics

- 3 Comment #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".
- 4 Comment #2: 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.
- 5 Comment #3: 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.

- 6 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

Land Use

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.

Aesthetics

- 7 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.

Transportation

- 8 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.

Public Services & Utilities

- 9 Public schools are significant enough to warrant their own category, and should not be lumped with utilities. 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. 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.

Demographic Survey (optional)

From: Wendy Reilly
To: [PCD_MHAEIS](#); [Brand, Jeseca](#); [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](#)
Cc: [suzanne lasser](#); [Wendy Reilly](#)
Subject: Proposed changes to Madison Miller Urban Village
Date: Sunday, August 06, 2017 7:52:16 PM

Hello,

My name is Wendy Reilly, I have lived at 517 18th Ave. East for 31 years. I am very concerned about the proposed changes to my neighborhood as are many of my neighbors. Oh yes, the actual people in the area are not onboard with your plans for many reasons. I know that there are a multitude of letters and emails already sent to you with all of our objections and concerns so rather than go on and on with them I will just list the most salient points from my perspective.

1. The area already is very dense and will exceed the HALA housing density goal before 2035 without any of your changes.
2. We already have a mix of multifamily homes, apartments and single family homes. We are also mixed economically and racially because of this. New construction is all very expensive and filled with upper income people.
3. The traffic and parking in this area already sucks and will only be worse with greater density. How that meshes with my street being part of an "urban greenway" currently being proposed is beyond me.
4. We already have rampant building on the arterials, for example a new 32 unit building now going up on 19th East and East Mercer. The arterials seem to be the appropriate place for more dense housing rather than ripping down the old houses (many of which are multifamily) and turning them into expensive apartments.
5. This neighborhood was part of the central district when I moved here in 1986 and due to redlining I had a very difficult time getting financing. I feel like this is more of the same discriminatory zoning. How about upzoning Laurelhurst? Maybe Madison Park? Magnolia? You could add more buses if transportation is the issue.

I am very frustrated with our government and the so called "Seattle Way" that really just is a cover for certain sectors to obtain their own vision. I think this is more of the same. All over the city neighborhoods are asking you to step back and look more carefully before these **developer friendly** changes are made but I feel like its on deaf ears. We, the people, are not happy with what you are proposing. Please step back and reconsider how our neighborhood is the spirit of Seattle that wants to survive.

Wendy Reilly

From: Julie
To: [PCD_MHAEIS](#)
Subject: MHA Draft EIS Comments from the Madison-Miller Park Resident
Date: Monday, August 07, 2017 1:51:06 PM

In addition to whole heartedly endorsing the comments from my neighborhood Group I have a couple more comments:

- Many single family houses in my neighborhood house group of individuals and groups of families. They are "hidden" affordable housing.
- Transportation - In addition to being a mile distant, there is **signifiant slope** to access light rail that makes it a much more difficult walk to get to either Capitol Hill or UW light Rail stations.
- I am halting any efforts to install solar as the extreme upzoning on my block (SF to the new LR2) would make any installed system worthless. I expect that any house sold on my block would instantly be demolished & converted to 4 storey flats for tech workers.
- As it is we have 4 new houses **under construction** on my street with a block & half from my house. There is obviously a demand for SF houses on the northeast side of the Miller Park boundary.
- Typology/Equity - as soon as this goes through there will be massive demolition and displacement in my neighborhood. This study underestimates the impact. This will greatly increase taxes forcing more people, especially retirees, from their homes.
- Almost every new neighbor (moved into home withing the last 5 years) have children. Seattle is not very child friendly, this makes it much worse.
- Madison-Miller is already exceeding our growth targets and have available zoning to incerase further. Many other areas of Seattle have not enjoyed this kind of growth & should have more incentive available to spread the growth around the City, not just concentrate it in a few popular locations.
- Historic homes will be torn down, many people walk on our streets for the calm atmosphere and plerasnat environment full of trees & gardens, with large setbacks. We will get more crowded, hot streets with minimal setbacks & hard surfaces. We fill the need for walking/running space due to our limited parks and greenspace.

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 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. In addition many SF homes in the area provide low income housing for groups of individuals.
2. **Transportation:** Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk. In addition there is **significant slope** to access light rail that makes it a much more difficult walk to get to either Capitol Hill or UW light Rail station.
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.

Name	Susan Rhodes
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 It is not clear from the study exactly what the "alternative plan" is. We have maps for the plan proposed by the mayor's office. Where are the maps for you the alternate plan?
Housing and Socioeconomics	2 Displacement risk in this statement does not include current homeowners. Many of us have affordable housing that will become unlivable if this plan is approved. We need to be added to the numbers of "displaced" residents.
Aesthetics	3 Aesthetic impacts are comparing current zoning allowances with new allowances without taking into account the fact that most of the lots in our city are not currently built to zoning maximums. There is a greater jump from existing conditions to the proposed zoning than is being studied.
Transportation	4 This study is completely wrong with regards to transportation in an out of West Seattle. The bridge is already part capacity at rush hours.
Biological Resources	5 This study does not take into account that the city has a plan to increase tree cover over time. Most tree cover occurs on single family lots. Eliminating single family lots will reduce tree cover substantially and will impact the goals for a greener 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?	

From: Sam Rich
To: [PCD_MHAEIS](#)
Subject: Comments for Draft Mandatory Housing Affordability Environmental Impact Statement.
Date: Monday, August 07, 2017 12:55:15 PM

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. 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.

Samantha Rich
206.660.7655

From: Edgar Riebe
To: [PCD_MHAEIS](#)
Subject: Leave West Seattle Junction alone!!!
Date: Sunday, August 06, 2017 11:55:50 PM

Hello there,

- 1 Don't destroy our neighborhood. We have already added enough high rise housing. No need to mess with the single family homes that support our urban core. The plan jeopardizes all the work we have done to grow our urban village!!!

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.

Best regards,
Edgar Riebe

Name	Michael Roberto
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 Alternatives 2 and 3 look great
Housing and Socioeconomics	2 Alternative 3's considerations of potential displacement of at-risk populations are important, and it does a good job of laying out some ways to mitigate the risks over Alternative 2
Land Use	3 I agree with the report's conclusions that the upzoning will increase density and be a better use of our limited land.
Aesthetics	No comment.
Transportation	4 We need to make sure we invest in - not just maintain - transportation to handle the influx of people. 100-year-old ship canal bridges will need replacement too! Bridges are not meant to last that long!!
Historic Resources	No comment
Biological Resources	No comment
Open Space & Recreation	5 I think the added open space to the city is great.
Public Services & Utilities	No comment.
Air Quality & Green House Gas Emissions	No comment.
Demographic Survey (optional)	
Have you been or are you at risk of being displaced from your	

From: Kiran Robertson
To: [PCD_MHAEIS](#)
Subject: HALA rezoning on 2600 Block of 45th Ave. SW 98116
Date: Monday, August 07, 2017 11:42:48 AM

To Whom It May Concern,

I can't express enough how strongly I, along with ALL of my neighbors, disagree with the proposed changes for our block.

I have to think that the people who selected this block do not actually know this neighborhood at all, and didn't take into account the population of the folks that live here. We have families with growing children, families who support Lafayette and their community, disabled folks (deaf/blind and unable to speak), a near shut-in and elderly folks, all who depend upon each other and the quiet safety of our tight block community. **YOU WILL BE DESTROYING THIS.**

Our street has historically protected and supported Lafayette Elementary and it's students and faculty. We have raised money for a new a playground, we have maintained that playground even after our children have left. We shepherd children to and from busses and we tend vehicle traffic to make a safer place for the student activity that is constant in this block. You will NOT be helping those students or those parents by increasing the population on this small block. As it stands now, residents and busses have a difficult time navigating the shared street, parking is very difficult for parents of the students attending this school and the unmoderated speed of folks who use this block as a thoroughfare is constantly putting students in danger. Creating MORE congestion in this area will put ALL of these kids, all of OUR kids in even more danger than they currently face.

What is more concerning is our knowledge that the solutions planned do not actually create more housing for low-income, we have data that proves that this pathway does not do the most to support our most vulnerable community members, but instead bolsters the developers and the city tax collectors who work with said developers. I would like to think that there is mind payed to the places you are affecting and that there is someone in your organization that cares more about these families than the money you can earn by allowing apartment buildings and the resulting transient residents to devour our tight community.

There are other rumors circulating amongst local real estate and developer community members that you have already made your decisions and the subsequent deals with the developers who will eventually benefit from the destruction of our community. I hope that is not the case.

Respectfully,

Kiran Robertson

Lovejoy Design- Principal | Creative Director
206-734-7487

From: Ann Rodak
To: [PCD_MHAEIS](#)
Subject: Haha park comments
Date: Thursday, June 29, 2017 8:42:14 AM

Hi.

To Whom it May Concern,

I was just looking over the overview maps and info for Seattle development. It appears that in some places there is a lack of park space. I agree this is true as there are a lot of competing entities vying for use of that park space and the city is just more crowded. The park space includes school fields which with all the remodels lately has also shrunk. For example, we used to have baseball fields at Wilson Pacific but there are now two schools there and no more field space, Loyal Heights Elementary used to have field space but they will lose that too when they finish their remodel. West Woodland Elementary has a small field and black top area but that will shrink when they add an addition. When Lincoln High School opens the already crowded lower Woodland field space will be harder to access because they don't have field space at that high school. Those are just the ones I know about. I don't think school park space should be included in this calculation because it is prone to shrink or disappear as it is not protected space.

Another thought is that the park spaces could feel bigger if they were connected in some way. Is there a way to make a string of parks that connect to the bigger parks? You might need less land and it would make the areas we have feel bigger by providing an experience of nature that is longer and more protected than just a little park here and a little park there. Just an idea. The beauty of places like Greenlake is that you don't have to stop walking but get nature all around you for a certain period of time (it takes about an hour for the average healthy person to walk it). A string of treelined paths with small areas of forest or viewpoints here and there along the way connecting to the bigger parks would go a long way to efficiently get people what they need. Of course, I also think we could use more play field space but not sure at this point in time, we can afford that as there are not any more large swaths of areas for park development. Safe, continuous nature/bike/walking paths would be great and really make Seattle a bit more world class.

Thanks for considering.
Ann Rodak

<p>Name</p> <p>Email address</p> <p>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.</p> <p>Comment Form</p> <p>Description of the Proposed Action and Alternatives</p> <p>Housing and Socioeconomics</p>	<p>Roberto Rodriguez-Lawson</p> <p>1 I agree with the comments put forth by the Crown Hill Urban Village Committee for Smart Growth, although I am not part of the committee, but a Crown Hill resident.</p> <p>2 See the detailed comments on this topic submitted by the Crown Hill Urban Village Committee for Smart Growth. I would like to draw attention to this comment especially, about the lack of light rail in some areas that would be upzoned:</p> <p>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.</p> <ul style="list-style-type: none"> • 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. <p>3 See the detailed comments on this topic submitted by the Crown Hill Urban Village Committee for Smart Growth. I would like to draw attention to the comment below especially, about the characterization of Crown Hill as "close to regional job centers". Crown Hill is on the periphery of Seattle and is not close to a large job center:</p> <p>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.</p> <p>4 See the detailed comments on this topic submitted by the Crown Hill Urban Village Committee for Smart Growth.</p> <p>In particular, I am concerned that Alternative 2 puts buildings of excessive height (4 and 5 stories) on 16th Ave NW and Mary</p>
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Land Use

Ave NW. This will block light to adjacent houses and also to lower floors of those new buildings in a way that creates a poor living environment for residents. These streets are also too narrow to handle the car traffic associated with commercial activity. Commercial zoning would only work there if these were pedestrian-only streets, which would make sense only if a light rail station was nearby.

Alternative 3 would result in excessive light blockage to even more streets, and you would end up with a village of dark, gloomy streets.

Aesthetics

- 5 See the detailed comments on this topic submitted by the Crown Hill Urban Village Committee for Smart Growth. I would like to draw attention to this comment especially, about the need for Design Review for buildings in M2 upzoned areas:

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.

Transportation

- 6 See the detailed comments on this topic submitted by the Crown Hill Urban Village Committee for Smart Growth. I would like to draw attention to these comments especially:

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.

- 7 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.

- 8 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.

- 9 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.

Biological Resources

- 10 See the detailed comments on this topic submitted by the Crown Hill Urban Village Committee for Smart Growth. I would like to draw attention to this comment especially, which points out that the DEIS understates the impact to tree canopy in Crown Hill and probably in other neighborhoods as well:

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.

Open Space & Recreation

- 11 See the detailed comments on this topic submitted by the Crown Hill Urban Village Committee for Smart Growth.

I am especially concerned that greenspace will be significantly reduced as single family homes are replaced with multifamily, and there has been very little discussion as to where or how new greenspace would be added in the urban villages.

Public Services & Utilities

- 12 See the detailed comments on this topic submitted by the Crown Hill Urban Village Committee for Smart Growth. I would like to draw attention to these comments especially:

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.

- 13 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.

- 14 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.

From: Douglas Rosenberg
To: [PCD_MHAEIS](#)
Subject: Mandatory Housing Affordability Comments
Date: Saturday, August 05, 2017 10:01:32 AM

To Whom It May Concern:

We have lived in our home at 734 16th Ave. E. for 43 years, and are concerned about the affect the proposed upzoning will have on the neighborhood we love. We are particularly worried about the impact on parking and traffic.

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.

Thank you,

Doug and Casey Rosenberg
734 16th Ave. E.
Seattle, WA 98112
206.325.3249

Name	Jenny Rose Ryan
Email address	
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.	Westwood Roxhill Arbor Heights Community Coalition
Comment Form	
Description of the Proposed Action and Alternatives	1 Alternative 3 allows neighborhoods that already have the infrastructure to support growth to do so, rather than concentrating it in places that have a high need for opportunities.
Housing and Socioeconomics	2 I'm concerned alternative 2 will mean people of color will be relocated to the edges of the city/areas that have less resistance to growth.
Land Use	3 I think alternative 3 does a better job of integrating the impacts of topography on the two centers of our neighborhood (South Delridge business district and Westwood Village)
Aesthetics	4 More of the homes in the upzone area for alternative 3 are in need of repair -- this alternative is more responsive to the quality of existing housing stock.
Transportation	5 Thinking of the neighborhood as two separate zones is still important, as we do not have the sidewalks to assist with walking around the hills that make things less accessible
Historic Resources	6 Alternative 2 puts even more people where there are fewer services. No good.
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?	

Ross, Jenn

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.

Jenn Ross

1240 S. Concord St

Seattle WA 98108

Jenn-Ross@comcast.net

From: Jay Rostosky
To: [PCD_MHAEIS](#)
Subject: DRAFT EIS comments
Date: Monday, August 07, 2017 2:35:41 PM

- 1 General comments: this set of comments is not me being NIMBY, this is not about halting progress; it's about equitable growth, and providing the requisite support services, etc., along with that. West Seattle Junction is already at 300+ percent of anticipated capacity expansion, with no rezoning yet.

The fact that the developers can pay a fee instead of provide actual affordable housing, coupled with the City's "intent," but not "obligation" to use those funds in our neighborhood means that we take on the extra capacity and see little to no benefit as a result.

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.

The plan is all Cart before the Horse.

Community Feedback

DEIS fails to take into account documented Junction neighborhood feedback. Comments from City-sponsored West Seattle meetings were "lost" more than once! What's that? Amending the West Seattle Junction Neighborhood Plan to meet the requirements for HALA is completely unethical and appears to not involve our input. This community worked hard to develop that plan - with the City - only to see it changed later on to support this expansion.

Lack of Affordable Housing

DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood. See above general comments. The developer fees are not required to be invested in our neighborhood. All pain, no gain.

Neighborhood Plan

DEIS reflects City's failure to honor neighborhood plan - and then call to amend that plan when it no longer suits them.

Traffic

DEIS analysis is flawed; Fails to utilize meaningful data. C-Line at 67% capacity, you say? What a joke...

Green Space

DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood. You count the West Seattle Golf Course as green space - another complete farce. This area is sorely lacking in parks and green space, and we're getting nothing more.

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. No hospital nearby, horrid bridge traffic many hours of each day.

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. Huge impact on so many families here, that chose to live here because of the schools.

Thank you,
James J Rostosky

From: Susan Roth
To: [PCD_MHAEIS](#)
Subject: Comments for MHA, EIS
Date: Monday, August 07, 2017 1:40:03 PM

Please consider my comments below, which are the same as those of Seattle Nature Alliance.

Susan Roth
3937 SW 109th Street
Seattle, WA 98146
206-616-2176

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
www.seattlenaturealliance.org

From: Alison Roxby
To: [PCD_MHAEIS](#)
Subject: HALA EIS comments - school overcrowding is not being considered
Date: Tuesday, August 01, 2017 7:46:11 PM

Hello, I have comments about HALA.

I grew up in a suburban area in North Carolina. Every time a developer created a large housing development on a big piece of land, they contributed something substantial to regional infrastructure. Most large developments that were expected to house hundreds of families REQUIRED contribution of land for a school, or even school construction. In addition, libraries, fire stations, sidewalks, parks, and bus routes were all on the table as something that a developer was EXPECTED to contribute. I am shocked at how LITTLE is expected of developers in Seattle. We have one of the most booming real estate markets in the country and developers do NOTHING. Worse, they spend money that they should be using to upgrade our community and mitigate their development on lobbying and blocking up the system so that citizens have virtually no input in development in this city.

The latest travesty is the lack of recognition of the DIRE SITUATION of public schools in Seattle, which are currently disgracefully crumbling and overcrowded. I have 2 children in Seattle Public Schools. Children have less than 20 minutes to eat lunch, and parents are told to pre-cut food to allow our little ones to wolf it down faster – because there are so many kids in the school that they have to race around to get everyone fed. Yes, even in the “wealthiest neighborhoods in Seattle,” the schools are like this. Playgrounds are tiny and overcrowded. The last 3 schools to open have no auditorium space. Playing fields are shared among students and the whole city. Every September, school openings represent a crazy jockeying of scarce spots at overcrowded schools. If HALA is approved in its current form, where are the new children going to be educated in these already overcrowded schools?? There is NO provision to increase numbers of schools, allocate lands for schools, or increase educational capacity in any way, as thousands of new housing spots are built. This will be a DISASTER that will punish our children for our lack of planning and foresight, even worse than today’s children are already being punished and crammed into schools. At Hamilton middle school, children eat lunch in the hallway sitting on the floor in front of their lockers because the cafeteria is so small and there is no outside space as it has been consumed by portable classrooms. My children’s elementary school had two girls and boys bathrooms shared by 680 students.

The HALA Master Plan on page 3.298 references the 2012 Facilities Master Plan of Seattle Public Schools. Those of us who are close followers of SPS know that these projections are already woefully inadequate and completely out of date. They were made BEFORE the current population boom in Seattle and do not come close to meeting even the current needs of SPS in 2017, let alone the needs of a HALA-future. In particular, the HALA EIS cites the BEX Phase 4 capital development plan. Bex-4 is not going to add capacity for 8000 students. This number is wrong. The renovated schools will provide more space for students, but these students will be moved from other, overcrowded facilities. In addition, Seattle Public Schools has had significant trouble predicting growth in the district and are behind current demographic projections for growth in Seattle.

I recommend, along with Gerry Pollet, our state representative, the following:

- Do not upzone any area where schools are overcrowded unless the City is committing to specific steps to mitigate and increase school capacity as part of its HALA plan;
- Withdraw the draft MHA EIS and revise it to include commitments by the City to add school capacity for every proposed upzone area where the schools are currently, or projected to be, overcrowded in order to meet our students' constitutional rights to attend schools with lower class sizes and which are not overcrowded;
- The Council should pass an ordinance committing to consider school capacity in all planning decisions;
- The Council should adopt developer impact fees to help pay for new school capacity, as almost every other city in our region does.

In addition, when viewed through an equity lens, HALA will hurt children. Children must have schools and parks in the city. HALA shoves more apartments in a smaller space without consideration for these key parts of urban living – parks, schools, libraries, athletic fields, pools, community centers. An urban village includes ALL THOSE THINGS, not just transit and apartments.

I also would like to criticize the process. I have seen NO PUBLICLY ADVERTISED REQUEST FOR INPUT on the HALA EIS. I read the Seattle Times daily, as well as citizen blogs and papers. The comment period has been shamefully not publicized.

This process is not designed to solicit meaningful public input and I think the architects of this process should be very ashamed of the lack of publicity for citizen comments. This is not democracy to pretend to solicit public comments while not actually making any attempt to get them. Why are there not well-publicized neighborhood meetings and other opportunities to ask questions? Seattle is too big a city to hold one meeting at City Hall and call that citizen engagement.

Alison Roxby
4335 2nd ave nW
Seattle WA 98107

From: Mike Ruby
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 8:23:24 PM

The environmental impact analysis of something like the MHA-HALA citywide rezone proposals is inherently complex and difficult.

Unfortunately the very nature of an EIS tends to lead away from understanding and solutions. The draft EIS provides a great deal of analysis of the potential for and potential effects of growth over the next 20 years but very little is offered for how to deal with the identified problems. One can say that this is not the job of an EIS but I would argue that it is the primary objective. Just identifying the problems is not enough. Saying that the existing policies will eventually respond is not enough. It would be most responsible to actually identify some solutions for resolving the impacts and providing cost estimates for those solutions. In my opinion, this is a fatal flaw of the draft EIS.

For example, the section on transportation identifies that there are numerous arterial segments that are currently at low Level of Service and will be worse under all alternatives. This is a very high cost to residents of the city in lost productive time and in the health impacts that come from stress. A difference can be seen in the graphs, with poorer LOS mostly north of the Ship Canal, which is then even worse in Alternative 3 than in Alternative 2. Several current programs, such as the Bicycle Master Plan, are described. But there is no attempt to say how these programs might actually mitigate the snarl or just how the LOS might actually change if bicycle use went from current levels to some higher level envisioned by the plan or what it might actually cost to implement the plan. Suggestions for improvement to transit, which might actually do some good, are limited to the comment "The Transit Master Plan identifies such improvements throughout the city." Funding for any improvements are suggested as possible through an ill-described impact fee program that is very limited by state law but no costs are estimated for projects that might avoid further declines in LOS. The scale of possible revenues from the impact fee program are not presented. Thus mitigation is not explored to the extent required by State law and regulations.

Similarly the EIS identifies that some 400 acres of parks and open space need to be acquired to meet the City's goals with the increased population projected to be housed in Alternatives 2 and 3. The EIS suggests as mitigation that the Seattle Dept of Parks and Recreation should study the problem and perhaps the same ill-described impact fee program might be used to collect funds that would be limited by the same state law. Again no costs are estimated for acquiring a new park land approximately the size of Magnuson Park plus Volunteer Park nor is any suggestion made as to where such available land might be located. Again, the possible revenues from the impact fee program are not estimated. The mitigation discussion does not meet the requirements of State law and regulations.

The draft EIS takes a similar and unsatisfactory approach to the Public Service, Public Utilities, Schools, and other identified impacts of the MHA-HALA proposed rezoning, making the draft EIS almost useless for those who would be interested in actually solving the problems that would be brought on by the accelerated growth to be triggered by the MHA-HALA program.

From data presented in the EIS and available on the City's website, there seem to be a total of approximately 44,000 units of income and rent restricted housing in Seattle (Seattle HO, SHA, MFTE and Section 8). This does not include several other sources of support for such housing so the number is likely an underestimate. This is approximately 13% of the 325,000 current housing units in Seattle quoted by the EIS. The additional number of income and rent restricted housing units to be provided through the 2016 Seattle Housing levy is 2,150 over 7 years. On a similar time scale, the EIS projects that an additional 5600 rent and income restricted units will be generated by the MHA-HALA program over its first 10 years.

The EIS says that 55,000 people moved to Seattle from outside King County in the data year. That would be about 26,700 households. So let's estimate at least net 30,000 households moved into Seattle in a year to include net internal King County migrants. This is 9% of the number of housing units in Seattle. Over the past 20 years of boom and bust cycles, Seattle averaged 3845 net new housing units per year or about 1% of the housing stock. Clearly most of these new residents were being absorbed into the existing housing stock. This suggests that at least 7% of the housing units turn over each year, or about 24,000 or 2,000 per month, on average.

The availability of housing is not related to the stock, or total number, of housing units but to the flow, or units on the market each year, both newly constructed and existing vacated. If the number of families looking for housing exceeds the available units there is a shortage and if it is less there is a surplus. The website "Zillow" currently lists new and existing 1,175 apartments and 550 houses available on the Seattle market. Zillow does not capture the entire marketplace so it is very likely the current available number of units is approximately in balance with the demand and no "shortage" exists. However, the EIS correctly identifies that much of the new units coming on the market are targeted to the higher income market, leaving an "affordability" crisis for lower income families who would prefer to live in Seattle instead of Tukwila or Shoreline.

If the 44,000 income and rent restricted units turned over each year at the same 7% rate as the general housing stock, more than 3000 units would be available each year. This compares to the approximately 500 new units that will be provided each year through the MHA-HALA program. Yet there is no information presented in the EIS of the turnover rate in the income and rent restricted housing, which is clearly a potentially much greater source of affordable housing than the MHA-HALA program. Nor are there any programs proposed in the EIS to monitor the turnover rate or to encourage greater movement out of the income and rent restricted units and into market rate housing. Persons who are in "transition housing" do receive social work assistance to strengthen their finances and allow them to make that transition. On the other hand, SHA, for example, provides little to no social work assistance to their tenants. Providing that assistance to everyone in income and rent restricted housing would be a simple, low cost and much more effective solution toward relieving any "shortage" in affordable housing to the persons eligible for the MHA-HALA housing.

The draft EIS describes a linear regression analysis (pp 3-37 ff) carried out to determine if increased housing production in a census tract

in Seattle resulted in more or less low-income housing occupancy in that census tract. The correlation coefficient (r) was 0.5, much less than the 0.85 to 0.9 generally recommended for further consideration of the analysis. But it is obvious from the graphic representation of the data that there are six or so sub-groups of data that could be analyzed separately, possibly yielding useful results if enough data were available for ANOVA analysis. Unfortunately, the draft EIS utilized its Displacement-Opportunity lens to do the further analysis, which resulted in four data plots with similarly poor correlations to simple linear regressions and, again, with obvious sub-groups that should have been analyzed differently. On only one of the four sets does the trendline represent the scatter of the data. The bottom line of this analysis should be that there are far more factors than housing production that influence the change in income distribution within a census tract. Correctly, the draft EIS does conclude that this analysis indicates their Displacement Risk metric may be flawed. I would say it is badly flawed.

The study done for the draft EIS to determine if you could raise the requirement for housing units or alternative payments (pp 2-48 ff) was poorly designed. Instead of trying to find the sweet spot that would maximize unit generation, they looked only at an alternative uniform 25% requirement and found an approximately 50% decline in the number of units that were "feasible" with the higher requirement. They did not estimate delta-MHA unit generation under the alternative. They did not test 5% and 10% increments of unit requirement and fees over the baseline to see if there might be a higher level at which more revenues would result in more units built or fees collected even if fewer buildings were "feasible" under the escalated MHA. I consider this a "straw man" sham study, a common undesirable debate tactic.

My last observation from reading the draft EIS is that Alternative 2 clearly produces more units of income and rent restricted housing and at less of a community impact than does Alternative 3. But I fail to see enough evidence in the draft EIS that either is the least cost solution to the problem that the draft EIS sets out to solve.

--

Mike Ruby
4128 Burke Ave N
Seattle WA 98103
206 632 9841

From: Brian Rulifson
To: [PCD_MHAEIS](#)
Cc: [O'Brien, Mike](#); [Herbold, Lisa](#); [Johnson, Rob](#)
Subject: MHA Draft EIS comments
Date: Monday, July 31, 2017 1:40:57 PM

The City Council should pass an ordinance requiring the consideration of school capacity in all land use planning decisions.

The City Council must not allow upzones in any 2014-2016 geozone for schools which were at that time exceeding 90% of their capacity.

The City Council should pass an ordinance adopting developer impact fees to help pay for additional school capacity.

The City Council should raise the percentage from ~5-7% of set-aside affordable units to 35.0%, or the equivalent mandatory housing payments (MHALA). The nearly-trivial set-aside currently in place is not enough and does not address the issue significantly.

Sincerely,

Brian Rulifson
Resident of Fremont

From: suzanne lasser
To: [PCD_MHAEIS](#)
Cc: saberskys@gmail.com
Subject: MHA Draft EIS Comments Madison/Miller Urban Village
Date: Thursday, August 03, 2017 6:19:00 PM

To: MHA.EIS@seattle.gov
Subject: MHA Draft EIS Comments
From: Sandy Sabersky and David Merz

From: Sandy Sabersky <saberskys@gmail.com>
Sent: Thursday, August 3, 2017 12:33 PM
To: suzlasser@hotmail.com; David Merz
Subject: Response to neighborhood upzoning

To City Planners.

Though we don't live in the area that is designated for change, my family has lived on Capitol Hill for 31 years. We see incredible change and opportunity as we move to make this a livable city for all.

One of the wonderful things about living on the hill is that it is a walking neighborhood that invites community. The inviting nature of the streetscape with the lower buildings and small businesses make them welcoming and not overwhelming for all ages and abilities.

We have already been added to buildings all over the hill and in other neighborhoods too and have seen how this forever changes a city.

My concern is that we will lose that welcoming nature feeling as tall buildings become like tunnels as has already happened in many parts of the city.

I know this is somewhat unavoidable as growth is growth. But, we need to be very careful because there is no going back. Once the charm is lost it is lost.

The professional and thorough response to the upzoning proposal by the Madison Miller Park Community group, in my opinion, deserves very careful consideration.

Thank you for your attention,
Sandy Sabersky
David Merz

From: Erik Saganic
To: [PCD_MHAEIS](#)
Cc: [Kathy Strange](#)
Subject: MHA DEIS comment
Date: Monday, August 07, 2017 3:22:30 PM
Attachments: [image001.jpg](#)

To whom it may concern,

The Puget Sound Clean Air Agency (the Agency) requests “Exhibit 3.9-2” on page 3.321 to be corrected.

The table shows “maximum concentrations”, however due the nature of the National Ambient Air Quality Standards (NAAQS), the concentration used for the calculation varies depending on the pollutant. For example, the 24-hour standard for PM_{2.5} is based on the 98th-percentile value for the year, not the maximum. This is usually the 7th or 8th highest value of the year. But in this table, the maximum is listed, leading a reader to think that an area may be over the air quality standard when it is not (like the listed 44.0 micrograms per cubic meter at the Duwamish monitor in 2014 vs the NAAQS standard of 35).

Similarly, the 8-hour ozone standard is based on the 4th highest value of the year, and this table lists the maximum value and this needs correction.

Also, some of this table includes incomplete data, where no value should be listed in its place. The 10th and Weller site was started in June of 2014. Therefore, no value should be listed for any pollutant in 2014 for this site. The Seattle Duwamish air monitoring site was also down for the first 2 quarters of 2014, and as a result should also not have any reported 2014 values without 75% data completeness as defined by the NAAQS calculations.

For all the correct values for this table, you can refer to our annual data summaries:

- 2014: <http://www.pscleanair.org/library/Documents/2014AQDS.pdf>
- 2015: <http://www.pscleanair.org/library/Documents/2015AQDS.pdf>
- 2016: <http://www.pscleanair.org/library/Documents/2016AQDS.pdf>

The Agency requests the following statement be corrected on page 3.318: “The federal daily PM2.5 standard has not been exceeded in the Puget Sound area since the initiation of monitoring for this pollutant in 2001 (PSCAA 2015).” This statement is incorrect as the Tacoma-Pierce County areas exceeded the daily PM2.5 standard in 2008 and was recently redesignated as a maintenance area in 2015.

The Agency requests that a reference be provided for this statement on page 1.35: “Portions of Seattle located within 200 meters of major highways, rail lines that support diesel locomotive operations, and major industrial areas are exposed to relatively high cancer risk values of up to 800

in one million.”

For any questions, contact me at eriks@pscleanair.org, 206-689-4003.

Thanks for your attention to this matter, Erik Saganic

Erik Saganic
Air Quality Scientist
206.689.4003



Puget Sound Clean Air Agency
1904 3rd Ave – Suite 105
Seattle, WA 98101

Name	Bill Sampson
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I believe that both alternative 2 and 3 have good elements but are too extreme. In alternative 2 density would dramatically increase in South Seattle especially Othello. This may increase gentrification since many new people would be moving in and only a certain percentage of the new units would be affordable. North Seattle especially Wallingford is better suited for allowing more density with a lower risk of gentrification.</p> <p>2 However I think alternative 3 goes too far the other way. If there is very little new density in South Seattle opportunities to increase economic activity may be lost. Also placing the vast majority of the density in a few neighborhoods makes the community feel like they are under attack from development and increases the pressure to provide good social services in the community. I think if both North and South Seattle should have a moderate increase in density both areas would encourage a better urban village by allowing a strong, vibrant, diverse, Transit oriented development, Urban Village.</p>
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	

Name	Nora Sandler
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<ol style="list-style-type: none"> 1 I definitely favor alternatives 2 and 3 over no action. I live in Ballard and support more upzoning here. I'd like to see higher performance requirements if they're not going to suppress overall housing production - the current requirements seem a bit low (in Montgomery County they're 12-15% and it doesn't seem like it's hurt housing production there at all).
Housing and Socioeconomics	<ol style="list-style-type: none"> 2 If high opportunity is the main determinant of displacement risk, maybe Alternative 3 isn't the best way to reduce displacement. Would it make sense to impose higher affordability requirements on projects that will displace tenants? Or expedite planning for projects that are less likely to cause displacement? 3 It also seems important to make sure that all this new housing is well-built and will last a long time. If it falls apart quickly, that will mean more demolitions, and more displacement, and we won't have as many units aging into affordability.
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?	

From: Andrew Sang
To: [PCD_MHAEIS](#)
Subject: Comments
Date: Tuesday, August 08, 2017 12:01:15 AM

Dear MHA team,

Thank you for the opportunity to provide comments on this historic proposal. I am hoping that this plan would avoid upzoning vulnerable regions such as Rainier Beach, where the displacement risk is high and there's not much opportunity. Please focus upzones in regions such as Ballard, Capitol Hill, Wallingford, Green Lake-Roosevelt, and other regions where there are many amenities (parks, schools, jobs etc) and good transit.

That being said, transit hubs do need heavy upzones so our region can move away from our car dependent lifestyle. I would like to ask the HALA team to please consider upzoning the regions around light rail stations very dramatically. For example, I'd suggest the 2-3 blocks directly adjacent to Capitol Hill Station, Northgate Station and Roosevelt station actually become zoned to high-rise and above, then the 2 blocks out from that be rezoned to mid-rise or high-rise. We need to ensure the people of our city are able to move around without needing a car, and every feet further from a station increases the chance someone will drive. This is especially necessary for two of these stations, since Capitol Hill is such a desirable region, and increasing housing stock here will decrease housing prices in the long run, and since Roosevelt is what will essentially be gateway for all other transit into NE Seattle, meaning it will become a center for activity, which increased density only reinforces.

Additionally, I would like to ask that the city upzone the Central District significantly. Being so close to the CBD such that one could walk there within 15 minutes but still live in a single family home is criminally bad planning. We need Low rise, mid rise, and high rise in the central district are necessary for the sake of sustainability going forward.

Also, I would like to request that the city please consider studying the effects of retaining a certain percentage amount of funds to be kept in the neighborhood from which they were collected. Many of the folks I spoke with were not happy that this legislation would only increase housing prices/displacement from their neighborhoods while not building any additional housing in them. They are concerned that their low income neighbors will be forced into whatever locality it is expedient in to construct housing.

Finally, though I'm not sure this falls under the purview of this legislation, I would like to ask for the city to increase all zoning city wide, in single family zones particularly, to permit RSL, townhouses/rowhouses, low rise condos and multi-plexes, and to permit local commercial activities such as additional corner stores. They do not damage the character of the city. I know, because I've lived in one. Denser housing allows for more diversity in our neighborhoods, and fights displacement and high housing costs in the long run.

Thank you once again for this opportunity.

Andrew Sang

From: Laura Saunders
To: [PCD_MHAEIS](#)
Subject: Roosevelt neighborhood upzone
Date: Sunday, August 06, 2017 10:37:11 AM

As a 42 year resident of the area bounded by 12th and 15th, 66th and 70th I am writing to strongly object to the proposed upzoning recommended in The HALA plan. This almost completely single family area is a gem of mostly affordable housing that promotes families and neighborhoods. I understand the need for more housing but would urge the city to respect and preserve this neighborhood. There is already much construction of multiple housing along the Roosevelt corridor that should be adequate and I would hate to see 4 story buildings intrude in this much more human sized environment.

Laura Saunders
1227 NE 70th

From: Amanda Sawyer
To: [PCD_MHAEIS](#)
Subject: Extend the comment period!
Date: Monday, June 19, 2017 11:02:16 AM

Hello,

Thank you for sharing the DEIS. Since this document is extremely large and has over 800 pages to review, please extend the comment period to September. 45 days to read and understand a document so complex is not enough time.

Please also setup and offer Neighborhood Open Houses in addition to the general Open House on 6/29. This is a very complicated matter that impacts each neighborhood differently. I live in West Seattle Alaska Junction and want to know more information about traffic studies conducted for the DEIS. (Just as one example.) Did the estimates for 2035 take into account future light rail, upcoming construction on Fauntleroy Way, Avalon Way? Why are peak hours identified for the WS bridge only in the afternoon? Again, each urban village will be affected by the proposed zoning so differently. Please organize workshops within each urban village for comment.

Thank you.

Sincerely,
Amanda Sawyer
asawyer131@gmail.com

Comment Form

Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS)

This form is for your comments on the Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS). The comment period will be open for 45 days, from **June 8, 2017 to July 23, 2017.**

We encourage you to use of this form because it will help us efficiently respond to your comment, but you can submit comments in other ways too.

Via email:
MHA.EIS@seattle.gov
By mail:
Office of Planning and Community Development
Attn: MHA EIS
PO Box 94788
Seattle, 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 Amanda Sawyer

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.

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.

low-income & affordable housing in urban Villages near transit & jobs is not 100% true. Developers can chose to pay a fee to bypass offering affordable units. DEIS fails to discuss impacts of affordable units being built further out in more affordable neighborhoods.

Housing and Socioeconomics. This Chapter analyzes potential impacts of the alternatives on housing and populations, and it includes a displacement analysis.

Fails to ~~see~~ recognize middle class families that may be displaced. Fails to address that affordable housing could be pushed out further if developers chose to pay a fee instead of provide affordable units

Land Use. This Chapter analyzes potential impacts of the alternatives on land use.

Design Review as a mitigation tool is laughable since that process has been changed to eliminate public comment on smaller projects

Aesthetics. This Chapter analyzes potential impacts of the alternatives on aesthetics, including height, bulk and scale.

Transportation. This Chapter analyzes potential impacts of the alternatives on transportation, including vehicular travel, transit, and parking.

Are your transportation assumptions based on future light rail? Peak Hours do not reflect am. travel times

Historic Resources. This Chapter analyzes potential impacts of the alternatives on historic resources.

Biological Resources. This Chapter analyzes potential impacts of the alternatives on biological resources including tree canopy and environmentally critical areas.

Open Space & Recreation. This Chapter analyzes potential impacts of the alternatives on open space and recreation.

Mitigation of developers providing open space or pay a fee, but we were told they wouldn't pay any more for providing or paying for affordable housing. How can you think they will develop public

Public Services & Utilities. This Chapter analyzes potential impacts of the alternatives on public services and utilities.

Air Quality & Green House Gas Emissions. This Chapter analyzes potential impacts of the alternatives on air quality and greenhouse gas emissions.

Name	Jennifer Scarlett
Email address	
Comment Form	
Housing and Socioeconomics	<p>1 You have not done proper outreach regarding MHA. The only HALA meeting in South Park was email invite only to people already on board with MHA. Other people found out by accident. The "mailer" sent out was an ad for an "open house" that did not explain Rezones at all, and we're deliberately misleading, and confusing.</p> <p>People in South Park still don't know what's happening. The door hanger was also vague and misleading. For transparency, copies of the mailer and door hanger should be included in the section on outreach. I would also like the actual number listed of Seattle residents who were able to log into the Web Platform Hala.consider.it revealed, as this was very difficult to navigate, and the residents of South Park have minimal access to technology.</p> <p>Many residents requested notice in letter form be sent to thier communities. Please state how many people made that tequest, and why is was not done.</p>
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	

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Subject: Insufficient Comment Period for MHA DEIS
Date: Saturday, June 17, 2017 7:29:54 PM

06/17/17

Attn: Seattle Office of Planning and Community Development
Re: MHA DEIS

1 The Draft Environmental Impact Statement prepared for MHA is unusually large and too broad to completely study and respond to in a 45 day comment period. Residents in the South Park area struggle with access to technology, and many have English as a second language. No notification has been done in our neighborhood, so that many are just learning about the MHA Rezone Proposal. It is also the summer break for families with children and adds an extra burden for them.

The MHA proposal is likely to cause significant adverse impacts to the mostly low income community of South Park. We need time to study the DEIS thoroughly.

I am requesting an extension to the MHA DEIS comment period of at least 80 additional days.

Thankyou for your consideration in this matter,

Jennifer Scarlett
South Park Resident
Duwamish Valley Neighborhood Preservation Coalition
Seattle, 98108

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Subject: Extension to DEIS Comment period
Date: Sunday, July 30, 2017 11:02:16 PM

- 1 I am requesting an extension on the MHA DEIS comment period. The DEIS is too large to respond to in such a short time. Please extend the comment period another 30 days past Aug 7th.

Sincerely,
Jennifer Scarlett
Resident of South Park, Seattle

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: Urban Village Criteria in EIS
Date: Thursday, August 03, 2017 9:50:50 PM

To the OPCD re: Land Use and Equitable Development in the MHA DEIS.

- 1 The MHA DEIS does not adequately describe why some areas are being drastically upzoned, and others are not. The exact criteria for "Urban Village" designation need to be clearly defined in the MHA EIS, as "Urban Villages" are singled out to take on most population growth.
- 2 Some of these areas do not meet the criteria for Urban Village designation. It's concerning that Urban Villages are arbitrarily singled out for growth without adequate planning or notice to residents while other, more connected and suitable areas are overlooked. This is neither prudent nor equitable, as many of the existing Urban Villages were former redlined areas and contain low income residents and communities of color. Many of these communities have not had outreach or involvement in planning.
- 3 A complete map of Seattle showing which areas, in and outside of current Urban Village boundaries, fit the criteria for increased population growth MUST be included in the MHA EIS. Areas that do not qualify for increased density/growth should also be clearly defined. It appears some areas are being protected while other, more low income areas like South Park, are carrying the burden of increased upzoning, demolition, and displacement. One of the goals of the MHA legislation is to distribute growth equitably, and showing this map and study is the only way to attain equitable growth.
- Please show ALL the areas suitable for increased population density and clearly define what legal criteria is used to reach this conclusion.

Thankyou

Jennifer Scarlett,

Resident of South Park, Seattle

South Park Land Use Committee

Submitted Aug. 3rd 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: Comment on Traffic and Air Quality in the MHA DEIS
Date: Thursday, August 03, 2017 10:31:42 PM

Attn OPCD

This is a comment on the MHA DEIS regarding Traffic and Air Quality in the South Park neighborhood.

1 Traffic Studies on HWY 99, SR 509, and I-5 need to be done and included in the MHA EIS showing the impact of increased population density from MHA Upzoning of South Park on traffic congestion and patterns in the area.

South Park is in an important freight corridor, connecting the Port of Seattle to Seatac, Tacoma and surrounding industrial areas and businesses.

Many of the residents of South Park depend on these businesses for employment, including myself.

2 Data on how much freight travels through this corridor daily should be included in the MHA EIS. Will increased population density inhibit freight mobility, or spur businesses to relocate?

Please also include what outreach was done to affected businesses in the South Park area regarding proposed MHA upzones and increased population within this important freight corridor.

1 Furthermore, when these main freeways back up, which surround and dissect South Park, Freight and other traffic spills onto South Parks' residential streets, causing congestion and further reducing air quality.

3 According to the MHA DEIS, diesel vehicles are only going to become 4% more efficient, so this diesel particulate will be an ongoing health issue for South Park residents, current and future.

The DRCC Cumulative Health Impacts Study of the Duwamish Valley should be included in the MHA EIS as it references these health and livability concerns.

Traffic Impacts on Hwy99, SR509 and I-5, and subsequent Air quality impacts must be included in the MHA DEIS.

Sincerely,

Jennifer Scarlett,

Resident of South Park Seattle

South Park Land Use Committee

Submitted Aug. 3rd 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: Loss of property value due to MHA requirement
Date: Friday, August 04, 2017 2:07:03 PM

Attn OPCD,
MHA DEIS comments

1 The MHA DEIS does not cover the loss of value in my property and my home. I am a property owner in South Park, and also a low income worker. I do not earn enough to pay my mortgage, etc. and save for retirement. My house is my savings and my safety net. My house will become economically obsolete on property no longer zoned single family and surrounded by tall buildings. My garden won't grow without sun, and my privacy will be gone. My home will no longer be desirable to families or buyers. The MHA requirement will devalue the property itself. Developers will deduct the cost from the amount they will pay to purchase the property. The house will be considered a liability, not an asset and so this is a lose/lose situation for myself and the other low/fixed income home owners in Single Family zones being upzoned to Lowrise 1 or higher. This is a taking and a loss. The MHA EIS needs to address and state the effects of this financial loss on property and home values.
Sincerely,
Jennifer Scarlett
Owner and resident of South Park, Seattle.
Submitted Aug. 4th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: MHA DEIS comment, Land Use Duwamish Valley
Date: Friday, August 04, 2017 2:09:08 PM

Attn OPCD

Re: MHA DEIS comments

1 This is a comment on the MHA DEIS regarding land use in the Duwamish Valley, including South Park and Georgetown areas.

These areas exist in a river delta, and contain areas of frequent flooding.

The MHA EIS does not discuss potential impacts of climate change and ocean level rise on the low elevation areas within the Duwamish valley.

The MHA EIS MUST include studies done on estimated ocean level rise due to climate change and potential increased flooding in the Duwamish Valley, if the Duwamish Valley areas are being upzoned for increased population density. Future residents will be put at risk.

Thankyou,

Jennifer Scarlett

Resident of South Park

Member of the Duwamish Valley Neighborhood Preservation Coalition

And South Park Land Use Committee

Submitted Aug. 4th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: Cmoments on the MHA EIS re:Critical Areas
Date: Friday, August 04, 2017 2:12:45 PM

Attn OPCD

Re: MHA EIS

1 This is a comment on the MHA DEIS. Critical Areas need to be removed from Rezoning under MHA for increased population density. Critical areas are not appropriate for increased population density or growth.

The MHA EIS needs to show where these critical areas are located within each Urban Village area, and each critical area needs to be removed from planning for growth.

Critical areas, such as flood plains, earthquake liquefaction zones, watersheds, ecologically sensitive shoreline areas, river deltas, areas of documented flooding and wetlands are not appropriate for population density.

No public investment should go to funding growth in these zones, regardless of the wishes of a few property owners who, under the guise of "area redevelopment committees" expect the public to fund improvements to thier properties and adjoining infrastructure.

Living in these critical areas should be at individual risk and not public cost.

2 All the critical areas in the city of Seattle need to be clearly mapped out in the MHA EIS, not just listed as a numerical amount, as some areas, such as South Park, contain many more critical areas than others, and some of these areas are overlapping, creating a cumulatively dangerous adverse impact.

Sincerely,

Jennifer Scarlett

Residentify of South Park

Member of the South Park Land Use Committee

Member of the Duwamish Valley Neighborhood Preservation Coalition

Submitted to OPCD Aug 04 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: Comment on the MHA DEIS re: Community Outreach
Date: Friday, August 04, 2017 2:55:48 PM

Attn OPCD.

Re MHA DEIS

This is a comment on the MHA DEIS regarding insufficient outreach and notice to the South Park community.

Notice and outreach was never done in the South Park community.

Affected residents and property owners were never told about the MHA Upzones. HALA postcards were vague and misleading. They were thrown out by most as junk mail, or an invitation to an "ice cream social".

NO HALA meeting was advertised to residents and held in South Park. A "design review" invite was emailed to a privately selected group on short notice and then when the event happened the attendees were NOT representative of the diverse population of South Park. A misleading "sales pitch" video was shown, and questions weren't answered.

No publicly advertised community meeting was ever held in South Park by the OPCD or HALA reps.

Please clearly explain what actual outreach and community notice has taken place in South Park in the MHA EIS.

The "hala.consider.it" app was inaccessible to many of us disadvantaged residents in South Park who don't have access to technology. It was confusing to many, and having to log in was a deterrent as well.

The app did not perform on my phone and I was unable to leave all the comments I wanted to.

It took hours to leave what I could. People from other areas were able to comment on South Parks Draft Rezone Map, even though they were not familiar with the area at all. Questions were Urban Village specific. They had access to better computers so they were able to leave more comments and skew the overall results.

The City is aware of our challenges, and many residents here repeatedly asked the OPCD to send out proper notice to affected residents in normal letter form, translated into multiple languages, in clear wording to explain what is happening, so that everyone could have a voice. Such letters were never sent out, instead excuses were made and people were directed to use the inaccessible "hala.consider.it" Web playform.

The OPCD and HALA have consistently denied our requests for notice and involvement.

The residents of South Park have not been included in planning for growth in our own community. This is not equitable development. This is incongruent with our neighborhood plans and the Seattle Comprehensive Plan, as well as the purpose of the MHA legislation.

What was supposed to be a "door knocking" campaign was just students running up and putting a door hanger on door knobs, without even knocking. Again, these were misleading ads for HALA, and did NOT clearly state our property was being upzoned and the post it note attached for an "open house" fell off the hanger. Both "open houses" were held in areas difficult to access from South Park, and had extremely low turnout.

The MHA EIS needs to include the specifics on how much outreach was done IN South Park.

The MHA EIS must specify how many residents of each urban village were actually able to get into and navigate the "hala.consider.it" app to leave comments, and how many comments were actually left by non-residents of the affected areas.

Thankyou,
Jennifer Scarlett

Resident of South Park, Seattle
Member South Park Land Use Committee
Member Duwamish Valley Neighborhood Preservation Coalition
Submitted Aug 4th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: Health Impacts in the MHA DEIS
Date: Friday, August 04, 2017 3:24:22 PM

Attn OPCD
Re: MHA DEIS

1 This is a comment on the MHA DEIS. Health impacts need to be included in the MHA EIS Scoping.

There are many adverse impacts to health, both physical and mental from displacement and living in an Urban environment vs. Suburban or rural. These are the two choices given to residents of affected areas, displacement or living in an increasingly urban environment. The MHA EIS should also include studies on adverse impacts to Mental Health in areas undergoing rezones and "redevelopment".

2 The MHA EIS should also include studies on suicide rates in low income areas facing upzoning and redevelopment.

Sincerely,
Jennifer Scarlett
Resident of South Park Seattle
Submitted August 4th, 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: Transit in the MHA DEIS
Date: Friday, August 04, 2017 8:29:42 PM

Attn OPCD
Re:MHA EIS

- 1 This is a comment on the MHA DEIS. The MHA EIS should contain info on actual, not
scheduled, bus arrival times and intervals in all the Urban Villages.
- 2 The Bus Service in many areas, including South Park does not meet the frequent transit
criteria. The Bus is unreliable and residents need cars to get to work and amenities, and
therefore need parking as well.

Thankyou,
Jennifer Scarlett
Resident of South Park
Member of the Duwamish Valley Neighborhood Preservation Coalition
Member South Park Land Use Committee
Submitted August 4th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Subject: Loss of tree canopy in the MHA DEIS
Date: Friday, August 04, 2017 8:59:26 PM

Attn OPCD

1 This is a comment on the MHA DEIS. The MHA DEIS does not adequately show impacts of tree loss in specific areas, such as South Park. The tree loss is averaged out over the whole of Seattle so that severe adverse impacts to individual communities are hidden in this way. Some areas have already been developed, so obviously they'll lose no more trees on a lot already covered by a building, whereas in South Park and many other predominately Single Family areas the loss of tree canopy will be immense.

The MHA EIS MUST show tree loss and other adverse impacts by specific Urban Village, and not averaged out over the city in an attempt to hide severe impacts.

2 Each Urban Village should have it's own SEPA analysis.

South Park is surrounded by industrial area and freeways, so loss of Single Family Zoning and loss of tree canopy within the Single Family Zoning would be devastating to the community.

This is the green belt between us and severe livability impacts.

South Park is the only "Urban Village" which is isolated from other residential areas, surrounded by industrial use, and suffering from severe pollution and toxic contamination issues. To average out the adverse impacts of Upzoning with the rest of Seattle is irresponsible and unethical.

Community groups have been working hard for years to plant trees and increase tree canopy, restore native habitat and soil, and improve air quality and livability in South Park.

3 The studies included in the Duwamish Valley Cumulative Health Impacts Analysis referenced below MUST be included in the MHA DEIS. The Adverse impacts to each Urban Village needs to be seperated out, and clearly visible to those reading the MHA EIS so that true impacts to vulnerable communities are highlighted. This is the ONLY equitable way to add population density in Seattle.

The Duwamish Valley Cumulative Health Impacts Analysis (CHIA) Published in 2013 by Just Health Action and DRCC/TAG, the Cumulative Health Impacts Analysis (CHIA) examines a range of disproportionate health exposures and impacts affecting people in the Duwamish Valley.

Sincerely,

Jennifer Scarlett

Resident of South Park Seattle

Member of the Duwamish Valley Neighborhood Preservation Coalition

Member of the South Park Land Use Committee

Submitted Aug 4th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: MHA DEIS Aesthetic Impacts
Date: Friday, August 04, 2017 9:43:16 PM

Attn OPCD Re MHA DEIS

This is a comment on the MHA DEIS.

1 The picture examples of different building sizes in the Aesthetic portion of the DEIS do not show the most severe example of impacts due to upzoning.

Please remedy this in the Final EIS so reviewers can see realistic examples of adverse impacts. The Lowrise buildings will block the view of homes, yards, and trees all the way down the street. In your example you've placed the lowrise building at the end of the block, giving it the appearance of being less obstructive to the public view, and likewise giving the existing homes the appearance of being larger.

2 Also, in the picture examples there is a multilane street, whereas many upzoned streets are ONLY TWO LANES. This gives the appearance that there is not a valley of shadow created, which there will be in many areas. This valley of shadow effect is aesthetically damaging to an entire neighborhood.

This needs to be presented realistically in the final EIS. The "worst case scenario" should be presented.

1 The MHA EIS must also show the most extreme height differences between building from street level, front view, side by side.

3 The existing environment needs to be presented honestly as well. Fully restored historical homes are unlikely to be demolished and replaced with 30' high single family homes, so the existing built environment of smaller homes with large yards should be presented against the new zoning standards of less setbacks and higher buildings.

Aesthetics is not a matter of "taste". There are set standards of "cohesion" and "intactness" of the existing environment.

4 A map showing the intactness of all Single family zones included in the proposed Upzone areas, as well as existing building heights should be included in the MHA DEIS, not just maps of zoning designation.

Thankyou,
Jennifer Scarlett
Resident of South Park Seattle
Member Duwamish Valley Neighborhood Preservation Coalition
Member South Park Land Use Committee
Submitted August 4th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: Aesthetics in the EIS
Date: Friday, August 04, 2017 10:13:03 PM

Attn OPCD Re MHA DEIS

This is a comment on the MHA DEIS regarding Aesthetics.

1 Not enough outreach has been done to the community to adequately gauge impacts to aesthetics in the areas of proposed upzoning.

Level of impact is directly related to level of negative reaction from the affected community, yet the community has not been adequately notified or consulted on their desires and expectations of building height and scale. Focus groups, hand picked by the city, were not representative of the entire community and turnout was poor. The Web platform "hala.consider.it" was hard to access and navigate, if people even knew about it.

Legitimate outreach has yet to be done.

2 Furthermore, Design Review is listed as a mitigating factor, but most of these buildings will not be subject to design review, and most of these communities do not have neighborhood specific design review/standards.

The MHA EIS should include surveys of responses from the actual community to be affected by changes to building bulk, scale and height, as well as reduced setbacks and loss of sunlight.

Impacts cannot be gauged reliably without study and outreach.

Further study and input via outreach to the affected communities should be included in the MHA EIS.

Design Review needs to be removed as a mitigating factor in the Aesthetics portion on the MHA EIS. The new standards and thresholds for design review DO NOT APPLY to most buildings causing adverse aesthetic impacts.

Sincerely,

Jennifer Scarlett

Resident of South Park Seattle

Member Duwamish Valley Neighborhood Preservation Coalition

Member South Park Land Use Committee

Submitted Aug 4th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: MHA DEIS comment on infrastructure
Date: Friday, August 04, 2017 10:33:09 PM

Attn OPCD Re MHA DEIS

1 The MHA DEIS does not adequately present the failing of, or lack of infrastructure within areas of proposed upzoning. Water, Sewer, electrical, gas lines, sidewalks are outdated or nonexistent in many areas.

Areas like South Park and Crown Hill don't have the infrastructure to support increased density but MHA itself does not pay for these improvements.

Please explain in the MHA EIS the damage and cost to infrastructure by adding population density to areas where infrastructure is already inadequate for current populations.

For example, sewer lines in South Park are only 8", and many sewage backups and flooding already occur in South Park regularly. Many streets do not have sidewalks.

How will this be affected by increased population density? How will replacements be paid for, and what is the cost? How long will construction and infrastructure improvements take and what is the disruption to the community during that time. Please include these collateral damage estimates in the MHA EIS.

Thankyou,

Jennifer Scarlett

Resident of South Park Seattle

Member Duwamish Valley Neighborhood Preservation Coalition

Member South Park Land Use Committee

Submitted August 4th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: MHA DEIS SUMMARY Comments
Date: Saturday, August 05, 2017 10:40:16 AM

Attn OPCD Re MHA DEIS,
 This is a comment on the MHA DEIS.

1 The reference in the Summary (p.1.1) to a one bedroom apartment being unaffordable "to a worker earning \$15 minimum wage" needs to be removed.
 As you know, MHA is not intended to provide housing for the very low income, but for those earning 60% AMI.

2 On p. 1.2. "Modify certain rezone criteria in the Land Use Code" needs to state WHY these modifications are required, which is that this proposal is in conflict with existing neighborhood plans developed by the communities affected.

3 On p 1.3 It states the proposal will create 6200 net new affordable units. This number includes MHA units created in the Udist, Downtown, and South Lake Union. This is misleading and incorrect.
 Please correct this number to reflect the number of MHA units created from this proposal only.

4 On p. 1.3 "Address the pressing need for housing affordable and available to a broad range of households" needs to be changed.
 "broad range" should be replaced with "households earning 60% AMI and up" as MHA is not intended to provide housing for very low income households.

5 On p. 1.4 reference is given to the "potential future strong demand for housing". Please remove this as it is not a fact, but speculation.
 Please state clearly that in Option 1, the Growth plans in Seattle 2035, fulfills Seattle's obligation for increased population density without any further changes in zoning.

6 On p. 1.5 There is an error. The statement "Higher MHA requirements would apply in strong market areas, and lower MHA requirements in weaker market areas" is grossly incorrect. South Park shows proposed MHA requirements of 11% in areas, while S.Lake Union has requirements much lower.
 This statement is false, and MUST be removed from the MHA EIS.

7 On p. 1.6, under Alternative 1 NO ACTION
 Please add that under no action, modification and changes to Land Use Code also would not occur, as this is included in the proposal.
 This is important as neighborhood plans and community involvement in planning for growth will be better preserved by choosing Option 1.

8 Both Action Alternatives, 2 and 3, are the same. Both involve changing neighborhood plans and removing Single Family Zoning from Urban Villages. Both limit growth to particular areas of the city. This is not equitable growth.
 All areas of the city with frequent transit available should absorb growth.
 Another option to create affordability in Seattle needs to be offered in the MHA DEIS.

South Park is does not have frequent transit or amenities. Why is it included in the proposal while other areas with frequent transit are not.
Please explain in the MHA EIS how this is good planning.

- 9 On p. 1.9 Exhibit 1-5 it says "apply smaller urban village boundary expansions to a 5 min walk shed or less from the frequent transit station". South Park does not have a frequent transit station, and other areas that also do not have frequent transit are included in this proposal.
Please define "frequent transit station" in the MHA DEIS.

- 10 On p. 1.11 Exhibits 1-6 and 1-7 show that most units built will be Market Rate, not affordable. The MHA DEIS does not show the impacts of Market Rate, or Luxury units being built in an area on rising property taxes.
The MHA DEIS needs to show the effects of market rate development on overall property assessments and property tax increases in an area, as these increases are subsequently passed on to renters as rent increases. This removes more affordability than it creates.

- 11 On p. 1.12 under "Impacts to All alternatives"
The DEIS states "The affordability of market-rate housing would continue to be a concern and burden for many residents under all three alternatives, notwithstanding the significant contribution from the implementation of MHA." and "this is a result of economic forces beyond the reach of MHA"

This negates the entire premise and purpose of the MHA proposal. HALA has been using the "supply and demand" example for upzoning. Creating more units does not in fact create affordability or reduce the burden on residents. With these statements, the MHA DEIS confirms the proposal does not meet its intended purpose.

- 12 The term "significant" is opinion and should be removed from the MHA DEIS.

Sincerely,
Jennifer Scarlett
Resident of South Park Seattle
Member of the Duwamish Valley Neighborhood Preservation Coalition
Member of the South Park Land Use Committee
Submitted to Seattle OPCD August 4th

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: MHA DEIS Summary comments
Date: Saturday, August 05, 2017 11:06:57 AM

Attn OPCD Re MHA DEIS,
This is a comment on the MHA DEIS.

1 On p. 1.12 remove the term "signifigant" as it is opinion only. The MHA units are only created by new development, which puts existing affordable units at risk of demolition.

2 The MHA DEIS states that the proposal will increase demolition, therefore the MHA EIS must include the estimated number of affordable units at risk of Demolition, not just the number of MHA units created.

3 On p. 1.13 the MHA DEIS states "based on assumptions , about 13 new affordable units would be built in the study area in alternative 2 and 3, for every low income household. This is an error. Based on the HALA MHA unit creation estimates, this would mean that there are only about 3 low income households in all of South Park at this moment. Upwards of 45% of South Park residents earn less than 60% AMI. The majority of children attending Concord Elementary are eligible for reduced or free lunches. OPCD itself has estimated only 14.6 MHA affordable units would be created in South Park.

This "assumption" is incorrect and this entire statement MUST be removed from the MHA DEIS, as it is misleading and fraudulent.

Sincerely,
Jennifer Scarlett
Resident of South Park Seattle
Member of the Duwamish Valley Neighborhood Preservation Coalition
Member of the South Park Land Use Committee
Submitted Aug 5th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: MHA DEIS Comments
Date: Saturday, August 05, 2017 11:36:12 AM

Attn OPCD Re MHA DEIS.

This is a comment on the MHA DEIS.

The "access to opportunity" analysis is flawed and is not an adequate tool to be used when planning for growth.

1 Included in the analysis are schools that residents are not automatically allowed to attend just by living in the area.

2 Merely abutting a wealthier area does not automatically give low income people wealth. In reality, it makes the area LESS AFFORDABLE and more difficult for low income people to live in.

3 The analysis is also useless because MHA units are not required to be built on site, so increased development in an area does not link to increased affordable housing for low income people being built close to opportunity.

4 The MHA DEIS is using the "risk of displacement and access to opportunity" analysis to determine where growth should go, but the analysis is flawed and incomplete.

5 Without including EVERY area of Seattle into the analysis and proposal for increased density, the "social and racial justice lens" is a fraud. Wealthier neighborhoods with amenities and frequent transit are spared from increased development, crowding and demolitions while poor, and diverse communities like South Park with no amenities and no frequent transit are taking the burden.

The MHA DEIS cannot present any part of thier proposal as being equitable as long as only some communities are sharing the burden of growth.

Sincerely,

Jennifer Scarlett

Resident of South Park Seattle

Member of the Duwamish Valley Neighborhood Preservation Coalition

Member of the South Park Land Use Committee

Submitted to OPCD August 5th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Subject: MHA DEIS
Date: Saturday, August 05, 2017 12:05:34 PM

Attn OPCD Re MHA DEIS,
This is a comment on the MHA DEIS.

1 The MHA DEIS assumes that housing demand in Seattle will continue to grow, and the access to opportunity analysis uses proximity to downtown as a factor when determining access to employment, but there is no analysis in the MHA DEIS of the impacts of light rail to outlying areas on housing demand in Seattle, or access to the downtown core.

Light rail is starting to connect outlying areas to Seattle in a way never seen before. Once the light rail is completed to outlying areas, a worker can access downtown within minutes. Communities without access to light rail will actually have LESS access to employment and opportunity even though they are physically located closer to downtown.

2 The MHA DEIS needs to show examples of transit times when light rail is completed, and figure this into their "assumptions" of housing demand and population growth in Seattle. Compare these times to transit times accessing downtown from Seattle neighborhoods not getting light rail service. Include this in the analysis of access to opportunity.

3 Today, families and individuals continue to seek out Single Family homes with yards and sunlight, and workers are willing to commute long distances to make sure their families are raised in a livable environment, and their homes have privacy and sunlight. The advent of light rail connecting these once far off suburbs with the downtown core will decrease the housing pressures within the city.

The MHA DEIS should include studies of which are the most desirable housing types (ie, SF, Condo, Apt.) and what are the most desirable lot coverages/setbacks in determining levels of Upzones. Aesthetics do matter. If we remove these most desirable housing/standards and options from our communities in Seattle, workers will seek them elsewhere and suburban sprawl will continue.

Thankyou,
Jennifer Scarlett
Resident of South Park Seattle
Member of the Duwamish Valley Neighborhood Preservation Coalition
Member of the South Park Land Use Committee
Submitted to OPCD August 5th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Subject: MHA DEIS comments
Date: Saturday, August 05, 2017 12:43:58 PM

Attn OPCD Re MHA DEIS,

1

This is a comment on the MHA DEIS regarding outreach and notification.

The HALA outreach and publications were intentionally confusing and misleading.

MHA was presented as being inextricably tied in with \$15 hr minimum wage, preschool for all, the housing levy increase, and other separate legislation not included in the MHA proposal.

In South Park people are still either unaware of the MHA Upzone proposal, or are confused as to the meaning and details.

Outreach was wholly inadequate and information was inaccessible to residents of my community of South Park, Seattle.

The Door Knocking campaign was merely hanging door hangers on door knobs, not knocking, and running away.

The door hangers were vague and did not look official, with cartoon representations of buses, Single Family Homes, and trees.

Legislation of this magnitude and changes to the fabric of our community this big should have merited legitimate notice and outreach to residents, with honest and simple explanation of the proposal and land use actions being taken.

The MHA DEIS needs to describe the Door knocking as "door hangers" and copies of the door hanger and the other vague HALA Mailer (postcard) so that reviewers can see the level of outreach actually attempted by HALA.

Jennifer Scarlett,
Resident of South Park Seattle
Member of the Duwamish Valley Neighborhood Preservation Coalition
Member of the South Park Land Use Committee
Submitted to OPCD August 5th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: MHA DEIS COMMENTS
Date: Saturday, August 05, 2017 2:16:00 PM

Attn OPCD Re MHA DEIS,

1 The MHA DEIS analysis using the TRAO participants to gauge displacement does NOT apply to South Park, where many residents are undocumented and therefore ineligible for benefits. Also, this study doesn't take into account the displaced persons who were able to locate another apartment when they first found out their current rental would be gone, or the residents who were forced out by other means and never participated in the program.

2 Displacement of vulnerable populations and low income people is not adequately studied in the MHA DEIS.

Sincerely,

Jennifer Scarlett

Resident of South Park Seattle

Member of the Duwamish Valley Neighborhood Preservation Coalition

Member of the South Park Land Use Committee

Submitted to OPCD Aug 5th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: MHA DEIS comments on number of units created
Date: Saturday, August 05, 2017 5:40:48 PM

Attn OPCD Re MHA DEIS,

1

On p. 1.13 of the DEIS it states that "Under Alternative 2 an estimated 7,513 new affordable units would be built in the study area, about 4,358 more affordable units in Alternative 1" This means that under Alternative 1, no action, 3,155 affordable units are already being built.

The MHA DEIS needs to state that under no action roughly 3100 units are already being created, and therefore the MHA EIS should state that the MHA proposal actually only creates 4,358 affordable units over taking no action.

2

On p 1.13 under Displacement the DEIS states "However, impacts could vary by neighborhood." This is further admission that each neighborhood requires it's own SEPA analysis, and that this broad MHA EIS is not effective at determining adverse impacts. The MHA EIS needs to state which neighborhoods will receive the most adverse impacts.

3

On p. 1.14 the MHA states "However, throughout the city as a whole, there is little difference between Alternative 2 and Alternative 3 in the amount of total expected physical displacement of low income household.

This statement shows that Alternative 2 and 3 are essentially the same, and that 1. Other action alternatives were not included in the MHA DEIS, and 2. The Displacement risk and Access to opportunity analysis used by HALA and the OPCD is not an effective tool to protect low income people from displacement, or gauge equitable development.

4

The MHA EIS needs to state the number of total expected physically displaced low income people. Clearly this number exists, the EIS needs to list it, not just mention that it exists.

5

On p. 1.17 the MHA DEIS states "Some demolition of housing and displacement of existing residents will occur with or without MHA." The MHA DEIS also states Action Alternatives 2 and 3 increase demolition, and that demolition is the #1 cause of physical displacement.

The MHA EIS MUST state the actual estimates of units lost to demolition, and number of displaced persons under each alternative.

"Some" is not informative to reviewers trying gauge impacts of the proposal.

6

Also on p. 1.17 Improvements to the TRAO listed are further proof that beneficiaries of the TRAO program are not an adequate study group to gauge numbers of displaced persons, And that the TRAO shouldn't be quoted in the MHA EIS to estimate displacement.

Sincerely,

Jennifer Scarlett

Resident of South Park Seattle

Member of the Duwamish Valley Neighborhood Preservation Coalition

Member of the South Park Land Use Committee

Submitted to OPCD August 5th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Cc: [Penni Cocking](#)
Subject: MHA DEIS comment
Date: Sunday, August 06, 2017 11:26:42 AM

Attn OPCD
Re MHA DEIS

This is a comment on the MHA DEIS.

The MHA DEIS fails to include effects on Seattle as a whole from the drastic Upzoning of Urban Villages. Each Urban Village is not an island, we are all a part of one city and the effects on the ENTIRE area, including connecting freeways and major roadways, need to be studied and included in the MHA EIS.

Sincerely,

Jennifer Scarlett

Resident of South Park Seattle

Member of the Duwamish Valley Neighborhood Preservation Coalition

Member of the South Park Land Use Committee

Submitted to OPCD August 6th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Subject: Fw: Comment on Traffic and Air Quality in the MHA DEIS
Date: Sunday, August 06, 2017 8:12:28 PM

[Sent from Yahoo Mail on Android](#)

On Thu, Aug 3, 2017 at 10:31 PM, Jennifer Scarlett <trentjen@yahoo.com> wrote:

Attn OPCD

This is a comment on the MHA DEIS regarding Traffic and Air Quality in the South Park neighborhood.

Traffic Studies on HWY 99, SR 509, and I-5 need to be done and included in the MHA EIS showing the impact of increased population density from MHA Upzoning of South Park on traffic congestion and patterns in the area.

South Park is in an important freight corridor, connecting the Port of Seattle to Seatac, Tacoma and surrounding industrial areas and businesses.

Many of the residents of South Park depend on these businesses for employment, including myself.

Data on how much freight travels through this corridor daily should be included in the MHA EIS. Will increased population density inhibit freight mobility, or spur businesses to relocate?

Please also include what outreach was done to affected businesses in the South Park area regarding proposed MHA upzones and increased population within this important freight corridor.

Furthermore, when these main freeways back up, which surround and dissect South Park, Freight and other traffic spills onto South Parks' residential streets, causing congestion and further reducing air quality.

According to the MHA DEIS, diesel vehicles are only going to become 4% more efficient, so this diesel particulate will be an ongoing health issue for South Park residents, current and future.

The DRCC Cumulative Health Impacts Study of the Duwamish Valley should be included in the MHA EIS as it references these health and livability concerns.

Traffic Impacts on Hwy99, SR509 and I-5, and subsequent Air quality impacts must be included in the MHA DEIS.

Sincerely,

Jennifer Scarlett,

Resident of South Park Seattle

South Park Land Use Committee

Submitted Aug. 3rd 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Subject: Comment on MHA EIS re: Neighborhood plan
Date: Sunday, August 06, 2017 8:28:09 PM

Attn OPCD Re MHA DEIS

This is a comment on the MHA DEIS.

1 The MHA proposal includes changes to the Seattle Comprehensive Plan because the proposal conflicts with many neighborhood plans.
The MHA EIS must state clearly this is why these amendments and changes are being made.
The Upzone is illegal under the existing plans.

Jennifer Scarlett

Resident of South Park Seattle

Member of the Duwamish Valley Neighborhood Preservation Coalition

Member of the South Park Land Use Committee

Submitted to OPCD August 6th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Subject: Aesthetics in the MHA EIS
Date: Sunday, August 06, 2017 10:13:52 PM

Attn OPCD Re MHA DEIS

This is a comment on the MHA DEIS.

1 The Aesthetics 3.3 portion of the MHA DEIS does not include info on the impacts of light and glare coming from taller buildings.

Please include mention of increased light and glare from taller buildings, with increased window surface and exterior lighting.

Sincerely,

Jennifer Scarlett

Resident of South Park Seattle

Member of the Duwamish Valley Neighborhood Preservation Coalition

Member of the South Park Land Use Committee

Submitted Aug 6th 2017

[Sent from Yahoo Mail on Android](#)

From: Jennifer Scarlett
To: [PCD_MHAEIS](#)
Subject: Comment on the MHA DEIS.
Date: Monday, August 07, 2017 12:47:33 PM

Comments for Draft Mandatory Housing Affordability Environmental Impact Statement.

Section 3.7, Open Space and Recreation.

Comments regarding USE of existing park land:

1 The Duwamish Valley Neighborhood Preservation Coalition and The South Park Land Use Committee 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,
Jennifer Scarlett
Resident of South Park Seattle
Member of the Duwamish Valley Neighborhood Preservation Coalition
Member of the South Park Land Use Committee
Submitted Aug 7th 1pm 2017

http://www.seattle.gov/Documents/Departments/HALA/Policy/MHA_EIS/3-7_OS_Rec_MHA_DEIS_2017.pdf

[Sent from Yahoo Mail on Android](#)

Name	Bruce Schauer
Email address	
Comment Form	
<p data-bbox="156 674 432 779">Description of the Proposed Action and Alternatives</p> <p data-bbox="156 1173 427 1352">Have you been or are you at risk of being displaced from your neighborhood?</p>	<ol style="list-style-type: none"> <li data-bbox="512 443 1422 651">1 Well I feel I am being placed in a box. I understand the need for some action but my sense is that there is enough property in the city that is already zoned for multi-family units that we can accommodate a huge increase in population. I would prefer that the existing multi-family zoned areas include HALA concepts. <li data-bbox="512 689 1382 795">2 I would also recommend that Rte. 99 from Greenlake going Northbound be zoned commercial residential. My concern is hyper-local. <li data-bbox="512 833 1430 1153">3 One half of North 84th St. between 99 and Linden Ave. North is being changed from single family to L1. It just seem absurd to change 1/2 a block inside a residential area to L1. I am old enough that I should not care but the change will most likely ruin the character and commitment people feel to each other. Community counts and this is coming from someone that grew up in NYC in an apartment building. So I guess I have to say if this is an all or nothing option I would vote for not adopting zoning changes.
<p data-bbox="156 1417 427 1597">Have you been or are you at risk of being displaced from Seattle entirely?</p>	
<p data-bbox="156 1659 475 1794">Are you now or have you ever experienced homelessness?</p>	
<p data-bbox="156 1865 469 2000">Do you live in rent- and income-restricted affordable housing?</p>	
<p data-bbox="156 2067 432 2136">How many people are in your</p>	

Name	Sharon V. Scherer, MPA
Email address	
Comment Form	
Historic Resources	<p>3.5 Historic Resources</p> <ol style="list-style-type: none"> 1 Mandatory Housing Affordability (MHA) as proposed seeks to increase development capacity in the places where Seattle's historic resources are found. Compact neighborhoods with mixed-income housing, retail, services, and institutions developed where street cars, trains, and small passenger boats provided transportation to persons who did not own a horse and adequate land for a horse. MHA creates an entitlement for developers to erase the character and cultural diversity that exists in the buildings of Seattle's oldest and densest pedestrian-orientated neighborhoods. 2 In the alternative, MHA should require developers to pay into a fund to buy development rights of residences, commercial and institutional buildings constructed prior to 1966 which are located in the designated urban villages and expansion areas. MHA should prohibit demolition in the designated urban villages and seek development opportunities in less dense areas served by public transportation.
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?	

Name	Mark Schletty
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<ol style="list-style-type: none"> 1 Alternative 1 is the only remotely acceptable choice. This whole HALA and MHA proposal is a complete give-away to developers. It doesn't get near enough affordable housing and will get almost none where the density is increased. The "fee payment " option is way too low, and will result in segregation by income. 2 The no parking requirements ignore reality. Liveability in the city is being destroyed by this proposal. Infrastructure and transit is completely inadequate to support this proposal. 3 Many areas that currently provide the most affordable rents are going to be replaced with higher, much more expensive buildings, resulting in displacement of lower income people. 4 The affordable units should be required in the new buildings, not allowed to be built elsewhere, and they should be affordable to a much lower income renter than is currently the case. 5 Many of the new buildings will have 1st floor businesses, but the workers for those businesses won't be able to live in the neighborhood. This will increase congestion as they will need to commute. These are just the tip of the iceberg concerning the problems with this proposal. The affordable housing activists involved with "negotiating" this proposal should be ashamed of themselves. It would never have been agreed to in any other city in which I have lived. It would have been actively opposed as the "Grand Screwing" that it really is, not a Grand Bargain. 6 And, very importantly, the City should never be allowed to have an EIS done by its own department when the City is directly involved in the proposal. It is a huge conflict of interest, which will always produce an EIS report that does not reflect reality, as is the case in this one.
Have you been or are you at risk of being displaced from your neighborhood?	<ol style="list-style-type: none"> 7 Since I can't figure out how to "copy" this from your form, would you please provide a complete copy of this comment to Councilmember Herbold. Thank you. Mark Schletty
Have you been or are you at risk of being displaced	

Name	Pablo Schugurensky
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 RE: MHA Draft EIS June 2017 2.39 / Exhibit 2–18 - Proposed Urban Village Boundary Expansions Action Alternatives: Roosevelt I object to the proposed crossing of 15th Avenue NE in the expansion plans. We have met and surpassed the requirements, and the neighborhood has spoken clearly many times.</p> <p>2 I was part of both the Ravenna and Roosevelt efforts until City Council showed disregard for our work. We as neighbors met and offered a very workable plan - and stated what we value in our neighborhood. I am disheartened to learn it is getting even worse.</p>
Demographic Survey (optional)	
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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	

Name	Sylvia Schweinberger
Email address	
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.	Crown Hill Urban Village
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Seattle 2035 Comp Plan Assumptions that are applied to Alt 1 conclude that Crown Hill Urban Village 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. 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. (In other words, Alt 1 does not describe doing nothing - it's already adding 600 new housing units).</p> <p>Seattle 2035 Comp Plan (page 30 of Growth Strategy) estimates a 50% growth in Crown Hill Urban Village, 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.</p> <p>Crown Hill Urban Village is not slated to get light rail and will only have the D-Line bus service. Urban Village Expansion Areas are defined as a 10-minute watershed 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. Current transit studies show that the D-Line is under capacity. This problem should be rectified before further upzoning.</p> <p>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. There is especially an oversimplification in the "Low Access to Opportunity" category. Opportunity for employment is high throughout Seattle right now - it's a bus ride, train ride or an hour drive away for most city residents. The EIS reduces the amount of upzoning in areas it designates as Low Opportunity. It seems this may mean low opportunity of generating high rents?? which doesn't make sense as a reason for rezoning. We should be rezoning to create more housing in places near where people work not rezoning only in places that might generate higher rents and be attractive to builders. It's unclear why the Low Opportunity number is being used to determine where housing density should be increased.</p> <p>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.</p> <p>"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 changes of more than 2 category levels (additional "M" designations -M3, M4 etc., or a separate naming convention from the payment structure system).</p> <p>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.</p>
Housing and Socioeconomics	<p>The overly simplistic classification of Crown Hill Urban Village (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.</p> <p>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. 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.</p>
	Seattle 2035 Comp Plan Assumptions and Growth estimates that serve as a basis for planning are underestimated;

Land Use	<p>growth assumptions in Crown Hill Urban Village (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.</p> <p>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.</p> <p>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." Alternative 3 does not support this goal.</p> <ul style="list-style-type: none"> • 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.
Aesthetics	<p>Exhibit 3.3–9 thru 3.3-16 are misleading. All existing housing stock is shown as 1 1/2 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. In my neighborhood, all existing houses have 8 foot ceilings on each story. New permitted houses are being built with no basement - all above ground - and are allowed 3 stories with each story having 10 foot ceilings plus a rooftop deck that allows another structure on top of the roof. Some of these new buildings tower over the existing homes casting them in shadows for most of the daylight hours.</p> <p>The DEIS also does not include the impacts of increasing zoning in the Crown Hill Urban Village, without providing sidewalks and appropriate drainage in areas where these don't currently exist.</p>
Transportation	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • 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.
Biological Resources	<p>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</p> <p>There is no mitigation suggested in the DEIS for managing increased runoff into major watersheds and consequently into the Puget Sound.</p> <p>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.</p>
Open Space & Recreation	<p>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.</p>
Public Services	<p>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.</p> <p>The DEIS omits impact analysis on EMS ability to access properties on narrow streets with parallel street parking on both sides.</p> <p>The DEIS analysis is not specific enough to address mitigations for current slow response times, or the impacts</p>

& Utilities

increased development will have on response times. The North Precinct has the lowest recorded response times in Seattle.

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.

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

Name	Gunner Scott for Highland Park Action Committee
Email address	hpacchair@gmail.com
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.	Highland Park Action Committee HPAC
Description of the Proposed Action and Alternatives	<p>1 The Seattle 2035 Comprehensive Plan did not update the Westwood/Highland Park Neighborhood Plan. This one size fits all approach to urban village Up zoning will not work in areas further from reliable transit such as Westwood/Highland Park and with the lack attention paid to infrastructure regarding streets, sidewalks etc...</p> <p>2 for the last 30+ years and increase in housing without mandating family friendly units 2-3+ bedroom units will increase displacement. The proposed percentage of affordable units and/or impact fees are not enough to justify building up in the Westwood/Highland Park area in any of the forms of MHA.</p>
Housing and Socioeconomics	<p>3 Most concerning is displacement. In Highland Park we do have several mid rise affordable apartments, but we are also seeing an increase in pricey town homes replacing modest single family homes. We are significantly concerned that those older mid-rise buildings are going to be replaced with expensive, small/micro units and not family friendly sized units, along with the proposed percentage of affordable units or impact fees are not enough to justify building up this area.</p>
Transportation	<p>4 Without a parallel plan to increase public transit in the next 3-10 years, adding additional housing in Westwood/Highland Park will only overburden our very limited bus access, the 131 bus being the main bus to downtown for Highland Park and it is already a squeeze to get on. With no immediate plans to increase bus service and bring light rail to the area, it is irresponsible to increase density in this area.</p> <p>5 The City of Seattle has had a long history of neglecting to increase infrastructure and resources in Highland Park and the surrounding neighborhoods in the Delridge area, from poor performing schools to ever increasing traffic, lack of sidewalks, a food desert, and poor bus service. These issues have been raised for years, some for over 70 years, with little progress. Without an immediate plan and the resources to increase infrastructure and the resources for our under-performing schools in the area it is irresponsible for the City of Seattle to upzone areas & increase density with high displacement and low</p>

opportunities such as Westwood/Highland Park.

Historic Resources

6 Highland Park is a mixed race/mixed income community that has faced historic redlining, has a lower median income as compared to Seattle overall (22% lower than Seattle overall), with 81% of students at Highland Park Elementary on Free or Reduced lunch (May 2016), higher percentage of single parent families (13% as compared to 8% in Seattle overall), and higher percentage of those who speak little to no English (10% vs. 5% for Seattle over all) and 28% of our neighbors are immigrants as compared to 18% for Seattle over all.

7 We still feel the effects of that redlining today, with street infrastructure improvements being requested and not addressed; under-performing schools; gang violence; vacant homes and business; cuts to transit; little to no community based services; and located within a food desert to name some of structural conditions neighbors are living under. With no immediate plans to increase infrastructure and resources to the area, it is irresponsible to increase density in this area.

Open Space & Recreation

8 Highland Park and the surrounding neighborhoods in the Delridge area fought to keep Myers Way parcel from being sold for development in order to develop further parks and green space. While the City has agreed to keep the parcel it has yet to be turned over to parks to begin the development process, with no timeline in place to increase open green space, it is irresponsible to increase density in this area.

Air Quality & Green House Gas Emissions

9 Westwood/Highland Park sits above South Park is already is dealing with significant air pollution. Adding density is adding more people with cars, because of the lack of transit options off the peninsular, which will exacerbate that even further.

Demographic Survey (optional)

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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

From: Ashley Seffernick
To: [PCD_MHAEIS](#)
Subject: Please Extend the EIS comment Period to 90 days
Date: Wednesday, June 28, 2017 1:51:41 PM

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!

Ashley Seffernick | Director of Customer Learning & Success
[Delightful Communications](#) | [Blog](#) | [Twitter](#) | [Facebook](#) | Tel: +1 (206) 954-6764
P.S. Please do sign up for our newsletter >> [The Personal Brand Lab](#)

From: Matt Sellars
To: [PCD_MHAEIS](#)
Subject: Review period
Date: Tuesday, August 01, 2017 12:22:59 AM

Please extend the review period for the draft HALA-EIS until September 1-2017.
Thank you,
Matt Sellars

<p>Name</p> <p>Email address</p> <p>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.</p> <p>Comment Form</p> <p>Description of the Proposed Action and Alternatives</p> <p>Housing and Socioeconomics</p>	<p>Ann Selznick</p> <p>participant in 2016 HALA focus groups</p> <p>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. 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.</p> <p>2 Comment #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".</p> <p>3 Comment #2: 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.</p> <p>4 Comment #3: 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</p>
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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.

Land Use

- 5 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.

Aesthetics

- 6 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.

Transportation

- 7 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.

Public Services & Utilities

- 8 Public schools are significant enough to warrant their own category and should not be lumped with utilities. 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. 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.

Demographic Survey (optional)

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

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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?

From: Linda Sewell
To: [PCD_MHAEIS](#)
Subject: MHA DEIS and naturally affordable older buildings
Date: Sunday, August 06, 2017 7:43:19 PM

The MHA DEIS does not consider the impact development has on affordability when replacing existing inventory.

As it is currently proposed, MHA allows developers to pay fees rather than provide affordable units onsite. This does nothing to effectively increase the affordable housing for low and middle income families. It only accelerates gentrification by destroying the older buildings that provide natural affordability to renters and mom-and-pop businesses.

In my neighborhood of Wallingford, there is new development currently being constructed on Wallingford Avenue between 35th and 38th streets. Small cottages and 1950's brick multi-family housing were demolished and are being replaced with 3+ story town homes that will sell for \$900,000+. I have watched this happen again and again the last 5 years and MHA as proposed will not change this dynamic. It will only accelerate low and middle class displacement and create only token low income units with no guarantee they will even be in our neighborhood. **The environmental impact is amplified gentrification.**

MHA needs to be rewritten to mandate onsite affordable housing and encourage density without demolition.

Linda Sewell
3926 Densmore Ave N

Name	Kim Sherman
Email address	
Comment Form	
Housing and Socioeconomics	<ol style="list-style-type: none"> 1 I live on North Beacon Hill, in an area recently rezoned as LR2. This rezoning has made this historically African American and immigrant neighborhood out of reach to most working class, lower middle class, and mid-middle class families. When I moved here seven years ago, the area was diverse, and included mostly modest homes. Many homes were rented by working class families, including many with several generations in one home. Over the past few years, I have watched most of the modest, affordable homes within the few blocks surrounding my home be demolished and replaced by \$700K townhouses. 2 There are four formerly-affordable houses in the process of permitting or demolition right now. In just a few years, the neighborhood has gone from diverse to nearly all white. Affordable housing units are being lost every month and replaced by housing for the upper middle class. This will be replicated in other historically-diverse areas where the city proposes to increase height limits. 3 And when this area is again upzoned, the multiplexes which have historically been affordable will be the next to be replaced - with more housing for rich people. 4 The paltry requirements for (temporarily) affordable units will accelerate the trends of decreasing affordability, gentrification, 5 and general destruction of the character of the neighborhood.
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	

From: sarah shifley
To: [PCD_MHAEIS](#)
Cc: [Ty Hedlund](#)
Subject: Columbia City Residents" Comment on EIS
Date: Sunday, July 16, 2017 12:03:31 PM

To Whom It May Concern,

We are writing in response to the Seattle City Master Use Plan and Environmental Impact Statement ("EIS"). We live on 33rd Ave. S. between Alaska and Oregon. We understand that our neighborhood is under consideration to be designated an "Urban Village" because of its proximity to the Light Rail station, affordable housing, and proximity to the Columbia City commercial area. We are committed to our community and care deeply about the well-being of our neighbors.

We strongly urge that our neighborhood not be rezoned or, in the alternative, be up-zoned to L-1. Either of these alternatives to up-zoning to L-2 would help maintain the diversity of the neighborhood and low resident turnover, even among those with fixed and low incomes. Up-zoning to L-2 would have a very serious, detrimental impact on current and future residents, particularly those with fixed and low incomes. These include:

1. Increased traffic and parking on small residential streets, resulting in serious safety and maintenance concerns.
2. A net decrease in low and moderate income housing.
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. Does not confirm with the existing residential quality of the neighborhood and does not provide the appropriate transition from the adjacent and existing multi-family housing.

We also ask that, should our neighborhood be up-zoned, that same up-zoning be extended one block north of Oregon. To sustain growth and provide additional opportunities for affordable housing and increased density, the blocks just north of Oregon, from 35th to 33rd 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. Yet the area desperately requires sidewalks and walkways for safe pedestrian access.

In addition, we ask that the City take measures to guarantee affordable 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.

Finally, should the City decide to up-zone our neighborhood, the following changes are necessary for public safety:

1. Ensuring sidewalks on both sides of every street.
2. Maintaining set-backs.
3. Marked crosswalks at every corner.
4. Speed bumps and traffic circles on Oregon to discourage speeding by motorists.

We are deeply committed to our community and the well-being of our neighborhood and hope that you will accept these recommendations.

Sincerely,

Sarah Shifley & Tyrell Hedlund

Name	Sarah Shifley & Tyrell Hedlund
Email address	
Comment Form	<ol style="list-style-type: none"> 1 We strongly urge that our neighborhood not be rezoned or, in the alternative, be up-zoned to L-1. Either of these alternatives to up-zoning to L-2 would help maintain the diversity of the neighborhood and low resident turnover, even among those with fixed and low incomes. Up-zoning to L-2 would have a very serious, detrimental impact on current and future residents, particularly those with fixed and low incomes. These include: <ol style="list-style-type: none"> 1. Increased traffic and parking on small residential streets, resulting in serious safety and maintenance concerns. 2. A net decrease in low and moderate income housing. 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. Does not confirm with the existing residential quality of the neighborhood and does not provide the appropriate transition from the adjacent and existing multi-family housing.
Description of the Proposed Action and Alternatives	<ol style="list-style-type: none"> 3 We also ask that, should our neighborhood be up-zoned, that same up-zoning be extended one block north of Oregon. To sustain growth and provide additional opportunities for affordable housing and increased density, the blocks just north of Oregon, from 35th to 33rd 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. Yet the area desperately requires sidewalks and walkways for safe pedestrian access. 4 In addition, we ask that that the City take measures to guarantee affordable 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. 5 Finally, should the City decide to up-zone our neighborhood, the following changes are necessary for public safety: <ol style="list-style-type: none"> 1. Ensuring sidewalks on both sides of every street. 2. Maintaining set-backs. 3. Marked crosswalks at every corner. 4. Speed bumps and traffic circles on Oregon to discourage speeding by motorists.

COMMENTS ON DRAFT EIS RE: MHA

- | | |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>Overall Analysis</u> | ✓ 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 |
| <u>Community Feedback</u> | ✓ DEIS fails to take into account documented Junction neighborhood feedback. |
| <u>Lack of Affordable Housing</u> | ✓ DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood. |
| <u>Neighborhood Plan</u> | ✓ DEIS reflects City's failure to honor neighborhood plan. |
| <u>Traffic</u> | ✓ DEIS analysis is flawed; Fails to utilize meaningful data. |
| <u>Green Space</u> | DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood. |
| <u>Neighborhood Character</u> | ✓ DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts. |
| <u>Loss of Light and Air</u> | ✓ DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings |
| <u>Loss of Views</u> | ✓ DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation. |
| <u>Historic Buildings</u> | ✓ DEIS fails to recognize historic buildings in Junction. |
| <u>Public Safety</u> | ✓ DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc. |
| <u>Utility Infrastructure</u> | ✓ DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed. |
| <u>Schools</u> | DEIS fails to note existing lack of school capacity and impact of increased density thereon. |
| <u>Other</u> | ✓ I have other concerns regarding the DEIS including, but not limited to, the following:
<u>Transit has not been adequately</u>
<u>addressed.</u>

_____ |

Name: Whitney Showalter
Address: 4527 41st AVE SW

From: sarajane3h@comcast.net
To: [PCD_MHAEIS](#)
Subject: Transportation
Date: Monday, August 07, 2017 3:39:04 PM

The city has vastly overstepped its infrastructure. The addendum to the HALA on Parking amounts to a "war on cars." Instead, we need to incentivise or lure people to scale down their car ownership and their use of their cars.

Quoting a public statement by Greg Flood:

"Even with its incredible train system and extensive bus system, residents of Japan STILL own cars. The cities accommodate storage of vehicles via mechanized self-serve parking structures and off-street parking provided at many apartments. Seattle can do the same by accessing the "reportedly underutilized" off-street capacity in existing multi-family and commercial buildings, much as NYC apartment dwellers do to store their vehicles, and continuing to require projects to include off-street parking until we have a decent frequent and extensive transit system.

"It is absurd (and punishingly oppressive) to try to eliminate the use of cars in Seattle simply by making it impossible to store a vehicle when the City is woefully and incredibly deficient in providing access to transit as an alternative. We will see folks get out of their car when the City provides a decent alternative."

One solution would be to return to requiring some parking in multifamily developments, with a goal of preserving street parking in urban villages and hubs for the businesses we hope to attract.

Sarajane Siegfriedt

Sent from XFINITY Connect Mobile App

From: sarajane3h@comcast.net
To: [PCD_MHAEIS](#)
Subject: Housing & socioeconomics
Date: Monday, August 07, 2017 4:15:17 PM

1) Please eliminate the definition of "access to schools" as being within a half-hour transit ride from the UW. True access has far more to do with being able to afford college, rather than being able to get there on Metro.

This is an absurd definition and ridiculously literal use of the word "access."

A better measure of access to higher ed is within a walkzone or single-bus ride of community college.

2) Please remove the even worse use of school test scores as a stand-in for access to quality schools. The test scores themselves have not been validated for this or any related use. They are not validated, period.

Common sense says access to Seattle Public Schools depends on there being a classroom to accommodate the child, and almost all of the northside schools far exceed legal class sizes. A school with average class sizes over 30, some at 35, is not accessible. Access needs to be by subarea, not citywide.

SPS has grown by more than 1,000 students every year since 2010. Neither Seattle nor the state has stepped up to its role in building classroom capacity, and we have a classroom capacity crisis. In addition, we have no downtown elementary school, middle school or high school.

Instead, the EIS needs to acknowledge that impact fees are the revenue source provided in the GMA to address impacts of growth on infrastructure (limited to schools, parks, roads and fire safety). Schools are the #1 use of impact fees in WA State. All the other three legal uses of impact fees have their own levies or tax revenue sources in Seattle. Offices impact commute trips. Seattle adopts a three-year school capital construction levy every six years, alternating with a maintenance capital levy, so the current maintenance levy isn't even addressing classroom overcrowding.

Obviously, residential development impacts school capacity. It's shocking that the EIS doesn't even have a chapter on education. Any realtor can tell you that the quality of the schools is a major contributor to the value of a housing development, and class size is a key indicator of quality.

Please include a chapter on education and include the SPS enrollment growth chart and the average class sizes and number of substandard portable classrooms in each school. We need to dedicate impact fees to school construction.

Sarajane Siegfriedt

Sent from XFINITY Connect Mobile App

From: sarajane3h@comcast.net
To: [PCD_MHAEIS](#)
Subject: Housing and socioeconomics
Date: Monday, August 07, 2017 4:25:50 PM

I have never understood the classification of Lake City HUV as similar to Ballard. It's the opposite. Ballard is overdeveloped, exceeding its growth targets, while Lake City has hardly grown, despite aggressive marketing by the Bill Pierre family, who own 14 acres of "downtown" Lake City.

In fact, Metro removed two direct to downtown bus routes from Lake City Way and rerouted NE Seattle service to feed the Husky Stadium Light Rail.

Lake City as it stands is not well served by transit and is the poorest area in North Seattle. Data from the 2010 census is useless. Lake City HUV doubled from 25% people of color to 50% people of color from 2010 to 2015. This misclassification of socioeconomic status and development potential has cost us a much-needed community center, among other city investments.

Please revisit and correct the maps for Lake City, based on current socioeconomic data and potential for development. The city needs to invest in Lake City, in order to draw development here.

Sarajane Siegfriedt

Sent from XFINITY Connect Mobile App

From: sarajane3h@comcast.net
To: [PCD_MHAEIS](#)
Subject: Housing and Socioeconomics
Date: Monday, August 07, 2017 4:32:55 PM

There is no policy to encourage family housing, that is, housing of 3 bedrooms or more. As we know, the market has no interest or intention of building rental units of 3 bedrooms, when it is far more profitable to build a studio and a 1 bedroom. (And Seattle has no justification for calling 2 bedrooms family housing. That's actually "roommate housing.")

Families have no choice but to rent a single-family house, and we know that 25% of single-family houses are rented. The MHA must include a section on family housing and the role of older single-family rentals in satisfying this demand. Any loss of single-family housing is a loss of family-size housing that is not being met by the market.

Seattle needs a new zoning category for low-rise family housing to accommodate this need.

Sarajane Siegfriedt

Sent from XFINITY Connect Mobile App

Name	Ron Sievers
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 Alternative 2 - Implement MHA in Study Area
Land Use	2 Single Family → should got to Lowrise 1, 2 or 3.. I do not think Single Family → Residential Small Lot (RSL) is enough.. There should be more density allowed over the next 20 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?	
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)	

Name	Jeff Silverman
Email address	
Comment Form	<p>1 My discussion begins with a letter I sent to Daniel Person of the Seattle Weekly.</p> <p>Daniel, I read with great interest your article in Friday's issue of the Seattle Weekly, Late Buses Could Spell Trouble for Denser Development in Seattle. The neighbors are correct. I have a hand waving explanation, and I used to have a simulation that would demonstrate the observed behavior, which I wrote in the late 1970s. My assumption is that people show up at bus stops at more or less random times. If a bus is late, then it has to pick up more and more people, because the number of people at any given stop is correlated with the amount of time between the last bus and this bus. The increased number of people that it picks up takes more time and makes it later and later. Meanwhile, because this bus is getting later and later, the amount of time between this bus and the next bus is becoming less and less. Eventually, the next bus will catch up with this bus, being earlier and earlier. Where I live, on Capitol Hill, there is nothing that can be done because the buses are on wires, and they can't pass one another without the first bus stopping to take its poles off the wires. In the case of the #5, the second bus could pass the first bus, but it isn't clear to me how much that would help. Because this bus is getting later and later, and the next bus is getting earlier and earlier, there is a more than a 15-minute gap between the last bus and this bus, a less than 15-minute gap between this bus and the next bus, and a greater than 15-minute gap between the next bus and the bus after that. When I was an undergraduate in the late 1970s, I took a class in simulation, and that was my choice of problem to solve. I have ridden the bus in Seattle since the late 1960s, and I am well aware of the problem. Alas, that software has long disappeared in the mists of time. There are a couple of solutions to the problem that I have thought of, that will work for the #5 in Phinney, but which will not work for, say, the #545 to Microsoft in Redmond.</p> <p>Bus to bus communication so that the drivers know when the bus in front of it has reached a certain point. If the next bus gets to that point with less than the desired headway, then it waits there until proper separation has been established. Greenwood Ave N is wide enough that Metro could do that. Pad the schedule with enough time so that the buses have a high likelihood of arriving on time. If a bus starts to be early, then it would have to stop and wait until it was on time.</p>
Transportation	I used to work at Google in Kirkland, and Microsoft in Redmond.

Most days, it takes on the order of 45 minutes to an hour to get to and from work. However, there have been days when it took over 2 hours to make the commute. With that kind of variance, it is very hard to plan. Of course, going by car has the same problem, but single occupant vehicle drivers probably do not want to think about the fact that the bus is just as stuck in traffic as they are (actually, with bus only lanes, the bus is frequently faster than single occupancy vehicles).

You mentioned in your article “City officials maintain that bus schedules are the more reasonable way to measure transit frequency”.

I suspect that is wrong. I would expect that OneBusAway has what’s called an API that would allow a computer to monitor the position of buses and generate a report on actual headway. Wendy Shark’s comment that “printed timetables have long been accepted as the measure for how frequent bus service comes to an area, given the vagaries of transit” is more of a statement of her knowledge about big data analysis than it is about transportation planning. She is correct that service can fluctuate slightly (I would argue that variation from 45 minutes to over 2 hours is not “slightly” but I quibble), but just because it can fluctuate does not mean that those fluctuations are not amenable to statistical analysis.

I plan on contacting Irene Wall, the Livable Phinney board member mentioned at <https://livablephinney.org/> and give her the same information I just gave you.

Best,
Jeff

My observation, based on living in the same house for 35 years and riding the #12 almost daily, is that buses traveling to downtown in the morning are usually punctual. However, buses traveling away from downtown frequently have this problem. The #43, when it had all day service instead of just rush hour service, frequently had this problem operating towards downtown. This was exacerbated by the opening of the Montlake bridge. The #8 is almost always late, the schedule Metro publishes for the #8 is 'way too optimistic about travel times and anybody who relies on Metro's schedules obviously is from outside the 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

Name	Lucas Simons
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<ol style="list-style-type: none"> 1 In any alternative , I support more density in our city, especially around light rail stops and bus line crossings. That's the only path forward if we are going to welcome however many hundreds of thousands of people and not force them into cars and incur even higher rents.
Housing and Socioeconomics	<ol style="list-style-type: none"> 2 I was a little skeptical of the assumption that you made regarding effects or upzones on displacement and access to opportunity. Wouldn't it createore opportunity in some cases. Those assumptions need to be scrutinized a little more closely. 3 Should consider inclusive development opportunities as well like the Liberty Bank building CH housing is building on 24th and Union
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: Glenn Singer
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Saturday, August 05, 2017 2:17:48 PM

"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."

Name	Aric Skurdal
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I strongly support Alternative 3 for the Lake City Urban Village. Given the virtually indistinguishable projections between Alternative 2 and Alternative 3 in terms of housing and jobs created, Alternative 3 is the smarter choice. This neighborhood is not yet ready to support high rise construction; a modest 10- to 20-foot height increase will serve the neighborhood well. No 145' height limits should be considered at this time.</p>
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: Tamra Smilanich
To: [PCD_MHAEIS](#)
Subject: comment on draft EIS for MHA-due August 7, 2017 -from a resident perspective
Date: Monday, August 07, 2017 9:59:32 PM

In regards to the public comment on the draft EIS which I have found on the city website in regards to the MHA (Mandatory Housing Affordability plan), I am hereby sending to the Office of Community Planning and Development this August 7th, 2017 (the last day for comment period) my comments. My perspective comes from that of a person whom appreciates architectural style, the natural environment and helping myself and others live an affordable lifestyle (which mainly includes keeping housing costs low).

There are two drafts. These two drafts pigeon hole two proposals, each for the neighborhoods in all of Seattle. There really needs to be at least 3-5 drafts, meaning, more proposals for the upzoning and zoning changes which will impact residents in neighborhoods such as Broadview (where I was raised), Crown Hill (where I went to elementary school), Beacon Hill (where I went to middle school) and SE Seattle/Rainier Beach/Othello (where I have made my home of 20 years).

My understanding is the city is seeking zoning changes to make it so developers (or even individuals) can buy and/or develop land that has been historically used for either single family residences, multi family and apartments and allow for more units to be built/more homes to be built on a plot of land. I have several points to make, some personal and some that just make plain sense. The negative to the proposals I see posted on the city website is more homes built on one plot of land =less open space/less of the natural environment. Also, crowding more units such as an apartment complex on what has been a tax parcel for a duplex or four plex, is taking away from the "skyscape" and creating miniature "downtown's" in residential type neighborhoods.

Another point, off the subject of aesthetics and the destruction of the natural beauty of our environment which makes us a beautiful port city of the northwest, my second point which is more popularly supported amongst the realists is allowing existing vacant units to be used in the count to reach the 6200 desired units goal. Addressing the current count of vacant units has not been presented by the City of Seattle or HALA.

There are plenty of affordable market rate and subsidized housing units available for rent BUT unattainable due to the redlining of the city administration and elected officials. I have already spoken to Councilmember Bruce Harrell about this and have not heard of any action that the city will take to remove the redlining. What I mean about this is that the balance between renters rights and property owner rights is off balance. As a property owner, I would gladly rent out my house if I knew that there was going to be a renter in it that would take minimal care of the property and would pay on time. As it is in Seattle, if a renter does not pay rent and will not move, the most efficient way to evict a renter for non-payment is to hire an attorney to proceed with the proper eviction process. This is way too expensive, way too time consuming, way too stressful and financially burdensome.

There is a property owner off Genessee St in S Seattle-he has shared his story with many people about how he has a very good 3 bedroom home to rent out but because of some past renters and because the city has redlined him, he has not been able to rent out his property for at least 2 years. I do not blame him for trying to sue the city for prohibiting him from renting out his property. The city has unfortunately preached about making housing affordable, yet

prohibits good landlords from renting out their properties.

I know of at least 3 landowners now that would be happy to lease out their property at "affordable rents", which would bring the target of 6200 housing units down to 6197. The building of 6200 new units is not necessary if the city would address years old city ordinances and work with resolving hardships and obstacles between landlords and tenants.

Another point, out of the many already made above, historically there is an increase in property taxes because the government has a goal to tax to the supposed "highest and best use of the property" based on zoning. Upzoning, changing the zoning on plots such as single family residences or LR1 or LR2, means property will be seen as more valuable, tax assessor will tax it at a higher rate, then we have displacement of persons that have resided in either their house they own or their rental because their income has not gone up fast enough to cover the inflated value of the property. Persons like me, like my mom, like my neighbors will be displaced unless we can make more money to cover this increased cost of living the City of Seattle is creating. The city creates displacement for many persons without out candid disclaimer on the subject.

My neighbors agree that Alternative 3 is a good option for SE Seattle. I personally believe there needs to be more options on the table and that is one, addressing the empty market rate and "workforce" housing units that are privately owned and not being marketed or made available.

My apologizes if there are too many points I have made but this is a sore subject to be discussing when the odds have been and appear to be, against the taxpayer and property owner having their concerns considered.

Thank you.

--

Tamra Smilanich
helping individuals and families with their housing needs

From: Smith, Gerald R
To: [PCD_MHAEIS](#); [Brand, Jessica](#); [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: Saturday, August 05, 2017 11:00:57 PM

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 also request, however, that housing on the east side of 18th Avenue be restricted to 3 stories high. Above that would make the existing homes that remain in the neighborhood, nearly all one or two story, very unpleasant to live in. If new construction is allowed to be five stories high, the existing houses would feel dwarfed by the large buildings across the street. Please do what you can to keep the remaining housing livable.

Respectfully yours,

Gerry Smith
606 17th Ave East
Seattle, WA

Gerald R. Smith
Member, Division of Basic Sciences
Fred Hutchinson Cancer Research Center
1100 Fairview Avenue North, A1-162
P.O. Box 19024
Seattle, WA 98109-1024
Tel. 206-667-4438
FAX 206-667-6497

<http://labs.fhcrc.org/gsmith/index.html>
<http://sharedresources.fhcrc.org/profile/smith-gerald>

Name	Randy Smith
Email address	
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.	No
Comment Form	
Aesthetics	<p>1 The graphics used in this section are intentionally designed mislead the reader by hiding the full scale and scope of the proposed development. In particular 3.3 - 9 through 3.3 - 13 are egregious examples of using forced perspective to mislead. Edward Tufte in his book "The visual display of Quantitative Information" and subsequent books describes in detail the trick of using forced perspective to hide the actual differences in numeric values. He describes placing the a graphic object in the background that while representing a larger numeric value is actually smaller on the printed page than the object that represents the smaller numeric value. Take the graphic 3.3 - 9. The two story house in the foreground is demonstratively taller at 1.25" in the image than the three story building deep in the background at .75" a 40% smaller image for a building in real life that would be 30% bigger! (that is just measuring height. The total surface areas of the two images are exponentially out of scale with each other.) By using these images this study is hiding the damage to the aesthetics of the neighborhood - the oversized buildings simply do not appear to dominate the smaller single family homes. This study needs to redo the graphics without any forced perspective (for example street view elevation drawings where all the images are on the same scale) so the impact the proposed changes can be properly evaluated.</p> <p>Furthermore, the drawings do not change the parked cars in the image. It is very unrealistic to assume the increase in house units would not also change the street level aesthetics due to many more parked cars. The importance of these choices can not be underestimated. The impact of a L2 next to single family home, including increased in park cars, would show the full extent of the impact on the aesthetics and character of the neighborhood.</p>
	<p>2 The results in this section seem contradictory and flawed. The data is thin with only a few data points taken from Google Maps on a single day to support. On one hand the study indicates that the increase in traffic times will be no different in the alternatives despite the increase in the housing units in the Junction (30 second increase in the case of Alternative 3) - the implication is that they will take other means of transportation. However, the</p>

Transportation

study also indicates that the main bus route for the junction will just 2 additional riders during peak hours (see 3.4 - 45), and no increase in Mode share. If there is no increase in traffic, no increase in mode share, no increase in riders during peak hours - how will the residents of the nearly 1000 housing units (Exhibit 2.7 and Exhibit 2.8) in the Junction alone commute to work? That means several thousand additional people under Alternative 3 (assuming more than one commuter per unit) will be taking C line or driving to work - yet no increase in traffic or bus ridership is expected? Before increasing housing stock in the junction by 46%, an update EIS needs to occur that (a) realistically estimates the increase in traffic and ridership perhaps by locating at the current traffic patterns in a thorough fashion between google maps and spells out mitigation thereof, (b) spells out a clear mitigation plan for the parking problems the study identifies, yet fails to offer any mitigation of, in the Junction, (c) takes into account the positive and or negative impact of Light Rail station due to be built in the Junction.

Open Space & Recreation

- 3 Alaska Junction is currently not meeting standards for open space and recreation and is currently facing an open space gap. The EIS does not provide any mitigation to this problem despite proposing worsening the problem by making gap bigger . Nor does the study factor in the impact of the loss of green space in the form of lawns, gardens and other privately own green space that improve the neighborhood. As the graphics in Aesthetics indicate, a significant portion of the privately owned green space will be lost to building material when changed from single family to multi family units. Since the entire point of an EIS is to measure an impact, and propose mitigation, this study is woefully inadequate vis a vis the Junction as precisely zero mitigation is provided. At a bare minimum the EIS should propose mitigation so that there is precisely zero worsening of the open space gap.

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: Smith-Bates, Jacqui
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Monday, August 07, 2017 4:27:29 PM

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.

Please consider the unique characteristics and needs of specific neighborhoods within the city – they will vary significantly. Thank you.

Jacqui Smith-Bates
Wallingford neighborhood

From: Jessica Smits
To: [PCD_MHAEIS](#)
Cc: [FLSTEAMcom@gmail.com](#); [LEG_CouncilMembers](#); [spsdirectors@seattleschools.org](#); [Bagshaw, Sally](#); [Burgess, Tim](#); [Johnson, Rob](#); [Harrell, Bruce](#); [rick.burke@seattleschools.org](#); [Jill.Geary@seattleschools.org](#); [leslie.harris@seattleschools.org](#); [sue.peters@seattleschools.org](#); [scott.pinkham@seattleschools.org](#)
Subject: school capacity and HALA
Date: Friday, August 04, 2017 9:47:00 PM

Hello,

I'm writing in regard to the Housing Affordability and Livability plans to require new developments to include affordable homes or contribute to a City fund for affordable housing. We need to consider school capacity in this discussion. It does not make sense that the school district has not been included in any of the city's HALA planning meetings. We need adequate classroom space for the growing Seattle population!

I hope 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.

Seattle is booming, our school capacity must respond accordingly!

Thank you,
Jessica Smits

From: Susan Soper
To: [PCD_MHAEIS](#)
Subject: Feedback on plans
Date: Sunday, June 11, 2017 3:26:46 PM

Hello!

I was a resident of the Seattle area before I became retired and moved away. During the 18 months I resided in the Denver area, I saw newspaper accounts about attempts to get developers to include affordable housing in their new construction. It turns out that the developers chose to pay the fines instead of including the affordable housing, because the fines cost the developers less in the long run. So, if you haven't already looked into how Denver dealt with the situation, I urge you to do so now.

Susan Soper

From: Patricia Spencer
To: [PCD_MHAEIS](#); [Brand, Jesseca](#); [Staley, Brennon](#); [Welch, Nicolas](#)
Cc: [Staley@seattle.gov](#); [Welch, Nicolas](#); [Wentlandt, Geoffrey](#); [Assefa, Samuel](#); [Herbold, Lisa](#); [Johnson, Rob](#); [Williams, Spencer](#); [Harrell, Bruce](#); [O'Brien, Mike](#); [Gonzalez@seattle.gov](#)
Subject: Comments to the Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (EIS)
Date: Friday, August 04, 2017 1:00:10 PM

Dear Persons,

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.

In addition to their more technical analysis summarized and added below I want to add a few personal comments. I have lived in the Central Area neighborhood since 1981, in my current address since 1992. Over the years I have seen my neighborhood be developed for the benefit primarily for developers profits and very affluent new residents with small regard for those of low and moderate income. Many people of color, older people and people of small means have not been well benefited and have been displaced by rising rents and property taxes.

It's the classic gentrification picture. Many of the businesses we have used over the years have also been replaced with upscale bars, restaurants and boutiques serving the new affluent residents. Small businesses, hardware stores, repair shops, drugstores, laundromats all gone. The city's plans have to take all of us into account.

If I did not own my little house I would surely have been displaced. I have limited mobility, no car and low income so where I am allows me to live within those parameters though I am sad to see many of my neighbors leave. I am worried that many remaining residents especially those of low income for whom the affordable housing guides are too expensive will be displaced.

It's a rare day I'm not approached to sell by people who have no interest in the neighborhood and are amazed that greed for profit does not trump a home that not only serves my needs but is a haven too.

Sincerely
Patricia Spencer
130 22nd E
Seattle

The text of their statement.

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. 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 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:

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adverse impact.

From: d_spengler
To: [PCD_MHAEIS](#)
Subject: EIS comments
Date: Saturday, July 29, 2017 12:05:16 PM

I am writing to ask you to extend the period for response until the end of August, 2017.

Thanks

Dan Spengler

Sent from my T-Mobile 4G LTE Device

From: tamsen spengler
To: [PCD_MHAEIS](#)
Subject: MHA-EIS extension
Date: Saturday, July 29, 2017 10:08:48 AM

I am asking if you would please extend the comment period for the MHA-EIS draft EIS until August 28. We have many members who work and volunteer in the community that need more time to review the 800 pages.
Thank you for your consideration.

Tamsen Spengler
206-261-3586
Westseattletimebank.org

Name	Marilyn Spotswood
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I only support No Action.</p> <p>The MHA betrays progressive principles by adopting policies that result in the consolidation of land ownership. This plan takes entire city blocks owned by working class people and puts them into the hands of corporations. This puts working people into the position of paying rent (whatever is demanded) for their entire lives without ever owning property. Overall the MHA flies in the face of progressive values. This is a sell out to developers and will result in consolidation of land ownership into the hands of a few.</p>
Housing and Socioeconomics	<p>2 The DEIS is neither sufficient nor accurate to represent all Urban Villages and the City overall.</p> <ul style="list-style-type: none"> • 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 its own individual EIS. An example of the inaccuracies is the categorization of Ravenna as an area that is lumped into the University community including the area directly north of the university where there are many fraternal “Greek” organizations and other housing; the University Village area, and a very small area south of Ravenna Park. The correct boundaries of Ravenna, as annexed by the city in 1907, are 15th Avenue NE on the west, NE 55th Street along the south, 30th Avenue NE on the east, and NE 65th Street on the north, except for an extension to NE 85th street between 15th Avenue NE and 20th Avenue NE. <p>3 • 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.</p>
Demographic Survey (optional)	
Have you been or are you at risk of being displaced from your neighborhood?	
Have you been or are	

Name	Stacy
Email address	
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.	Roosevelt Froula Neighborhood
Comment Form	
Description of the Proposed Action and Alternatives	1 The EIS is based on current growth trends, rather than historical growth trends. This assumes no economic downturn or changes in local, regional, and national economy. The analysis should include low, medium, and high growth trends.
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?	

Name	Stacy
Email address	
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.	Roosevelt Froula
Comment Form	
Description of the Proposed Action and Alternatives	1 Alternative 1 (no upzone) was not analyzed sufficiently to see if it has sufficient development potential under current zoning to meet the needs identified in the Seattle 2035 Growth Plan.
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?	

Name	stacy
Email address	
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.	Roosevelt/Froula
Comment Form	
Aesthetics	1 The EIS has only brief, and entirely inadequate, discussion of potential mitigation measures with regard to neighborhood character and livability. Design Review is mentioned as a mitigating factor, however separate proposals in front of the city council are aiming to reduce the number of developments subject to design review.
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 own or rent	

Name	Stacy
Email address	
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.	Roosevelt/Froula
Comment Form	
Public Services & Utilities	1 The EIS should be more thorough in its analysis of impact on schools, as it is far from clear that SPS has the resources, land, and funding to meet the needs of increased density. Alternatives 2 and 3 will have markedly different impacts on needs for new or expanded school resources.
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?	

Office of Planning and Community Development
ATTN: MHA EIS
P.O. Box 34019
Seattle, WA 98124-4019
MHA.EIS@Seattle.gov

CC: Geoff Wentlandt
Office of Planning and Community Development
600 4th Avenue, Floor 5
P.O. Box 94788
Seattle, WA 98124-7088

RE: Comments regarding MHA
Draft Environmental Impact Statement

August 7, 2017

These comments address the Mandatory Housing Affordability Draft Environmental Impact Statement (MHA DEIS) set forth by the city on June 8, 2017. While I appreciate the tremendous effort the city is making to accommodate the rapid expansion of our area, I have the following concerns about the impact of zoning changes to our neighborhoods:

- The DEIS as it is now is confusing, overly lengthy and daunting to anyone but an experienced SEPA professional. It is virtually unintelligible to the lay reader or ordinary resident. There are no copies at the public library, and its 400-page size (not to mention appendices, maps, charts, etc.) makes it virtually impossible to parse. Neighbors don't have a chance of understanding it and making comments; it grieves me to think that this may be intentional, to keep people from being able to comment.
- I don't feel that the city has adequately taken into consideration the cumulative environmental effects of the upzone on a neighborhood level: loss of trees and other open space may be more extreme in one neighborhood than in another. (The city should be looking for ways to enhance our urban forest, rather than encouraging its reduction.) The MHA DEIS "one size fits all" position does not take different neighborhood environments into consideration.
- There is no consideration for the importance of maintaining the historic character of Seattle's great neighborhoods. Again, the "one size fits all" idea does not work to preserve the valuable architectural integrity of our neighborhoods. Different neighborhoods have their own character and values, and should be treated respectfully and individually in the EIS.
- Neighbors have repeatedly stated their support for increasing housing density around the Roosevelt light rail station. We are not a bunch of NIMBYs. However, the respectful, long-view thing to do is to concentrate the density to the area in the original Roosevelt Urban Village (bounded on the east by 15th Ave NE) and to preserve the integrity of the Ravenna neighborhood by not encouraging density in an area that has traditionally been a place for families to own homes. Encouraging land speculation in the

Ravenna neighborhood (by allowing an extreme upzone) will put home ownership out of range for most families, and concentrate wealth in the hands of real estate speculators, landlords and developers. It's backwards thinking that will further divide rich and poor in Seattle.

- The MHA DEIS does not take into consideration the effect that abrupt land use transitions have on livability, especially for those neighborhoods of architectural importance. These transitions will have more than minor impacts on the integrity, value and livability of the neighborhood. "Diversity" does not mean packing in as many units as is possible; it means respecting that there are all sorts of different housing options, including single-family.

I encourage the city to maintain the original boundaries of the Roosevelt Urban Village (bounded on the east by 15th Ave NE) and not to push into the Ravenna neighborhood. Abrupt height transitions will encourage land speculation and concentrate wealth in the hands of developers and move home ownership out of reach for many people. These abrupt transitions will also threaten our historic buildings, and the character of our neighborhood. I encourage more individual review, rather than a one size fits all approach to neighborhood expansion.

Sincerely,

Dana Standish

6311 21st Ave. NE
Seattle, WA 98115
(206) 528-1727
danastandish@yahoo.com

From: Korina Stark
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: Sunday, August 06, 2017 11:11:07 AM

Dear HALA Team:

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. **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.
2. **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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This playfield will also be used as the sole recreational field for Meany Middle School starting this fall.

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.

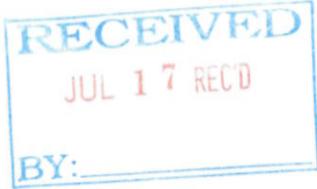
Thanks for your consideration in emailing a letter,
Korina Stark,
929 19th Ave E
Seattle, WA 98112

From: Brad Steiner
To: [PCD_MHAEIS](#)
Subject: Roosevelt Urban Village Expansion
Date: Tuesday, August 01, 2017 5:33:48 PM

Hi,

As a long-time resident of the Roosevelt neighborhood, former board member of the RNA and participant in the HALA focus groups, and owner of a single family home that will be significantly impacted by upzoning I'm writing to express my strong support for the Roosevelt Urban Village expansion plan as proposed under HALA. It's imperative that expansion of the urban village boundary increases density uniformly around the light rail station and provides greater opportunity to live in proximity to neighborhood parks and school. The proposed plan does just that! Over the course of my 15 years in Roosevelt neighborhood planning has been disproportionately influenced by well organized and vocal homeowners to the southeast (i.e. near Cowen Park) and east of the neighborhood core, including many folks east of 15th Ave in the Ravenna neighborhood. As a result when the neighborhood plan was written several years ago there was a large and vocal effort to limit building heights east of 12th in exchange for increased density in the northwest part of Roosevelt along I-5 where residents are less involved in neighborhood politics. In the end the blocks west of Roosevelt and north of 65th were upzoned even more than the city recommended. Urban Village expansion under HALA is a great opportunity to provide a better balance of density and housing types throughout the neighborhood, particularly southeast and east of the neighborhood core, and allowing those same homeowners to once again disproportionately affect future growth in the neighborhood would represent yet another lost opportunity. I'm proud to say the Roosevelt community has long been a proponent of increased density around the light rail station and the impacts should be equitable throughout the neighborhood and not felt just by those of us who truly support it, even if it's on our own block.

Thanks
Brad Steiner
Roosevelt Neighborhood



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:

Public transportation is inadequate and not accurately represented

Name: Deanna Stelling
Address: 3039 40th Ave SW
98136



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. *I attended several HAA meetings - felt I was NOT "HEARD."*

Lack of Affordable Housing

DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood. *- all this for 32 MORE UNITS?*

Neighborhood Plan

DEIS reflects City's failure to honor neighborhood plan.

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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:

HAA is deeply disappointing. Please listen to us. Also I was NEVER NOTIFIED personally about the proposed changes that

DIRECTLY AFFECT MY PROPERTY. I found out VIA a "flyer" from a neighbor. We also did a walk-along with several

MY wife rides the A-LINE every morning "6:15 AM TO THE HOVCH. 15 MIN? Really? Did anyone from the Planning Dept. ever ride along with her? Rush Hour?"

Name: Tim Stelling
Address: 5039 40th Ave SW

from the Hala team. I honestly felt I was NOT "heard."

From: John Stewart
To: [PCD_MHAEIS](#)
Subject: Comments on MHA, Draft Environmental Impact
Date: Monday, August 07, 2017 11:45:59 AM

Though the DEIS was confusing and unavailable in printed form to the public, I will provide excerpts from a review that I trust and are most important to me.

1. I would like to clearly see the No Action options. These were not represented clearly at all.
2. I would like to see the boundaries of the Ravenna neighborhood described as it is described by the currently available city maps and the RBCA, not the DEIS which is mislabeled.
3. The process outlined for future individual project SEPA and Design Review appears to provide no practical path for review at all. Many projects would fall below the thresholds for review and therefore provide no practical guidance for environmental impact at all. Essentially the DEIS negates any potential for further study or cumulative effects of the smaller impacts.
4. Addressing historic resources
 - a. Insufficient historic resources surveys. As noted on page 3-244, "...not all properties in the study areas have been systematically inventoried for their potential eligibility. Therefore, it is likely that the study area contains additional properties that meet the criteria for being determined for listing in the NRHP, but have not been inventoried." This is indeed the existing situation. Historic properties that are demolished or whose architectural integrity has been sufficiently altered are **irreversibly and irretrievably** lost. Thus, when "funding continuation of the comprehensive survey and inventory work that was begun in 2000" is listed as a mitigation measure (see page 3-255), this would only be applicable if done **before** historically sensitive areas and properties are upzoned for redevelopment. Timing is critical.
 - b. Mitigation measures for historic and cultural resources. We strongly agree that surveys need to be completed to identify historic resources and additional historic districts and/or conservation areas should to be established to preserve "historic fabric" of some neighborhood areas, with the caveat above regarding critical timing; TDR programs need to be added in applicable areas; and assessment of landmark eligibility needs to be completed for SEPA-exempt projects, as well as ones exceed SEPA review thresholds.
 - c. Significant unavoidable adverse impacts on historic resources. Despite the list of mitigation measures, the paragraph describing significant unavoidable adverse impacts (see page 3-256) states that "no changes will occur to existing policies and regulations regarding review historic and cultural resources under any alternative," then we cannot expect that there is any intent to actually fulfill the mitigation measures suggested in the DEIS. For example, without enacting policy/regulation changes, properties under the current SEPA review threshold would not be assessed for landmark eligibility per current regulations, etc. Thus, stating that "no significant unavoidable impacts to historic and cultural resources are anticipated under any of the proposed alternatives" is disingenuous. The "gap" between non-project level and project-level SEPA review will cause adverse impacts on, or loss of, historical and cultural resources on smaller properties that fall below SEPA review thresholds and additionally may also decrease the historic fabric of some older neighborhood areas, as described on page 3-252.

- d. Ravenna* neighborhood and historic resources. Please see comment above about potential confusion between “EIS Ravenna” and the Ravenna* neighborhood when reviewing historical resources. Note that the Ravenna* neighborhood should be identified as a neighborhood that includes areas that have retained their historic fabric very well and, like Wallingford, include what several architectural historians also consider one of Seattle’s best early twentieth century bungalow neighborhoods. These include areas near Ravenna and Cowen Parks, and should be considered before upzoning for redevelopment irreversibly and irretrievably alters architectural integrity and historic fabric.
- e. Historic buildings in the housing supply. It is important to note that historic buildings can contribute significantly to the affordable housing supply, as well as the overall housing supply. Assuming these buildings are maintained, suitable, and meet current codes, they are often fully or largely depreciated and can absorb lower rents. They offer distinctive character to neighborhoods, as well as help maintain connections with Seattle’s roots. Utilizing suitable historic buildings also avoids the need to adding to demolition/solid waste issues, and retains the energy and resources already invested in them for future decades. Policy-level mitigation strategies should reflect these factors, in addition to encouraging redevelopment.

Thank you for your consideration.

Sincerely,

John Stewart

Direct line: 206-729-0243

2115 NE 62nd St

Seattle WA 98115

From: melissa stoker
To: [PCD_MHAEIS](#)
Subject: MHA-DEIS
Date: Sunday, August 06, 2017 9:45:38 PM

This DEIS is not sufficient to represent all Urban Villages and the City overall. Because each Urban Village is unique, with different housing types, local and cultural traditions, businesses, resources, and growth needs, the current DEIS cannot recognize, and therefore assess, these important differences.

It is my view, and those of many of my neighbors who will be writing you too, that 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 their own neighborhoods and in the City at large, yet this DEIS fails to thoroughly and accurately analyze the impacts to local neighborhoods and, at the same time, to the City as a whole.

Thank you for considering my comments.

Melissa Stoker
Madison Valley resident

Name	stephanie stone
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Strong supporter of proposed action. Call me a YIMBY! My neighborhood council is a selective group of above-average income white people who oppose HALA and are not open to discussing alternative viewpoints. To their credit, they are organized and well funded. Please know that there are many supporters of HALA out there in Capitol Hill/Miller still to be heard but aren't as organized -- renters, busy families, and many more.</p>
Housing and Socioeconomics	<p>2 Displacement is the only thing I have a hard time with. I want affordable housing units IN MY NEIGHBORHOOD - not somewhere else. Capitol Hill housing is building affordable housing units above Country Doctor, literally in my backyard. More please! Reacting to (out of state/out of town) developers "needs" for offsets is weak sauce - If infinite time, I should build community REITs to buy property and develop affordable housing ourselves.</p>
Land Use	<p>3 If investing in SOV transportation amenities, then invest in parking. If not, don't build any parking, meter what parking exists (to minimize park-n-ride), and build transit that people will actually use. It's getting there....keep going!! Also, please pay market rate and buy Republican p-patch, with HALA we need all the available greenspace, developers are swarming & courting the land owner with offers - don't let it go!</p> <p>4</p>
Aesthetics	<p>5 Trees make Seattle what it is. Drive around California and compare. Huge difference.</p>
Transportation	<p>6 More bike racks - developers seem to wiggle out of this requirement</p>
Historic Resources	<p>7 use the committee. Owners of 100 year-old homes will try to petition otherwise to secure NIMBY status.</p>
Biological Resources	<p>8 Trees make Seattle what it is. Please please please keep the parking strip greenbelts and street tree requirements (and keep energy costs down). Offsets and Setbacks are debatable.</p>
Open Space & Recreation	<p>9 More sports fields - Miller and Montlake are already booked solid til 11pm before HALA. Parking needs to support, people are not going to bus to and from soccer.</p>
Public Services & Utilities	<p>10 Make developers pay the connection/infrastructure fees. Ridiculous they don't have to.</p>
Air Quality & Green	

House Gas Emissions 11 Keep trees. Reduce traffic/parking.

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?

Name	Megan Sullivan
Email address	
Comment Form	
Housing and Socioeconomics	1 Beacon Crossing.How can you add all these apartments and not REQUIRE parking to be part of the structure? This is outrageous! This will have seriously negative consequences.
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	

From: Aditya (Ted) Sunidja, MD
To: [PCD_MHAEIS](#)
Cc: hoei@me.com
Subject: Fwd: HI neighbors, I have another urgent request for you to email the City for an Extension for reviewing the EIS for MHS if you please could do this
Date: Saturday, July 29, 2017 4:02:24 PM

Please extend the review period for the draft HALA-EIS until September 1-2017.

Thank you,
Aditya (Ted) Sunidja
4000 SW Findlay St
Seattle, WA 98136
(617)851-5703

From: Paul Sureddin
To: [PCD_MHAEIS](#)
Subject: Request for extension
Date: Sunday, July 02, 2017 5:41:49 PM

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.

Paul Sureddin & Silvie Johanson

Sent from my iPhone

Name	Tyler Szabo
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I found that it's hard to compare alternatives 2 and 3 without consideration to the commercial incentives. It'd be nice to have alt 2 if there areas that will be targeted for growth will also get things like nearby supermarkets (like how other hot neighborhoods have 24 hour supermarkets). A lot of focus is (understandably) on housing but I worry that other aspects of living are being left to a "build it and they will come". It may indeed be the case that the commercial will come with the density but the models seemed lacking.</p>
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)	

Name	Patrick Taylor
Email address	
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.	No
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I would urge the city to adopt a hybrid of alternative of 2 and 3: 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>Alternative 3 for Wallingford, Fremont, Ballard, and Crown Hill. The displacement analysis found low displacement risk and high opportunity in these North Seattle neighborhoods. It's a no-brainer to funnel more growth here with M2 upzones (which come with a higher affordability requirement) and with urban village expansions.</p> <p>Alternative 3 for West Seattle Junction and Morgan Junction would better capitalize on light rail investments to West Seattle thanks to a larger urban village boundary expansion and more M1 and M2 zoning.</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> <p>Alternative 2 for Othello (my neighborhood). We should build as much housing as we can near transit to maximize the return on our investment. More housing will also mean more affordable units.</p>
	<p>2 I think displacement is a real danger and something the city needs to take seriously. That being said, the tool to address is is not the zoning code. I live in the Othello neighborhood and see housing selling for 500k. Not upzoning will not stop displacement and not stop housing values from soaring. It will preserve single</p>

Housing and Socioeconomics	<p>family housing near light rail for affluent buyers. Upzoning in Othello and other displacement impacted neighborhoods will allow for the creation of more apartments which will be more affordable than SF houses. More apartment will also include more affordable unit created through MFTE and MHA. Further policies should implemented to address displacement including the creation of more affordable housing, tax abatement for low income residents, and community land trusts.</p>
Aesthetics	<p>3 Large and small scale building can exist together. This is a non-issues.</p>
Transportation	<p>4 Upzoning in the city near transit and services allow people to live with less automobile dependence. It will reduce displacement and allow more people to live in the city with shorter commutes to work giving them more time to enjoy life.</p>
Biological Resources	<p>5 Building more housing in the city will reduce pressure to covert farm and forest land to suburban development. Even if the city has a slight loss of habitat it is a win for biological resources on a regional scale.</p>
Air Quality & Green House Gas Emissions	<p>6 Building more housing in the city will allow for more people to drive less and have a lower green house gas foot print.</p>
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?	

Name	Shawn Terjeson
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 We need to see impacts at the block and street level. West Seattle Junction should get its own EIS.</p>
Aesthetics	<p>2 Our West Seattle Single Family areas and aesthetics are protected by our Neighborhood Plan, which is an adopted part of the City Comprehensive Plan. This plan built in growth with an eye to aesthetics that maintains our neighborhood character.</p> <p>The DEIS failed to assess the impact of larger, taller buildings with regard to the West Seattle Junction’s character. Our neighborhood plan and design guidelines are the standard. Don’t ignore our input.</p>
Transportation	<p>3 This part of the DEIS is embarrassing and baldly prejudiced to the HALA position.</p> <p>No streets or intersections assessed in West Seattle. Try the intersection of Alaska and Fauntleroy on a weekday morning between 7am and 10am when School is in session (10 months out of the year).</p> <p>The assessment of West Seattle traffic is both lazy and duplicitous. Really, I am insulted. The author of the study, “Checked Google Maps on an undisclosed Wednesday in March at 5:00 PM, 5:15 PM, 5:30 PM, and 5:45 PM.” West bound on the West Seattle Bridge at evening Peak.</p> <p>Try the West Seattle Bridge at the Eastbound peak, 7am to 10am on a weekday morning when school is in session. You are lucky if you can get out in 20 minutes.</p> <p>The DEIS does not consider the impact of when the Alaska Way Viaduct becomes a toll road.</p> <p>For this section alone, the DEIS needs to be sent back for further study.</p>
Biological Resources	<p>4 The 15 acres of tree canopy that the DEIS quoted for the expansion area is incorrect. In the HALA plan will effecton 47 acres of single-family housing in the West Seattle Junction.</p> <p>It’s small relative to the size of the city, the impact is huge within the West Seattle Junction.</p> <p>The DEIS must study the West Seattle Junction specifically and propose mitigations to preserve tree canopy.</p>

Open Space & Recreation

5 The West Seattle Junction has a severe park and open space shortage, the DEIS included a golf course as open space. It is open space, that you cannot use without fees and can only do one activity.

The DEIS proposes no mitigation

The issue is only going to get worse.

The DEIS must present a mitigation plan for the West Seattle Junction. Give us new park space within the West Seattle Junction. Write open space design standards and incentives. Fund it with developer impact fees.

Public Services & Utilities

6 This is not a viable address to West Seattle utilities. The DEIS did not take public utility capacity seriously. This will cause us, the residents to pay for utility issues cause by developers. I'm sick of paying for other people's profit margin.

The DEIS fails to acknowledge that most sewer lines in the Junction are <12" and must be upgraded to meet the demands of any Alternative. No mitigation is proposed.

The sewer analysis is itself faulty, as it fails to study peak flows. Given the age of the sewer system and its use as a storm water system, peak flows are critical.

The DEIS relies on an obsolete wastewater plan, and does not acknowledge the City's issues managing wastewater overflows.

The DEIS fails to study drainage and the impact of the additional impermeable surfaces.

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

From: Shawn Terjeson
To: [PCD_MHAEIS](#)
Subject: HAAH EIS
Date: Saturday, July 29, 2017 10:03:34 PM

Please send an email that says:
Please extend the review period for the draft HALA-EIS until September 1-2017.

Shawn Terjeson

From: Susan Terjeson
To: [PCD_MHAEIS](#)
Subject: REQUESTING MORE TIME TO REVIEW AND COMMENT ON THE DRAFT EIS
Date: Sunday, July 02, 2017 9:51:08 AM

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.

Toby Thaler
PO Box 1188, Seattle, WA 98111
(206) 697-4043 • <toby@louploup.net>

August 7, 2017

City of Seattle
Office of Planning and Community Development
Sam Assefa, SEPA Responsible Official
Geoffrey Wentlandt, Lead Contact Person
Via email Only:
Samuel.Assefa@seattle.gov
MHA.EIS@seattle.gov

Re: Draft EIS for "Citywide Implementation" of MHA Program

Dear Mr. Assefa and Mr. Wentlandt:

Thank you for the opportunity to comment on the above cited DEIS.

Unfortunately, the June 8, 2017 Draft EIS has significant legal flaws and deficient impact analyses regarding numerous elements of the environment. I believe you will need to prepare a new Draft EIS to correct these problems. An attempt to move straight to an FEIS will fail to meet one of the key purposes of SEPA:

The EIS process enables government agencies and interested citizens to review and comment on proposed government actions, including government approval of private projects and their environmental effects. This process is intended to assist the agencies and applicants to improve their plans and decisions, and to encourage the resolution of potential concerns or problems **prior to issuing a final statement**. An environmental impact statement is more than a disclosure document. It shall be used by agency officials in conjunction with other relevant materials and considerations to plan actions and make decisions. (emphasis added)

WAC 197-11-400(4). The current state of the EIS makes it impossible for the City to properly conduct the underlined activities. Any "actions and decisions" by the City Council (or OPCD) based on the level of analysis present in the current draft are not likely to be in the best interest of a majority of people and institutions in the City of Seattle.

1. The DEIS fails to accurately describe the City's decision making process

The MHA citywide implementation actions are the culmination of a lengthy decision making process. SEPA allows the City to conduct review of different phases of a long decision process. WAC 197-11-776; 197-11-060(5). "When a lead agency knows it is using phased review, it shall so state in its environmental document." WAC 197-11-060(5)(e). For this DEIS, phased review applies both to prior programmatic (non-project) actions establishing the policy "framework" for the specific zoning actions proposed in the MHA DEIS, and to any subsequent actions (programmatic and project) that are relied on to mitigate identified adverse impacts. The DEIS fails to disclose these relationships or even to use the phrase "phased review."

Furthermore:

Phased review is not appropriate when:

- (i) The sequence is from a narrow project document to a broad policy document;
- (ii) It would merely divide a larger system into exempted fragments or avoid discussion of cumulative impacts; or
- (iii) It would segment and avoid present consideration of proposals and their impacts that are required to be evaluated in a single environmental document under WAC 197-11-060(3)(b) or 197-11-305(1); however, the level of detail and type of environmental review may vary with the nature and timing of proposals and their component parts.

WAC 197-11-060(5)(d). The referenced section (3)(b) provides:

Proposals or parts of proposals are closely related, and they shall be discussed in the same environmental document, if they: ... Are interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation.

In previous letters, I have objected to the City's failure to conduct proper SEPA review of the MHA program.¹ I am including them as part of this comment letter. Not only has the City failed to properly invoke phased review, but it has willfully chosen a segmented decision making path that purports to allow it to avoid any consideration of an appropriate range of alternatives to the proposed actions. While the MHA-R Framework has been adopted, it is not too late for the City to prepare a DEIS that evaluates the objectives and alternatives to reach them as required by SEPA. As my prior letters state, there is no "bargain" that binds the City to the Framework.

2. The DEIS fails to include or evaluate an adequate range of alternatives

By using an improper phased review, the City has avoided consideration of an appropriate range of alternatives to meet the stated objectives for the proposed action(s).

SEPA requires the DEIS to contain a range of reasonable alternatives. "Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." WAC 197-11-440(5)(b). Thus, the key is how the City defines the "proposal's objectives." As the Wallingford Community Council letter states: "The draft EIS 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 EIS. This is a significant deficiency in the DEIS and a violation of SEPA."

3. The DEIS fails to properly evaluate impacts on individual communities.

By avoiding a transparent phased review SEPA process, the City also avoids consideration at the programmatic level of impacts on individual neighborhoods and communities. The DEIS should explicitly acknowledge the shift in City policy over the past few years away from neighborhood

¹ Letters of August 1 and August 14, 2016 concerning CB 118736, MHA-R Framework

planning to help guide development and provide more certainty of mitigation, toward a top down planning model. The latter is certain to result in more significant adverse impacts in a number of areas. The term "neighborhood plan" barely appears in the DEIS, and "neighborhood planning" not at all.

The repeated reliance in the DEIS on other policies and programs to "mitigate" for possible adverse impacts is unwarranted. Most if not all of these programs, such as tree canopy protection and design review, have been weakened, or are in the process of being weakened, either directly, or in the Seattle 2035 Comprehensive Plan.

The City relied on a "focus group" process to replace the lack of more extensive engagement with communities. The City claims the focus groups and "Community Urban Design Workshops gave communities the opportunity for input on draft MHA zoning maps in a setting and location specific to their neighborhood." (DEIS, p. 2.14) These meetings do not even come close to replacing the extensive community engagement that the City undertook during the 1990s neighborhood planning effort. This disempowering of Seattle's communities is shameful.

Sincerely,

A handwritten signature in black ink that reads "Toby Thaler". The signature is written in a cursive, slightly slanted style.

Toby Thaler

August 1, 2016

To: Seattle City Council
PLUZ Committee
rob.johnson@seattle.gov
mike.obrien@seattle.gov
lisa.herbold@seattle.gov
lorena.gonzales@seattle.gov
bruce.harrell@seattle.gov
sally.bagshaw@seattle.gov
tim.burgess@seattle.gov
debora.juarez@seattle.gov
kshama.sawant@seattle.gov

Re: CB 118736, “to establish the framework for mandatory housing affordability for residential development”

Dear Members of the Seattle City Council:

Council Bill 118736 proposes adopting significant changes to Seattle’s Land Use Code implementing the so-called “Grand Bargain” of July 13, 2015.

The “Grand Bargain” memorandum—“Statement of Intent for Basic Framework for Mandatory Inclusionary² Housing and Commercial Linkage Fee”—is sometimes characterized as a binding contract, which it is not. The mayor and city council member who executed the memorandum had (and have) no authority to bind you as Seattle’s legislative body to the terms spelled out in the memorandum. Promises were made, including forbearance of related litigation by some of the most powerful large developers in town (their counsel is a signer!). However, certainly anyone who is not a signer is not legally bound by the memorandum either; other developers can sue regardless.

The Grand Bargain was executed in the context of a process known as the Housing Affordability and Livability Agenda (HALA). As has been well known and criticized from its inception, the members of the HALA committee consisted largely of representatives from the housing development community, with little representation from low income, renter, and neighborhood interests, minority and immigrant communities, or environmentalists. Moreover, arguably none of the eight signers of the Grand Bargain has advocated effectively for these interests. It is incumbent on you (the first council with seven members elected by district, *after* the Grand Bargain was negotiated and signed) to thoroughly review the content and justification for the adoption of the proposed action, despite the heavy pressure not to make any changes from the Executive and large developers.

The HALA process is being pursued separately from a major overhaul of the City’s Comprehensive Plan (Seattle 2035). Unfortunately, there has been little coordination or joint consideration of the overlapping impacts of these closely related processes.

The Executive created a HALA focus group process, ostensibly to provide a forum for input to the City regarding the HALA recommendations, with a focus on the “Mandatory Inclusionary Housing”

² “Inclusionary” was changed to “Housing” because the Grand Bargain’s terms limit the ability to actually provide “inclusionary housing” on most projects—thus “Mandatory Housing Affordability” or MHA.

(now “MHA”) proposal.³ As a member of the focus group supposedly “representing” the Fremont neighborhood, I was astonished that the process has not included consideration of how the MHA will produce the goal of 6,000 net new affordable housing units over ten years. I and others have repeatedly asked for this information, both in the focus group and in separate meetings and written requests to City officials.

Proposed amendments to CB 118736 (July 16 memo by Ketil Freeman) are intended to address the absence of this supporting data and analysis, but cannot do so effectively. Instead, this is exactly the type of information that the State Environmental Policy Act (SEPA) is designed to elicit from the City *before* it takes significant action.

Unsurprisingly, the City on July 28th “determined the MHA proposal is likely to have a significant adverse impact on the environment.” Thus, “[a]n environmental impact statement (EIS) is required under RCW 43.21C.030 (2)(c) and will be prepared.”⁴

It is foundational SEPA law that no action shall be taken prior to completion of the EIS process once a DS has been issued. Therefore, I request that you not vote on CB 118736 until the EIS process has been completed. Furthermore, it would be appropriate for the Council to direct the Executive to work with you to combine consideration of the HALA-driven MHA with your pending review of the Seattle 2035 Comprehensive Plan update.

If you do choose to move forward on CB 118736 at this time, at a minimum all of the amendments proposed by Councilmembers O’Brien, Herbold, and Johnson are necessary to reduce—or at least try to get a handle on—the still unquantified adverse impacts that will be caused by precipitate action on such an important city wide land use policy.

Thank you for your consideration and the opportunity to comment on this very important proposal that will affect how development proceeds in Seattle, and how its impacts will be mitigated (if they can be mitigated at all), for years to come.

Sincerely,



Toby Thaler

Cc: Mayor Ed Murray
City Attorney Peter Holmes

³ E.g., see agenda at

http://www.seattle.gov/Documents/Departments/HALA/FocusGroups/July/2016_0711_HALA_Expansion_FG_Agenda_v3.pdf

⁴ See Determination and Notice of Significance for “amendments to Land Use Code (Seattle Municipal Code Title 23) to implement a proposed new program, Mandatory Housing Affordability (MHA)” (<http://web6.seattle.gov/DPD/LUIB/NoticePrint.aspx?NID=23008>).

August 14, 2016

To: Seattle City Council
bruce.harrell@seattle.gov
rob.johnson@seattle.gov
mike.obrien@seattle.gov
lisa.herbold@seattle.gov
lorena.gonzales@seattle.gov
sally.bagshaw@seattle.gov
tim.burgess@seattle.gov
debora.juarez@seattle.gov
kshama.sawant@seattle.gov

Re: CB 118736, “to establish the framework for mandatory housing affordability for residential development”

Dear Members of the Seattle City Council:

Two weeks ago I wrote you about Council Bill 118736. One point I made was that:

It is foundational SEPA law that no action shall be taken prior to completion of the EIS process once a DS has been issued. Therefore, I request that you not vote on CB 118736 until the EIS process has been completed. Furthermore, it would be appropriate for the Council to direct the Executive to work with you to combine consideration of the HALA-driven MHA with your pending review of the Seattle 2035 Comprehensive Plan update.

The Planning, Land Use and Zoning (PLUZ) Committee did vote to move the matter to the full Council for consideration on Monday, August 15. Amendments to CB 118736 were adopted in committee to require some study of impacts and comparison of alternatives, and requirement of mitigation that a SEPA process would properly develop.

Nevertheless, your approval of CB 118736 prior to the conduct an environmental impact statement (EIS) would be in violation of both the spirit and letter of the State Environmental Policy Act (SEPA).

After passage of CB 118736 by the PLUZ Committee, the basis for the City’s position that adoption of the “framework” for the mandatory housing affordability in residential zones (MHA-R) outside Downtown and South Lake Union is not subject to WAC 197-11-070(1)(b) came to my attention:

Because the MHA framework legislation does not actually make any zoning changes, nor does the program apply to any properties until zoning changes occur, it received a “determination of non-significance” [SEPA DNS] for impacts to the natural and built environment last year.⁵

The referenced DNS is the June 8, 2015 “Notice Of Proposed Legislation, Comprehensive Plan Amendments, And Environmental Determination.”⁶ That DNS informed the adoption of the

⁵ August 10, 2016 email from Office of C.M. Johnson.

⁶ <http://web6.seattle.gov/dpd/luib/Notice.aspx?BID=1040&NID=19865>

framework for the mandatory housing program for *commercial* development—MHA-C.⁷ Nowhere in that DNS is there consideration of impacts on housing, land use, transportation, and other elements of the environment in residential zones across the city.

Moreover, the structure of the City’s purported phased review⁸—framework and policy first, then specific zoning changes—is designed to avoid SEPA review of site specific impacts or consideration of alternatives at the policy level. Here are two extracts from the June 8, 2015 SEPA documents that show the City’s attempt to obfuscate the specific decision being considered:

1. From the SEPA Checklist:⁹

A.11. Give brief, complete description of your proposal...

This proposal would implement an affordable housing mitigation program requiring new development to provide affordable housing in proportion to the gross floor area of their project. ...**the proposed affordable housing mitigation program would require developers to provide affordable housing** (either through performance or payment of a fee) **regardless of whether an incentive was used**, in order to mitigate (to some extent) the impacts of new development on the need for affordable housing. While the incentive zoning requirement would be calculated based on the amount of extra floor area achieved, the affordable housing mitigation program requirement would be calculated based on the total floor area of the project regardless of its size.

D. Supplemental sheet for nonproject actions...

5. ...**This proposal would not change the maximum height, floor area ratio, or density for any properties.** Developments affected by this proposal would still have to meet existing standards for bulk, design, landscaping, etc.

2. From the SEPA Determination of Non Significance (DNS):¹⁰

“the proposal is not likely to result in changes that would substantially increase development capacities, or development envelopes, or otherwise expand development size capabilities in any given zone or part of the city. ...

This does not rule out the possibility that through the amendatory changes there might be alterations that have some effects of marginally changing total development capabilities. However, **there is not an intent to generate different amounts or types of growth capabilities on any given property in the city.** Nor does the proposal intend to substantially change in any adverse manner the range of land uses permitted to be built on any given property across the city. **Nor does the proposal intend to alter development capabilities in terms of substantially changing the maximum height limits of development on any given property across the city.**

The observations in the two preceding paragraphs assist in drawing a conclusion that on a property by property basis, there is a **low likelihood of the proposal inducing future development and land**

⁷ CB 118498; Ordinance 124895 (November 17, 2015). See Findings of Fact (Attachment A), paragraph 6.

⁸ “Phased review” is allowed (WAC 197-11-040(5)), but “When a lead agency knows it is using phased review, it shall so state in its environmental document.” There is no such reference in either the May 2015 DNS, or the new DS for the MHA-R, and the latter makes no reference to the former.

⁹ <http://www.seattle.gov/dpd/LUIB/AttachmentProjectID661306.11.15%20HM&I%20Z%20-%20SEPA%20Checklist%20FNL.pdf> (emphasis added)

¹⁰ <http://www.seattle.gov/dpd/LUIB/AttachmentProjectID661206.11.15%20HM&I%20Z%20-%20SEPA%20Determination%20-%20FNL.pdf> (p. 7; emphasis added)

use patterns in ways that might generate significant adverse land use pattern, compatibility, or height/bulk/scale impacts. While there could be a de minimus potential that differences in the proposal's regulatory schemes exist in ways that could alter aspects of future building designs, there appears to be little or no potential for such differences to generate land use impacts that are significant and adverse for any given property. This means that **density related impacts** (as contemplated under Height, Bulk, and Scale in the City's SEPA policies) and land use compatibility-related impacts (as contemplated under Land Use in the City's SEPA policies) **are not anticipated** to affect the built environment in a manner that is significantly adverse."

This June 2015 SEPA checklist and DNS determination occurred *before* the so-called July 13, 2015 "Grand Bargain," which for the first time explicitly acknowledged that the City is proposing a program requiring "adoption of additional zoning capacity."¹¹ The language emphasized in the checklist and DNS above is very carefully crafted to imply that because *specific* zoning changes were not before the Council in May 2015, no evaluation of the impacts of *changes certain to occur* was needed at that time. This is wrong.

With this non-explicit phased review path, the City seeks to avoid comprehensive consideration of impacts and alternatives of a major program. By the time the City is ready to implement the mandatory housing program with zoning changes, the policy criteria and process details will have been chosen and predetermined to have "no significant impact." Extensive upzoning across the City is an inherent part of the mandatory housing program as proposed, yet evaluation of significant impacts—and mitigation—is avoided by pretending that these changes are not on the table for consideration.

I again request that you attend to the important values being promoted by the proposed action—including providing more affordable housing while avoiding adverse impacts on existing affordable housing—and deeply consider whether it would behoove you to require OPCD to prepare an environmental impact statement for the framework before acting on it. Waiting until "specific zoning changes"¹² are ready for review improperly avoids consideration of impacts, mitigation, and more effective alternatives for the most important policy aspects of the entire program.

That is, repeatedly adopting MHA "frameworks" as programmatic decisions with a perfunctory SEPA DNS facilitates negative consequences without ever knowing what alternatives could better achieve desired policy goals, and without mitigation for the significant but as yet unquantified impacts.

We should never bargain away our ability to guide our future without knowing what we may be giving up. Major policies such as the MHA should be made only with broad public engagement, empowerment, and transparency. These are essential elements of democratic governance inherent in SEPA's requirements.

¹¹ Upzones are not the only "incentive" local governments may use under RCW 36.70A.540(1)(a) for affordable housing incentive programs.

¹² The HALA "focus group process" (<http://www.seattle.gov/hala/focus-groups>) will determine the basic outline of specific zoning changes that will be prepared by the OPCD for Council consideration. The focus groups and OPCD will not be done with this work until the end of 2016, at the earliest. Conducting scoping for a zoning change EIS (<http://web6.seattle.gov/DPD/LUIB/Notice.aspx?BID=1158&NID=23008>) at this early stage is inappropriate unless the City plans to complete a far more inclusive outreach effort than is currently outlined in the DS notice.

Thank you for the opportunity to comment on this very important proposal designed to make Seattle more equitable, that will affect how development proceeds in Seattle—and whether and how its impacts will be mitigated or avoided—for many years to come.

Sincerely,

A handwritten signature in black ink that reads "Toby Thaler". The signature is written in a cursive style with a prominent horizontal line across the top.

Toby Thaler

Cc: City Attorney Peter Holmes
Mayor Ed Murray

From: RUTHA M THOMAS
To: [PCD_MHAEIS](#)
Subject: Rezoning Parcels in the 3200 Block of NW Market St.
Date: Friday, July 21, 2017 6:37:21 PM
Attachments: [Rezoning Request0001.pdf](#)

Dear HALA and Seattle City Council:

Thank you for the opportunity to express our position relative to rezoning parcels on the north side of NW Market Street in the 3200 block.

Attached is a request for rezoning signed by several property owners. Each of the home owners have resided here for more than 30 years. Needless to say, we have observed all of the development changes, including the apartment buildings constructed at the corner of NW Market & 32nd Ave. NW that were previously single family homes. The current wave of development of townhouses on the south side of Market Street presents a significant disadvantage competitively as it relates to buyer appeal and property value. It is a fact that our block is in a housing transition, and the current SF 5000 zoning does not provide a level playing field for the ten property owners. We believe the best and highest use of these parcels would be multifamily zoning. Thank you for your consideration.

Respectfully,

Eddie & Rutha Thomas
David Thomas
Erik Myrold
Lee Olsen
Nate, Kari & Micari Williams

Rutha Thomas, Managing Broker
Century 21 Real Estate Center
(206) 550-1335 - seattlehomesales.com
The highest compliment that I can receive
Is the referral of your family and friends.
Thank you for your trust.

From: Thompson
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](#)
Subject: Comments on MHA DEIS
Date: Sunday, August 06, 2017 4:08:50 PM
Attachments: [MadisonMillerDEISResponse_Rev_2017_08_02.docx](#)
[MMRUJ-MAP-073117.pdf](#)

To:
The MHA/HALA team,
The City Council,
The Seattle Department of Neighborhoods,
Mayor Murray, and
All who are working hard to address the disparity and scarcity of affordable "workforce" housing in our beautiful and growing city of Seattle,

We support the MHA Draft EIS Comments submitted on behalf of the Madison-Miller Park Community Group dated August 2, 2017, (documents attached).
We encourage you to carefully consider these documents as you continue to work on the affordable housing issues.

We have lived in the Madison Miller Residential Urban Village in a 110 year old craftsman home since 1977 (40 years!).
Our home is an irreplaceable historic structure.
We chose to live IN the city when many others opted for the larger lots and homes available in suburban areas.
Ours WAS an affordable home for a working class family with access to many amenities. At the time we bought our home this neighborhood was red-lined. We could not have obtained a mortgage if I had not been white and employed at a financial institution. In 1977 our block had 5 black homeowners, 6 white homeowners, and one rental occupied by a black family. Presently we have 1 black homeowner and 11 white homeowners (two of which are rentals occupied by artists, students and young professionals). So, it is evident that **there has already been significant displacement impact** in our urban village.
Fortunately, organizations such as Capitol Hill Housing and SHA recognized that affordable housing could be retained in this urban village so we have multiple affordable complexes that will remain so for 20 plus years. Unfortunately, these organizations are now unable to compete with developers for available land in this area. We feel it is quite unlikely that developers will opt to build affordable units in this area because it is so attractive. We have heard suggestions that giving the developers the option to put money in the "pot" will enable the City to build more affordable units in neighborhoods such as Lake City where land is slightly cheaper. Doesn't this sound like another form of red-lining??

Please carefully consider the response of our Madison-Miller Park Community group that is presented in detail in the attached documents.
We want to work with you to make the urban village opportunities that we have so enjoyed available to working class families without destroying a unique, historic and mixed residential neighborhood.

Thank You for your devotion to Seattle!
Gayle & Jack Thompson
614 20th Ave East
Seattle WA 98112

August 2, 2017

TO: MHA.EIS@seattle.gov

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:

- **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**, (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 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 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 those 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:

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

- The designation of “High Opportunity” is flawed, and warrants further analysis:
 - MADISON-MILLER has no direct access to light rail within a quarter mile or 10 minute walk shed (see detailed comments below regarding transportation).
 - MMRUV 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:**
 - 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.
 - Further data gathering, analysis, and impact mitigation studies should be conducted to

- accurately understand the scale and negative impacts of displacement.
- Existing low income and affordable housing listed above should be protected and designated for affordable housing development exclusively.
- 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 bus transfers 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 – this is an indicator that while we are well situated for local transit connections, faster, more direct options are still required.
- **Specific Request:**

Madison-Miller Urban Village should be categorized as “Low to moderate-Access to Opportunity” with appropriate density increases for a non-Hub urban village.

#3: Transportation: Traffic and parking impacts will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.

- 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.
- Meany Middle School will reopen in the fall of 2017 (with a significantly increased student population) which will have a significant impact on our current traffic and parking. The school has no designated parking lot for parents, volunteers, or staff. Buses will travel on our narrow streets. At lunch time, 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 require on street parking. Included in the MMRUV 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:**

- Further data gathering, analysis, and impact mitigation studies should be conducted to accurately understand the negative impacts to traffic, parking, and public safety.
- Within the MMRUV 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 approximately 1.6 acres of open space 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 indicates the entire acreage of Miller Park and Playfield as 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:**
 - 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.
 - 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, road ways, and garbage pick-up are already compromised due to their age and condition and our narrow streets.

- 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 adjacent to single family homes, 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:**
 - 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.
- Preservation Green Lab produced 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 existing setting 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. Even more if the HALA proposed changes to Design Review Process are implemented.
- 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:**
 - 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.
 - 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. They could 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:**
 - 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.

Madison-Miller Park Community Group

Co-Chairs:

Dara Ayres _____

Elaine Nonneman _____

DEIS Response:

Lauren Swift, Planner _____

K. LeMoyné Harwell, Architect _____

Debrah L. Walker, Architect _____

Greg Walton, Developer _____



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.

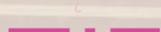
6 **RSL(M)** - Scale Transition to Neighborhood and Park. Playfield is not normally available for community use. John Frontage has historic neighborhood home.

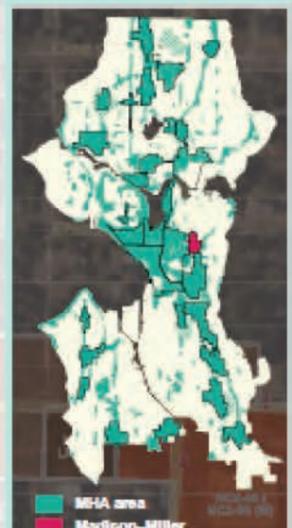
7 **LR1(M)** - Address scale transition and adjacency to Greenspace.

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**



Name	John Thomson
Email address	
Comment Form	
Aesthetics	<p>1 Large developments that reduce availability of yards and other green areas should be incentiveized to contribute to the development of community accessible green spaces such as expanded parks or pea patches.</p>
Transportation	<p>2 With the large population of high earning individuals entering Seattle, some value may be gleaned by increasing the availability of higher value desirable properties *for purchase* as opposed to for rent. High earning individuals are looking to buy, but can only do so through urban sprawl, as there seems to be much lower condo development compared to high-end rentals being built.</p> <p>It is my understanding that it is much more difficult / risky from a legal standpoint to build a condo as opposed to a rental building.</p> <p>If this is found to be true, the city should be taking steps to incentivize high density, but desirable, living areas that can be owned as opposed to rented.</p>
Open Space & Recreation	<p>3 To reiterate an earlier comment, large housing developments should be incentivized to develop / contribute to green spaces, and steps should be taken to ensure these green spaces are available to all. This could include gardens, parks, and pea patches.</p>
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	

From: Wendy Thon
To: [Herbold, Lisa](#)
Cc: [PCD_MHAEIS](#)
Subject: HALA in Gatewood
Date: Monday, August 07, 2017 10:56:36 PM
Attachments: [IMG_5979.JPG](#)

Dear Councilmember Herbold,

Thank you for being at the community meetings and for fighting for our interests.

On Tuesday evening we had the annual Seattle Block Watch Night Out potluck/street party on our block. We have done this every year for 20 or so years since my husband Tom became the block watch captain.

One of our newer neighbors asked me how I felt about the current proposals for change on our block. I replied that from the standpoint of our neighborhood ~ our one little block of 42nd between Heights and Holly ~ it feels like a divorce ~ one that nobody wants where an arbitrary line has been drawn down the middle of the street that divides our neighborhood family in half. One side "wins" and the other side "loses".

We have lived here 29 years and several families have been here longer. We know each other; we look out for each other; we care about each other.

The impact of the HALA proposal will be severe. One side of the street will remain zoned as it has been as single family dwellings. The other side could be up zoned 2 or 3 times. As the people on that side of the street move on, they will inevitably sell to developers who will be building on view property and these will not be "affordable" units. And they will not be required to include parking. This is a big mistake. Our block is already parked up by cars from dwellings on California Ave that have been built with little or no parking.

If we had the subway and bus systems and the flat terrain of NYC, this might make sense; but we do not. There needs to be a transition that is reasonable and in the meantime parking needs to be a part of new housing development until people are living with fewer or no cars.

We do need more housing and we desperately need AFFORDABLE and low income housing but I don't think this plan is going to get us there.

In our immediate area we have a number of affordable apartment buildings. An upzone may finally make it profitable to tear down those affordable buildings and replace them with higher end units for workers making big \$ downtown. The local workers and seniors who live there now will be pushed out. Instead of helping, this makes our problems as a city worse.

How many affordable units will the current plan generate? And how many affordable units will be torn down? I believe there will be a net loss.

I would be in favor of incentives to protect some of the best affordable housing we currently have. I would be in favor of intelligent and thoughtful design such as High Point. I would be in favor of back yard cottages in residential neighborhoods such as ours. I would be very interested in a program like Portland is starting where backyard dwellings will house homeless people for a period of time before becoming accessory units or affordable rentals.

So while I favor a NO ACTION option for our block, I have concerns for all of Morgan Junction and for more growth than we already have in West Seattle (I haven't even touched on the bridge traffic issues!) and mostly for a plan that doesn't adequately address the very real affordable housing issues in our city.

I believe you have a strong voice and a valued one on the city counsel and I hope you will use it for us all.

Thank you!

Sincerely,

Wendy Thon
Gatewood resident



>

>

>

> Sent from my iPhone

Thoreen, Kari

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.

Kari Thoreen 98108

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 IMPROVED PATHS AND DEMAND FOR PARKING

From: Christy Tobin-Presser
To: [PCD_MHAEIS](#)
Cc: [Herbold, Lisa](#)
Subject: Impact Statement - Request to Extend Comment Period
Date: Saturday, June 24, 2017 2:01:14 PM

Please extend the comment deadline for three months. The EIS is a voluminous document – 400+ pages plus 400+ pages in appendices. The proposals dramatically impact large single-family residential areas filled with individuals that are not trained in reading and understanding these types of documents. A 45-day comment period during the time of year when many people have planned family/summer vacations is unfair and insufficient. Finally, the link to the comment email on the HALA/EIS misdirected users for the first 12 days of the already short comment period.

Christy Tobin-Presser
Bush Kornfeld LLP
601 Union Street, Suite 5000
Seattle, WA 98101
Tel. 206-292-2110
Fax 206-292-2104
e-mail: ctobin@bskd.com

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WEST SEATTLE JUNO
LAND USE COMMITTEE

August 7, 2017

Office of Planning & Community Development
Attn: MHA EIS
PO Box 34019
Seattle, WA 98124-4019

Re: Comments to Draft Environmental Impact Statement

Dear Sir or Madam:

Enclosed herewith are the comments to the MHA Draft Environmental Impact Statement prepared by the West Seattle Junction Land Use Committee ("JLUC"). Please direct any follow up questions or comments to luc@wsjuno.org. Thank you.

Sincerely,

Rich Koehler, Chair, JLUC
Christine M. Tobin-Presser, JLUC
Dan Berger, JLUC
Amanda Sawyer, Director, JuNO
Janine Rees, JLUC
Joe Fuller, JLUC
Carl Guess, JLUC

Enclosures

GENERAL COMMENTS ON DEIS ANALYSIS

WEST SEATTLE JUNCTION URBAN VILLAGE

GENERAL COMMENTS ON THE DEIS

Statement with Regard to the Draft EIS

We have reviewed the Draft Environmental Impact Study (DEIS). We find it to be cursory and too superficial to reveal impacts at the Junction, flawed in multiple areas of analysis, and incomplete with regards to proposed mitigations.

General

The DEIS scoping comment period closed on Sep 9, 2016. Property owners and residents that would be directly affected by the MHA changes were not individually notified prior to this date. The City recognized this flaw in its outreach and began a more deliberate communication effort, however, the scoping comment period was already closed. Therefore the DEIS scoping itself is flawed as it may not reflect the input of the most-affected members of the community, and it is certainly flawed as it relates to the items listed below.

The DEIS fails to study the impacts to the Junction in adequate detail. As a citywide analysis, it fails to find potential block-level impacts, such as traffic impacts at individual intersections, the aesthetic impacts of zoning changes by blocks, parking impacts on certain streets, impacts of public views in the Junction, shortfalls of local infrastructure capacity, and so forth. As the Junction is the transportation hub for much of the West Seattle peninsula toward Downtown, the Junction is even more likely to have acute impacts at the block-and-street level. Due to the need for depth, the Junction warrants an EIS unto itself, or at least, an EIS should be developed exclusively for West Seattle.

Concurrent planning is vital. The DEIS fails to consider the impact of other projects that will take place during the planning period. These will create acute, temporary issues and/or sustained impacts that have not been considered. During the planning period, the Junction will experience impacts from (1) Terminal 5 development; (2) Fauntleroy boulevard partial closure; (3) Avalon Way rechannelization; (4) Sound Transit construction and development; (5) Demolition of the SR99 Viaduct; (6) Bus rerouting due to "One City Center"; (7) possible implementation of an RPZ. The DEIS should consider these impacts in tandem and outline their "worst case" impacts at annual intervals between 2018 and 2035.

The DEIS identifies multiple areas where all Alternatives result in unacceptable performance as compared to standards, for example, Traffic Level of Service (LOS) and access to Parks. The DEIS must specify that a means of mitigation is to refrain from taking actions that encourage additional growth, such as Alternatives 2 and 3, until the City has taken the steps needed to address these issues. This is a requirement for concurrent planning and growth. Given that the City has a track record of allowing growth without taking steps to manage growth impacts at the Junction, we believe that this mitigation measure is required. The DEIS should present a specific mitigation approach that uses developer impact fees in order to make necessary improvements more plausible.

Statement with Regard to the Designation of the Junction as “High Opportunity and Low Displacement Risk”

The DEIS outlines its methodology for opportunity and risk analysis. It plots the relative calculation for each on a chart. The “opportunity analysis” is flawed due to the choice of parameters used for the evaluation. The parameters fail to account for livability factors such as (1) open space; (2) commute time; (3) parking; (4) emergency services; (5) crime rate; (6) local jobs per resident; (7) tree cover; (8) child care capacity; (9) anticipated disruptions due to construction.¹ Property appreciation is not a positive opportunity factor – it is a negative due to the impact on property tax. It can only be realized as favorable for a resident that leaves the area (i.e. due to cultural displacement) or to a landowner that sells (i.e. causes economic displacement). All factors should be evaluated relative to the number of residents. For example, “proximity to a park” does not account for the strain that high density creates on small parks.

Also, it is not clear whether the Opportunity Analysis considered the Junction’s current boundary, or the boundary as it would be modified by the Alternatives. It seems self-evident that if extending the boundaries causes a lower opportunity level, then the lower level should be acknowledged.

The “displacement risk analysis” is flawed. All displacement matters. The DEIS fails to account for, and must account for, the displacement of families with children and the elderly, both of which are groups that are sensitive to the impacts of growth and displacement. It also fails to ascertain the displacement of the tenants of rented houses, and houses with roommates. We found that 24% of the single-family homes within the Junction are non-owner occupied.²

The Junction – along with the other West Seattle urban villages – is at the lower end of the Opportunity level. The Junction ranks 30th out of 39 urban villages for opportunity. This low-end result is unsurprising, given that few amenities have been provided to the Junction to offset the impact of growth that has taken place over the past 20 years. We object that the Junction has been designated a “High Opportunity” area given the large disparity between the it and neighborhoods like Green Lake and Fremont. This disparity is vividly depicted in the DEIS appendix, with the Junction plotted in the overlap with the “Low Opportunity area” while numerous neighborhoods are well farther to the right.³ It does not seem sensible to group the Junction with those neighborhoods for matters of policy.

Statement with Regard to the Proposed Alternatives

The DEIS includes analysis of two Alternatives (numbered 2 & 3) for MHA implementation. The City states that neither takes community input into account. Alternative 2 is considered the baseline MHA proposal. Alternative 3 seeks to minimize displacement among marginalized groups, which has the effect of shifting significantly more density to the Junction. Our position is:

¹ The Junction will be heavily disrupted by construction due to several projects including the deployment of Sound Transit; One City Center bus reroutes; Terminal 5 development; Avalon Way rechannelization; Fauntleroy Way redevelopment. Twenty-years of constant construction and traffic impacts should be a factor when considering the urban village’s opportunity level.

² Data provided to Lisa Herbold, July 2017.

³ Appendix Figure 7, p.25

- While neither Alternative is acceptable at the Junction, Alternative 3 is substantially worse than Alternative 2.
- All displacement matters, not just the displacement of what the City has defined as marginalized groups. The City should develop an additional Alternative 4 that minimizes total displacement.
- All cultures matter. All urban villages must include a measure to “build on local cultural assets”, not only those with High Displacement Risk.⁴ The Alternatives must then describe their approaches to preserving culturally important facets of the Junction, including by comparing their implementation to Junction design standards and neighborhood plan guidelines and policies.⁵
- For the purpose of developing Alternative 3 displacement risk, the City should include in its assessment the displacement of families with children and the elderly, as they are acutely sensitive to disruptions to their living situations.
- The three alternatives are too similar. The DEIS should propose alternatives that are distinctly different. At least one alternative should include limitations on development in some or all of the urban villages, including the Junction, in order to allow areas that have been impacted by growth to stabilize. This alternative can meet City objectives by proposing new urban villages in areas of the city where the opportunities are favorable as a means to incentivize economic development or tap into land use opportunities more equitably.
- In addition to Physical, Economic, and Cultural displacement, the City should include a cause of displacement due to loss of household Livability due to the environmental impacts cited in the DEIS (e.g. a lack of nearby school capacity would be incompatible to livability by households with children).
- Further, failure to adhere to a neighborhood’s plan and design guidelines constitutes a cause of Cultural displacement.
- The Junction should be classified and managed as a Low Opportunity Urban Village, given that it ranks 30th out of 39 areas ranked in the EIS and appears within the Low area of the mapping figure.⁶
- The opportunity and displacement assessments must be based on the proposed village expansion areas. By correctly using the proposed village boundary, the Junction’s lack of access to opportunity will be more apparent.

⁴ Table 6, DEIS Appendices, Growth and Equity

⁵ As outlined in Goal 1, Strategy 3, DEIS Appendices p.3 Growth and Equity

⁶ Figure 7, DEIS Appendices, Growth and Equity

COMMENTS ON DEIS ANALYSIS
SECTION 3.1
HOUSING AND SOCIOECONOMIC
IMPACTS

WEST SEATTLE JUNCTION
URBAN VILLAGE

COMMENTS ON DEIS SOCIAL AND ECONOMIC ANALYSIS

The DEIS fails to provide a comprehensive study of the social and economic impacts 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, only 6 and 10 new affordable units respectively would be built in the West Seattle Junction (WSJ) Urban Village study area through performance. 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).

EXHIBIT A

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

4727 36th Ave SW	1	1	\$	2,950	2	Edmonds Slope
4725 36th Ave SW	1	0	\$	2,800	3	Edmonds Slope
4721 36th Ave SW	1	0	\$	2,950	4	Edmonds Slope
4715 36th Ave SW	2	1	\$	2,200	3	Edmonds Slope
4714 37th Ave SW	1	0	\$	2,900	3	Edmonds Slope
4722 37th Ave SW	1	1	\$	2,950	4	Edmonds Slope
4724 37th Ave SW,	1	0	\$	2,500	2	Edmonds Slope
4730 37th Ave SW	1	0	\$	2,800	2	Edmonds Slope
4734 37th Ave SW,	1	0	\$	3,400	3	Edmonds Slope
4738 37th Ave SW,	1	0	\$	3,841	3	Edmonds Slope
4744 37th Ave SW,	1	0	\$	2,900	3	Edmonds Slope
4750 37th Ave SW,	1	1	\$	3,000	5	Edmonds Slope
4754 37th Ave SW,	1	0	\$	3,200	3	Edmonds Slope
4709 37th Ave SW,	1	0	\$	2,325	2	Edmonds Slope
4715 37th Ave SW,	1	0	\$	2,650	2	Edmonds Slope
4717 37th Ave SW,	1	0	\$	2,900	3	Edmonds Slope
4721 37th Ave SW,	1	0	\$	2,900	4	Edmonds Slope
4725 37th Ave SW,	1	0	\$	2,550	2	Edmonds Slope
4729 37th Ave SW,	1	0	\$	2,500	3	Edmonds Slope
4733 37th Ave SW,	1	0	\$	2,400	2	Edmonds Slope
4737 37th Ave SW,	1	0	\$	2,800	3	Edmonds Slope
4741 37th Ave SW,	1	0	\$	3,000	3	Edmonds Slope
4745 37th Ave SW,	1	0	\$	3,200	3	Edmonds Slope
4749 37th Ave SW,	1	0	\$	2,900	3	Edmonds Slope
4753 37th Ave SW,	1	1	\$	2,800	2	Edmonds Slope
3700 SW Edmonds St,	1	0	\$	3,873	4	Edmonds Slope
4714 38th Ave SW,	3	1	\$	3,200	5	Edmonds Slope
4718 38th Ave SW,	1	0	\$	2,800	3	Edmonds Slope
4724 38th Ave SW,	1	1	\$	2,650	3	Edmonds Slope

4728 38th Ave SW,	1	0	\$	2,795	3	Edmonds Slope
4732 38th Ave SW,	1	0	\$	2,950	3	Edmonds Slope
4736 38th Ave SW,	1	0	\$	3,150	4	Edmonds Slope
4740 38th Ave SW,	1	0	\$	2,500	2	Edmonds Slope
4744 38th Ave SW,	1	1	\$	2,650	2	Edmonds Slope
4748 38th Ave SW,	1	0	\$	2,995	3	Edmonds Slope
3718 SW Edmonds St,	1	0	\$	3,400	4	Edmonds Slope
4727 38th Ave SW,	1	1	\$	2,695	2	Edmonds Slope
4731 38th Ave SW,	1	1	\$	2,590	2	Edmonds Slope
4731 38th Ave SW,	1	0	\$	3,000	3	Edmonds Slope
4755 38th Ave SW,	1	0	\$	3,000	5	Edmonds Slope
4807 38th Ave SW	1	1	\$	3,000	2	Edmonds Slope
4811 38th Ave SW,	1	1	\$	2,500	3	Edmonds Slope
4817 38th Ave SW,	1	1	\$	2,650	2	Edmonds Slope
4823 38th Ave SW,	1	0	N/A	N/A	N/A	Edmonds Slope
4823 38th Ave SW,	1	0	N/A	N/A	N/A	Edmonds Slope
4831 38th Ave SW,	1	0	N/A	N/A	N/A	Edmonds Slope
4837 38th Ave SW,	1	0	N/A	N/A	N/A	Edmonds Slope
4841 38th Ave SW,	1	0	N/A	N/A	N/A	Edmonds Slope
4847 38th Ave SW,	1	1	\$	2,995	4	Edmonds Slope
4853 38th Ave SW,	1	0	N/A	N/A	N/A	Edmonds Slope
4857 38th Ave SW,	1	1	\$	2,900	4	Edmonds Slope
3719 SW Edmonds St,	1	1	\$	3,000	2	Edmonds Slope
4808 38th Ave SW,	1	0				Edmonds Slope
4814 38th Ave SW,	1	0				Edmonds Slope
4818 38th Ave SW,	1	0				Edmonds Slope
4822 38th Ave SW,	1	1	\$	2,500	2	Edmonds Slope
4828 38th Ave SW,	1	0				Edmonds Slope
4832 38th Ave SW,	1	0				Edmonds Slope

4836 38th Ave SW,	1	0			Edmonds Slope
4842 38th Ave SW,	1	0			Edmonds Slope
4846 38th Ave SW,	1	0			Edmonds Slope
4850 38th Ave SW,	1	0			Edmonds Slope
4856 38th Ave SW,	1	0			Edmonds Slope
4803 37th Ave SW,	1	0			Edmonds Slope
4807 37th Ave SW,	1	0			Edmonds Slope
4811 37th Ave SW,	1	0			Edmonds Slope
4817 37th Ave SW,	1	1	\$	2,899	Edmonds Slope
4817 1/2 37TH Ave SW,	1	1	\$	2,395	Edmonds Slope
4821 37th Ave SW,	1	0			Edmonds Slope
4827 37th Ave SW,	1	0			Edmonds Slope
4833 37th Ave SW,	1	0			Edmonds Slope
4837 37th Ave SW,	1	0			Edmonds Slope
4841 37th Ave SW,	1	1	\$	2,900	Edmonds Slope
4847 37th Ave SW,	1	0			Edmonds Slope
4853 37th Ave SW,	1	0			Edmonds Slope
4857 37th Ave SW,	1	0			Edmonds Slope
442X 41st Ave SW	0	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
483X 41st Ave SW	N/A	N/A		N/A	N/A
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
3243 SW Genesee	N/A	N/A	N/A		N/A
3238 SW Genesee	N/A	N/A	N/A		N/A
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

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

EXHIBIT B

COMMENTS ON DEIS ANALYSIS
SECTION 3.2
LAND USE

WEST SEATTLE JUNCTION
URBAN VILLAGE

General Deficiencies in Land Use Section of DEIS

In general, the Land Use section of the DEIS fails to provide sincere or achievable mitigation proposals.

- **Design Review is Not Available as a Mitigating Tool.** As in other sections, the Land Use section of the DEIS suggests that Design Review will be a mitigation tool for significant adverse impacts. This is disingenuous. As the City is aware, the Design Review Process will no longer be available for most Lowrise (“LR”) projects. Single family areas proposed to be rezoned to Lowrise are the most significantly impacted areas of the proposal. Without required design review, the community will no longer have the right or opportunity to be made aware or to participate in the projects that will dominate their communities.
- **Proposal Does Not Ensure Low-Income Housing in Areas With High Access to Opportunity.** The DEIS makes the unsupported assumption that the production of more low-income housing through the proposed MHA rezones will allow more people, including low-income households, to live in areas with high access to opportunity, which includes residing near high-frequency transit. The DEIS classifies the Junction Urban Village as an area with high access to opportunity. However, because the proposal allows developers to pay a fee in order to avoid offering low-income units within the Junction Urban Village and/or other so-called high access to opportunity urban villages, there is no assurance whatsoever that low-income units will be built in these areas. It is equally likely that market-rate units will be built in these areas instead and the fees paid to the City will be utilized to build the projected low-income units in low access to opportunity areas.
- **The City has Gutted Neighborhood Planning.** The DEIS suggest that potential land use impacts can be addressed as part of neighborhood-level planning efforts including measures to address transitions and density and planning for and making investments in livability improvements, such as open space or streetscape improvements near areas of land use impact. The DEIS fails to recognize the systematic elimination of the organizations that have traditionally organized neighborhood-level planning, including the de-funding of the Neighborhood Councils and the elimination of funding for neighborhood planning. The Office of Community Planning and Development has roundly rejected the Junction Urban Village’s requests for a neighborhood planning process to create a plan to address the need for affordable housing and density. See Exhibit A [attach email from Assefa].

Examples of Specific Deficiencies

The Land Use section of the DEIS contains many deficiencies. The following are only examples.

DEIS Statement	Deficiency/Issue
<p>The DEIS states that “[s]everal goals and policies from the recently adopted Seattle 2035 Plan assist evaluation of the proposed action to implement MHA” . . . “Seattle 2035 considered expansions of certain urban villages with very good transit service. The Plan includes new land use policies that support aligning urban village boundaries generally with a 10-minute walk of light rail and other very good transit. (GS 1.12).” DEIS at 3.78</p>	<p>It is unclear whether the “alignment” of urban village boundaries as part of the proposal is based upon projected future light rail stations that will not be open and functional in neighborhoods such as the Junction Urban Village for over 15 years;</p> <p>It appears that the DEIS fails to adequately consider existing crowded transit conditions (<u>see</u> comments to Transportation section);</p> <p>“Very good transit” is not defined.</p>
<p>The DEIS cites “[p]ressure for further zone changes” as a potential land use issue, stating that “[z]oning changes can create pressure for further rezoning areas in proximity, although this would be controlled by Comprehensive Plan policy and zoning standards.” <u>See</u> DEIS at 3.95.</p>	<p>The Comprehensive Plan already contradicts existing neighborhood plans that communities worked to develop together in 1999 and that the City adopted. Residents have no reason to rely upon any assurance that the Comprehensive Plan will make any effort to control further rezoning.</p>
<p>The City cites “Incremental Development” as a potential land use issue, but assures that that “[d]evelopment is expected to occur over time, and is not anticipated to occupy all sites, or even a majority of sites within a given neighborhood or area during the 20-year horizon addressed in this EIS. This [Land Use] chapter [of the DEIS] discusses impacts related to changes in zoning, but zone changes alone do not cause development. The incremental pattern of infill development would moderate the impact on land use.” <u>See</u> DEIS at 3.96.</p>	<p>There are other impacts to rezoning than development occurring all at once. Property taxes and home values will fluctuate. People on fixed incomes may not be able to afford home due to increased value of land, thus increasing property taxes. Incremental changes in a neighborhood can cause traffic, parking problems and other environmental impacts. Development will occur under all three alternatives, but this study downplays the impact of rezoning of larger multifamily buildings on existing neighborhoods.</p>

DEIS Statement	Deficiency/Issue
<p>The DEIS cites the following as possible mitigation measures: “[c]onsider topographical changes, and reduce the proposed degree of land use change, or select a lesser intensive alternative, in specific locations, where topography could exacerbate impacts” and “[c]onsider specific block patterns and access conditions (such as lack of an alley, where mitigation will more likely be needed), and reduce the degree of land use change, or select a lesser intensive alternative, in specific locations with constraints.” See DEIS at 3.120.</p>	<p>It is absurd to cite the consideration of topographical changes or block level conditions as potential mitigation when the City failed to study individual Urban Villages as part of the DEIS for its massive rezone proposal. There is no assurance that the City has any commitment to ever work at the block level. Design Review is being eliminated to the most impactful projects to the single family areas. The OPCD felt it was sufficient to conduct a superficial (at best) analysis of 20+ urban villages. Which agency does the City commit to manage/regulate zoning/design/building based on block level topography and other factors?</p>

COMMENTS ON DEIS ANALYSIS

SECTION 3.3

AESTHETICS

WEST SEATTLE JUNCTION

URBAN VILLAGE

ANALYSIS OF DEIS SECTION RE AESTHETICS

A. The City Acknowledges that the Aesthetics Analysis is Deficient.

The overarching deficiency of the Aesthetics analysis stems from the City's position that, due to the sheer magnitude of its proposed project, it is unable to provide a comprehensive study of the aesthetic impacts to the impacted neighborhoods and thus, it need only provide a non-specific study that could apply generically to any urban village.

In reality, the City would certainly be able to provide a village-by-village study but has chosen not to. The reason for this choice is likely twofold. First, the amount of work, time and costs associated with undertaking a detailed study for this massive proposed rezone is substantial. Second, and likely more importantly, the City would be forced to disclose specific and substantial negative aesthetic impacts on a neighborhood level and the lack of meaningful mitigation would be more sharply apparent.

The City's dismissive attitude of the individual neighborhoods it proposes to impact is entirely consistent with its lack of any targeted, neighborhood specific planning or collaboration throughout the entire HALA/MHA process. Residents should not be required to accept an insubstantial study and/or insufficient mitigation because the City opted to proceed with a project too large to manage under existing EIS requirements.

1. **Junction Urban Village Feedback Establishes Residents' Desire to Retain Existing Neighborhood Character and Style**

Since the City's release of its initial MHA maps in October 2016, the data establishes that the Junction Urban Village has repeatedly expressed to the City that it wishes to preserve the character of its single-family neighborhoods, which are filled with 90+ year old homes. See, e.g., (a) transcript of the November 15, 2016 Junction Neighborhood Organization meeting led by Nick Welch of the OPCD; (b) written comments submitted at the December 7, 2016 City-sponsored open house at Shelby's Ice Cream Parlor and Youngstown; and (c) written comments and table summaries from the January 26, 2017 Junction MHA Workshop organized by Councilmember Rob Johnson. The City has represented its commitment to utilize the neighborhood's feedback to shape its proposals but has virtually ignored such feedback to date.

2. **Urban Form Analysis Fails to Take Into Account Neighborhood Characteristics**

The City takes the approach of describing "common" built forms to provide a "baseline" for analyzing the proposal's aesthetic impacts on single-family neighborhoods. DEIS at 3.127. The pictures utilized by the City are clearly intended to give the impression the proposed changes to the aesthetic character of all neighborhoods are already in progress under existing zoning and thus, its proposed action will have no real impact. The City's cursory approach willfully ignores the distinct nature of each urban village neighborhood and the potentially for vastly differing aesthetic impacts resulting from the proposed rezoning.

The City describes a typical block of “established single family housing” as having “many homes with an age of 50 years or older.” The City then states that “[n]ew single-family homes often replace existing older single-family homes, and many exceed the scale of older homes nearby, noting that this “infill single-family home development” does not require design review and will proceed regardless of the proposed rezoning action. The picture of the new infill development utilized by the City is boxy, bulky and intentionally consistent with the style of the lowrise zone structure pictured directly below it. Notably, the picture of the lowrise structure is taken from farther away so as to give the impression of compatibility in scale with the infill single family home pictured.

The clear implication is that neighborhoods are going to change to the bulky, boxy structure without any rezoning and thus, the impacts of the proposed action are inconsequential. This fails to recognize that certain urban villages, such as the Junction Urban Village have neighborhoods with blocks substantially filled with homes near or over a century old single-family homes designed in craftsman and other timeless styles. Homes of this type remain sought after as evidenced by their continued demand in the market. Consequently, with some exceptions, most of the blocks within certain neighborhoods (e.g., the Junction Urban Village) are not, in fact, significantly transitioning to the style depicted in Exhibit 3.3-3, if at all. Much of the post-2000 home development (of which there is very little) is designed to blend in with the existing older styles.

By way of example, the 4 single-family areas proposed to be rezoned to multi-family within the Junction Urban Village are substantially comprised of very old homes, which give each area a distinct character, which the community has indicated it values:

Single Family Area	Year Built¹	# Years Old	# of Homes	# of Homes Built in Boxy Geometric Style
Fairmount Park 42 nd Ave SW to 40 th Ave SW SW Edmunds to SW Dawson	1906-1927	111-90	124	4
	1929-1950	88-67	36	
	1951-1967	66-50	16	
	1978-1995	39-22	8	
	2000-2007	17-10	9	
	2008-2017	9-0	4	
Note: on 42 nd between Edmunds and Dawson, 83% of the homes are between 90 and 109 years old				
Edmunds Slope 38 th Ave SW to 36 th Ave SW	1907-1927	110-90	33	0
	1928-1939	89-78	5	

¹ See Exhibits A-D to Aesthetics Analysis with data from Zillow.

Single Family Area	Year Built ¹	# Years Old	# of Homes	# of Homes Built in Boxy Geometric Style
SW Alaska to SW Edmunds and/or Hudson	1940-1957	77-60	46	
	1960-1976	57-41	4	
	1988-1991	29-26	3	
	1992+	25-0	0	
	Unknown		1	
42st Ave SW to 36 th Ave SW SW Oregon to SW Genessee and/or Dakota	1907-1927	110-90	61	1
	1928-1949	89-68	22	
	1951-1969	66-48	11	
	1977-1990	40-27	6	
	2002-2010	15-7	11	
	2013	4	1	
32 nd and Genessee Area	1907-1927	110-90	28	0
	1928-1947	89-70	13	
	1950-1968	67-49	17	
	1974-1986	43-31	3	
	1990-1999	27-18	6	
	2000+	17-0	0	

2. Design Review Mitigation is Unavailable for Most Proposed Changes to Single-Family

The City describes Seattle's Design Review Program as a tool to consider issues such as proposed project's building and site design, open space, relationship to adjacent buildings, street frontage, relationship to unusual aspects of the site like views or slopes, and pedestrian and vehicular access, among other things. The City states that "the program reviews most new multifamily . . . projects in Seattle." Unfortunately, as the City goes on describe, design review is currently inapplicable to projects falling within the RSL, LR1, LR2 and some LR3 projects unless the gross floor area exceeds a certain threshold (20,000 square feet for Design Review Board process; 5,000-11,999 square feet for Streamlined Administrative Design Review process; and 12,000 to 19,999 square feet for Administrative Design Review process). The City acknowledges, without any description or analysis, that changes to design review regulations proposed in connection with HALA would further reduce the applicability of design review for lowrise zones. These are the precise zoning types to which the City proposes to change single family under MHA.

The City notes that many neighborhoods have neighborhood-specific guidelines that would assist with maintaining neighborhood character. As noted in the DEIS, the Junction Urban Village does not have any neighborhood-specific guidelines. Exhibit 3.3-7. However, the Junction Urban Village Neighborhood Plan as adopted by the City in the Comprehensive Plan

does make it a policy to maintain the character and integrity of the existing single-family areas. Concurrently with the comment period for this DEIS, the City has sought to strike this policy from the Junction Neighborhood Plan which, without recourse to design review, would allow for the destruction of the character of the single-family areas.

Nonetheless, the DEIS continually cites design review as a mitigation tool for almost every negative aesthetic impact it describes in the DEIS, at the same time knowing that this tool will be unavailable for most of the projects that will dominate the single family neighborhoods proposed to be rezoned. The City is willing to make changes to development regulations to further the implementation of the proposed MHA rezones. It should also be required to make changes to the regulations to ensure that design review is available mitigate the impact of those rezones.

3. Potentially Impacted Views are Not Identified and Mitigation is Not Provided.

While acknowledging that the Comprehensive Plan states a policy that public views are protected, the DEIS does not identify any of the specific protected public views, or even the general types of protected public views that will potentially be impacted within the areas subject to the proposed rezones. Instead, the DEIS simply concludes that, because development regulations do not currently set precise requirements for protecting views within individual development projects, public view protection can be addressed through the design review process. DEIS at 3.132. Again, design review will not apply to most of the RSL, LR1, LR2 and LR3 development – all of the new proposed zoning designations for single-family areas. Therefore, essentially no mitigation or protection is proposed for these areas. The City is willing to make changes to development regulations to further the implementation of the proposed MHA rezones. It should also be required to make changes to the regulations to mitigate the impact of those rezones on public views.

As to private views, while observing that they are not protected by the Comprehensive and Land Use Code, they may be considered by the design review process. As previously noted, this will be unavailable to many projects in single family neighborhoods.

4. Describing Aesthetics Impacts to Currently Single Family Zoned Areas by Using (M), (M1) and (M2) Tier Categories is Inadequate.

As shown below, rather than undertaking a neighborhood-by-neighborhood analysis, the City simply categorizes the types of zoning jumps that are proposed to occur into three categories: (M), (M1), and (M2) and then generally describes some of the aesthetic changes that may occur along with exceedingly general potential mitigation in the form of design review (generally inapplicable); façade modulation (unclear); upper level setbacks for LR2 and LR3 and potential new design guidelines (none proposed).

The chart below reflects the potential impacts and proposed mitigation set forth in the DEIS. This “analysis” could apply to anywhere. There is no meaningful analysis that residents can use to understand the impacts of the proposed alternatives **to their neighborhoods.**

a. (M) Designation

Type of Change	Impacts Per the DEIS	Proposed Mitigation
(M) SF to RSL	Buildings can be built closer to lot lines	No mitigation proposed
	Buildings can cover 15% more of the lots area	No mitigation proposed
	Buildings can be closer to street (smaller setback requirements)	No mitigation proposed
	and changes to lot coverage limits and required setbacks	No mitigation proposed
	Primary aesthetic affect is smaller yards between structures and reduction from neighboring structures	

b. (M1 Designation)

(M1) encompasses both change from SF to LR1 and SF to LR2. There is a significant difference between LR1 and LR2 in terms of change to neighborhood character, i.e., rowhouses and townhouses versus apartment buildings, yet the DEIS simply combines them with no independent analysis. They are separated below.

i. *Lowrise 1*

Designation Exhibit	Impacts Per DEIS	Proposed Mitigation	Issue (Beyond Failure to Propose Any Mitigation)
(M1) SF to LR1 Exs. 3.3-12 and 3.3-13	New development would likely take on a different character and format than existing neighborhood	Upper-story setbacks and façade modulation to mitigate effects of height and bulk on neighborhood character.	Does not describe existing character or explain how upper story setbacks and façade modulation would help to mitigate effects
	New development would likely be a mix of attached rowhouses and townhouses or small multi-unit apartment structures instead of detached single family homes.		DEIS does not describe which types of structures are allowed within the LR1 zoning designation
	Density limit is removed	No mitigation proposed	
	Side façade modulation required per Development Regulation Amendments	Unclear what this what/how this would mitigate	

Designation Exhibit	Impacts Per DEIS	Proposed Mitigation	Issue (Beyond Failure to Propose Any Mitigation)
	<p>Smaller front and rear setbacks than those of existing buildings; Smaller yards</p> <p>Increase maximum FAR by .1 to .3</p> <p>Structures closer together</p> <p>Increased building bulk and visual prominence due to greater height and more intense building forms could reduce amount of direct sunlight reaching ground level in public rights of way</p> <p>Compatibility impacts could arise where M1 zoning is adjacent to SF or RSL</p> <p>Increase in building height and bulk can interfere with protected view corridors and private views.</p>	<p>No mitigation proposed</p> <p>No mitigation proposed</p> <p>No mitigation proposed</p> <p>No mitigation proposed</p> <p>Design standards, such as increased setbacks for property on the edges of M1 zones or graduated height limits or setbacks could soften abrupt transitions. [See 3.3.3 Mitigation Measures]</p> <p>Design review</p>	<p>Design review will not be available for many LR1 areas. Junction Urban Village, for example does not have neighborhood-specific guidelines beyond the Neighborhood Plan provisions that the City seeks to strike from the Comp. Plan</p> <p>No specific affected public view corridors, private views and/or scenic routes are identified. Design review will not be available for many projects in LR1.</p>

ii. *Lowrise 2*

Designation Exhibit	Impacts Per DEIS	Proposed Mitigation	Issue (Beyond Failure to Propose Any Mitigation)
<p>(M1) SF to LR2</p> <p>Note: No</p>	<p>New development would likely take on a different character and format than the existing</p>	<p>Upper-story setbacks and façade modulation to mitigate effects of height and bulk on neighborhood character</p>	<p>Does not describe existing character or explain how upper story setbacks and façade modulation would</p>

Designation Exhibit	Impacts Per DEIS	Proposed Mitigation	Issue (Beyond Failure to Propose Any Mitigation)
<p>Illustration is Provided</p>	<p>New development would likely be a mix of attached rowhouses and townhouses or small multi-unit apartment structures instead of detached single family homes</p> <p>Increased building height from 30 to 40 feet with required upper story setback above 30 feet (per new development regulations)</p> <p>Side façade modulation requirement (per new development regulations)</p> <p>Increase maximum FAR by .1-.2</p> <p>Smaller front and rear setbacks</p> <p>Smaller yards</p> <p>Structures closer together</p> <p>Increased building bulk and visual prominence due to greater height and more intense building forms; Reduce amount of direct sunlight reaching ground level in public rights of way</p> <p>Compatibility impacts could arise where M1 zoning is adjacent to SF or RSL</p>	<p>Applying design standards and other mitigation measures could limit the effects of large localized changes in height.</p> <p>Unclear what this what/how this would mitigate</p> <p>No mitigation proposed</p> <p>No mitigation proposed</p> <p>No mitigation proposed</p> <p>Measures to mitigate could include new design standards</p> <p>City could apply additional design standards such as upper-story setbacks</p> <p>Design standards, such as increased setbacks for property on the edges of M1 zones or graduated height limits or setbacks could soften abrupt transitions. [See 3.3.3 Mitigation Measures]</p>	<p>help to mitigate effects</p> <p>DEIS does not describe which types of structures are allowed within the LR2 zoning designations</p> <p>Design review will be unavailable for most projects. Aside from required setbacks, it is unclear what “other mitigation measures” this is referring to.</p> <p>No discussion of the fact that there may be no yards; loss of greenspace</p> <p>No new standards beyond upper story setback and façade modulation are proposed</p> <p>No new standards beyond upper story setback and façade modulation are proposed</p> <p>Design review will not be available for many LR2 projects</p>

Designation Exhibit	Impacts Per DEIS	Proposed Mitigation	Issue (Beyond Failure to Propose Any Mitigation)
	Localized shading of adjacent properties or obstruction of protected views and private views.	As applicable, project-level design review during the permit application process would include evaluation of views and shading impacts, and provide an opportunity to define site-specific mitigation; Citywide require preservation or replacement of existing streetscape vegetation along designated scenic routes to preserve and/or improve visual character.	Protected views and private views and/or scenic routes are not specifically identified; Design review will not be available to many LR2 projects.

c. (M2) Designation

Designation Exhibit	Impacts Per DEIS	Proposed Mitigation	Issue (Beyond Failure to Propose Any Mitigation)
(M2) SF to LR3 Ex. 3.3-17	<p>Increased height and bulk</p> <p>New development would differ markedly in scale and form compared to existing buildings</p> <p>Increase height limit from 40 to 50 feet with required 12 foot upper story setback above 40 feet per new development regulations</p> <p>Side façade modulation requirement per new development regulations</p> <p>Greater visual bulk</p> <p>Increase maximum FAR by .1 to .2</p> <p>Reduced access to air and light at ground level</p> <p>New development types could differ from existing development and could mark a transition to a different</p>	<p>Applying design standards and other mitigation measures could limit the effects of large localized changes in height.</p> <p>Unclear how/what this would mitigate</p> <p>No mitigation proposed</p> <p>No mitigation proposed</p> <p>City could apply additional design standards such as upper-story setbacks</p> <p>Design standards, such as increased setbacks for property on the edges of M2 zones or graduated height</p>	<p>Design standards not applicable in all projects; No other mitigation measures proposed beyond upper story setback and side façade modulation</p> <p>No new standards beyond upper story setback and façade modulation are proposed</p> <p>Fails to adequately describe existing character; Design Review will not apply to all LR3 projects</p>

Designation Exhibit	Impacts Per DEIS	Proposed Mitigation	Issue (Beyond Failure to Propose Any Mitigation)
	neighborhood character	limits or setbacks could address conflicts in building scale where (M2) zones contrast with and transition to lower-intensity development transitions.	

In summary, the impacts are not described in a manner that would allow a resident to understand the significance to his or her actual environment and the proposed mitigation is either insufficient, unavailable or non-existent.

**WEST SEATTLE JUNCTION URBAN VILLAGE
PROPOSED REZONE TO SINGLE FAMILY ZONING
FAIRMOUNT PARK/SPRINGS AREA**

Address	Year Built	Street	Alternative 1	Alternative 2
5252 40 th Ave SW	1910	40 th Dawson Brandon	No Change	Residential Small Lot
5247 40 th Ave SW	1911	40 th Dawson Brandon	No Change	Residential Small Lot
5227 40 th Ave SW	1912	40 th Dawson Brandon	No Change	Residential Small Lot
5220 40 th Ave SW	1912	40 th Dawson Brandon	No Change	Residential Small Lot
5224 40 th Ave SW	1912	40 th Dawson Brandon	No Change	Residential Small Lot
5228 40 th Ave SW	1912	40 th Dawson Brandon	No Change	Residential Small Lot
5230 40 th Ave SW	1912	40 th Dawson Brandon	No Change	Residential Small Lot
5237 40 th Ave SW	1915	40 th Dawson Brandon	No Change	Residential Small Lot
3925 SW Dawson	1916	40 th Dawson Brandon	No Change	Residential Small Lot
5236 40 th Ave SW	1916	40 th Dawson Brandon	No Change	Residential Small Lot
5243 40 th Ave SW	1918	40 th Dawson Brandon	No Change	Residential Small Lot
3921 SW Dawson	1918	40 th Dawson Brandon	No Change	Residential Small Lot
3917 SW Dawson	1918	40 th Dawson Brandon	No Change	Residential Small Lot
5216 40 th Ave SW	1918	40 th Dawson Brandon	No Change	Residential Small Lot
5233 40 th Ave SW	1920	40 th Dawson Brandon	No Change	Residential Small Lot
5242 40 th Ave SW	1922	40 th Dawson Brandon	No Change	Residential Small Lot
5256 40 th Ave SW	1945	40 th Dawson Brandon	No Change	Residential Small Lot
5253 40 th Ave SW	1948	40 th Dawson Brandon	No Change	Residential Small Lot
5257 40 th Ave SW	1948	40 th Dawson Brandon	No Change	Residential Small Lot
5201 40 th Ave SW	1950	40 th Dawson Brandon	No Change	Residential Small Lot
5211 40 th Ave SW	1956	40 th Dawson Brandon	No Change	Residential Small Lot
5217 40 th Ave SW	1956	40 th Dawson Brandon	No Change	Residential Small Lot
5223 40 th Ave SW	1980	40 th Dawson Brandon	No Change	Residential Small Lot

Address	Year Built	Street	Alternative 1	Alternative 2
5207 40 th Ave SW	2007	40 th Dawson Brandon	No Change	Residential Small Lot
5212 40 th Ave SW	2009	40 th Dawson Brandon	No Change	Residential Small Lot
5248 40 th Ave SW	2011	40 th Dawson Brandon	No Change	Residential Small Lot
4817 40 th Ave SW	1912	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4827 40 th Ave SW	1913	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4831 40 th Ave SW	1913	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4845 40 th Ave SW	1914	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4823 40 th Ave SW	1918	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4843 40 th Ave SW	1918	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4837 40 th Ave SW	1922	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4859 40 th Ave SW	1981	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4811 40 th Ave SW	2000	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4815 40 th Ave SW	2000	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4849 40 th Ave SW	2007	40 th Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
5051 40 th Ave SW	1910	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5039 40 th Ave SW	1911	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5043 40 th Ave SW	1911	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5033 40 th Ave SW	1914	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5047 40 th Ave SW	1915	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5027 40 th Ave SW	1916	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5003 40 th Ave SW	1918	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5023 40 th Ave SW	1921	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5007 40 th Ave SW	1944	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5015 40 th Ave SW	1944	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5017 40 th Ave SW	1944	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5057 40 th Ave SW	1944	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5002 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5006 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5012 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5016 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5022 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts

Address	Year Built	Street	Alternative 1	Alternative 2
5026 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5032 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5036 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5042 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5046 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5052 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5056 40 th Ave SW	1948	40 th Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5210 41 st Ave SW	1907	41 st Dawson Brandon	No Change	Residential Small Lot
5226 41 st Ave SW	1910	41 st Dawson Brandon	No Change	Residential Small Lot
5256 41 st Ave SW	1910	41 st Dawson Brandon	No Change	Residential Small Lot
5223 41 st Ave SW	1911	41 st Dawson Brandon	No Change	Residential Small Lot
5202 41 st Ave SW	1911	41 st Dawson Brandon	No Change	Residential Small Lot
5236 41 st Ave SW	1911	41 st Dawson Brandon	No Change	Residential Small Lot
5227 41 st Ave SW	1916	41 st Dawson Brandon	No Change	Residential Small Lot
5211 41 st Ave SW	1918	41 st Dawson Brandon	No Change	Residential Small Lot
5213 41 st Ave SW	1918	41 st Dawson Brandon	No Change	Residential Small Lot
5241 41 st Ave SW	1918	41 st Dawson Brandon	No Change	Residential Small Lot
5237 41 st Ave SW	1919	41 st Dawson Brandon	No Change	Residential Small Lot
5248 41 st Ave SW	1922	41 st Dawson Brandon	No Change	Residential Small Lot
5207 41 st Ave SW	1927	41 st Dawson Brandon	No Change	Residential Small Lot
4108 SW Brandon	1939	41 st Dawson Brandon	No Change	Residential Small Lot
4102 SW Brandon	1939	41 st Dawson Brandon	No Change	Residential Small Lot
5206 41 st Ave SW	1948	41 st Dawson Brandon	No Change	Residential Small Lot
5252 41 st Ave SW	1953	41 st Dawson Brandon	No Change	Residential Small Lot
5230 41 st Ave SW	1956	41 st Dawson Brandon	No Change	Residential Small Lot
5242 41 st Ave SW	1958	41 st Dawson Brandon	No Change	Residential Small Lot
5233 41 st Ave SW	1959	41 st Dawson Brandon	No Change	Residential Small Lot
5216 41 st Ave SW	1959	41 st Dawson Brandon	No Change	Residential Small Lot
5222 41 st Ave SW	1978	41 st Dawson Brandon	No Change	Residential Small Lot
5247 41 st Ave SW	2001	41 st Dawson Brandon	No Change	Residential Small Lot
4856 41st Ave SW	1911	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts

Address	Year Built	Street	Alternative 1	Alternative 2
4830 41st Ave SW	1912	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4847 41st Ave SW	1916	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4857 41st Ave SW	1917	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4827 41st Ave SW	1918	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4853 41st Ave SW	1918	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4812 41st Ave SW	1920	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4811 41st Ave S W	1929	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4816 41st Ave SW	1948	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4822 41st Ave SW	1954	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4840 41st Ave SW	1956	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4846 41st Ave SW	1956	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4823 41st Ave SW	1979	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4832 41st Ave SW	1995	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4843 41st Ave SW	2001	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4815 41st Ave SW	2002	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4836 41st Ave SW	2003	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4837 41st Ave SW	2014	41 st Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4014 SW Hudson	1906	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5047 41 st Ave SW	1908	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5017 41 st Ave SW	1910	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5021 41 st Ave SW	1910	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5036 41 st Ave SW	1911	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
4016 SW Dawson	1911	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5052 41 st Ave SW	1912	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5006 41 st Ave SW	1913	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
4111 SW Hudson	1914	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5012 41 st Ave SW	1914	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5040 41 st Ave SW	1915	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5032 41 st Ave SW	1918	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5046 41 st Ave SW	1918	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5011 41 st Ave SW	1925	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts

Address	Year Built	Street	Alternative 1	Alternative 2
5033 41 st Ave SW	1927	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5037 41 st Ave SW	1935	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
4101 SW Hudson	1940	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
4108 SW Dawson	1942	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
4104 SW Dawson	1942	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5028 41 st Ave SW	1951	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5043 41 st Ave SW	1953	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5022 41 st Ave SW	1981	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5018 41 st Ave SW	1988	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5027 41 st Ave SW	1995	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5007 41 st Ave SW	2008	41 st Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5202 42 nd Ave SW	1908	42 nd Dawson Brandon	No Change	Residential Small Lot
5218 42 nd Ave SW	1908	42 nd Dawson Brandon	No Change	Residential Small Lot
5232 42 nd Ave SW	1908	42 nd Dawson Brandon	No Change	Residential Small Lot
5240 42 nd Ave SW	1908	42 nd Dawson Brandon	No Change	Residential Small Lot
5213 42 nd Ave SW	1909	42 nd Dawson Brandon	No Change	Residential Small Lot
5206 42 nd Ave SW	1909	42 nd Dawson Brandon	No Change	Residential Small Lot
5248 42 nd Ave SW	1909	42 nd Dawson Brandon	No Change	Residential Small Lot
5222 42 nd Ave SW	1910	42 nd Dawson Brandon	No Change	Residential Small Lot
5256 42 nd Ave SW	1910	42 nd Dawson Brandon	No Change	Residential Small Lot
5233 42 nd Ave SW	1911	42 nd Dawson Brandon	No Change	Residential Small Lot
5207 42 nd Ave SW	1912	42 nd Dawson Brandon	No Change	Residential Small Lot
5228 42 nd Ave SW	1914	42 nd Dawson Brandon	No Change	Residential Small Lot
5212 42 nd Ave SW	1916	42 nd Dawson Brandon	No Change	Residential Small Lot
5217 42 nd Ave SW	1921	42 nd Dawson Brandon	No Change	Residential Small Lot
5253 42 nd Ave SW	1922	42 nd Dawson Brandon	No Change	Residential Small Lot
5223 42 nd Ave SW	1925	42 nd Dawson Brandon	No Change	Residential Small Lot
5255 42 nd Ave SW	1925	42 nd Dawson Brandon	No Change	Residential Small Lot
5236 42 nd Ave SW	1925	42 nd Dawson Brandon	No Change	Residential Small Lot
5225 42 nd Ave SW	1926	42 nd Dawson Brandon	No Change	Residential Small Lot
5247 42 nd Ave SW	1936	42 nd Dawson Brandon	No Change	Residential Small Lot

Address	Year Built	Street	Alternative 1	Alternative 2
5237 42 nd Ave SW	1946	42 nd Dawson Brandon	No Change	Residential Small Lot
5252 42 nd Ave SW	1946	42 nd Dawson Brandon	No Change	Residential Small Lot
5241 42 nd Ave SW	1948	42 nd Dawson Brandon	No Change	Residential Small Lot
5201 42 nd Ave SW	1957	42 nd Dawson Brandon	No Change	Residential Small Lot
4111 SW Dawson	2003	42 nd Dawson Brandon	No Change	Residential Small Lot
4811 42 nd Ave SW	1910	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4832 42 nd Ave SW	1910	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4852 42 nd Ave SW	1913	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4853 42 nd Ave SW	1916	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4828 42 nd Ave SW	1916	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4856 42 nd Ave SW	1916	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4817 42 nd Ave SW	1918	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4823 42 nd Ave SW	1918	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4827 42 nd Ave SW	1918	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4837 42 nd Ave SW	1918	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4843 42 nd Ave SW	1918	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4847 42 nd Ave SW	1918	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4857 42 nd Ave SW	1918	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4812 42 nd Ave SW	1918	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4822 42 nd Ave SW	1919	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4846 42 nd Ave SW	1922	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4816 42 nd Ave SW	1925	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4833 42 nd Ave SW	1940	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4840 42 nd Ave SW	1957	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
4836 42 nd Ave SW	1967	42 nd Edmunds Hudson	LR2 40 ft Apts	LR3 50 ft Apts
5030 42 nd Ave SW	1908	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5006 42 nd Ave SW	1910	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5053 42 nd Ave SW	1911	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5007 42 nd Ave SW	1912	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5011 42 nd Ave SW	1912	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5026 42 nd Ave SW	1912	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts

Address	Year Built	Street	Alternative 1	Alternative 2
4115 SW Hudson	1913	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5040 42 nd Ave SW	1913	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5050 42 nd Ave SW	1914	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5016 42 nd Ave SW	1916	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5036 42 nd Ave SW	1918	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5012 42 nd Ave SW	1921	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5022 42 nd Ave SW	1923	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5023 42 nd Ave SW	1924	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5027 42 nd Ave SW	1924	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5033 42 nd Ave SW	1924	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5047 42 nd Ave SW	1924	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5005 42 nd Ave SW	1925	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5037 42 nd Ave SW	1925	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5041 42 nd Ave SW	1925	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5002 42 nd Ave SW	1925	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5057 42 nd Ave SW	1927	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5015 42 nd Ave SW	1929	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5046 42 nd Ave SW	1945	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts
5056 42 nd Ave SW	1964	42 nd Hudson Dawson	Residential Small Lot	LR2 40 ft Apts

EXHIBIT B

**WEST SEATTLE JUNCTION URBAN VILLAGE
PROPOSED REZONE TO SINGLE FAMILY ZONING
OREGON GENESSEE DAKOTA**

Address	Year Built	Street	Alternative 1	Alternative 2
4414 37 th Ave SW	1911	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4410 37 th Ave SW	1912	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4427 37 th Ave SW	1916	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4400 37 th Ave SW	1922	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4421 37 th Ave SW	1923	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4403 37 th Ave SW	1926	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4407 37 th Ave SW	1939	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4413 37 th Ave SW	1947	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4406 37 th Ave SW	1953	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4417 37 th Ave SW	1987	37 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4457 38 th Ave SW	1907	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4453 38 th Ave SW	1907	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4442 38 th Ave SW	1911	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4416 38 th Ave SW	1916	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
3718 SW Oregon	1917	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
3714 SW Oregon	1917	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4422 38 th Ave SW	1917	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4420 38 th Ave SW	1917	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4436 38 th Ave SW	1919	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4432 38 th Ave SW	1919	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4441 38 th Ave SW	1923	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4433 38 th Ave SW	1923	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4427 38 th Ave SW	1924	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4407 38 th Ave SW	1924	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments

Address	Year Built	Street	Alternative 1	Alternative 2
4423 38 th Ave SW	1925	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4417 38 th Ave SW	1925	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4411 38 th Ave SW	1925	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4403 38 th Ave SW	1925	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4446 38 th Ave SW	1926	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4426 38 th Ave SW	1932	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4412 38 th Ave SW	1944	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4406 38 th Ave SW	1944	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4402 38 th Ave SW	1944	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4437 38 th Ave SW	1968	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4450 38 th Ave SW	2005	38 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4457 39 th Ave SW	1907	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4427 39 th Ave SW	1908	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4417 39 th Ave SW	1909	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4403 39 th Ave SW	1909	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4451 39 th Ave SW	1910	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
3812 SW Oregon	1910	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4402 39 th Ave SW	1910	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4413 39 th Ave SW	1915	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4448 39 th Ave SW	1917	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4446 39 th Ave SW	1917	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4440 39 th Ave SW	1917	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4456 39 th Ave SW	1919	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4442 39 th Ave SW	1919	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4421 39 th Ave SW	1919	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4436 39 th Ave SW	1920	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4428 39 th Ave SW	1921	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4424 39 th Ave SW	1921	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4441 39 th Ave SW	1924	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4414 39 th Ave SW	1927	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments

Address	Year Built	Street	Alternative 1	Alternative 2
4447 39 th Ave SW	1928	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4433 39 th Ave SW	1940	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4434 39 th Ave SW	1949	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4406 39 th Ave SW	1960	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4437 39 th Ave SW	1963	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4416 39 th Ave SW	1963	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4421 39 th Ave SW	1977	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4409 39 th Ave SW*	2010	39 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4449 40 th Ave SW	1907	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4426 40 th Ave SW	1912	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4453 40 th Ave SW	1914	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4416 40 th Ave SW	1915	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4457 40 th Ave SW	1918	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4412 40 th Ave SW	1918	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4406 40 th Ave SW	1918	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4432 40 th Ave SW	1923	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4441 40 th Ave SW	1940	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4437 40 th Ave SW	1940	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4433 40 th Ave SW	1940	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4429 40 th Ave SW	1940	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4436 40 th Ave SW	1941	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4421 40 th Ave SW	1948	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4440 40 th Ave SW	1948	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4450 40 th Ave SW	1951	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4456 40 th Ave SW	1953	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4446 40 th Ave SW	1953	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4422 40 th Ave SW	1969	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4408 40 th Ave SW	1990	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4415 40 th Ave SW	2005	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4413 40 th Ave SW	2005	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments

Address	Year Built	Street	Alternative 1	Alternative 2
4411 40 th Ave SW	2005	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4409 40 th Ave SW	2005	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4407 40 th Ave SW	2005	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4405 40 th Ave SW	2005	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4403 40 th Ave SW	2005	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4401 40 th Ave SW	2005	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4400 40 th Ave SW	2013	40 th Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4102 41 st Ave SW	1908	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4118 41 st Ave SW	1909	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4112 41 st Ave SW	1909	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4132 41 st Ave SW	1912	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4106 41 st Ave SW	1915	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4122 41 st Ave SW	1918	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4142 41 st Ave SW	1929	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4136 41 st Ave SW	1929	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4146 41 st Ave SW	1947	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4150 41 st Ave SW	1958	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4126 41 st Ave SW	1981	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4138 41 st Ave SW*	2002	41 st Genessee and Dakota	Residential Small Lot	LR1 Townhouses
4456 41 st Ave SW	1911	41 st Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4426 41 st Ave SW	1918	41 st Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4424 41 st Ave SW	1918	41 st Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4440 41 st Ave SW	1939	41 st Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4436 41 st Ave SW	1939	41 st Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4446 41 st Ave SW	1944	41 st Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4452 41 st Ave SW	1958	41 st Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4434 41 st Ave SW	1988	41 st Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments
4430 41 st Ave SW	1988	41 st Oregon and Genessee	LR1 Townhouses	LR2 40 Ft Apartments



**WEST SEATTLE JUNCTION URBAN VILLAGE
PROPOSED REZONE TO SINGLE FAMILY ZONING
EDMUNDS SLOPE AREA**

Address	Year Built	Street	Alternative 2	Alternative 3
4715 36 th Ave SW	1929	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4721 36 th Ave SW	1911	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4725 36 th Ave SW	1988	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4727 36 th Ave SW	1988	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4731 36 th Ave SW	1919	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4735 36 th Ave SW	1921	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4739 36 th Ave SW	1916	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4745 36 th Ave SW	1907	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4747 36 th Ave SW	1911	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4751 36 th Ave SW	1950	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4755 36 th Ave SW	1950	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4718 36 th Ave SW	1949	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4722 36 th Ave SW	1911	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4724 36 th Ave SW	1950	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4728 36 th Ave SW	1976	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4736 36 th Ave SW	1943	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4740 36 th Ave SW	1949	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4746 36 th Ave SW	1950	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4750 36 th Ave SW	1949	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments

Address	Year Built	Street	Alternative 2	Alternative 3
4754 36 th Ave SW	1948	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4715 37 th Ave SW	1926	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4717 37 th Ave SW	1955	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4721 37 th Ave SW	1926	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4725 37 th Ave SW	1925	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4729 37 th Ave SW	1926	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4733 37 th Ave SW	1926	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4737 37 th Ave SW	1910	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4741 37 th Ave SW	1927	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4745 37 th Ave SW	1927	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4749 37 th Ave SW	1927	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4733 37 th Ave SW	1927	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
3700 SW Edmunds	1946	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
37 th Ave SW	1955	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4722 37 th Ave SW	1917	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4724 37 th Ave SW	1918	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4730 37 th Ave SW	1919	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4734 37 th Ave SW	1954	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4738 37 th Ave SW	1950	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4744 37 th Ave SW	1950	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4750 37 th Ave SW	1946	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4754 37 th Ave SW	1946	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4803 37 th Ave SW	1948	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4807 37 th Ave SW	1948	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4811 37 th Ave SW	1991	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4817 ½ 37 th Ave SW	1928	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4817 37 th Ave SW	1924	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4821 37 th Ave SW	1948	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4827 37 th Ave SW	1948	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4833 37 th Ave SW	1949	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses

Address	Year Built	Street	Alternative 2	Alternative 3
4837 37 th Ave SW	1950	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4841 37 th Ave SW	1949	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4847 37 th Ave SW	1950	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4853 37 th Ave SW	1951	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4857 37 th Ave SW	1951	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4727 38 th Ave SW	1948	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4731 38 th Ave SW	1948	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4737 38 th Ave SW	1957	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4745 38 th Ave SW	unknown	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4755 38 th Ave SW	1957	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4714 38 th Ave SW	1939	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4718 38 th Ave SW	1921	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4724 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4728 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4732 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4736 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4740 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4744 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4748 38 th Ave SW	1956	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
3718 SW Edmunds	1930	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4807 38 th Ave SW	1922	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4811 38 th Ave SW	1928	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4817 38 th Ave SW	1914	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4823 38 th Ave SW	1908	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4827 38 th Ave SW	1912	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4831 38 th Ave SW	1908	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4837 38 th Ave SW	1969	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4841 38 th Ave SW	1969	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4847 38 th Ave SW	1952	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4853 38 th Ave SW	1955	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses

Address	Year Built	Street	Alternative 2	Alternative 3
4857 38 th Ave SW	1955	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
3719 SW Edmunds	1960	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4808 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4814 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4818 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4822 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4828 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4832 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4836 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4838 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4846 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4850 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4856 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses

EXHIBIT D

**WEST SEATTLE JUNCTION URBAN VILLAGE
PROPOSED REZONE TO SINGLE FAMILY ZONING
EDMUNDS SLOPE AREA**

Address	Year Built	Street	Alternative 2	Alternative 3
4715 36 th Ave SW	1929	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4721 36 th Ave SW	1911	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4725 36 th Ave SW	1988	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4727 36 th Ave SW	1988	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4731 36 th Ave SW	1919	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4735 36 th Ave SW	1921	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4739 36 th Ave SW	1916	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4745 36 th Ave SW	1907	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4747 36 th Ave SW	1911	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4751 36 th Ave SW	1950	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4755 36 th Ave SW	1950	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4718 36 th Ave SW	1949	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4722 36 th Ave SW	1911	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4724 36 th Ave SW	1950	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4728 36 th Ave SW	1976	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4736 36 th Ave SW	1943	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4740 36 th Ave SW	1949	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4746 36 th Ave SW	1950	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4750 36 th Ave SW	1949	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments

Address	Year Built	Street	Alternative 2	Alternative 3
4754 36 th Ave SW	1948	36 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4715 37 th Ave SW	1926	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4717 37 th Ave SW	1955	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4721 37 th Ave SW	1926	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4725 37 th Ave SW	1925	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4729 37 th Ave SW	1926	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4733 37 th Ave SW	1926	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4737 37 th Ave SW	1910	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4741 37 th Ave SW	1927	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4745 37 th Ave SW	1927	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4749 37 th Ave SW	1927	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4733 37 th Ave SW	1927	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
3700 SW Edmunds	1946	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
37 th Ave SW	1955	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4722 37 th Ave SW	1917	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4724 37 th Ave SW	1918	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4730 37 th Ave SW	1919	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4734 37 th Ave SW	1954	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4738 37 th Ave SW	1950	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4744 37 th Ave SW	1950	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4750 37 th Ave SW	1946	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4754 37 th Ave SW	1946	37 th Alaska Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4803 37 th Ave SW	1948	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4807 37 th Ave SW	1948	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4811 37 th Ave SW	1991	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4817 ½ 37 th Ave SW	1928	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4817 37 th Ave SW	1924	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4821 37 th Ave SW	1948	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4827 37 th Ave SW	1948	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4833 37 th Ave SW	1949	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses

Address	Year Built	Street	Alternative 2	Alternative 3
4837 37 th Ave SW	1950	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4841 37 th Ave SW	1949	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4847 37 th Ave SW	1950	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4853 37 th Ave SW	1951	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4857 37 th Ave SW	1951	37 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4727 38 th Ave SW	1948	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4731 38 th Ave SW	1948	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4737 38 th Ave SW	1957	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4745 38 th Ave SW	unknown	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4755 38 th Ave SW	1957	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4714 38 th Ave SW	1939	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4718 38 th Ave SW	1921	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4724 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4728 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4732 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4736 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4740 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4744 38 th Ave SW	1927	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4748 38 th Ave SW	1956	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
3718 SW Edmunds	1930	38 th Alaska and Edmunds	LR 1 Townhouses	LR2 40 Ft Apartments
4807 38 th Ave SW	1922	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4811 38 th Ave SW	1928	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4817 38 th Ave SW	1914	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4823 38 th Ave SW	1908	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4827 38 th Ave SW	1912	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4831 38 th Ave SW	1908	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4837 38 th Ave SW	1969	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4841 38 th Ave SW	1969	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4847 38 th Ave SW	1952	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4853 38 th Ave SW	1955	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses

Address	Year Built	Street	Alternative 2	Alternative 3
4857 38 th Ave SW	1955	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
3719 SW Edmunds	1960	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4808 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4814 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4818 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4822 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4828 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4832 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4836 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4838 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4846 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4850 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses
4856 38 th Ave SW	1947	38 th Edmunds Hudson	LR 1 Townhouses	LR 1 Townhouses

COMMENTS ON DEIS ANALYSIS

SECTION 3.4

TRANSPORTATION

WEST SEATTLE JUNCTION

URBAN VILLAGE

COMMENTS ON DEIS TRANSPORTATION ANALYSIS

Transportation is one of the most acute issues for the Junction. The transportation analysis is egregiously faulty in several areas. The Junction is the transportation hub for the West Seattle peninsula and Vashon Island. The main bus lines are routed through the Junction before traveling downtown. Most wheeled traffic from across the peninsula traverses the Junction in order to access the West Seattle Bridge via Fauntleroy or Avalon. Growth anywhere west of the Duwamish river therefore has an impact on the Junction.

The DEIS utterly fails to acknowledge the role of the Junction in West Seattle's transportation patterns and therefore risks missing significant impact areas. It fails to offer any mitigations for transportation impacts for the Junction or for West Seattle. The DEIS at best merely refers the issue for further study. This is not acceptable – the City must present a material and detailed mitigation plan for transportation at the Junction.

Parking

The DEIS failed to address parking occupancy at the Junction in its analysis.¹ This must be corrected. Parking at the Junction is a significant problem. An RPZ is currently under evaluation, which would have a major impact on parking patterns. The effect of the RPZ must be considered with each Alternative.

Residents have informed us of multiple impact patterns related to growth and parking. The DEIS must answer to how each Alternative create impacts at the Junction that arise from these trends.

- “Park and Hide” – since the Junction is the transportation hub, residents from outside the Junction use the local streets as defacto park and ride spots.
- Load/Unload – Businesses and residents in multi-family units are constantly double-parking or illegally parking in order to load or unload furniture, groceries, etc. when it has not been provided by the property. This blocks-in residents and obstructs the narrow streets.
- Apartment parking overflow – No parking is required for new construction per City policy. Parking that is provided for apartments comes with a fee. It appears that some apartment residents are either avoiding the parking fees, or they own cars even when the building has no parking, and parking on the streets.
- Commercial parking – Residents from across the peninsula come to the Junction to shop. Parking is critical for the survival of our local businesses.

Bus

The City uses Metro data indicating that the RapidRide C Line operates at 67% capacity at peak hours, but local riders know that the C Line is overcrowded and skips stops at the Junction when full during peak AM trips.² The level of crowding on the C Line forces elderly and mobility impaired people to stand as the bus traverses corners, hills, and jostles them about. It's unsafe.

¹ Exhibit 3.4-17

² Exhibit 3.4-26

The DEIS must investigate and reconcile the disparity between Metro's statistics and actual ridership in order to properly assign an impact level and mitigation.

Traffic

The travel time corridor analysis used a Google Maps query at 5:00/5:15/5:30/5:45 PM on an unspecified Wednesday in March.³ We do not assume that Google Maps can be trusted as accurate – the city should study the corridors itself. Further, it is absurd to assume that data collected on one evening in March is representative of the peak volumes of the corridors. Corridor 7 – the West Seattle bridge to I-5 – suffers the worst traffic eastbound in the morning, and also varies during the course of the year, as shipping terminal volumes change and seasonal variations in commuting take place. This analysis must be corrected.

Given the growth in the Junction and across the peninsula, the DEIS must study the effects of traffic within the Junction itself, in addition to regional transportation corridors. The DEIS must study the LOS for all traffic signals. The DEIS must assess the impact on all unsignaled intersections and determine whether signaling is needed. The DEIS should pay especially close attention to:

- Fauntleroy SW, Alaska SW, California Ave, 44th Ave SW between Edmunds and Genesee, and Avalon Way SW. These are all primary avenues for local traffic and peninsula-wide traffic.
- SW Edmunds and SW Oregon, which are steep hills and which are seeing significantly increased traffic already. These are secondary routes due to “overflow” from primary routes.
- All roads that cannot support more than two lanes of parking and one lane of travel, such as are found throughout the Fairmount Springs area. The proposed for upzoning to multi-family would exacerbate the head-to-head conflicts on these roads.
- All roads with Bus traffic.
- Transit corridors through the Junction that correspond to the morning and afternoon commutes to/from the West Seattle Bridge
- Transit corridors north/south between Admiral and Morgan Junction (and points south), all of which traverse the Junction via California Avenue or a side-street.
- The compounding effects of development projects during the time period of study. In the ensuing 20 years we anticipate temporary or permanent impacts arising from: viaduct demolition; Sound Transit construction; Fauntleroy Way partial closures; Avalon Way rechannelization; Terminal 5 development; a potential RPZ; One City Center bus re-routing which will make bus infeasible for some current riders; property development permissible under each Alternative.

³ DEIS Appendices, page J.12

Safety

The DEIS fails to study potential safety issues arising from blind corners and pedestrian crossings within the Junction, which would be a result of development and heightened pedestrian activity.

General Conclusions

The DEIS treatment of transportation at the Junction is much too cursory and analytically flawed. The effects of the Alternatives on transportation at the Junction is a critical area of study and warrants a detailed project. The City must then propose real, direct, specific mitigations for the Junction. Among its mitigations, the EIS must propose a development freeze in West Seattle until new transit capacity is created through Sound Transit construction, which will add a new bridge across the Duwamish River.

COMMENTS ON DEIS ANALYSIS
SECTION 3.5
HISTORIC RESOURCES

WEST SEATTLE JUNCTION
URBAN VILLAGE

COMMENTS ON DEIS HISTORIC RESOURCES ANALYSIS

The DEIS acknowledges the importance of preservation of historic resources. It also recognizes that one of the main factors that drive displacement is caused by a loss of cultural community.¹ It cites that building on local cultural assets is one of the principal means to address displacement risk.²

The DEIS states that significant growth rates put historic and cultural assets at risk. At 111%, the Junction had the highest growth rate of any urban village in Seattle, and is predicted to have the second-highest growth rate of any urban village for the next 20 years. Clearly the historic and cultural assets of the Junction are at imminent risk and this risk must be mitigated.

We therefore expected a deep analysis of the historic and cultural resources and attributes of the Junction. The DEIS, however, failed to address the topic. It did not acknowledge any risk or impact at the Junction. It fails to acknowledge the Historic Resources and cultural assets of the Junction at all.

The West Seattle Junction was an economic center for the peninsula dating back to the early 1900's. A streetcar ran from Seattle through what is now Alaska and California Avenues, running north and south from there. It is this streetcar intersection that gave the "Junction" its name. This intersection remains the center of the area.

The DEIS fails to recognize the Hamm and Campbell buildings, which are historic landmarks in the upzone area, in this very intersection. It acknowledges that a private group carried out a historic survey but fails to take advantage of it. It should use it as an integral part of the analysis.³ Six additional buildings are identified that have landmark potential, and community input and local business owners comment extensively on the culture of the Junction as it is worth preserving.

The study focused on this historic and cultural heart of the Junction: the area from SW Genesee to SW Edmunds, from 42nd to 44th Ave SW with California Ave in between. Indeed the DEIS must call out this area in general as the historic and cultural center of the Junction. The length of California Ave within the Junction is culturally significant. In addition to the two landmark buildings, California Ave houses numerous historic small businesses (e.g. Husky Deli, Easy Street Records) and is the place of long-running events such as the West Seattle Grand Parade. The DEIS must recognize the cultural significance of California Ave and the streets of its nearby vicinity, and must propose mitigations to protect it. It is inappropriate, for example, to raise the zoning along California Ave to NC-95 and to leave it without the protection of specific design standards.

¹ "Cultural displacement occurs when residents are compelled to move because the people and institutions that make up their cultural community have left the area." p.3.29.

² Appendix, Table 6, p.25

³ *What Makes the Junction Special?*, March 2016, Sheridan Consulting obo West Seattle Junction Historical Survey Group.

By comparison, when the Urban Center University Ave faced upzoning to NC-85, it was met with such concern as to the potential cultural and historic loss, the street was set aside for a specific study unto itself. It is duplicitous and unfair that the City treat the University Ave with such great care and study, while our own historic Avenue is dismissed with no further mention.

The Junction now hosts numerous community murals that depict scenes from the Junction's past. They are well known in the community. So well known that one large, new apartment building is named "Mural" in recognition of this important asset to the community. These are painted onto private buildings and are therefore at risk as a result of MHA and zoning.

The DEIS must comprehensively study the Junction's historic and cultural resources and identify specific mitigations, such as:

- In general, study the Junction more thoroughly and treat it with respect.
- Make a determination of significant impact to the Junction, especially at California Avenue and the adjacent streets.
- Designate California Ave and the adjacent streets a historic preservation area.
- Designate the six potential landmarks for study.
- Recognize the locations and importance of our historic murals, note a finding of impact, and propose a mitigation strategy to protect them.
- Acknowledge that the loss of these resources and disruption of the overall aesthetic and character of the Junction is a significant impact as a cause of cultural displacement.
- Do not upzone California Avenue.
- Propose specific design standards and requirements that aim to protect the historic buildings and businesses inside the Junction, especially in the study area of the 2016 Survey.

COMMENTS ON DEIS ANALYSIS
SECTION 3.6-3.7
BIOLOGICAL,
OPEN SPACE AND RECREATION

WEST SEATTLE JUNCTION
URBAN VILLAGE

COMMENTS ON DEIS BIOLOGICAL AND OPEN SPACE ANALYSIS

The DEIS exhausts most of its effort on city-wide park space ratios. Although this is required, it is not useful as a consideration for the impact to the residents of the Junction. The Junction is among the worst urban villages for access to parks and open space.¹ The DEIS reveals that accessibility to Parks at the Junction is worse than its open space standard, and the Junction has among the lowest amounts of nearby park space per resident in the City. It acknowledges that more growth will create a greater strain on park and recreation resources. However, the DEIS proposes no specific mitigation whatsoever. This DEIS must acknowledge this directly, and propose mitigations that are specific to close both the existing deficit as well as accommodate the growth arising from each Alternative.

Parks

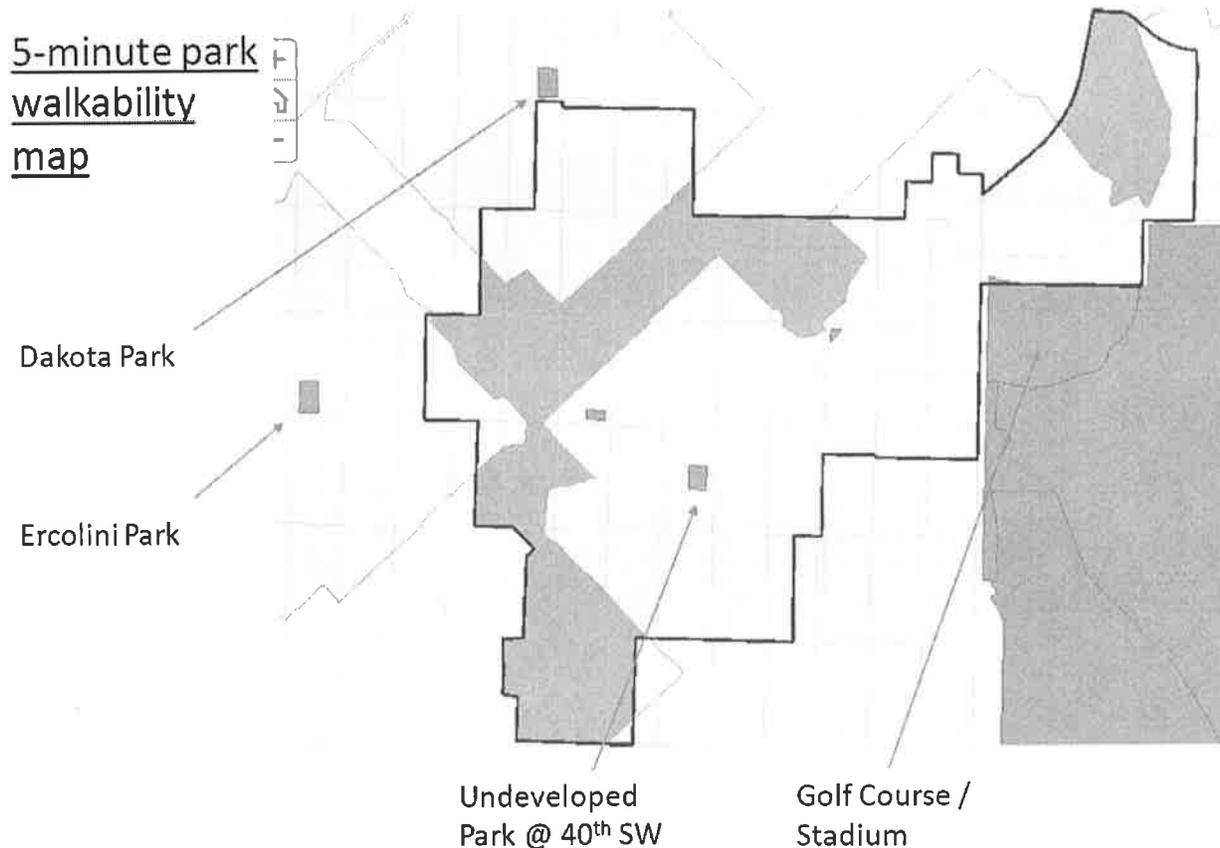
The DEIS recognizes the gap in park service with regards to the 2011 open space standard.

The DEIS says that there is not an impact under the new 2017 walkability standard. The DEIS relies on an assessment by Seattle Parks and Recreation (SPR) to reach this conclusion, however, the SPR conclusion is itself flawed. The SPR walkability standard depends on a 5-minute walkshed distance to a 10,000 sq ft park. Its assessment map is below.

It is flawed in these ways:

- Dakota Park does not meet the criteria of a viable park. It is a locked building with a small back yard that is available for rentals.
- The Golf Course and Stadium do not meet the criteria of a viable park. The Golf Course requires payment and a reservation. Both are accessed by a road entrance for cars, down a steep hill, that itself is a 5-minute walk from the street.
- Ercolini Park is down a very steep hill. It's unrealistic to think that all street distances are equal times to traverse. Many people will take longer than 5-minutes to climb that hill, or would take a longer path.
- The location on 40th Ave SW is the site of a temporary fire station. It is unclear as to whether it will be a viable park, or when.
- A significant portion of the Junction, marked in orange, does not meet the 5-minute standard even if these parks were valid.

¹ Exhibit 3.7-4



Therefore the DEIS must acknowledge that there is insufficient park space to serve the Junction by either criterion. The DEIS must propose specific and realistic solutions in light of the proposed growth. A specific mitigation should be the purchase of park space. For the Junction, this could be done in concert with Sound Transit planning and property acquisition. In addition to park space acquisition, Approved community offsets include school grounds, green streets, boulevards, and trails, among others (SPR, 2011).

The DEIS should identify funding sources such as developer impact fees in order for the mitigations to be considered feasible. MHA provides no avenue for SPR to purchase property to alleviate open space gaps in UVs. If anything, upzoning makes property more expensive and out of reach for SPR's budget. Thus failing neighborhoods taking on the most density and contradicting SPR 2011 Development Plan. The only mitigation listed in the DEIS is to encourage developers to provide public open space in UVs. However, there is not mandate or impact fee as part of MHA for developers who do not provide this space. So this is a mitigation that is not based in reality.

Tree Canopy

The DEIS states treats tree canopy with an overly broad brush that must be made more specific in order to be meaningful. There is no calculation of tree canopy for the Junction, nor an assessment of the loss of canopy resulting from each Alternative. The DEIS must add this, make a statement of impact, and propose mitigations.

The DEIS states, broadly, “Parcels changing from single family would see the largest changes in tree canopy if developed,” and then goes on to say, dismissively, “...however, these categories only account for 15 acres within the 2,383 acre study area.” This is flawed for at least two reasons:

- “15 acres” is factually incorrect. The expansion area of the Junction alone is 47 acres of single-family zoning.
- While the impact across the study area might be lower, the impact within the Junction will be much higher. That’s because a great portion of the single-family area is concentrated at the Junction. Once again, since the DEIS is operating over too-broad an area, it fails to find impacts within the Junction. The DEIS needs to study and assess the impact on the tree canopy of the Junction specifically.

The DEIS proposes no mitigations to protect tree canopy, but must. Especially given the shortage of green space/open space and parks at the Junction, our single-family areas contribute much-needed resources to the area. Mitigations should include the preservation of Single Family Residential areas, which the City’s comprehensive plan is an essential part of maintaining open space and tree canopy.²

² “While they are thought of as residential neighborhoods, they include a variety of uses beyond housing. ... In most of these areas, houses are usually not very tall and typically have yards and open space around them. That open space provides recreation opportunities for residents and land for much of the city’s tree canopy.” Seattle Comprehensive Plan, 11/2016, p.51.

COMMENTS ON DEIS ANALYSIS
SECTION 3.8
PUBLIC SERVICES AND UTILITIES

WEST SEATTLE JUNCTION
URBAN VILLAGE

Deficiencies Identified in the HALA EIS

Section 3.8 Services and Utilities

References and reliance on the 2035 comp plan EIS are inappropriate due to the magnitude of the growth further anticipated by HALA. Each area needs specific and detailed analysis of the magnitude of the impacts from the added burden of growth, particularly because, this growth is not, as depicted in the comp plan EIS, gradual.

LIBRARIES

The EIS excludes libraries as a public service in the analysis. There are no libraries in the WS Junction.

POLICE

This section does not adequately address the impacts on Police services. It fails to include the findings of the city commission 2016 Berkshire report that severely criticizes police staffing levels and services.

The EIS is completely dismissive of impacts on police services that are already woefully inadequate. The EIS states

“Demand on police services would be identified and managed as growth occurs in the City over time (City of Seattle, 2015)”. This is patently untrue, as it is not being managed adequately now.

The EIS further states that “demand on police services would be identified and managed as projects under the MHA are implemented”. Clearly the below references below indicate this is not the case. Reliance on average response times citywide is not appropriate to describe neighborhood impacts.

<http://www.seattletimes.com/seattle-news/data/how-long-is-too-long-to-wait-after-calling-911/>

But if you call for a domestic-violence assault, the average citywide wait time is more than 10 minutes.

The response to an in-progress violation of a restraining order is even slower — more than 15 minutes.

<http://mynorthwest.com/153157/report-shows-police-response-to-several-seattle-neighborhoods-slower-than-target-time/>

Obviously the SPD is not managing services to the needs of the community and taking more than 7 minutes to respond to priority 1 calls in 14/51 beats. These beats cover most of Northwest Seattle, Georgetown, Magnolia and parts of Queen Anne and West Seattle.

When evaluated as response in the 90th percentile, as is more appropriately done by the SFD, police response times are abysmal. The conclusion is that police response times are unacceptable. There is essentially no mitigation provided in the EIS other than “managmebt.”

A quick review of SPD stats show that the SW precinct most recently No. 2 in overall shots fired calls. http://www.seattle.gov/Documents/Departments/Police/SeaStat/SEASTAT_2017JUN7_FINAL.pdf

Average police response times identified in the March 2016, City commissioned Berkshire report also show poor response by police to non-emergency calls. During the study time of similarly sized cities, Seattle was listed as No. 1 in Burglary, No 2 in larceny, and No 2 in Auto theft, and with “low clearance rates for murder and rape” an indicator of inadequate staffing. In fact, the Berkshire report shows damning evidence, precinct by precinct, of poor response times in the North and SW precincts.

<https://seccinsight.com/2016/03/23/deeper-look-berkshire-report-police-staffing/> (cut and paste into google to find).

Seattle police have long been under fire for slow response times to low level crimes such as auto theft and burglary. But, an incident in March shows that some victims of more serious crimes have also been waiting longer for help. <http://mynorthwest.com/296490/waiting-for-spd-seattle-victims-waiting-along-the-road-for-more-than-an-hour/>

Police Staffing History Data and information:

TOTAL FTE history

<http://www.seattle.gov/financedepartment/17adoptedbudget/documents/SPD.pdf>

<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
2,019.35	2,033.35	2095.35	2146.35

The 2017 budget is for 72 new officers and 25 new 911 staff over a two year period. “The additional police officers will increase the size of the force from 1,421 to 1,493. In 2013 there were 1302 officers in including “student officers”
<http://www.seattle.gov/Documents/Departments/Mayor/SPD-overview.pdf>

In the below article, the mayor had committed to a net increase of 200 officers relative to 2013 staff levels and this hiring

<http://www.seattle.gov/financedepartment/17adoptedbudget/documents/SPD.pdf> will keep the department on pace to achieve this goal by early 2020. The new 200 officers, once fully trained and deployed, will represent a 15% increase in the size of the sworn force above 2013 levels. In the near term, SPD sworn staffing levels reached an all-time high in 2016 and will continue to expand in 2017 and 2018 to accommodate Seattle's growing population”.

This report further states that the 911 Center was remodeled in 2016 and that “SPD has been relying on overtime to meet the call volume standards set forth by the state. Increased staffing will improve SPD's ability to meet call volume standards while also boosting workplace morale and enhancing the customer experience. A 2016 assessment of the 911 communications center confirmed the need for more staff and recommended additional changes that could make hiring and training more efficient increase management oversight and improve customer service. The department began implementing these recommendations in 2016 and will continue in 2017”, and “The department has relied on both voluntary and mandatory overtime over the past five years to meet demand at the 911 communications center. Since 2011, the department has used an average of 14,000 hours of overtime each year to meet call volume standards, or approximately \$645,000 per year spent on 911 call taker overtime”.

A study commissioned by the city in 2001 concluded that SPD needed to grow. <http://crosscut.com/2015/11/seattle-uses-guesswork-to-rebuild-police-force/>. After a surge in hiring in 1990, the department had gone largely unchanged until 2002 and actually shrank in 2003 due to economic recession. Part of the problem was that, compared to other cities, Seattle did not pay well. According to City Council President Tim Burgess, recruits were crossing the pond to Bellevue or heading south to Renton where the pay was better. In 2008, the city rolled out pay raises for officers with a hopeful goal that should sound familiar: “SPD is committed to hiring 20 to 25 recruits over and above retirements in each of the years, 2008 through 2012,” read an excerpt from SPD's neighborhood policing plan. But along came the Great Recession and those plans were shelved.

However, when SPD says it's committed to increasing the force by 20 to 25 officers, that means it actually needs to hire close to 80 new recruits. That's thanks to attrition for officers leaving the force, either through retirement or firing. So in effect, to achieve a stable work force, SPD must hire at more than 3 times the number of officers it needs to meet its commitment.

In summary: The analysis of impact on police services was flawed, incomplete, reached an incorrect

conclusion, was inadequately mitigated. The studied area was both incomplete, inadequate, and ignored readily available data and studies of deficiencies in policing.

Further, the comp plan draft EIS acknowledges that SPD does not currently have adequate staffing but is pursuing staff levels consistent with the staffing targets established in the Neighborhood Policing Staffing Plan as well as increasing the efficiency with which facilities and staff are deployed.

The EIS states that the SW Police station has capacity for 13 additional staff members-which they state will likely be sufficient for 20 years. This is patently NOT TRUE based on response times for SW precinct.

FIRE/EMS

The Seattle Fire Department does not currently meet NFPA response times for EMS or Fire suppression services.

The EIS draft EIS states “more compact growth may reduce distance for emergency vehicles”, however, there is no analysis of the effect of traffic congestion on such responses that are currently not being met.

Under the No Action alternative, The draft EIS states that growth would occur and potentially result in an increase in call volumes. The EIS mitigation strategy is “However, the City would continue to manage fire and EMS services in the city as a whole in view of planned housing and employment growth (City of Seattle, 2015)”.

That at least 80% or more of SFD responses are medical calls and Medic 1. Medic 1 is funded by ballot measures, flawed funding strategy. The draft EIS fails to analyzed and mitigate the increase burden on SFD resources in any way.

WSJ is serviced by Station 32 (E32, L11, M32 and a reserve medical unit)-Response times for 2015 (most recent published). http://www.seattle.gov/fire/statistics/runtimes/companyResponseTimes_2015.htm

Apparatus	Total calls	BLS	ALS	Fire
E32-2015	1,653	03:58	04:04	05:07
E32-2014	1460	04:10	04:13	05:07
L11-2015	640	04:21	04:10	06:36
L11-2014	496	04:40	04:29	06:50
M32-2015	1,781	07:21	06:33	06:51

M32-2014	1728	07:21	07:15	07:39
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Engines and ladder staff provided BLS basic life support. Medic units provide ALS-advanced life support.

Our response time for advanced live support is almost double the City overall average.

SFD responses

2014-89,980 (14,260 fire)

2015-94,346 (15,079) fire)

2016-97,043 (15,787 fire)

City wide Average response times are below. NFPA standards

Year	BLS	ALS	Fire
2015	3:38	3:45	4:15
2014	3:50	3:47	4:22

Per Chief Scoggins <https://www.seattle.gov/financedepartment/17proposedbudget/documents/SFD.pdf>
Seattle averages 0.7 fires annually, per 1000 residents. This is not identified in the EIS.

There are no calculations or estimates of the need for increasing staffing or Fire/EMS apparatus to respond to increase in population resultant from HALA upzones of the Junction or anywhere else.

Budget

Year	2015	2016	2017	2018
\$	185,353,496	183,522,714	200,982,105	203,663,980
FTE	1162.55	1167.55	1155.55	1155.55
FTE Ops	1,001.25	1,001.25	1,001.25	1,001.25
FTE Med	83	83	82	82

This is a net loss in employees for the SFD between 2016 and 2017.

The average age of FF is 45 years old. There are 209 FF on staff around the clock. The 2017 budget includes \$ for 60 new recruits (but no net gain in Fire Fighters).

There is a recognized correlation between population growth and the number of alarms.

SFD's goal is to meet the NFPA 1710 measures to provide for the arrival of an engine company within 4 minutes travel time to 90% of fire suppression incidents, and the arrival of a first responder within 4 minutes travel time to 90% of EMS incidents.

The EIS states "due to increases in population, number of employees, and commercial property uses, it is projected that the SFD will continue to experience growth in the number of emergency incidents. This will challenge the department to maintain current response time outcomes as SFD looks into the future". Response time for the WS Junction's Station 32 are already abysmal.

The City has admitted that "SFD is currently experiencing a high number of vacancies, due mostly to retirements from an aging workforce. Mandatory minimum staffing levels require SFD to maintain service to the City around the clock and SFD is increasingly relying on overtime hours to staff the City's fire stations".

To compensate for those missing personnel, firefighters worked a total of 392,178 overtime hours in 2014. Divided between the approximately 1,000 firefighters in SFD, each person worked about 390 extra hours last year, or, in the context of a 40-hour workweek, almost 10 extra workweeks.

<http://crosscut.com/2015/04/the-seattle-fire-department-is-understaffed-why/>. As a result the SFD exceeded its \$13,013,972 overtime budget by \$5.4 million. If overtime is not a budgetary concern, it is a safety concern. "Firefighters are working more than they want,"

There is only a general reference to Alki (misspelled)/Admiral (multiple urban villages and surrounding areas) needing increased EMS services based on EMS Demand Forecast model. The EIS sole mitigation is that deficiencies would be identified and managed. This is not currently being done today.

In summary: The analysis of impact on fire/EMS services was flawed, incomplete, reached an incorrect conclusion, was inadequately mitigated, studied the area both incompletely and inadequately, and ignored readily available data and studies of deficiencies in fire/EMS services.

911 CALL CENTER

The EIS does not address impacts on the 911 call center.

PUBLIC SCHOOLS

The EIS fails to include the West Seattle Junction from the 8 sectors identified in the draft EIS analysis. The one elementary school nearest the junction (Fairmount) is currently at capacity with no room for portables at the site. Fairmount was renovated recently and not likely to be subject to additional capacity through construction.

The SPS 2012 Facilities Master Plan projected an increase of 9,000 students city wide from 2012 to 2022. This projection exceeds school capacity. The draft EIS erroneously states that Fairmount Park elementary renovation is currently underway, which is not true. Fairmount was remodeled, opened and is now at capacity. Schmitz Park it closed and in dire need of renovation before it could be opened.

West Seattle High has had student growth of 225 students since 2012. It is at 951 students, or if you would rather use the SPS Capital Project data of actual enrolled it was 986. Per http://www.seattleschools.org/UserFiles/Servers/Server_543/File/District/Departments/Enrollment%20Planning/Projections/5_Year_School_Projections_2016-17.pdf.

Fairmount Elementary as of 6-1-2017 has 533 students. Cap Projects predicts 554 for fall 2017. Fairmount has decommissioned their computer lab to make room for one more classroom for fall 2018. There is no more room. There is no room for portables due to the size and slope of the school property. Students who take tests on computers and will have no computer room for this activity.

http://www.seattleschools.org/UserFiles/Servers/Server_543/File/District/Departments/REA/data_and_reports/P223_Jun17.pdf

Projected enrollments from Capital Projects:

http://www.seattleschools.org/UserFiles/Servers/Server_543/File/District/Departments/Enrollment%20Planning/Projections/2017-18%20School%20Enrollment%20Projections.pdf

The analysis for school impact is massively flawed. The last SPS Capital Projects and planning 5 year projection was published 9-8-16 and most recently 10-19-16. The EIS did not rely on the most current data. Even this limited data is self reported as "projected from October 2015-January 2016 enrollment data", and "came from moderate ten year resident projections" which fail to characterized the massive growth in the West Seattle Junction area where the City's own HALA growth data shows and increase of

663 households in 2015 and an estimated 1674 new apartments opening between 2016 and 2018 per the Seattle Times <http://www.seattletimes.com/business/real-estate/seattles-record-apartment-boom-is-ready-to-explode/>. Genesee Hill Elementary attendance is 688 and projected for 723 and it is full.

The draft EIS states that “Under the No Action alternative, growth would continue to occur based on the preferred alternative identified in the Seattle 2035 Comprehensive Plan. For SPS, growth is expected to be most evident in Northwest Seattle, Northeast Seattle, Downtown/Lake Union and Capitol Hill/ Central District. The Northwest Seattle, Northeast Seattle and Capitol Hill/Central Districts currently have the capacity to serve potential growth (City of Seattle, 2015)”.

There is no discussion of the burden of more students on the current Junction K-12 schools.

Comp plan Draft EIS States that “currently no policies direct the district to purchase new property or to increase capacity in schools within urban villages, with the exception of a possible investment in a downtown school, currently under exploration”. “However, growth in the number of housing units may not indicate a proportionally similar growth in school-aged population”. This is because most new housing units will be in multi-family structures, and units in these types of structures tend to have lower numbers of children. SPS will continue to actively engage in facilities planning and facilities improvements toward meeting future needs....No significant adverse impacts to public schools are expected under the Preferred Alternative’s pattern of growth for any part of the city”. This conclusion is patently erroneous and fails to minimize the fact that apartment dwellers do have children.

SIDEWALKS AND ROADS

The study does not address the need to upgrade the large number sidewalks in and around the Junction or every village to ensure walkability and handicap access points. The damage to roads and sidewalks due to the impacts of massively heavy construction equipment is completely ignored. An example of the damage caused by construction and not repaired is the damage to 42nd Ave SW west of Jefferson Square. This was not repaired during construction of Junction 47 and the Mural. Damage recently caused by the construction of the Whittaker was not completely repaired on the 40th Ave SW. The current scale of allowed development necessitates the use of a large number of extremely heavy equipment including cranes, excavators, large materials trucks, concrete pumpers and concrete trucks, dump trucks for earth removal... This equipment has caused long term and deleterious damage to the streets and roadways in the neighborhood.

The EIS fails to discuss or analyze the impacts of proposed density in, and around villages, to street use and travel by cars, bikes and heavy vehicles. The majority of single-family neighborhoods proposed for upzone have streets that are only 25 feet wide. This street width is designated per the Seattle Right of Way Improvements manual as appropriate for low density residential application per http://www.seattle.gov/transportation/rowmanual/manual/4_6.asp

Zone	Standard Roadway Width
Low Density Residential	
SF, LDT, L1, NC1	25 Feet
Mid-Density Residential and Mixed Commercial / Residential	
L2, L3, L4, NC2-30, NC2-40, NC2-65	32 Feet
High Density Residential, Mixed Commercial / Residential, and Industrial	

NC3, MR, HR	36 Feet
C1, C2, IB, IC, IG1, IG2	40 Feet

The failed policy of not mandating adequate off street parking for all urban village new development has resulted in the new residents bringing their cars with them and parking them on the narrow side streets of single-family neighborhoods. This effectively resulted in highly congested side streets allowing for passage of one vehicle at a time. Further growth in these areas creates a snarl of traffic, danger for bicyclists, and further slows Fire, Police and EMS response times when a vehicle will have to back down a street to make way for emergency traffic. Fire apparatus, school busses, delivery vehicles and other large vehicles are now have great difficulty turning and transiting on many of these streets. The impacts of what has, in fact, become one lane streets is not analyzed or investigated, nor mitigated.

WATER

Seattle's water infrastructure is aging though water usage has been reduced by conservation. The aging water delivery system continues to suffer main breaks. Impacts of replacement of aging water mains are is not addressed.

<http://deohs.washington.edu/environmental-health-news/keeping-seattles-drinking-water-safe>

Comp PLAN draft EIS "however, design fire flow demands can be much greater than the average daily usage for a building. There will be greater demands on localized areas of the water supply and distribution system due to redeveloped buildings being brought up to current fire codes. There is no mitigation discussed.

SEWER-STORM

The draft EIS fails to competently or thorough address the impact on the city sewer systems. SPU has stated "Until recently, the design of combined sewers in Seattle has been based on a uniform runoff of 15 cubic feet per minute per acre. For many of the drainage areas, this amount of runoff can be expected to occur with storms having a recurrence interval of only two years. Seattle's population density per square mile has increased by nearly 10 percent since 2010, making the city one of the most populous cities in the U.S."

https://www.seattle.gov/util/cs/groups/public/@spu/@diroff/documents/webcontent/1_055340.pdf

SPU is already under a DOJ consent decree mandating better control of sewage outflow to Puget Sound during storm events.

http://www.seattle.gov/util/cs/groups/public/@spu/@drainsew/documents/webcontent/01_030101.pdf

Developer storm water improvements, as referenced in the EIS, are piecemeal by project. This EIS does not address the projected increase in storm H2O where the up-zoned areas will be built. These new structures cover substantially more of an existing lot than almost all current structures, particularly SFR. New construction, such as townhomes, plumb their roof water to (some to a short term retention area) that drain into the existing sanitary sewer system. It is incorrect to state that all drainage will be mitigated on site. Single family lots formerly dispersed drain water to their yards and lawns and not into the sewer system.

The EIS states that areas of the City that have 12" or smaller sewers are stated to be likely "near capacity. The EIS further states that replacement of a SFR by townhouses may reduce per capita demand", though this is completely irrelevant when there is a net increase in the total number of people which increased total demand on the system. This is no mitigation to reduce the overall impact.

The EIS further states that "on-site Stormwater Management BMPs must be incorporated throughout the project site wherever feasible, constrained only by the physical limitations of the site and practical considerations of engineering design and necessary business practices". The impact of drainage waters on the already burdened sanitary sewer system is virtually neglected.

<http://www.seattle.gov/dpd/codesrules/codes/stormwater/>

The EIS references the 2035 comp plan, which includes a detailed city sewer map, shows that roughly 90% of all Seattle sewer lines are, in fact, <12" in diameter. There are at least 32 blocks in the WS Junction that are <12" and many of these are actually 8" in diameter. Wallingford and South Park have similar issues with undersized sewers in the proposed upzone areas.

The vast majority of wastewater mains in the Junction are combined sewer and storm water. There are combined mains service areas with significant slope and run off potential on 41st Ave SW south of the Junction and in the quadrant west and south of Mt. St. Vincent. This is not addressed in the EIS.

2013 DOJ news release stated that: "Under the settlement with the city of Seattle, the city will develop and implement a long-term plan for better controlling sewer overflows and improve system-wide operations and maintenance. The city will also implement plans to control fats, oils and greases, and reduce debris being discharged by the system. In addition, the settlement provides Seattle with the opportunity to also use an integrated planning approach and to substitute green infrastructure at several of its sewer overflow control projects. By implementing these measures, the city will reduce its raw sewage discharges by approximately 99 percent at an estimated cost of \$600 million. Seattle will also pay a civil penalty of \$350,000".

Yet per the city map

http://www.seattle.gov/util/cs/groups/public/@spu/@usm/documents/webcontent/02_032346.pdf

There are no sewer upgrades planned for the Junction between this EIS release and 2030.

The comp plan further states that there will be greater demands on the local sanitary sewer, combined sewer and storm water collection systems, the downstream conveyance and the treatment facilities. There will be a greater overall need for sewage capacity with increased density. Increases in peak flow and total runoff caused by conversion of vegetated land area to impervious surfaces also create increased demand on drainage system capacity

From http://your.kingcounty.gov/dnrp/library/wastewater/cso/docs/AnnualReport/2015_CS0-CD_Annual.pdf

"While 2015 had record heat and snow drought, it was also a year of rainfall extremes. Half of the months in 2015 were wetter than normal and half were drier than normal. Two months were among the wettest on record (August and December) and a few were among the driest ever (May, June, and July). November (6.36 inches) and December (9.78 inches) had the highest rainfall. More than five inches separated the year's rainiest, hilltop location (West Seattle, 42.51 inches) from its driest, rain-shadowed location (Georgetown, 37.11 inches). SPU's rain gauges recorded an above average 12 storms with heavy rainfall (intensity equal to or greater than a two-year recurrence interval) in 2015. Of those events, three were extreme (equal to or greater than a 25-year recurrence interval). Each extreme event also contained

embedded 100-year rainfall, which places 2015 among the most extreme precipitation years in a 38-year record”.

“Hydraulic modeling predicts that King County CSOs will discharge 800 million gallons (MG) of untreated CSO in an average year of rainfall. In 2015”.(Southwest Alaska Street Overflow (SW Alaska St. Overflow), Murray Pump Station Overflow (Murray PS Overflow)

Seattle Public Utilities’ assessment of the proposed zoning changes (from prior zoning changes in the West Seattle Junction Triangle (SEPA)) already indicates that some of the combined sewer lines in the triangle study area may be capacity-constrained. An increase in density and/or changes in the existing conditions could result in near-capacity or over-capacity flow conditions during intense storm events. Such conditions could affect the Longfellow Creek watershed unless improvements are made to the combined sewer system.

<https://www.seattle.gov/Documents/Departments/OPCD/Vault/WestSeattleTriangle/West%20Seattle%20SEPA%20Decision.pdf>

WSJUV Sewers sized under 12” (inventory).

37th SW:Edmunds-Alaska 8” VC, Alaska-Oregon 8” VC, Fauntleroy-Genesee 10” VC.

38th SW: Dawson-Hudson 8” VC, Hudson-Edmunds (1/2 8” VC –no sewer on rest of street –sewer runs down east alley and is 8” VC full alley length), Edmunds-Alaska (2/3 8” VC and 1/3 12” VC), Oregon-Genesee 10” VC.

39th SW: Oregon-Genesee 10” VC, Genesee-Dakota 8” VC.

Fauntleroy SW: Brandon-Dawson (1/2 10” VC), Dawson-Hudson (1/2 8” and ½ 10” VC), Hudson-Edmunds 8” VC.

40th SW- Dawson-Hudson 10” VC, Hudson-Edmunds 8” VC, Edmund –Alaska (1/3 8”VC), Oregon-Genesee (1/2” VC), Genesee-Dakota 8” VC.

41st SW: Brandon-Dawson (1/2 10” VC), Dawson-Hudson (1/2 8” and ½ 10” VC), Hudson - Edmunds 8” VC, Edmunds –Alaska 8” VC (runs down the alley dead ending into BofA Bank parking lot and not on street), Genesee –Dakota 8” VC.

42nd SW- Brandon-Dawson (1/2 10” and ½ 8” VC), Dawson- Hudson 8” CON, Hudson-Edmunds 8” VC, Edmunds-Alaska (1/3 8” VC and 2/3 10”VC), Genesee-Dakota 10” VC.

California SW -Brandon-Dawson 8” VC, Oregon-Genesee 10”VC, Genesee-Dakota 10” VC.

44th SW: Alaska – Oregon (1/2 10” VC), Oregon-Genesee (1/2 10” and ½ 8 “ VC).

Sewers tend to run south from Hudson SW and mostly south north of the Junction. Of note is the triangle between Fauntleroy, 35th SW and Mt. St Vincent are generally 8” and this area is slated for the NC very high buildings.

The EIS incorrectly states “There would be no direct impacts to public services and utilities from the proposed zoning changes under the MHA program” although there will be and “substantial population increases in some areas. Population growth generally increases demand for public services,” and “similarly, population growth increases demand on utilities, regardless of density, but higher density can concentrate demand and cause local capacity problems”. This is not actually addressed.

The EIS also states “But higher density can concentrate demand and cause local capacity problems”. Mitigation is not addressed.

This EIS does not discuss or address the potential capacity constrained areas reference in the 2011 SEPA of the West Seattle Junction.

The Comp Plan states that residential densities could be comparatively less in some urban villages, particularly those in south Seattle, and are **not projected to significantly exceed the urban village growth estimates** considered in the Draft EIS. For these reasons, impacts to utilities are expected to be relatively comparable to those described in Draft EIS Section 3.9, Utilities. **No additional types of adverse utility impacts** resulting from the Preferred Alternative are identified. Conclusions are similar with or without use of the SEPA infill provisions. the mitigation identified in Draft EIS Section 3.9, Utilities, is adequate to mitigate potential impacts to the Preferred Alternative. No new mitigation is proposed. This conclusion is incorrect.

CITY LIGHT

Seattle City Light no actual discussion of impact on electrical utilities.

CRITICAL AREAS, EXTREMEME SLOPES

The EIS also fails to address, in any way, any of the many dozens of highlighted areas in the Junction designated in the City's DSO Water & Sewer Map that are covered by the City Critical Areas Ordinance. http://gisrevprxy.seattle.gov/wab_ext/DSOResearch_Ext/. These areas are primarily 40 % grade steep slopes, landslide areas.

PSE

There is no discussion on the impact to natural gas needs or services.

NOISE

This impact is not evaluated at all and simply references the 2035 comp plan noise which does not allow for wholesale conversion of single family zoning to massive apartment complexes. Under the HALA plan, entire residential neighborhoods and their occupants could be completely surrounded by continuous and ongoing demolition and construction from multiple projects in all directions for months, if not years. The health effects on residents is completely minimized or ignored. <http://crosscut.com/2016/12/seattle-construction-noise-code-outdated-development-boom/>

There are well researched noise studies for the construction industry on the OSHA web pages, which details noise contribution by activity and equipment type. None of this information was included or addressed, nor was there any meaningful disuccion of the impact to residential occupants occupants

Section/Page	Description	Data used in the study was flawed or inappropriate	Analysis excluded an incorrect variable	Mitigation Inadequate, Inappropriate or incomplete	DEIS Review		Omitted study area	Omitted Recommendations	Other (Please Describe)
					Incomplete or Inadequate Study Area	Alternative is faulty relative to its intended purpose			
3.8.1 AFFECTED									
3-295	Does not address Impact on PSE gas utility								
3-295	Does not address Impact on Library services								
3-295	Impacts summarized on a city wide scale is not appropriate	x			x				
3-295	Erroneously uses comp plan FEES data for an additional 50% growth and claims no or minimal impact		x		x				
3-295	DEIS admits to a construction boom-relies on comp plan that asserts gradual growth	x	x		x				
3-296	Police-no other precincts except North are identified for growth related facility needs-SW has room for 13 mo	x	x	x	x		x		
3-296	SPD established response time is 7 minutes which it meets per 2035 CP- averages don't show true response time	x	x		x				
3-296	SPD lower level crime such as burglary and auto theft not addressed	x	x		x				
3-298	Fire-Does not state WS Junction is part of Alki/Admiral analysis	x							
3-298	School-does not include WS Junction in Sector 6	x							
3-298	School BEX Phase IV plan 1,100 students shy of need				x				
3-299	Schools listed as in the pipeline are actually open now and some full	x	x		x				
3-299	About 1/4 schools have no sidewalks				x				
3-300	Water-no discussion of aging infrastructure or replacement	x			x				
3-300	Sewer-some city pipes are < 12" actually most are <12 and many 8"	x	x		x				
3-302	Per capita sewer demand is an irrelevant metric-total/peak flow is relevant	x	x	x	x				Gross misrepresent
3-302	Refers to the 2004 drainage plan and 2006 wastewater plan-not published								
3-302	Sewers								
3-303	Storm Water-Controlled or treated on site is not actually described	x	x	x	x				
3-300	Right of way Improvement manual only requires some development to install side walks	x		x	x				
3-305	Electricity -no statement of what additional electrical needs will be	x			x				
3.8.2 IMPACTS SECTION									
3-306	No direct public services or utility impact conclusion is wrong	x	x		x				
3-306	Says no direct impacts then says there will be a demand increase	x	x		x				double speak
3-306	Says some development is required to improve storm and drainage systems	x			x				double speak
3-307	Police-Alt 1 identified and managed- this is not adequately managed now	x	x	x	x				
3-307	Fire-Alt 1 managed-this is not adequately managed now	x	x	x	x				
3-307	Schools-Alt 1-ignores full elementary schools in WSJUV now	x	x	x	x				
3-308	Erroneously states consistent with comp plan which it is not	x	x	x	x				
3-308	Police-Alt 2-ignores increased density in all non UV multifamily areas outside UV	x	x	x	x				
3-308	Fire-Alt 2-ignores increased density in all non UV multifamily areas outside UV	x	x	x	x				22 addnl. Fires
3-309	School-Alt 2-resolution is inadequate	x	x	x	x				
3-310	All Alt 3 impacts deficient for the same reason as Alt 2	x	x	x	x				
3-310	It is not more efficient to serve more people-it burdens the systems	x	x	x	x				

3.3.8 MITIGATION

3-311	No other mitigation needed is faulty	x	x	x	x
3-311	No significant unavoidable impacts	x	x	x	x

Not addressed damage to roads/sidewalks caused by construction equipment-ubiquitous x

It is wholly inappropriate to use the comp plan EIS for the HALA eis. The population increase is more than 50 percent higher under HALA and the impacts are much greater. COMP plan EIS asserts gradual growth. A construction boom as described by the HALA EIS is not gradual growth and therefore this is wholly inaccurate

Notes

This is an essential utility

This is an essential service that is already under funded

City wide scale is inappropriate for this EIS, each village should be addressed to show true impacts which can be severe

Comp Plan EIS excludes development of all SFR. This plan affects substantial SFR areas and can't be compared with a new analysis of added growth. Example=noise

Gradual growth conclusion of comp plan EIS do no apply to a construction boom

Police staffing needs are identified in the 3-16 Berkshire report was not included in the 2035 CP. It identifies the need of at least 175 officer or 35 per station. Berkshire 3-2016 report. <https://sccinsight.com/2016/03/23/deeper-look-berkshire-report-police-staffing/>

The 2017 budget is for 72 new officers and 25 new 911 staff over a two year period. <http://www.seattle.gov/financedepartment/17adoptedbudget/documents/SPD.pdf>

SW is particularly bad. <http://www.seattletimes.com/seattle-news/data/how-long-is-too-long-to-wait-after-calling-911/> <https://sccinsight.com/2016/03/23/deeper-look-berkshire-report-police-staffing/>

Response times should be evaluated at the 90th percentile as SFD does. <https://sccinsight.com/2016/03/23/deeper-look-berkshire-report-police-staffing/>

To increase the SPD force by 25 FTE you need to hire about 80 due to leaving, retiring, or firing staff per Tim Burgess. <http://crosscut.com/2015/11/seattle-uses-guesswork-to-rebuild-police-force/>

SPD takes more than 7 minutes to respond to priority 1 calls in 14/51 beats. <http://mynorthwest.com/153157/report-shows-police-response-to-several-seattle-neighborhoods-slower-than-target-time/>

A quick review of SPD stats show that the SW precinct most recently no. 2 in overall shots fired calls. http://www.seattle.gov/Documents/Departments/Police/SeaStat/SEASTAT_2017JUN7_FINAL.pdf

Omitted the WSJ UV

Omitted the WSJ UV

Doesn't address at capacity schools such as Fairmount and Genesee Hill which is over capacity

Fairmount is open (2014) and full, Genesee is open and full(2016), Arbor Heights is open, Jane Addams is open, Nova is open, TT Minor is open. Transportation costs away from villages needed

Costs and feasibility ignored for replacement of the aging water system-even if we are under capacity, you still have to replace 1,880 miles of aging pipes

The comp plan sewer map figure 3.9.7 shows most of Seattle sewers are < 12". I count at least 32 blocks in the WSJUV upzone area that are <12". No cost discussion or who will bear the costs. http://gisrvprxy.seattle.gov/wab_ext/DSOResearch_Ext/

This is superficially discussed without any analysis of the current sewer systems in each upzone area. Misrepresents that likely 90 percent of Seattle sewer are <12" from their own maps.

Per SPU the average pipe is 80 Y/O. https://www.seattle.gov/util/cs/groups/public/@spu/@diroff/documents/webcontent/1_055340.pdf.. SPU RFP published in 2016 for a new wastewater plan, so apparently the old plan is outdated and cannot be relied upon in this EIS

as of 2013 SPU had only cleaned 418 miles of sewers and inspected 124 miles of mains. http://www.seattle.gov/util/cs/groups/public/@spu/@drainsew/documents/webcontent/01_030101.pdf

There are on average at least 140 CSO overflow events into public waters (same reference as above)-these are not yet controlled-this is the reason for the DOJ consent decree

There is no actual discussion of the volume of new impermeable areas that will result and exactly how rules prevent any increase of storm run off from massive increased lot coverage. The references are vague generalities with no specific detail or actual data other than reference to city codes. cursory treatment of informal drainage,

CL predicts less revenue for the utility as it faces increasing costs to replace aging infrastructure and deploy new technology customers want. <http://www.seattle.gov/light/stratplan/docs/2017-2022%20Strategic%20Plan%20Document.pdf>.

There are significant impacts in all areas. Existing deficiencies in fire, police, sewers and schools ignored. Undersized or absent drainage mostly ignored, aging water infrastructure ignored, missing sidewalks mentioned but mostly ignored. Conclusion is these agencies will manage and cope.

a demand increase is a direct impact, no discussion of traffic impacting emergency services. Police and fire don't just serve the UV and travel all over their precinct and will be impacted by traffic. Most streets are 25 feet wide and now fully parked and result in 1 day streets for 2 way traffic-street size when fully parked is completely ignored.

Then it says higher density can cause local capacity problems on the same page it says there would be no direct impacts.

This is clearly not adequately managed now with no strategy for even greater growth

this is not adequately managed now.

ignores full elementary schools at the West Seattle Junction UV now

SFR were not massively rezoned under the comp plan, nor were the villages expanded

This is poorly managed now and response times are unacceptable now. SPD is understaffed now-"identified and managed" is not happening now much less with additional growth

This is poorly managed now and response times are unacceptable now. SFD is understaffed now-"identified and managed" is not happening now much less with additional growth. Seattle averages 0.7 fires annually per 1,000 residents. <https://www.seattle.gov/financedepartment/17proposedbudget/documents/SFD.pdf>. 22 additional fires not accounted for.

WSJUV elementary schools are full, Fairmount has no room for portables. No meaningful discussion of additional school transit

See Alt 2 explanations--identifying and managing is not working now and cannot be expected to so in the future

No consideration of traffic impact on poor response times already. More service calls with inadequate staffing increases already poor response times

See above -service needs assessments were published after comp plan FEIS and were not included in 2035 FEIS -not using the correct, current and very damning data.

Police, fire, EMS are underfunded with poor response times, schools are full in many areas, sewer lines need wholesale replacement, roads are too narrow for two way traffic when now fully parked-to say there are no significant impacts is magical thinking of the worst sort.

Contractors do not repair all the damage they cause by heavy weight excavators, track hoes, concrete trucks, pumpers, cranes, dump trucks which continue to damage streets during development and are not fully repaired. 42nd SW at Safeway is a prime example of construction ion damage not repaired.

COMMENTS ON DEIS ANALYSIS
SECTION 3.9
AIR QUALITY AND GREENHOUSE GAS
EMISSIONS

WEST SEATTLE JUNCTION
URBAN VILLAGE

Section 3.9 Air Quality and Greenhouse Gas Emissions critique.

The draft EIS is massively flawed because it does not address the presence, impact, or mitigation of localized, ground level air pollution. Regional air monitoring from Puget Sound Clean Air Agency (PSCAA) evaluate ambient air pollutants only at 3 ambient air quality monitoring stations located in the Duwamish region, Beacon Hill, and the International District. The very real exposure of residents to localized, continuous air pollution is virtually ignored, or at best mentioned in passing and dismissed. To ignore this exposure is a disservice to residents who are subjected to the pollutants caused by increase density and decades of construction work done in close proximity of residents.

Standards for monitoring ambient air pollution are specifically required to be designed to exclude local air pollution source contributions. Some samples can take up to 15 meters above ground level and “away from dirty dusty areas”, and local air pollution source plumes should “not be allowed to inappropriately impact the air quality data collected at a site”.

<https://fortress.wa.gov/ecy/publications/documents/1602001.pdf> (Part 58 Appendix E).

The continuous and unrelenting air pollution experienced by residents in the up-zone area will be enormous, particularly when sections of SFR zoned blocks can, and will, be under months, if not years, of demolition and construction work up to 7 days a week. It is likely, and highly probable, that individual residents and groups of residents would be surrounded by construction and demotion air pollution with no meaningful analysis or mitigation.

Lead

Pollutants generated by demolition include lead from homes build before 1978. Most properties subject to demolition will be structures where lead paint is present. Lead is ubiquitous in older homes and is not required to be removed prior to demolition, nor is the lead waste segregated at landfills. Only unpainted wood is recycled.

<http://clerk.seattle.gov/~scripts/nph-brs.exe?s1=&s3=&s4=124076&s2=&s5=&Sect4=AND&l=20&Sect2=THESON&Sect3=PLURON&Sect5=CBORY&Sect6=HITOFF&d=ORDF&p=1&u=%2F~public%2Fcbor1.htm&r=1&f=G>

The EIS incorrectly states there are no lead emissions associated with development. Every structure demolished will release lead to the air and soil.

Silica

Silica exposures to residents are virtually ignored. OSHA regulations do not protect neighborhood residents much less most workers. The reference to the existence of OSHA rules to protect workers is akin to referencing theft regulations to protect residents from burglaries. It is a good idea, only if everyone followed the rules and they don't. There were only 960 occupation health inspections done by

LNI in 2015 for the entire State of Washington.

https://www.osha.gov/dcsp/osp/efame/2015/wa_report.pdf. The obvious conclusion is that most worksites will never get inspected to identify, much less control, these types of hazards.

I have been an industrial hygiene compliance inspector with Washington State Department of Labor and Industries for 29 plus years. I have personally investigated and issued multiple violations to contractors for violating silica (and asbestos and lead) exposure regulations. Silica is a significant and deadly health hazard. The new OSHA Permissible exposure limit of 50 ug/m3 is much higher than the 35 ug/m3 for PM 2.5. Even if the contractor was protecting workers from the enormous levels of silica emitted during construction work, the neighbors have no protections. Concrete workers who may, or may not wear respirators, won't protect the neighborhood.

<http://deohs.washington.edu/sites/default/files/images/general/MajarThesid.pdf>

https://www.osha.gov/silica/Combined_Background.pdf

Furthermore, the vast majority of new structures typically are clad with Hardie Board, or Hardie Plank siding. This material releases enormous quantities of silica when cut. Air levels for workers alone, can be 2-3 times the OSHA allowable limit. <https://www.cdc.gov/niosh/docs/wp-solutions/2015-185/pdfs/2015-185.pdf>

Again, residents are not protected from this dust.

Asbestos

Washington State Department of Labor and Industries regulates asbestos. Asbestos must be removed from buildings prior to demolition. Guess what, this does not always happen.

I have spent 29 years personally enforcing these regulations and issued over 150 willful violations alone to contractors who illegally remove or demolish structures with asbestos removal throughout King County and in Seattle specifically. This includes the old Huling property in West Seattle.

Regulatory Agencies, including LNI and PSCAA, do not mandate the removal of materials that contain <1 percent asbestos prior to demolition. This means all asbestos, when present at levels of < 1%, is not removed from every structure demolished and releases asbestos to air and the neighbors property during demolition.

Sulfur Dioxide

The EIS erroneously states that SO2 emissions would not be appreciably generated by development under any alternative. Diesel construction equipment will cause increases in neighborhood exposures to this hazard. This is not measured or evaluated, nor is there any mitigation proposed because the authors are completely dismissive of the hazards.

Carbon Monoxide

The EIS already admits that the Puget Sound region is designated a maintenance area for air pollution. Carbon Monoxide level will increase, particularly around every construction and demolition project. This will adversely impact the residents adjacent to all construction projects.

NOX

Oxides of nitrogen are always released from diesel equipment, which is the vast majority of all equipment used on construction sites. NOX will adversely and negatively impact residents in up-zoned neighborhoods.

Construction equipment as an air pollution source and hazard

The draft EIS minimizes and dismisses resident's exposure to air pollution from construction equipment. There is no mitigation.

"The average excavator (used in demolition) emits as much particulate matter in one hour as a new "big rig" traveling 1,100 miles". "Higher risk of exposure to operating construction equipment occurs both in population-dense cities and in suburbs where large construction projects are accompanying population growth".

<http://www.ucsusa.org/clean-vehicles/vehicles-air-pollution-and-human-health/digging-up-trouble#.WXEeJDOZOu4>

"Data from the California Air Resources Board's pollutant emission inventory and air pollution monitoring data were used to estimate construction equipment's contribution to regional air pollution. Peer-reviewed epidemiological studies that establish links between elevated levels of air pollution and increased hospitalizations, premature deaths, and other health conditions were then used to estimate the health damage from construction equipment pollution".

The city of San Francisco clearly recognized the hazards of construction equipment emissions to residents and has made efforts to control air pollution outlined in the document below. This EIS made no meaningful effort to address this hazard, much less mitigate hazards to residents. There are no requirements for contractors to upgrade or retire highly polluting older construction equipment, which can be in operation for decades.

https://www.sfdph.org/dph/files/EHSdocs/AirQuality/San_Francisco_Clean_Construction_Ordinance_2015.pdf

The EIS defaults to their position that the Puget Sound area is generally in compliance with Federal Air pollution Standards but ignores the citizen exposures to localized and ground level pollution. This is inappropriate and highly misleading, particularly when health impacts to residents are very real irrespective of generalized ambient air quality readings.

The draft EIS admits that the Puget Sound region will grow by 1 million people by 2040 (27% increase) and that estimates indicate that CO, PM 2.5, ozone, will increase which will lead to violations of federal air quality regulations. No mitigation of any type is proposed.

The draft EIS admits that residential areas are considered more sensitive to air quality conditions because people spend more time at home and thus have proportionally greater exposure to ambient air quality conditions. This no longer includes just retirees, or the elderly, but the large populations of workers telecommuting from their homes.

It is also preposterous to state that workers are not considered “sensitive receptors” because employers must follow OSHA rules. This presumption, again, assumes every employer is in compliance that we know is not true. Were this presumption true, 70 workers would not have died on the job in 2015.
<http://lni.wa.gov/ClaimsIns/Files/DataStatistics/blsi/FATAL2015CFOIWA.pdf>

A review of the draft EIS exhibit 3.9-2 shows that SO2 is not measured anywhere in Seattle except Beacon Hill. The authors cannot draw any conclusions from one monitoring station that ignores ground level and local levels of pollution generated from construction and growth. There are but two monitoring stations that measure NOX. NOX, during 2014, was within 91 percent of the allowable level, during 2015 exceeded standards, and during 2016 was within 70 % of federal limits. PSCAA monitoring does not include Ozone measurements at any site other than Beacon Hill. Carbon Monoxide is only measured at Beacon Hill and the I. D. PM 10 is only measured at Beacon Hill. The broad conclusions drawn in the draft EIS are made from extremely limited monitoring from few sites. This is inappropriate.

Water during demolition

The reliance on PSCAA regulations that require water to be used during demolition activities, likewise, is a nice idea that is infrequently enforced due to the abundance of demolition projects and limited PSCAA staffing (about 12 inspectors for 4 counties, who don't work week ends). Furthermore the standard for PSCAA is “no visible emissions”. PM 10, 2.5 and ultra-fines particulate are not visible to the observer and therefore cannot be seen by PSCAA inspectors on demolition sites. If the inspector can't see it they can't cite it.

Current major air pollution source in West Seattle-Nucor is ignored

South Park and the West Seattle Junction Urban villages appear to be the only two villages that have foundries next to the urban villages. South Park has an air quality monitoring station nearby. West Seattle does not.

There is no air pollution monitoring station of any type in West Seattle, however, we have a metal foundry adjacent to our urban village that is allowed to discharge:

up to 1000 PPMV of Sulfur Dioxide/ 1-hour runs;
up to 100PPM of Hydrochloric Acid/ 1 hour runs;
up to 7.14 lbs/hour of PM 10 from the Baumco Baghouse;
up to 7.93 lb/hr from the Wheelabrator baghouse;
up to 0.48 lbs/30 consecutive days of NOX for each ton of steel produced (limit is 1.1 million tons of steel a year);
up to 1.98 lbs/30 consecutive days of CO for each ton of steel produced.

<http://www.pscleanair.org/library/Air%20Operating%20Permits%20Library/10281-faop.pdf>

We already have a major air pollution source next to our urban village. Additional and local pollution must be identified, evaluated, and mitigated.

Former Nucor CEO who fought air pollution regulations is now one of Trumps 14 economic policy advisors.

<https://insideclimatenews.org/news/15082016/donald-trump-economic-adviser-assault-trade-environment-regulation-epa-dan-dimicco-nucor>

Greenhouse Gas Emissions

The draft EIS admits the deforestation and land cover conversion contributes to global warming. Wholesale demolition of single family neighborhoods will severely reduce the tree canopy and ground cover, which are primarily localized on single family lots.

The City of Seattle adoption of the a green building goal for municipal facilities is a goal only. The LEED program is an incentive program that is not required.

The lofty goad of reducing miles traveled by 20% and 75 % reduction in GHG emission per mile for Seattle vehicles completely ignores the massive amount of additional time spend operating vehicles due to traffic congestion. It is more appropriate to look at total vehicle operation time rather that vehicle miles traveled to estimate GHGE.

<https://www.ncbi.nlm.nih.gov/pubmed/23500830#>

<https://www.surrey.ac.uk/mediacentre/press/2017/latest-research-reveals-sitting-traffic-jams-officially-bad-you>

<https://www.geekwire.com/2016/study-traffic-seattle-still-horrible-ranks-2nd-worst-u-s-evening-rush-hour-congestion/>

This study suggests that health risks from congestion are potentially significant, and that additional traffic can significantly increase risks, depending on the type of road and other factors. Further, evaluations of risk associated with congestion must consider travel time, the duration of rush-hour, congestion-specific emission estimates

<https://www.ncbi.nlm.nih.gov/pubmed/23500830#>

The draft EIS relies on the 2014 Seattle Community Greenhouse Gas Emissions Inventory and states that “GHGE declined from 3.6 to 3.4 tons between 2008 and 2014”. This city study only addresses inventories of sectors to the year 2012 and remarks that core emissions have only declined 4 % since 1990. This City openly admits that estimates for commercial equipment has high uncertainty since it is based on a national model and not inclusive of the building boom in Seattle (pg 21).

https://www.seattle.gov/Documents/Departments/OSE/2012%20GHG%20inventory%20report_final.pdf

Off road construction equipment is a significant source of GHGE. This is largely dismissed in the EIS.

<http://www.tandfonline.com/doi/full/10.1080/10962247.2014.978485>

The EIS incorrectly stated the Seattle GHGE study is inclusive though 2014. The newest study is inclusive to the year 2012. The study completely ignores emissions from construction equipment or the recent building boom at all. Transportation, building and wastes are the only categories addressed. The draft EIS relies on passenger vehicle miles traveled, and fails to address the additional hours of vehicle and truck operation due to congestion.

The draft EIS conclusion that the impacts of construction dust is less than significant if wrong, particularly at the local level. The reliance on a 2008 PSCAA estimate of the contribution of pollutants by construction equipment is almost 10 years old. The released in 2008 was also during a dramatic economic downturn that is not reflective of current conditions. Reliance on observations that Federal air pollution violations won't occur is no comfort to residents who have to breath the air next to construction sites. The conclusion that NOX emissions are not expected to lead to adverse impacts, other than temporary localized impacts, is completely dismissive (of those localized impacts) without actually addressing or thoroughly analyzing the hazards. The construction boom in West Seattle is continuous and unrelenting. Temporary, is not an appropriate of suitable adjective to describe our reality. Many residents could easily live within a “few hundred feet” of multiple projects which can compound exposures.

The fact that federal regulations are mandating cleaner off-road equipment ignores that fact that contractors do not purchase this type of equipment frequently due to the expense and longevity of such equipment. Nor do contractors usually buy new equipment. It is ridiculous to rely on the speculative future purchase of new equipment to reduce air pollution when this equipment is a very large capital expenditure and rarely purchased. A new excavator can cost up to \$500,000.

The EIS erroneously observes that construction is transient. For individual projects, yes, but construction work is near continuous in West Seattle and other parts of the city. Chinn Construction has been working on large scale projects in West Seattle, using the same pollution generating equipment, for several years.

The conclusion that emissions associated with all three alternative is only minor is incorrect and dismissive of all local air pollution.

The EIS states it would be prudent to consider risk reducing mitigation strategies such as setbacks for residential and other land use around major traffic corridors. The West Seattle bridge is ignored however. The Port of

Seattle, Terminal 5 operations are scheduled to be reopening in the near future and this operation will be a significant and additional pollution source for West Seattle. The draft EIS fails to evaluate the impact, and air pollution the Terminal will contribute to the West Seattle Urban Villages. Terminal 5 alone will contribute significantly to West Seattle pollution due to high traffic volume of diesel vehicles. Describing this a moderate impact is dismissive. There is no risk reduction mitigation described.

The EIS states that global warming is not expected to be impacted by any given single project. However, the massive rezoning as a whole, in addition to existing excessive development, is a contributor to GHGE. While individual projects may be “temporary”, wholesale rezoning of entire neighborhood will unleash development on an unprecedented scale that is unlikely to be parceled out over 20 years. This is obvious from the near continuous growth and non-stop construction experienced in West Seattle and Ballard. Construction related emissions are hardly negligible. The estimates for emissions of 13.8 million metric tons is given for Alternative 1. Estimates for alternative 2 and 3 are 15.8 and 15.6 million metric tons. It is inconceivable that adding an additional 20,000 homes, resulting in demolition of 6 % of Seattle single family homes will only result in 2 million more metric tons of GHGE emissions. The Data listed in Appendix L????

Additionally there is no data presented to justify the EIS claim that they estimated total construction related emissions inclusive of “embodied” or “life-cycle” emissions related to construction. These emissions are those generated by extraction, processing, and transportation of construction materials.

Seattle GHG inventory

<https://www.sei-international.org/mediamanager/documents/Publications/Climate/Seattle-2012-GHG-inventory-report.pdf> see page 30, which states “Seattle collaborated with King County to undertake an extensive study that estimated that consumption based emissions were at 25 tCO₂e in 2008”.

https://www.seattle.gov/Documents/Departments/OSE/CN_Seattle_Report_May_2011.pdf

Waste Diversion

The EIS proposed mitigation to reduce construction related landfill waste was largely already implemented at the time of the release of the EIS. This mitigation therefore is not new, nor could it be considered a mitigation if it is already a practice. Virtually all recommendations except diversion of carpet, and asphalt shingles and plastic film have already been implemented.

Seattle --Phased Landfill Disposal Bans 2012 - 2018

Seattle Municipal Code 21.36.089 prohibits the disposal of certain C&D materials in construction site disposal containers and the disposal areas of transfer stations. SPU Director's Rule 405.3 Revision 4(pdf) adopts a new implementation schedule for certain targeted items:

- Asphalt Paving, Bricks, and Concrete (2012)
- Metal (2014)
- Cardboard (2014)
- New Construction Gypsum Scrap (2014)
- Unpainted and Untreated Wood (January 2015)
- Carpet (July 2018)
- Plastic Film Wrap (July 2018)
- Tear-Off Asphalt Shingles (July 2018)

Are there exceptions to the landfill ban?

The disposal bans do not include materials that are:

- painted, most interior and exterior walls are painted.
- have hazardous constituents,
- difficult to separate from others (such as wood or Styrofoam adhering to concrete), or
- present in very small quantities.

According to the City of Seattle, we already divert 72 % of building waste ((435,000 tons in 2015) from the landfill. However 39,000 tons is burned as industrial boiler fuel, which creates pollution and GHGE. Burning construction waste and requisite pollution is not discussed in this EIS. The EIS erroneously states that city waste diversion recycle target of 70 percent to be met by 2030. The goal year is 2020 and we are already at 63%.

The EIS mitigation concept of creating grading standards for salvaged lumber is irrelevant since this wood has not been sent to landfills for 2 years. All painted wood is sent to landfills.

The draft EIS states as another mitigation concept “Expand source reduction efforts to city construction projects, and incorporated end of life management considerations into city procurement guideline”. This statement makes no sense and is redolent of consultant blather of the worst sort. It is a nonsense sentence with no tangible way to discern what is meant or if it is relevant (pg 3-331).

Therefore the conclusion that construction related emission would NOT be negligible is correct. The second conclusion that the “combination of regulatory improvements and actions under way” would

result in only minor adverse air quality completely is NOT correct. The EIS is dismissive of the facts and ignores that such emission are indeed significant.

Transportation and GHGE.

This section is woefully inadequate and essentially states that emissions will go up but the trend towards increases in federal fuel efficiency standards negates the impact, so it doesn't really matter.

Vehicle mile traveled is an incomplete method of assessing not only pollution, but also GHGE. Drivers are increasing spending substantially more time operating their vehicles due to congestion directly resultant from unmitigated growth. The longer an engine runs and idles in traffic at low speed the more pollutants generated. This is neither identified, examined nor mitigated.

The increase in fuel economy to 54.5 mpg in 2025 is a pipe dream. It also is not reality and is much closer to 36 mpg. <https://www.usnews.com/news/articles/2012/08/29/545-miles-per-gallon-for-all-cars-by-2025-not-exactly>

Also record high sales of SUV, a particularly appealing vehicle to the Seattle residents, should be considered for inclusion in data to reflect the penchant for higher polluting vehicles.

<http://www.latimes.com/business/autos/la-fi-hy-auto-sales-20170104-story.html>

The EIS admits that the GHG for heavy trucks only increased by 4% by 2035.

There will clearly be at least 21,000 more metric tons of GHG with adoption of Alt 2 or 3. Residents would clearly prefer reducing GHGE by 21,000 metric tons. Estimates of GHGE are likely much higher than the EIS states bases on the deficiencies illuminated above.

The presumption that growth in other regions (serviced by the same bus system) would automatically result in greater GHGE is speculative. Workers relocating to the general Puget Sound area may in fact use the exact same bus system that services Seattle resulting in no net change in personal vehicle miles traveled. In fact, traffic is so horrendous at this point, that newcomers outside the city limits are very likely to elect public transportation in lieu of the nightmare of the commute.

The EIS erroneously assumes that residents will shorten trips due to traffic congestion. The distance driven in Seattle is based on need to drive to a specific location and not as a pursuit of pleasure. There is no pleasure driving in Seattle. Further there is no net reduction in VMT when using Uber, a taxi, or other hire cars. A car still operates and pollution is generated. Emission reductions based of fuel economy improvements can be lauded, but reductions were decades overdue and emission are still ridiculously high.

The EIS does not appear to adequately address the increase in natural gas emissions in any significant or meaningful way.

Solid waste generate GHGE fail to address the increased transportation costs associated with diverting the near million tons of construction waste that must be shipped to multiple recycling operations. Very little of a building sent to a single landfill or site. Painted wood will still be sent to landfills under the current SPU policy, primarily because of lead and other paint. The EIS reference to composting of construction waste as a diversion method in incredulous. The EIS fails to identify what elements of building can be "composted".

The EIS erroneously stated that more growth will result in air quality improvements "compared to baseline", but fails to reference what the baseline is. The data presented clearly shows that air quality will be negatively impacted by growth and residents are forced to rely on improved projected vehicle fuel efficiencies to meet any reductions in GHGE. This is tantamount, to "Don't worry, be happy, it will be fine because cars will get better mileage".

The conclusion that there are no adverse impacts from Alt 2 or 3 if specious because the EIS data clearly shows increases in pollution and GHGE with the additional development.

The only mitigation measure mentioned are setbacks from rail, freeways and port facilities and where separation is not feasible, then filtration systems. Really!!!! like what? respirators for residents? This is hardly a mitigation unless you wear a device on face whenever you are home?

The conclusion that there are no significant unavoidable impacts to air quality complete ignores that the Seattle, had it the forethought and will could reduce the negative impacts of development and reduce pollution.

Reference. PSCAA 2005 Air Emission inventory.

Non Road Diesel engines, when compared to on road diesel engines produce almost 23% of all CO2 equivalent, 46% of VOCs, about 30% SO2, 53% of PM 2.5 28% of NOX and about 42% of CO produced.

http://s3.amazonaws.com/zanran_storage/www.pscleanair.org/ContentPages/2838178.pdf

Construction equipment is a massive source of air pollution and GHGE. It is preposterous for the EIS to dismiss this impact. Whereas on road diesel equipment moves through traffic. Construction equipment stays on site for weeks or months and in some cases, years polluting the neighborhood.

Pg 118 of the same PSCAA document discloses that 40 tons of PM 2.5 were estimated to be released by residential construction in King County in 2005, from construction activities. For non residential construction activities, 534 tons of PM 2.5 were release in King County during the same year. In fact 38/79 million gallons of diesel was consumed in King County alone, by construction equipment (A-15) more than 12 years ago.

This is old data but still illustrates the horrific amount of pollution created by construction.

The EIS must, but does not, address localized pollution and impacts.

**COMMENTS ON DEIS ANALYSIS
APPENDICES**

**WEST SEATTLE JUNCTION
URBAN VILLAGE**

COMMENTS ON DEIS APPENDICES

Community Outreach

We have separately documented that the City's community outreach was deeply flawed.¹ It was ineffective at reaching the most affected members of the community and soliciting their input. It was disingenuous and/or poorly managed, as it failed to accurately summarize the community's feedback. With regards to the DEIS appendices, the City must refrain from vague summaries like "some said" and "many said" and use more precise figures that establish the relative quantities of feedback. The City must present the feedback from those residents that are directly affected by the MHA proposal as residents of the Junction, distinctly separated from those that are only indirectly affected as residents of Seattle. The City must also publish the results of input from HALA.consider.it.

Statement with Regard to the Draft Urban Design and Character Study

Residential Small Lot (RSL)

We believe that RSL can be used more extensively in urban villages as compared to the proposals of Alternatives 2 and 3. We prefer that RSL zoning can be specific to certain suffixes. We believe that RSL for cottages, townhouses, and tandem housing is more suitable for a family residential neighborhood than stacked housing, which is an apartment design.

Low Rise

We oppose the change to the density limits in LR zones. The removal of any limit encourages the development of "micro-units" where household densities in LR zones will be 4-5x current levels. A boom in such development would greatly exceed the growth estimates and overwhelm neighborhood facilities. The City should develop more restrictive policies for housing density in LR zones, either at the parcel level or in the aggregate. The requirement for a 2BR or 3BR unit per multiple of micro-units is inadequate and must be higher, for example. We propose one 2 BR unit per two units < 400 sf instead of per seven.

LR2/LR3 should have defined standards for differences by lot size. LR limits for setbacks, height, FAR, and density limits should be set differently for lots <= 6,000 sq ft, 6,001-10,000 sq ft, 10,001-15,000 sq ft, and > 15,000 and above. Under no circumstances should a lot of <= 6,000 sq ft be permitted to be higher than 30' or the average of the nextdoor structures. Up to 10,000 sq ft the height limit may be 40'. LR3 must have side setbacks.

Note that the picture of a wonderful park that is supposed to be near an LR zone is a completely foreign concept in the Junction, where no such park exists amid existing or proposed LR areas (p.39).

Maps of Alternatives

As stated above, the existing Single Family Areas within the Junction are protected by the neighborhood plan and may not be upzoned to LR as depicted in the Alternatives.

¹ As prepared by Cindy Tobin-Presser and presented to Lisa Herbold and others on or about 6/23/17.

As stated above, California Ave SW and its vicinity is a historical and cultural center for the Junction. The City should not increase zoning to NC-95 in this area, nor to NC-55/75 to the block west. A reasonable area for NC-95 is the “triangle” area bounded by Fauntleroy, Alaska, and 35th Ave SW. The triangle area would be easily accessible to proposed Light Rail at Avalon.

Be cautious about zoning changes at or between 40th – 41st adjacent to Alaska that might increase property value or encourage development. This is the ideal location for a Light Rail station and a large, central park. Development or appreciation will make this location less feasible.

COMMENT ON DEIS
APPENDIX B
SUMMARY OF COMMUNITY INPUT
WEST SEATTLE JUNCTION
URBAN VILLAGE

Introduction to Community Input Analysis

While the DEIS has not yet included a summary of feedback from the West Seattle Junction Urban Village, it appears from the general information provided in Appendix B to the DEIS that the City intends to continue its pattern of describing the Junction Urban Village's feedback as neutral or evenly divided.

Attached is a detailed analysis of every outreach effort cited by the City as having been directed to the Junction Urban Village, and the community response thereto. The analysis includes all data in the City's possession, as obtained by public records requests, as well as written transcripts. The documents and data unequivocally establish that, while recognizing the need to accommodate additional density and supporting the addition of affordable housing, the Junction Urban Village residents have overwhelmingly and with few exceptions expressed that they do **not** support the proposed MHA rezones as the appropriate way to achieve density and/or affordability in their community. Residents have repeatedly and continually requested a neighborhood specific planning process to achieve these important goals.

The exhibits cited in the attached analysis may be viewed at

https://www.dropbox.com/sh/dmssces393tb4jz/AAA98ekcBZD1CHLU1SQQ3_gHa?dl=0.

ANALYSIS OF JUNCTION URBAN VILLAGE FEEDBACK TO PROPOSED MHA UPZONES

SUMMARY

In late 2016, the City of Seattle released its first draft maps proposing substantial rezones of 23 neighborhoods throughout the city, including the West Seattle Junction Hub Urban Village (the “Junction Urban Village”). The City repeatedly assured residents through its Housing Affordability and Livability website¹ (the “HALA Website”) and its public statements that it would listen closely to community feedback and that this feedback would be used to shape the City’s final recommendations with respect to rezoning.

Notwithstanding these assurances, a detailed analysis of the actual data from the City’s purported outreach efforts shows the following:

- The City repeatedly misled residents inside and outside the Junction Urban Village regarding the proposed MHA rezones;
- The City had no intention of using the Junction Urban Village’s input to meaningfully shape the rezones it intends to seek to have enacted into law; and
- Despite the Junction Urban Village residents’ near universally critical response, the City continues to willfully ignore, minimize and/or mischaracterize the neighborhood’s feedback.
- The proposed rezones are in direct conflict with the City’s adoption of the Junction Urban Village Neighborhood Plan and the Seattle Comprehensive Plan.

Without question, the proposed rezones in the maps originally proposed by the City and the maps in its recently released Draft Environmental Impact Statement (the “DEIS”) would substantially alter the makeup and feel of the Junction Urban Village and surrounding area. The City promotes the density of these rezones with no assurance of any investment in infrastructure, services, amenities and/or green space – and with no protection against the displacement of existing low-income and elderly residents.

The City is in possession of data that clearly establishes the Junction Urban Village is vehemently opposed to its unilateral proposal – and that Junction Urban Village residents have repeatedly articulated specific, detailed, substantive concerns and objections. To the extent the City chooses to proceed with the proposed rezones, it does so with actual knowledge of the Junction Urban Village’s objections. It further does so without having collaborated in good faith with the Junction Urban Village to resolve the neighborhood’s stated concerns.

¹ <http://www.seattle.gov/hala/get-involved>

ANALYSIS TIMELINE & METHODS

The analysis herein covers the City's MHA and HALA outreach efforts from December of 2015 to the present. It relies on documents provided in response to multiple public records requests as well as in-person, media, and online statements by City officials. It contains 55 supporting exhibits (Exhibits A-EEE) and additional links providing supporting data for all assertions, analyses and conclusions.

KEY FINDINGS

- Despite its representations, the City did not take into account input from the Junction Urban Village community in drafting the preliminary maps seeking to rezone 20+ single-family blocks.
- At self-characterized pre-map outreach events, City staff falsely led residents to believe that single-family zoning would either remain in place or would change only with community support after extensive engagement.
- In a telephone town hall for District 1 neighborhoods, including the Junction Urban Village, Mayor Ed Murray misled the 350 listeners by stating single-family neighborhoods would not be rezoned. Mayor Murray was well aware that the Junction Urban Village contains single-family neighborhoods that he would push to rezone.
- The City quietly released its preliminary zoning maps on its website and with no direct notice to owners of the affected properties.
- The City's HALA team repeatedly advised the Junction Urban Village that these preliminary maps would be revised in response to neighborhood input. Nonetheless, HALA representative Jesseca Brand of the Department of Neighborhoods privately acknowledged that regardless of neighborhood feedback, the City's executive branch had predetermined that it would recommend that the City Council upzone every single-family zoned block within the Junction Urban Village, without exception.
- The City's attempts to portray the Junction Urban Village response as neutral or evenly split are knowingly misleading. Under every way of measuring the data in the City's possession, Junction Urban Village residents have fully participated in all events but their support for the proposals has been virtually nonexistent. Concerns and objections to the proposal have been voluminous, consistent, and unequivocal. And ignored.
- At the City's chaotic open house in the Junction Urban Village, many attendees expressed concern that the City was not listening to the neighborhood. Ironically, City staff lost almost all but twelve of the written comment sheets that were handed in at the event.

KEY FINDINGS CONT'D

- Despite specific language in the Junction Urban Village neighborhood plan that makes it a policy to protect the character and integrity of single-family areas inside its boundaries – language instantiated in the Seattle 2035 Comprehensive Plan and in Municipal Code – the City proposes in its DEIS to rezone these areas to allow up to 40-50 foot high apartment buildings.
- The City has sought to bypass collaborative neighborhood planning – instead it has cultivated feedback from individuals and special interest groups from outside of the impacted neighborhoods under general and malleable principles to justify its proposed rezones.

The following is a detailed breakdown of the details behind these findings.

A. The Eight Pre-Map Meetups

The HALA Website cites a multitude of events (each, a “Meetup”) sponsored or attended by City staff throughout the City’s seven legislative districts relating to HALA. According to the HALA Website, the Meetups are the events at which City staff talked with the various impacted communities about HALA and listened to the communities’ feedback *for the purpose of making changes after taking into account such feedback.*

At the time of its release of the draft MHA rezone map of the Junction Urban Village on October 20, 2016, the City identified eight Meetups (the “Pre-Map Meetups”) that had taken place throughout Seattle Council District 1 (“District 1”). District 1 includes the Junction Urban Village (see table below and Exhibit A).

Even though the City purportedly gathered community feedback at them, none of the eight Meetups in District 1 provided information specific to West Seattle. At most of the Meetups, it does not appear the City even acknowledged it was seeking to rezone large swaths of single-family areas, provided substantive information or engaged in meaningful discussion with respect to the concept from which feedback could be generated. At those Meetups where the City even *referenced* the concept of rezoning single-family neighborhoods, the information provided to attendees was limited and misleading, if not false.

It appears that the City’s intent was to minimize pre-map resistance while, at the same time, create a record that would support an alleged outreach effort. Residents were led to believe that single-family zoning would either remain in place or would change only with community support and after extensive engagement.

	Meet-Up	Date	Estimated # Attendees (Per City)	City’s Summary of Attendee Comments (if any)
1	Comprehensive Plan Meeting West Seattle	11/12/15	50	
2	Southwest Community Council	12/2/15	20	Concern about apodments, concern about parking, destroying communities
3	Morgan Junction Comm. Council	1/20/16	100	Interest/support in developer fees, concern developer requirements are not enough, heights not high enough, Airbnbs are taking out rental properties, ADUs
4	Telephone Town Hall – South Seattle/West Seattle	2/4/16	350	Support, liked the mission/vision of HALA, “thank god you are doing something” – heard from community member
5	Housing Levy & HALA in West Seattle	2/23/16	30	Interest in seeing affordable housing throughout the city, near services and transit, need for affordable housing for growing senior population, need to preserve units that re currently affordable in market-rate buildings
6	West Seattle VIEWS	3/12/16	80	Panel was mostly about transportation and parking concerns

	Meet-Up	Date	Estimated # Attendees (Per City)	City's Summary of Attendee Comments (if any)
7	West Seattle Farmers Market	8/21/16	50	
8	CityScoop West Seattle	9/25/16	50	

What follows is a meeting-by-meeting review. Emphasis has been added in certain sections in **boldface type**.

1. November 12, 2015 – Comprehensive Plan Meeting. Eight days prior to the close of the comment period for the draft City of Seattle Comprehensive Plan (“Seattle 2035”) the City hosted a workshop about that plan at the West Seattle Senior Center.² The workshop materials were blatantly misleading with respect to the City’s plans to rezone single-family neighborhoods.

(a) The Slide Deck. The workshop slide deck identified the City’s key proposals it later used to justify the proposed MHA upzones. These proposals were labeled as Growth Strategy, Land Use and Housing and Neighborhood Planning.³ The slides imply that the single-family areas within the urban village would remain intact.

i The Growth Strategy includes the following quote: “Growth should be guided to Multi Family Zoned areas. **No need to upzone or rezone SF zoned neighborhoods at this point.**”⁴

ii. The relevant Land Use slide contains the following quote: “**Residents need to be a part of new development plans. Open communication and collaboration on what the community needs is key.**”⁵

iii The Housing slide indicates that the City proposes to “[i]ncrease the Diversity of Housing Types in Lower Density Residential Zones in Urban Villages.” The accompanying photograph presents three illustrative scenarios, all of which depict **utilizing existing single family zoning** to accommodate density through usage of single-family homes.⁶

The proposals set forth on the Housing slide include eliminating “duplicative” single-family rezoning criteria and “encouraging” accessory dwelling units and

² Exs. A, B and C.

³ Ex. D.

⁴ Ex. D at 9.

⁵ Ex. D at 13.

⁶ Ex. D at 15.

backyard cottages- there is no mention of eliminating single-family zoning entirely.⁷ The slide also proposes to “encourage” a transition in scale at the edge of urban villages. Yet the “low-rise transitional housing” depicted for these areas is misleadingly described as only “duplexes, triplexes, cottage housing”- no mention is made of 40-50 foot apartment buildings.

iv. Finally, the Neighborhood Planning-related slides specifically assure readers that “[N]o changes are proposed to specific neighborhood plans” and “no changes to policies for individual neighborhoods.” Yet the Junction Urban Village’s neighborhood plan makes it a policy to maintain the integrity of the single-family areas within the urban village.⁸

(b) Attendee Comments. The notes maintained by the City with respect to attendee’s flip charts comments do not reflect any discussion of single-family rezones, which is unsurprising as the issue does not appear to even have been raised.⁹

(c) Survey Responses. Roughly three-quarters of the identified West Seattle survey respondents potentially living in the Junction Urban Village were undecided or disagreed with the proposal to “[i]ncrease diversity of housing in lower density residential zones.” Notably, the words “rezone” and “single-family” were not used in the survey.¹⁰ Two-thirds identified “[c]ottage housing or single family homes on small lots”¹¹ as the type of housing they would like to see more of in urban villages. Less than one-sixth of the total survey respondents at the workshop selected 4-6 story apartment buildings as the housing they would like to see more of in urban villages. More importantly, based on the materials, there is nothing to show that respondents understood the premise that single-family zoned neighborhoods would be the location for this hypothetical new construction.¹²

The neighborhood’s clear preference was for low-impact changes, if any.

2. December 2, - Southwest Community Council Meeting. Robert Feldstein, Director of the Office of Policy and Innovation created by Mayor Murray, provided a purported overview presentation of HALA to the Southwest Community Council.¹³ Attendees consisted of

⁷ Ex. D at 15.

⁸ Ex. D at 6 and 18.

⁹ Ex. E.

¹⁰ Exs. F and G.

¹¹ Exs. F and G.

¹² Exs. F and G.

¹³ <http://westseattleblog.com/2015/12/bigger-apartments-cheaper-housing-southwest-district-council-hears-what-hala-might-and-might-not-do/> (“December 8, 2015 WSB Article”).

approximately 20 neighborhood representatives from the southwest neighborhoods in District 1.¹⁴

Prior to the meeting, Director Feldstein was directly advised that the City's own data identified "preservation of single-family homes" and "fairness in growth and density" as critical issues to the community.¹⁵ Mr. Feldstein's prepared slides did not address these issues and did not discuss rezoning.¹⁶

Attendee Deb Barker, the president of the Morgan Community Association and a former land use planner specifically asked if single-family zoning would be impacted. Mr. Feldstein acknowledged that single-family areas within urban villages would probably change to low-rise.¹⁷ Ms. Barker specifically advised Mr. Feldstein that not everyone understands what that means. For example, as previously indicated, attendees at the Comprehensive Plan Meeting were led to believe that low-rise consists of duplexes, triplexes, cottage housing, not 50+ foot apartment buildings.¹⁸

Despite its awareness of the neighborhood's priority of preserving single-family areas, the City was already well along the path to seeking dramatic rezones of single-family areas within the urban villages.

3. January 20, 2016 - Morgan Junction Community Council. This Meetup was initiated, planned and hosted by the Morgan Community Association ("MoCA"), a neighborhood organization for Morgan Junction.¹⁹

Jessica Brand of the Department of Neighborhoods spoke to the attendees about HALA. In Ms. Brand's 20-minute presentation, her discussion of zoning changes was limited yet accompanied by repeated assurances that zoning changes would not be made without "robust" community outreach and "conversation" with the affected communities regarding the acceptability of the proposed changes:

It is a commitment of ours that we will have the conversations in the communities. I will get into sort of the **robust outreach plan** that we're talking about, but if we pass the mandatory housing affordability residential structure, what it's called here or framework or the basis for this program today, let's just say, which we're not, but

¹⁴ *Id.* Exs. A and H

¹⁵ Ex. I

¹⁶ Ex. J.

¹⁷ Ex. H.

¹⁸ Ex. D at 15.

¹⁹ <http://www.morganjunction.org/about-our-neighborhood/moca-minutes/313-moca-hala-meeting-minutes-january-20-2016>

if we were, it would not go in to effect or be implemented until we had zoning conversations, until we had the trade-off conversation which again is going to be in 2017. Well, the decision will be made somewhere in 2017 if we move forward with it or we don't. I think what we need to understand is that there were really some thoughtful thinking and some principles behind why they thought this was a good idea. But as we have this conversation over the next year, it's up to us, just like everything else that we've done in the past several years, decades, to make Seattle great. It really is up to us to have that conversation. **Is that a trade-off we're willing to make? Is it not?**²⁰

Ms. Brand's prepared presentation use similar verbal gymnastics throughout to avoid disclosing to attendees that the City already planned to recommend dramatic rezones in single-family areas within West Seattle urban villages.

In the 35-minute question and answer session, and in response to a direct question from an attendee as to where zoning changes would happen, Ms. Brand acknowledged a potential for change to single-family zoning but again stressed the conversational nature of the decision-making process.²¹

In short, individuals seeking clarity about what was being proposed by the City and how it would happen were given the false impression that if proposed zoning changes were unacceptable to the affected community, they would not occur.

4. February 4, 2016 Telephone Town Hall. On February 4, 2016, the Mayor held a "Telephone Town Hall" for the southwest neighborhoods attended via phone by 350 individuals according to the City.²² The City was unable to provide any records indicating how participants were given notice of the event or the identities of those who participated.²³ In terms of substance, the only mention of rezoning came when a participant asked Mayor Murray whether any single-family areas outside urban centers (Downtown and University) would be re-zoned. Mayor Murray assured the 350 listening attendees that single-family neighborhoods would **not** be re-zoned, stating

There is no plans [sic] in our proposal to change or upzone our single-family neighborhoods. So, it affects urban villages, it does not affect our single-family neighborhoods. That is-- this may sound like I'm equivocating, but I'm not. There is no plans [sic] in our single family neighborhoods to upzone.

²⁰ Ex. L (emphasis added); MoCA Video at 10:32-13:39.

²¹ Ex. L. MoCA Video at 38:49-40:00.

²² Ex. A.

²³ Ex. M.

There are some arterials, as you know, that are already mixed use next to single-family homes where there are maybe another floor or two possible. Again, that's on an arterial. That's already used, that's already mixed use in many of our neighborhoods. **Again, not single-family neighborhoods**, our urban villages, particularly those urban villages that have a transit capacity.²⁴

This statement is both inaccurate and misleading as **there are numerous single-family neighborhoods within urban villages**, including the Fairmount Springs/Fairmount Park neighborhood that lies within the Junction Urban Village. Mayor Murray was well aware that he was simultaneously laying the groundwork to upzone those neighborhoods at the same time he was making assurances to the contrary.

Notably, the statement ascribed by the City to an attendee in its summary – “Thank God you are doing something” – **was never made**.²⁵

The City characterizes the response from attendees positively as “[s]upport, liked the mission/vision of HALA.” That is incomplete, if not false. In reality, the transcript reflects that attendees expressed numerous and significant substantive concerns including, but not limited to, concerns regarding displacement of existing family-sized residences and affordable units, increased property taxes, abuse by developers and lack of infrastructure to support increased density.²⁶ Evidently, the City did not deem it important to note these concerns.

5. February 23, 3016 Housing Levy & HALA in West Seattle. The subject of this Meetup was to discuss the housing levy sought from Seattle voters.²⁷ There was no information or discussion with respect to rezoning single-family areas. In fact, the Director of the Office of Housing declined to address questions relating to HALA’s developer-related program.²⁸

6. March 12, 2016 West Seattle VIEWS. This non-City sponsored event, entitled "Gathering of Neighbors," was put on by a group called Visualizing Increased Engagement West Seattle (VieWS). There were a number of panels, one of which had a representative from HALA, along with Councilmember Lorena Gonzales; Ben Crowther of the Urbanist; and Susan Melrose representing the Junction Association businesses.²⁹

²⁴ Ex. N (transcript); See also http://video.seattle.gov:8080/podcasts/HALA/16_02_04-HALA-TelephoneTownHall.mp3 (audio recording of Telephone Town Hall) at 10:19-11:16.

²⁵ See Exs. A and N.

²⁶ See Ex. N.

²⁷ Ex. O (transcript).

²⁸ Ex. O; See also <https://www.youtube.com/watch?v=8E6s-SOVh6c&feature=youtu.be> at 25:00.

²⁹ Ex. P (transcript).

The HALA representative was Michelle Chen, of the City's Office of Planning and Community Development (OCPD). Ms. Chen's comments were limited and general in the extreme.³⁰ She mentioned **nothing** about rezoning of single-family areas in West Seattle or anywhere else and thus, the community provided no input regarding its view on rezoning. The City correctly acknowledges that the comments at the event largely related to parking and transportation concerns.³¹

7. August 21, 2016 West Seattle Farmers Market. As indicated by its name, the West Seattle Farmer's Market is comprised primarily of booths of produce and other edible wares from local farmers and producers. Residents and visitors go to the Farmer's Market to shop. The City retained no notes or records with respect to City staff's conversations, if any, with Junction Urban Village residents at the Farmers Market. The City has no records supporting its estimated 50-attendee figure.³²

The materials the City represents it had on hand at the Farmer's Market for attendees do not disclose it was planning significant zoning changes to single-family neighborhoods in the Junction Urban Village.³³ Discussion of MHA appears on page five of a seven-page brochure containing information about a multitude of unrelated programs. The topic of MHA is next to a picture of a downtown skyscraper, not a single-family structure, implying that MHA relates to commercial areas. Moreover, the final paragraph repeatedly assures that no zoning changes would go into effect until after an extensive community engagement process.³⁴

The only materials that suggest that rezones would take place in any single-family neighborhoods is a *HALA – Myth vs. Fact* sheet which again assures residents that changes to single-family zoned areas would be extremely limited and fails to identify the areas in which they would occur.³⁵

8. September 25, 2016 - CityScoop West Seattle. The Seattle Department of Transportation held an event called Seattle Summer Parkways on Alki in West Seattle.³⁶ The event was a large festival with food, live music and other entertainment and a marathon, among other things – in other words, a light-hearted event. The City described it as follows:

Come for FREE ICE CREAM and share your ideas with the City.

³⁰ See Ex. P.

³¹ Ex. A.

³² Ex. R.

³³ Exs. Q1-Q6.

³⁴ Ex. Q1 at Page 5.

³⁵ Ex. Q6.

³⁶ Ex. S.

We need your input on important city activities that will affect you. Come relax in our tent, tell us what you think, and enjoy a free treat courtesy of Full Tilt Ice Cream.³⁷

There was nothing to indicate that the City would be discussing potential rezones to single-family areas in the Junction Urban Village or elsewhere.

Of the written materials the City represents it had on hand at its tent, two refer to MHA.³⁸ The first is a seven-page brochure similar to that at the Farmer's Market with MHA again described next to a picture of a downtown skyscraper.³⁹ The second is a one-page single-spaced handout regarding MHA which says **nothing** about re-zoning single-family areas in or outside of the Junction Urban Village.⁴⁰

The City has no records as to how it arrived at its estimate of 50 attendees. The City has no notes as to conversations with any festival attendees other than the following:

- (a) Two table sheets with the preprinted question "What else should we consider as the City begins implementing Mandatory Housing Affordability (MHA)?" It appears that only three individuals wrote comments, none of which support rezoning single-family neighborhoods.⁴¹
- (b) Twenty-four blue sticker dots placed on a sliding scale from "agree" to "disagree" in response to the question: "Do you think it makes sense to allow buildings to have one more story in exchange for developers to provide or pay for affordable housing?" Not surprisingly, the majority of dots fall on the "agree" side of this extremely general and leading question, one that could easily refer to an additional story added to a 10-story building, as opposed to an apartment building next to a single-family residence.⁴²

B. Junction Urban Village Post-Map Feedback Has Been Overwhelmingly Critical

Despite never having participated in any meaningful engagement with the Junction Urban Village community regarding rezoning, or obtaining any meaningful support from the community, the City drafted a map proposing to rezone over 20 single-family zoned blocks in and directly adjacent to the Junction Urban Village. The City quietly released the maps on its

³⁷ Ex. T.

³⁸ Exs. U1-U6.

³⁹ Ex. U1.

⁴⁰ Ex. U2.

⁴¹ Ex. V.

⁴² Ex. W.

website on October 20, 2016, with no direct notice to owners of the affected properties. The West Seattle Blog published the map for the Junction Urban Village and a segment of the community began to understand the magnitude and impact of the proposal.⁴³

1. **Post-Map Meetups.** The City characterizes the following events occurring after the map releases as additional Meetups.⁴⁴ The City's summaries of the events misleadingly portray community feedback as neutral or evenly mixed. The City utterly fails to represent the overwhelming breadth and depth of the critical response of the Junction Urban Village community to the proposed rezones:

Meet-Up	Date	Estimated # Attendees (Per City)	City's Summary of Attendee Comments (if any)
West Seattle small group walk	11/1/16	7	Concerns about upzone, worry about their property values and interest in not having the boundary expanded to their community
JuNO Conversation	11/15/16	60	Concern about change, some interest in seeing more density but closer to the Junction and not in their Single Family areas. Others in the Single Family areas were supporting. Parking, transit not good enough.
HALA Winter 5 – West Seattle (Shelby's & Youngstown)	12/7/16	[over capacity]	
Council hosted design Workshop/West Seattle Junction	1/26/17	[over capacity at 230+]	
West Seattle JuNO and MOCA committee discussion	3/9/17	7	

(a) **November 15, 2016 West Seattle Small Group Walk.** This Meetup occurred on November 15, 2016 rather than November 1 as indicated in the City's records. Jesseca Brand of the Department of Neighborhoods and Nick Welch of the Mayor's recently created OCPD, both members of the HALA team, joined a group of seven neighbors to walk around their block (40th Avenue SW, between Dawson and Hudson). The event was neither publicized nor open to the general public.⁴⁵

The neighbors pointed out safety issues, including the lack of access for emergency vehicles because of the existing overcrowded parking, and pointed out this condition would

⁴³ Ex. X.

⁴⁴ Ex. A.

⁴⁵ Ex. Y.

worsen with increased density. The neighbors discussed with Ms. Brand and Mr. Welch their view that the MHA upzones would displace existing elderly and lower-income residents within the upzoned areas. They further pointed out that the nearby school, Fairmont Park Elementary, is already at capacity and there is a lack of any real park or other green space in the Junction Urban Village. The neighbors explained to Ms. Brand and Mr. Welch that the City's calculated 10-minute walkshed from their street to Alaska and Fauntleroy (the point from which the City based its proposed expansion of the Junction Urban Village boundary) is unrealistic given the topography, particularly for anyone with existing physical challenges. Moreover, they pointed out that Alaska and Fauntleroy, from which the City calculates the walkshed, is not the center of the Junction Urban Village. Finally, the neighbors discussed their concerns regarding a decrease in their property values as a result of the rezone.⁴⁶

Public records requests have confirmed that the only notes the City recorded with respect to these detailed, concrete and valid concerns are "[c]oncerns about upzone, worry about their property values and interest in not having the boundary expanded to their community."⁴⁷

(b) November 15, 2016 JuNO Meeting. Upon the release of the draft maps on October 20, 2016, the Junction Neighborhood Organization ("JuNO") immediately sought to have a City representative explain HALA and MHA to concerned individuals in the West Seattle community, many of whom had been caught completely unaware. OCPD/HALA representative Nick Welch gave a presentation on November 15, 2016.⁴⁸

Mr. Welch told the assembled group that the proposed upzones were aligned with "community" input and that "community" feedback over several months regarding certain principles and values had guided the City's creation of the draft maps.⁴⁹

The City misrepresents the nature of the attendees' feedback in its summary of comments above.⁵⁰ Contrary to the City's summary, there was **no** support voiced for rezoning or increasing density in the single-family zoned areas of the Junction Urban Village. As can be verified by the video and written transcript, the vast majority of the comments focused on the concern that livability within the urban village would be severely compromised and that existing residents would be displaced through, among other things, lack of parking, lack of infrastructure and amenities, increased property taxes, constant construction noise pollution,

⁴⁶ Ex. Y.

⁴⁷ Ex. A.

⁴⁸ Ex. Z; See also video <https://youtu.be/j8B2fHlls0s> at 11:20-40.

⁴⁹ *Id.*

⁵⁰ Ex A.

blocked sunlight and loss of neighborhood character.⁵¹ Again, the City evidently did not deem it necessary to record these concerns at all.

(c) **December 7, 2016 Shelby's and Youngstown Open House.** Following the November 15, 2016 JuNO meeting, the City sent a postcard mailer to West Seattle residents announcing an event at Shelby's ice cream parlor on December 7, 2016.⁵² The front of the postcard contained bright cartoon drawings with a title of "Our Path to Livable City," and surrounded by the following phrases: "Pre-K 2014;" "2014 Economic Justice;" "2014+2015 Transportation;" and "2016 Housing for All – learn more about the plan to create 20,000 more affordable homes across Seattle." The mailer invites residents to a conversation about "housing, parks, transportation *and snacks!*" There was no mention of the significant rezones already proposed for the Junction Urban Village for which residents had received no notice from the City.

Numerous West Seattle residents became aware of the proposed rezones through non-City sources such as the West Seattle Blog. On December 1, 2016, weeks after being advised by West Seattle community leaders that the Shelby's ice cream parlor would be too small for the anticipated crowd, the City added a second venue, Uptown Espresso, to handle the projected overflow.⁵³ On December 5, 2016, the City changed the second venue to the Youngstown Cultural Arts Center.⁵⁴ Despite the last-minute confusion regarding venues, hundreds of people attended the Shelby's and Youngstown open houses on December 7, 2016.⁵⁵

The Shelby's event was, as predicted, over capacity and many attendees were unable to speak to City representatives or view the maps.⁵⁶ Those that could approach the maps were invited to handwrite comments on flip pads.⁵⁷ Additionally, comment sheets were handed out to attendees to turn in to City staff.⁵⁸

Many attendees expressed concern in their flip pad comments that the City was not listening to their concerns.⁵⁹ Ironically, the City staff lost almost all but twelve of the written comment sheets that were turned in by attendees at Shelby's.⁶⁰ Of the 100+ written comments

⁵¹ Ex. Z (transcript); Ex. BB (chart of comments)

⁵² Ex. CC.

⁵³ Ex. DD.

⁵⁴ Ex. EE.

⁵⁵ Ex. FF

⁵⁶ See note 2 (comments)

⁵⁷ Ex. GG.

⁵⁸ See, e.g. Ex. HH.

⁵⁹ Ex. GG.

⁶⁰ Ex. II. Ex. GG.

actually retained by the City (primarily from the flip pads), only **two** can be characterized as supportive of the proposed rezones.⁶¹

(d) **January 26, 2016 Junction Design Workshop.** After the Shelby's event, City Councilmember Rob Johnson, a staunch advocate of the proposed MHA upzones, organized a workshop for the Junction Urban Village. Attendees were requested to RSVP. As of the morning of January 26, over 180 individuals had RSVP'd. Those attempting to email thereafter received a form response stating that RSVPs had reached the capacity limit of the main room and that participation options may be limited.⁶² The City's headcount for the event was 230 attendees.⁶³

At the event, Brennan Staley of the Office of Community Planning and Development gave a slide presentation regarding HALA and the proposed MHA upzones. Attendees were invited to hand in written questions to be answered at the 35-minute question and answer session following the presentation. Of the **over 225** written questions/comments submitted, only **three** indicated support for the zoning proposed for the Junction Urban Village.⁶⁴ Most questions exhibited significant concerns.⁶⁵ During the presentation, Mr. Staley assured attendees that the neighborhood's input would be taken into account in the City's final proposal.⁶⁶

Attendees were separated into 13 tables, 10 of which were hosted by third-party facilitators employed by the City. The remaining tables were self-facilitated due to the high neighborhood turnout. The City published its summaries of the table feedback on or about March 23, 2017.⁶⁷ When compiled into one streamlined chart, the data from the City's own summaries clearly reflects that the myriad concerns and criticisms expressed by attendees dwarfed the few comments supportive of the proposed upzones.⁶⁸

Prior to the City's publication, the JuNO Land Use Committee ("JLUC"), a neighborhood subcommittee of JuNO, provided Councilmember Johnson's office with the summaries JLUC had solicited from attendees at each table to ensure a full report.⁶⁹ Inexplicably, the City only published one third-party account, that of Matt Hutchins, a pro-HALA Admiral Urban Village

⁶¹ Exs. BB, GG and HH

⁶² Ex. JJ.

⁶³ Ex. KK.

⁶⁴ See Exhibits MM (copies of questions/comments) and BB (summary table)

⁶⁵ See Exs. BB and MM.

⁶⁶ The video of the question and answer session can be viewed at

<https://www.youtube.com/watch?v=wbVpLKtgCgl&feature=youtu.be>. Mr. Staley's comments regarding incorporation of community input are at 16:13-18:30.

⁶⁷ Ex. NN

⁶⁸ Ex. AAA.

⁶⁹ Ex. LL.

resident who specializes in the design of Accessory Dwelling Units⁷⁰ and who has testified on behalf of the City in zoning-related litigation. Mr. Hutchins participated in Table 5.⁷¹ Notably the few comments supporting the proposed upzones to the Junction Urban Village originated primarily from his table.⁷²

(e) **March 9, 2017 - JLUC Meeting with Jesseca Brand.** This event was a meeting between Jesseca Brand, on behalf of HALA, and five members of JLUC and two of its advisors. The meeting centered around a letter JLUC had recently sent to OCPD Director Samuel Assefa that called attention to (1) the portion of the long-standing Junction Urban Village Neighborhood Plan which explicitly provides for maintaining the existing single-family areas, as well as the City's adoption of this policy in Seattle 2035; (2) the neighborhood's decisively critical feedback on the proposed MHA upzones; and (3) its support for a planning process coordinated with light rail.⁷³ JLUC requested a collaborative approach to plan for increased density in conjunction with ST3. The JLUC letter was accompanied by the signatures of over 400 West Seattle residents requesting the City provide more time for residents to understand the proposed rezones.

JLUC reiterated the concerns set forth in the letter to Ms. Brand. Ms. Brand, in turn, told the group that regardless of neighborhood feedback and the City's assurances that such feedback would be utilized, the HALA team would - under all circumstances - be proposing a plan to the City Council providing for **upzoning every currently single-family zoned block within the Junction Urban Village without exception.**⁷⁴

(f) **May 5, 2017 Open House.** The City held an open house at the Westside School in Arbor Heights on May 5, 2017. The open house was not specific to or located in the Junction Urban Village but rather, covered all of the affected District 1 neighborhoods. Flip pads were provided and labeled with the five individual District 1 urban villages; however, attendees did not always write their comments on the flip pad matching the neighborhood about which they were commenting.⁷⁵ With the exception of South Park, it is difficult to isolate particular urban village feedback. Regardless, attendees provided feedback across the board that was consistent with that at all prior events: strong concerns regarding livability issues,

⁷⁰ Ex. OO; http://www.seattletimes.com/seattle-news/politics/city-rules-among-big-obstacles-for-little-houses/?utm_source=email&utm_medium=email&utm_campaign=article_left_1.1 (quoting Mr. Hutchins). Mr. Hutchins previously testified on behalf of the OCPD in the City's dispute with the Queen Anne Community Council regarding ADUs and DADU's, at the same time he was serving as a City-selected community focus group member with respect to HALA. Ex. PP at 6; Ex. VV.

⁷¹ Ex. NN at 16.

⁷² Ex. AAA.

⁷³ Ex. QQ.

⁷⁴ Ex. II.

⁷⁵ Ex. BBB.

including loss of single family homes; displacement of existing residents; increased taxes; lack of parking; construction noise pollution; lack of necessary infrastructure; lack of traffic amelioration; lack of adequate transit; and inequality of the rezone distribution throughout the city.⁷⁶ There was a repeated theme in the comments that the City was not listening to the affected communities and that the MHA rezone proposals are primarily for the benefit of developers.

Of the **83** written comments provided, only **two** can be categorized as wholly positive and an additional five as partially supportive, at best.⁷⁷

2. Other West Seattle Urban Village Community Feedback Opportunities

(a) Hala.consider.it Feedback. From the time the draft maps were released on October 20, 2016 to the present, the City has posed a series of questions relating to the maps on <https://hala.consider.it>. Individuals are invited to weigh in on the maps relating to their neighborhoods. The level of West Seattle’s objection to the proposed MHA rezones on the hala.consider.it site is exponentially greater, in both number and percentage, than any other neighborhood. With respect to the following questions, the Junction Urban Village has responded as follows:

Proposition	Disagree	Neutral	Agree	Percentage disagree ⁷⁸
Draft zoning changes accurately reflect MHA principles ⁷⁹	123	7	69	62%
RSL is in appropriate places	94	2	35	72%
Change from SF to Lowrise In Junction UV are appropriate	98	3	32	74%
Expansion of urban village boundary is appropriate	111	1	41	73%

The percentage of disagreement with the proposals for the Junction Urban Village is especially noteworthy given that outside special interest groups, including urbanist groups and

⁷⁶ Ex. CCC.

⁷⁷ Ex. CCC.

⁷⁸ The figures are derived from the hala.consider.it website regarding the Junction Urban Village section as of May 15, 2017. The configuration of the website requires a manual count of the number of reponses, which are placed very close together and thus, it is possible that the numbers may be very slightly off (one or two responses), although not enough to change the percentages.

⁷⁹ The “MHA principles” are a series of broad statements formulated by City staff posted on the hala.consider.it website. The principles include (1) increasing the range of housing types available in different neighborhoods, i.e., family size housing in addition to small studios and one-bedroom apartments; (2) being sensitive to transitions between higher density areas and single family areas; (3) allowing more people to live near transit, parks and schools; and (4) paying attention to design quality. Due to their generic nature, these principles could have guided a multitude of potential options for Junction Urban Village beyond what the City presented.

developers, taking note of the Junction Urban Village's negative feedback, issued public "calls to action" to their followers. These calls explicitly sought to skew the hala.consider.it data in favor of the rezones, specifically in the Junction Urban Village.⁸⁰ The immediate and direct impact of the "call to action" was noted and applauded by The Urbanist blog, which strongly advocates in favor of citywide upzoning.⁸¹

(b) Emails Submitted to HALAinfo. The City has directed individuals to send inquiries and comments relating to HALAinfo@seattle.gov. In response to public records requests seeking copies of all emails received at that address, the City provided approximately 444 emails (not including spam emails).⁸² The vast majority of the emails relate to the MHA proposals.⁸³ Of the total emails, approximately 215 were emails originating an inquiry/comment, as opposed to responsive emails in the thread, which comprise the remainder.⁸⁴ Only 21 of the total originating emails provided positive comments relating to HALA/MHA.⁸⁵ The remainder were either neutral, primarily seeking information (123); negative, expressing criticism of the proposals (70); or unclear (1).⁸⁶

Of the emails specific to a particular neighborhood, the highest number of emails relate to the Junction Urban Village. Of the 27 originating emails from identifiable Junction-area residents, 20 of the emails were critical of the MHA proposals and five were neutral (seeking information). Only two (7%) could potentially be characterized as supportive, although one may have been a marketing effort, which would reduce the percentage to 4%.

(c) Focus Groups. The City selected 169 applicants to serve on focus groups representing the various neighborhoods that it planned to upzone.⁸⁷ There were nine focus group meetings, including an introductory meet and greet in April 2016 and a final debrief

⁸⁰ On January 25, 2017, the Seattle Transit Blog, a known urbanist, density advocate blog, issued a "Call to Action" asking for readers to support the proposed Junction Urban Village rezones on hala.consider.it, even posting a link to the West Seattle Junction Urban Village section (see Exhibit RR). This same call to action was posted on the Reddit online site (https://www.reddit.com/r/SeattleWA/comments/5q5Jwj/call_to_action_hala_online_feedback_needs_your/) and on the Facebook page of "Seattle for Everyone." According to its Facebook page, "Seattle for Everyone" is "a broad coalition of affordable housing developers and advocates, for-profit developers and businesses, labor and social justice advocates, environmentalists and urbanists." In other words, Seattle For Everyone is made up of the very groups poised to financially benefit from the rezone of West Seattle's single-family neighborhoods.

⁸¹ Ex. SS.

⁸² Ex. TT.

⁸³ Exs. TT and UU.

⁸⁴ *Id.*

⁸⁵ *Id.*

⁸⁶ *Id.*

⁸⁷ Ex. VV.

meeting in January 2017.⁸⁸ It appears there was also a “drop-in” meeting in December attended by five of the citywide focus group participants.⁸⁹

A total of five applicants were chosen to represent the Junction Urban Village. Of those, three lived within the Junction Urban Village, one lived in the Delridge neighborhood, and one lived “near” the Junction Urban Village.

From the attendance records published by the City,⁹⁰ there is no indication that three of the five Junction Urban Village focus group members attended any of the meetings. The City issued the draft MHA maps in October 2016. The critical time for input would have been prior to the release date. With the possible exception of the introductory meeting in April, the Junction Urban Village was represented – sparsely - at only two of these meetings:

	Neighborhood	April*	May	June	July	Aug	Sept	Oct*	Nov	Jan*
Greg Knoke	Junction									
Karthik Jaganathan	Delridge			X	X					
Lisa Rough	Near Junction									
Melissa Bailey	Junction									
Ryan Reese	Junction			X						

*The City did not keep and/or publish the attendance records for these meetings.

Even assuming the City had intended to take feedback into account, the focus group members selected by the City for the Junction Urban Village provided little, if any, representation of its thousands of residents.

3. Recent Application to Amend Comprehensive Plan. JLUC has repeatedly advised the City that Seattle 2035 explicitly incorporates the portion of the Junction Urban Village Neighborhood Plan, making it a City policy to maintain the integrity of the existing single-family areas within the Junction Urban Village.⁹¹ Because it appears that the City is prepared to ignore this stated policy and require every area within the boundaries of an urban village to be upzoned, JLUC filed an application with the City on May 13, 2017 to amend Seattle 2035 to remove the single-family areas from within the Junction Urban Village boundary. In this way, the neighborhood’s intent and goals would be respected, as well as the City’s desire to ensure that the entire Junction Urban Village be rezoned for significantly greater density. In the

⁸⁸ Ex. WW.

⁸⁹ Ex. A.

⁹⁰ Ex. WW. Note: The published attendance records disagree with Exhibit A in which it appears that the City merely recorded 25 for each focus group meeting.

⁹¹ See, e.g., Ex. QQ and Ex. YY.

three weeks prior to the May 15, 2017 amendment deadline, JLUC easily obtained signatures of 242 West Seattle residents in support of the amendment.⁹²

C. City Continues to Characterize Junction Urban Village as Neutral.

The City refuses to accurately describe the true nature and extent of the Junction Urban Village's feedback. As of May 19, 2017, the HALA Website summarized West Seattle's feedback as follows:⁹³

- Interest in seeing affordable housing throughout the city, near services and transit;
- Need for affordable housing for growing senior population; and
- Need to preserve units that are currently affordable in market-rate buildings.

While these statements are true, they do not begin to represent the full spectrum of the objections and concerns consistently raised by the Junction Urban Village to the City at every opportunity.

D. HALA Team Demonstrates it Has Sought to Replace Neighborhood-Level Planning.

On May 30, 2017, the City Council was briefed regarding the MHA workshops.⁹⁴ In response to reported neighborhood concerns regarding the lack of any intentional planning process directed to their specific neighborhoods, Sara Maxana of the HALA team defended the process by assuring the City Council that feedback opportunities had been provided to enable "community members" to shape the MHA proposal:

It's true that when we're looking at a two-year planning process that's citywide, it is not the same level of engagement as a one-year process that is neighborhood specific. What we've tried to do is oversee a community engagement process that speaks to the principles and values that this project is carrying forward, that were articulated in the Council work plan that you laid out for us and to hold true to those values while **very much giving opportunities for community members to shape the proposal.**⁹⁵

However, Ms. Maxana's further comments, as well as those of Jesseca Brand, underscore that "community" is not synonymous with "directly impacted neighborhood." Ms.

⁹² Ex. XX.

⁹³ Ex. ZZ.

⁹⁴ Attached as Exhibit DDD is a written transcript prepared from the video at <http://seattlechannel.org/explore-videos?videoid=x76783>

⁹⁵ Ex. DDD at 10.

Maxana praised the Department of Neighborhoods' "creative" methods of obtaining feedback on the MHA proposals, specifically citing online feedback opportunities such as hala.consider.it and Reddit.⁹⁶ As previously documented, outside special interest groups with no connection to the West Seattle community have the ability to, and have demonstrably sought to, manipulate the response on hala.consider.it with respect to the Junction Urban Village.⁹⁷

The Reddit HALA event is another clear example of feedback that cannot and should not take the place of targeted and deliberate neighborhood planning. Reddit itself is a discussion website at which any registered user worldwide can post submissions and can vote on other users' submissions.⁹⁸ The HALA Reddit event took place in the middle of the day on Thursday, March 30, 2017 from 12:00 to 1:00 p.m.⁹⁹ The only notice given by the City of the date and time of the event was that same morning. A non-Reddit user would have had to then register and familiarize him/herself with the process in order to participate.

The City posted the following single paragraph on Reddit for any Reddit user to comment on:¹⁰⁰

The City of Seattle set an ambitious goal to create 20,000 new affordable homes and 30,000 market rate homes in ten years, to address our affordable housing crisis. We are harnessing the growth to build that affordability. And, we are asking you, residents, business owners and other folks who feel invested in Seattle's future to weigh in on this plan, the Housing Affordability and Livability Agenda (HALA). Here is your chance to talk to AMA about Seattle's efforts around affordable housing and the 65 HALA strategies. Can you help us make room for more neighbors in a welcoming and affordable way?

Presumably there is no way for the City to evaluate the identities of those commenting or whether they live in Seattle or any of the affected neighborhoods. This is clearly not designed to educate neighborhood residents or to solicit neighborhood feedback about proposals to drastically change their neighborhoods.

⁹⁶ Ex. DDD.

⁹⁷ See Note 77; Exs. RR and SS.

⁹⁸ <https://en.wikipedia.org/wiki/Reddit>

⁹⁹ Ex. EEE (Same-day Reddit notice)

¹⁰⁰ The comment thread can be viewed at :

https://www.reddit.com/r/SeattleWA/comments/62eaqq/we_are_the_city_of_seattle_and_we_are_tackling_a/

The idea that the City would accord anonymous comments on a message board or even its own website the same weight as direct feedback from residents of the affected neighborhoods, or that the City would equate this with a neighborhood planning process, is appalling yet consistent with its outreach efforts.

CONCLUSION

The City's community engagement regarding the Junction Urban Village cannot hold up to any reasonable or fair-minded scrutiny. The record and the available data paint a clear picture of indifference: the City viewed neighborhood input as immaterial and the outcome of its check-the-box exercise was predetermined.

For all of the City's rhetoric of local government and its neighborhoods working to make Seattle great, it was clearly never the City's intention to inform the public or to seek input regarding its intent to rezone single-family areas in urban villages prior to creating and releasing its draft rezone maps. It kept information minimal and misleading, obscured key details and then released the draft maps with as little notice as possible. Yet the City characterizes its shallow process as a genuine attempt to engage neighborhoods.

The City's processes for collecting, maintaining, and analyzing both qualitative and quantitative data have been similarly deficient: information has been lost, misrepresented, and seemingly invented. Facts have been made to fit the arguments, not the other way around.

The City characterizes Seattle as a city of neighborhoods. For that to be true, it must offer more than platitudes. From the release of the first upzone maps, the Junction Urban Village has stood ready to work with the City to add density, transit, and livability items in a way that preserves the character of the neighborhood. It remains ready to do so.

From: Christy Tobin-Presser
To: [PCD_MHAEIS](#)
Subject: RE: West Seattle JuNO Land Use Committee Comments on DEIS
Date: Monday, August 07, 2017 11:24:19 AM
Attachments: [2017_08_07_part 2.pdf](#)

Part 2.

From: Christy Tobin-Presser
Sent: Monday, August 07, 2017 10:50 AM
To: 'MHA.EIS@seattle.gov' <MHA.EIS@seattle.gov>
Subject: West Seattle JuNO Land Use Committee Comments on DEIS

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Bush Kornfeld LLP
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3-295	Does not address Impact on PSE gas utility						X		
3-295	Does not address Impact on Library services						X		
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3-295	Erroneously uses comp plan FEES data for an additional 50% growth and claims no or minimal Impact		X		X				
3-295	DEIS admits to a construction boom-relies on comp plan that asserts gradual growth	X	X		X	X			
3-296	Police-no other precincts except North are Identified for growth related facility needs-SW has room for 13 mo	X	X	X	X		X		
3-296	SPD established response time is 7 minutes which it meets per 2035 CP- averages don't show true response time	X	X		X		X		
3-296	SPD lower level crime such as burglary and auto theft not addressed	X	X		X		X		
3-298	Fire-Does not state WS Junction is part of Alki/Admiral analysis	X					X		
3-298	School-does not include WS Junction in Sector 6	X					X		
3-298	School BEX Phase IV plan 1,100 students shy of need				X				
3-299	Schools listed as in the pipeline are actually open now and some full	X	X		X		X		
3-299	About 1/4 schools have no sidewalks				X				
3-300	Water-no discussion of aging Infrastructure or replacement	X			X		X		
3-300	Sewer-some city pipes are < 12" actually most are <12 and many 8"	X	X		X				Gross misrepresent
3-302	Per capita sewer demand is an irrelevant metric-total/peak flow is relevant	X	X	X	X		X		
3-302	Refers to the 2004 drainage plan and 2006 wastewater plan-not published				X				
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3-300	Right of way Improvement manual only requires some development to install side walks	X		X	X				
3-305	Electricity -no statement of what additional electrical needs will be	X			X				
3.8.2 IMPACTS SECTION									
3-306	No direct public services or utility Impact conclusion is wrong	X	X		X				
3-306	Says no direct impacts then says there will be a demand increase	X	X		X				double speak
3-306	Says some development is required to improve storm and drainage systems	X			X				double speak
3-307	Police-Alt 1 Identified and managed- this is not adequately managed now	X	X	X	X				
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3-309	School-Alt 2-resolution is inadequate	X	X	X	X				
3-310	All Alt 3 Impacts deficient for the same reason as Alt 2	X	X	X	X				
3-310	It is not more efficient to serve more people-it burdens the systems	X	X	X	X				

3.3.8 MITIGATION

3-311	No other mitigation needed is faulty	x	x	x	x
3-311	No significant unavoidable impacts	x	x	x	x

Not addressed damage to roads/sidewalks caused by construction equipment-ubiquitous x

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Then it says higher density can cause local capacity problems on the same page it says there would be no direct impacts.

This is clearly not adequately managed now with no strategy for even greater growth

this is not adequately managed now.

ignores full elementary schools at the West Seattle Junction UV now

SFR were not massively rezoned under the comp plan, nor were the villages expanded

This is poorly managed now and response times are unacceptable now. SPD is understaffed now-"identified and managed" is not happening now much less with additional growth

This is poorly managed now and response times are unacceptable now. SFD is understaffed now-"identified and managed" is not happening now much less with additional growth. Seattle averages 0.7 fires annually per 1,000 residents. <https://www.seattle.gov/financedepartment/17proposedbudget/documents/SFD.pdf>. 22 additional fires not accounted for.

WSJUV elementary schools are full, Fairmount has no room for portables. No meaningful discussion of additional school transit

See Alt 2 explanations--identifying and managing is not working now and cannot be expected to so in the future

No consideration of traffic impact on poor response times already. More service calls with inadequate staffing increases already poor response times

See above -service needs assessments were published after comp plan FEIS and were not included in 2035 FEIS -not using the correct, current and very damning data.

Police, fire, EMS are underfunded with poor response times, schools are full in many areas, sewer lines need wholesale replacement, roads are too narrow for two way traffic when now fully parked-to say there are no significant impacts is magical thinking of the worst sort.

Contractors do not repair all the damage they cause by heavy weight excavators, track hoes, concrete trucks, pumpers, cranes, dump trucks which continue to damage streets during development and are not fully repaired. 42nd SW at Safeway is a prime example of construction ion damage not repaired.

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There are significant impacts in all areas. Existing deficiencies in fire, police, sewers and schools ignored. Undersized or absent drainage mostly ignored, aging water infrastructure ignored, missing sidewalks mentioned but mostly ignored. Conclusion is these agencies will manage and cope.

a demand increase is a direct impact, no discussion of traffic impacting emergency services. Police and fire don't just serve the UV and travel all over their precinct and will be impacted by traffic. Most streets are 25 feet wide and now fully parked and result in 1 day streets for 2 way traffic-street size when fully parked is completely ignored.

Then it says higher density can cause local capacity problems on the same page it says there would be no direct impacts.

This is clearly not adequately managed now with no strategy for even greater growth

this is not adequately managed now.

ignores full elementary schools at the West Seattle Junction UV now

SFR were not massively rezoned under the comp plan, nor were the villages expanded

This is poorly managed now and response times are unacceptable now. SPD is understaffed now-"identified and managed" is not happening now much less with additional growth

This is poorly managed now and response times are unacceptable now. SFD is understaffed now-"identified and managed" is not happening now much less with additional growth. Seattle averages 0.7 fires annually per 1,000 residents. <https://www.seattle.gov/financedepartment/17proposedbudget/documents/SFD.pdf>. 22 additional fires not accounted for.

WSJUV elementary schools are full, Fairmount has no room for portables. No meaningful discussion of additional school transit

See Alt 2 explanations--identifying and managing is not working now and cannot be expected to so in the future

No consideration of traffic impact on poor response times already. More service calls with inadequate staffing increases already poor response times

See above -service needs assessments were published after comp plan FEIS and were not included in 2035 FEIS -not using the correct, current and very damning data.

Police, fire, EMS are underfunded with poor response times, schools are full in many areas, sewer lines need wholesale replacement, roads are too narrow for two way traffic when now fully parked-to say there are no significant impacts is magical thinking of the worst sort.

Contractors do not repair all the damage they cause by heavy weight excavators, track hoes, concrete trucks, pumpers, cranes, dump trucks which continue to damage streets during development and are not fully repaired. 42nd SW at Safeway is a prime example of construction ion damage not repaired.

Name	Dan Tran
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 From this, it appears that the best approach would be to mix and match Alternatives 2 and 3. For Northgate, Alternative 2 would have greater zoning at the parking lot where an affordable housing project is plan with minimal displacement considering it's a parking lot. For Capital Hill, with light rail access, Alternative 2 is needed to absorb the neighborhood's housing demand and transit orientated development. For Wallingford, Fremont, Ballard, and Crown Hill, Alternative 3 would be best for low displacement risk and high opportunities with the urban village expansion. For West Seattle Junction and Morgan Junction, Alternative 3 seems to better capitalize on light rail investments to West Seattle thanks to a larger urban village boundary expansion and more M1 and M2 zoning. For Rainer Beach, it would be best to follow the Rainer Beach Neighborhood Plan which is similar to Alternative 2 as Alternative 3 would undercut the neighborhood plan near the station area. For Othello, perhaps a hybrid approach would be best, expanding the urban village boundary but having more measured changes.</p>
Housing and Socioeconomics	<p>2 While HALA is a great first step, more needs to be done to increase housing to accommodate the influx of new residents, especially unlocking all of the Single Family Zones to provide for the "missing middle" (duplexes, triplexes, townhouses, etc.). We need to upzone the SFZs to make sure all areas of Seattle contribute to managing growth, not just the urban villages.</p>
Transportation	<p>3 Please reduce the requirement of parking in projects if not eliminate the requirement all together.. 16% of rent goes to parking which many don't use, especially if they are near transit. Building parking is extremely expensive and its resources would be better used to provide housing.</p>
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	

From: Steven Treffers
To: [PCD_MHAEIS](#)
Subject: Public Comment on MHA Draft EIS
Date: Sunday, August 06, 2017 10:20:19 AM

To Whom it May Concern:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Citywide Implementation of Mandatory Housing Affordability (MHA). As the father of a young child and renter, housing affordability is one of my primary concerns; one which I know I share with so many others living in Seattle. After reviewing the Draft EIS however, I have some serious concerns about the proposed approach of the Housing Affordability and Livability Agenda (HALA) and MHA, and the potential impacts that will result to historic resources following its implementation. The Draft EIS is deficient in its historic resources analysis, specifically in its identification of the affected environment, potential impacts, and proposed mitigation.

Relating to the affected environment, the baseline used for assessing impacts is incomplete. Section 3.5.1 - Affected Environment states that not all properties within the study area have systematically inventoried for their potential eligibility and it is likely that the study area contains additional properties that could meet the criteria for Seattle Landmark designation. The Draft EIS details that the City is no longer conducting historic resource surveys to identify significant properties and that 17 of the neighborhoods have yet to be systematically inventoried. There is no appended cultural resources technical report to reference, however no additional survey work appears to have been done in support of the Draft EIS and the discussion of historic resources also fails to consider the results of the city's previous survey and inventory efforts, which are available through the City's Department of Neighborhoods webpage (<https://www.seattle.gov/neighborhoods/programs-and-services/historic-preservation/historic-resources-survey>). Further, without explanation, figures included in the Historic Resources chapter only identify properties that are listed or have been determined eligible for listing in the National Register of Historic Places. These figures fail to include local landmarks and districts and provide a false sense of the existing conditions of historic resources in the MHA Study Area. Without truly understanding what the affected environment is, it is impossible to know how it will be impacted. The analysis should be revised to include reference to all sites that are either listed or have been previously been found eligible for federal and local designation so a full picture of the affected environment is presented.

In addressing impacts to historic resources the Draft EIS states that on page 3.250 that "for this analysis, significant impacts will be defined as potential growth rates of 50 percent or greater than the potential growth rates under the No Action Alternative." The proceeding tables identify that under Alternative 2, 10 Urban Villages would be subjected to 50% or greater estimated housing growth and eight urban villages under Alternative 3. Some of the estimated growth rates are as high as 172%, nearly three times the rate identified as the threshold for significant impact to historic resources. Further, only a small portion of these Urban Villages have been subject to a systematic inventory, which again indicates the baseline used for analyzing impacts is deficient. The summary paragraphs downplay these substantial impacts by stating that only two Urban Villages will have housing growth rates above 50%, when in fact there would be 10 or eight depending on the chosen alternative.

The final paragraph of Section 3.5 also incorrectly states that there will be no significant

unavoidable impacts to historic resources under the proposed alternatives. The basis for this statement is that at the project level, projects will still be subject to review under existing policies and regulations. However, the City is currently considering changes to these policies, which are not accounted for in the analysis. The Planning, Land Use, and Zoning (PLUZ) Committee is currently considering increasing categorical exemptions for new infill development under the State Environmental Policy Act (SEPA) (see <http://seattle.legistar.com/LegislationDetail.aspx?ID=2802890&GUID=4220AE4A-4544-4357-943A-013792690EA8&Options=&Search=&FullText=1>). These changes would exempt smaller projects from SEPA review, which as stated on page 3.251 "redevelopment could result in a significant adverse impact for properties that have the potential to be landmarks if the regulatory process governing the development does not require consideration of that property's potential eligibility as a Seattle Landmark." Therefore stating that SEPA review will mitigate impacts to historic resources is false and will only become increasingly insufficient if SEPA thresholds are changed, a point that should be addressed in the Draft EIS.

In addition, the Draft EIS suggest that the Seattle City Landmark process will mitigate impacts to historic resources. However, the City is also considering changes to this process, which are not addressed in the Draft EIS. Per the Frequently Asked Questions webpage for HALA, "Design Review and Historic Review are critical to ensure new buildings contribute positively to our neighborhoods. However, these tools add unpredictability and time to the process of bringing new housing online, which ultimately adds cost and decreases affordability. Through legislation, the City will improve these processes to continue their important functions in a way that improves predictability and consistency" (<http://www.seattle.gov/hala/faq#DesignReview>). Outside of the fact that historic preservation is incorrectly being scapegoated as a factor in our housing affordability crisis, changes to the process could have the potential to affect the development process and impacts to historic resources under MHA and should be addressed in the Draft EIS.

Finally, the proposed mitigation to offset impacts to historic resources is insufficient and vague. Creating "Comprehensive Plan polices that promote new development consistent with the historic character of the neighborhood" (page 3.255) lacks specifics and does nothing to address the demolition of historic resources that will result. "Historic character" is not a legally definable term and there is no discussion of how this would actually mitigate potential impacts that would result through demolition. Other proposed mitigation is the continuation of funding for comprehensive survey and inventory work; however, no source or means to create such funding is identified, such as the implementation of development impact fees. Real mitigation would identify how this funding would be created, outline the process and areas subject to survey work, and subsequently how this information would be integrated into the planning process to avoid impacts to historic resources (which would result in increased predictability to the development process). Without the explicit outlining of these steps, the mitigation is meaningless, especially when the presentation of these measures is prefaced with "could" (i.e. "other mitigation measures could include").

I believe that historic resources are an integral part of a diverse, inclusive, and affordable city, and provide great opportunity for addressing our housing affordability crisis. There is an obvious need to develop more housing to offset increasing demands and clearly not every building can or should be saved. However, the potential impacts to historic resources that will occur under HALA and the MHA have not been adequately addressed under the current Draft EIS and I urge you to further understand the existing conditions of the affected environment and develop new and meaningful measures to mitigate potential impacts.

Thank you for your time and consideration,
Steven Treffers
Seattle, WA 98119

From: Sarah Trethewey
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 1:55:40 PM

To the City,

This DEIS isn't sufficient to represent all Urban Villages and the City overall. Because each Urban Village is unique, with different housing types, local and cultural traditions, businesses, resources and growth needs, the current DEIS can't recognize and therefore assess, these important differences.

It is my view and those of many of my neighbors, who will be writing you too, that each Urban Village and Surrounding Area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.

Additionally, the DEIS doesn't 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 their own neighborhoods and in the City at large, yet the DEIS fails to thoroughly and accurately analyze the impacts to local neighborhoods and at the same time, to the City as a whole.

Thank you for considering my comments.

Sarah Trethewey

COMMENTS ON DRAFT EIS RE: MHAOverall 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:

EIS seeks to displace current residents in the areas to be rezoned. It is poorly thought out, will have a disastrous impact on traffic, utilities (including sewer system), and also the tree canopy (as most trees are in areas zoned as single family housing).

Name:

Benjamin Tromby

Address:

4402 30th Ave SW
Seattle WA 98126

Name	Doug Trumm
Email address	doug@theurbanist.org
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Alternative 1 is no changes, would lead to many fewer units, particularly of the guaranteed affordable variety. Don't do this!</p> <p>Alternative 2 implements MHA rezones without displacement analysis. It follows Comp Plan more closely. It capitalizes on Central Link investments better and should be used near Capitol Hill and future Northgate stations. The Northgate station area is owned by the County so we grant a big upzone to provide opportunity for big equitable TOD.</p> <p>Alternative 3 implements MHA rezones with a displacement analysis, adding more capacity in low displacement risk area and subtracting it from high risk areas like Rainier Valley and CID. It goes bigger near future Roosevelt station and West Seattle Junction station, which is great strategy since displacement risk is low and opportunity is super high. It also does a good job of pushing growth to low displacement risk neighborhoods like Fremont, Wallingford, Crown Hill, and Ballard. Great!</p> <p>My full argument is here: https://www.theurbanist.org/2017/08/04/mha-deis-monday-deadline/.</p>
Housing and Socioeconomics	<p>2 Single family zoning is a huge driver of displacement since it effectively reserves vast parts of Seattle for only high-priced housing. In 2017, middle class families cannot afford single family homes, meaning that zoning excludes them. That's why I think bigger urban village expansions are important including the big Othello expansion in Alternative 2. We can start with a conservative zoning like RSL or LR1 in new areas but we should seize the opportunity to reduce SFZ. Expanding the urban villages has the added benefit of eliminating parking minimums in more areas which is great for our climate and mobility goals.</p> <p>3 Another important thing to remember is downzoning lower-income neighborhood is also a form of divestment. Development can bring jobs to areas that need them. That's why the Rainier Beach Neighborhood Plan emphasized need for mixed-use zoning and recommended a 85-foot limit near the Link station to incentivize it. We should follow the Rainier Beach Neighborhood Plan as closely as we can since it is a critically important neighborhood for preserving a home and cultural space for people of color.</p>
	<p>4 I'd like to see ample LR2 or bigger in many areas to ensure our urban villages see apartments, not just townhomes which tend to be more expensive. LR1 and RSL would struggle to see much</p>

Land Use	apartment development. We should seek to make Missing Middle housing types like courtyard apartments very easily to build, preferably by right, so that we could entice a whole new generation of small developers to invest and help alleviate our crisis in housing choice and affordability.
Aesthetics	5 Our policy on setbacks should not be too prescriptive. It's an expensive thing to require so we need to have a very good reason to do so.
Transportation	6 We need to clarify the definition of frequent transit (to an average of 15 minute frequency) avoid future lawsuits like the Phinney Flats faced when buses were too off schedule for the Hearing Examiner. Parking minimums kill the feasibility of many small apartment projects. That's why we need to hold the line. We can better manage our street parking by expanding areas that are metered and perhaps implement parking benefit districts.
Historic Resources	7 We should implement key ideas from the CAP report.
Biological Resources	8 We're doing well on canopy. I'd hate to see trumped up concerns over urban canopy kill needed changes to single family zones.
Open Space & Recreation	9 We need to upzone near parks so that they don't enshrine privilege for single family homeowners. We also need to make a downtown park happen.
Public Services & Utilities	10 Let's get our sewers running in tip top shape so that we can put to bed these tired poo concerns from neighborhood groups.
Air Quality & Green House Gas Emissions	11 The best thing we can do for GhG emissions is build walkable, bikable cities. Parking minimums are the enemy. We should go to parking maximums, implement congestion pricing and a carbon tax if we are serious about climate change and stewardship of our delicate ecosystem for future generations. MHA gives us a chance to improve on our patterns by building more urban spaces where it's easy to live carfree (as my household is.) It's possible to vastly cut our emissions but one necessary step is making the right planning decisions.
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?	

From: Kate Turpin
To: [PCD_MHAEIS](#)
Subject: MHA Environmental Impact input
Date: Monday, August 07, 2017 11:00:37 AM

Thank you for your time and consideration regarding input into the draft Environmental Impact Statement on how the Mandatory Housing Affordability program affects our neighborhoods in Seattle and the city as a whole.

My main concern is that the current draft does not adequately represent the different housing types, cultural traditions, businesses, resources, and growth needs of each Urban Village. This will have a huge negative impact not only on specific neighborhoods but on the city as a whole. Each Urban Village and its surrounding area needs to be analyzed separately, thoroughly and accurately with its own individual EIS. And then these individual analyses need to be looked at in terms of impact on the whole of Seattle.

Time consuming and hard work but I believe the pay off will be well worth it and that Seattle is up to the challenge.

Thank you again,

Kate Turpin

Name	Tyler
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 Eliminate single family zone
Housing and Socioeconomics	Eliminate single family zone
Land Use	Eliminate single family zone
Aesthetics	Eliminate single family zone
Transportation	Eliminate single family zone
Historic Resources	Eliminate single family zone
Biological Resources	Eliminate single family zone
Open Space & Recreation	Eliminate single family zone
Public Services & Utilities	Eliminate single family zone
Air Quality & Green House Gas Emissions	Eliminate single family zone
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: Roger Valdez
To: [PCD_MHAEIS](#)
Subject: Comments on the DEIS for Seattle's MHA Program
Date: Saturday, August 05, 2017 10:21:24 AM

The following is our comments on the City's Draft Environmental Impact Statement (DEIS) for the proposed Mandatory Housing Affordability (MHA) Program.

In testimony before the Seattle City Council the City's planning staff have said that 120,000 people will be [moving into the city of Seattle](#) in the next two decades, creating a demand for at least 75,000 new units of housing. Other versions of this the story of growth suggest that about [1,000 people are moving to the city every week](#). No matter the source or the number it is clear that every measure points to job growth (unemployment is at a historically low 3 percent) and high demand for housing. People want to live in Seattle.

The City of Seattle should be developing policy that supports the building of a supply of housing that can accommodate new people moving here. The City's version of Mandatory Inclusionary Zoning (MIZ), the MHA program will render many new housing projects infeasible, will increase prices to rationalize fees and mandated inclusion of rent restricted housing, and is illegal based on the State's prohibition of taxing new housing construction (see RCW 82.02.020).

The impact of this proposal will result in new significant adverse environmental impacts to transportation, as more new regional residents are forced to find housing further from, and commute longer distances, to their jobs. Some of this transportation and transit impact will fall inside the City of Seattle and some will fall outside the City borders. The City must meet its obligation and identify and evaluate these internal or extra-jurisdictional impacts on the environment.

The DEIS states

Housing costs will continue to be a burden for a segment of the Seattle's population due to high demand and competition for housing generated by a strong job market and attractive natural and cultural amenities. Therefore, even with implementation of MHA in the study area, Seattle will continue to face a significant challenge in the area of housing affordability. *This condition is a result of market and economic forces, however, and not an impact of MHA* (emphasis mine).

This last statement is false.

On the contrary, an analysis done by our own builders and by [the Sightline Institute](#) has found that the fee structures for the program will harm housing production in areas best suited to accommodate new growth, the city's low-rise zones. Fees from MHA will make many projects infeasible and thus reduce supply or the price will increase to absorb the additional costs. And by its previous actions, the Seattle City Council has already lowered capacity in those zones in legislation it passed in 2015. And it is currently considering imposing impact fees, a move that would add even more costs to the production of market rate housing.

When taken together with numerous other mandates, fees, taxes, and restrictions (e.g. decisions to impose building code standards that push up the size of small apartments, mandates to extend unnecessary water mains and drainage, a failure to clarify existing exemptions for parking in areas with frequent transit etc.), the City Council is already engaged in what might appear to be a wide ranging strategy to actually suppress housing supply in the face of rising demand.

At the same time the City appears to be imposing more costs and constraints on the production of market rate housing, it is also engaged in an effort to channel more and more capital to subsidized non-profit housing, a needed product in a time of high demand; however, the costs to develop these units is climbing as land and labor costs along with the many transaction costs associated with Low Income Housing Tax Credits (LIHTC) consume more and more subsidies.

The City, whether intentionally or blindly, is constraining the production of market rate housing, pushing up its price, then rationalizing the imposition of more constraints through the illegal extraction of value from new construction to pay for subsidies because of rising prices. The City is rigging the system in a way that ensures higher prices and thus a swelling demand for subsidies that it will wring from market rate housing, a recipe for perpetual increases in housing prices and thus more and more pressure on people with fewer resources to find housing elsewhere.

The City is creating both an economic and environmental disaster, and the DEIS fails to assess this damage. The City needs to take responsibility for its continued actions to thwart the production of housing even while its elected officials and staff say publically that rising prices have created a "crisis." The crisis, to the extent there is one, is entirely self imposed, and the DEIS should assess the quantitative impact of its actions on housing prices and how that will contribute to environmental impacts.

--

Roger Valdez

Director
Smart Growth Seattle
(206) 427-7707
www.smartgrowthseattle.org



Name	Austin Valeske
Email address	
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.	Capitol Hill Renter's Initiative
Comment Form	
Land Use	<ol style="list-style-type: none"> 1 I agree with everything said in the comment submitted by the Capitol Hill Renter's Initiative, but I'd like to add two things to this section. 2 - I'd like to see at Neighborhood Commercial along E John St between Broadway and 15th. This is a corridor with a large amount of pedestrian traffic, due to the lightrail station, and there should be the option to develop small shops and restaurants along this corridor. Additionally, it would activate the connection between the Broadway and 15th Ave NC zones. 3 - While outside the scope of the DEIS, I'd like to see incentives around using cross laminated timber, and the an expansion of building code to allow wood structures above 85 feet if they're using CLT. This could help fill the gap in midrise construction, as well as allow for more varied building forms.
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	

Name	Megan Van Woodward
Email address	
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.	private citizen
Comment Form	
Description of the Proposed Action and Alternatives	1 Please increase zoning limits in Seattle as many places as possible.
Housing and Socioeconomics	2 The more places there are to live, the easier it will be for more people to live here without displacement. Please make it easier to build housing.
Land Use	3 To the degree possible, new housing should be concentrated around transit, especially expensive mass transit (such as light rail) and RR lines. Let's maximize our investments.
Aesthetics	4 Other than light being able to reach the streets in downtown, the only important thing aesthetic-wise is to make sure that the street level is designed with pedestrians in mind. The design of the first floor of buildings, esp. how they interact with the street/sidewalk, is all that matters. (We probably should not be building brick stuff anymore (earthquake risk), and our society doesn't have the money/taste to build Craftsmen homes anymore, sadly!)
Transportation	5 Parking is the spoiler that destroys the best density plans. I think the city needs to put more effort into parking issues than any other part of this upzone. A new system is needed - some street parking, esp. in neighborhoods like Wallingford and Fremont and Ballard, should be offered to residents as private property (and marked as such, and enforced as such). This is in order to woo them into acceptance of a new regime. Businesses may also be offered street parking in some cases. The rest of the street parking must be monetized and monitored (read Donald Shoup). We need to build housing without parking, and residents who choose to live in this housing and sneak their cars onto side streets must be actively prosecuted (or, charged the fair market cost of long-term car storage as they contract with private car lots). Enforcing this standard on new residents will cut the cost of the rent, as there is some inconvenience (thereby assisting housing affordability) and usher in a new cultural standard that will help us all going forward. We have buses, Car2go, Zipcar,

and bikeshare in our city - new residents should use them, and add their political will to help expand them too. Residents can help with enforcement by using Twitter etc. to report cars illegally parked and inconveniencing their lives. A swift response from authorities to such texts will be necessary. I hope you will seriously consider how to handle - kindly but firmly - the necessary transition away from citizens' personal-car-centric lifestyles within Seattle proper.

Historic Resources

6 Historical buildings are valuable and irreplaceable, but please do not ever count a parking lot/garage as "historic" going forward - this is insulting to the entire concept. Infill, even in a modern style, should be allowed around historic buildings. Also consider relaxing some usage rules/regulations to ensure that historic buildings are occupied, and not just lovely white albatrosses.

Biological Resources

7 Please maintain and increase street tree cover - this makes our city beautiful and livable. "Green space", which is mostly just a nature bandaid for car drivers to look at in traffic, is not a good use of our resources.

Open Space & Recreation

8 Please maintain city parks, but also allow commerce within them where possible (food trucks, etc) to increase usage. Buildings which make useless plazas as part of their footprint (places where people do not/cannot use) should be penalized - the buildings should be as close to street/sidewalks as possible. Be cautious in making new open spaces in our city. Parks without enough "eyes on the street" become actively dangerous to local residents.

Public Services & Utilities

9 I respect the need for a police building in north Seattle, however, the building design MUST be radically changed from the images I have seen. To build a brooding, hostile bunker in the middle of our neighborhood as if it were a war zone is indicative of the philosophy at the root of recent police failings of the community, and deeply insulting to the residents. Policing in general should be more focused on "walking the beat" in neighborhoods, with dedicated officers who can build up good relations with residents over many years, and please can we have a little more enforcement on property crimes?!

Air Quality & Green House Gas Emissions

10 Fewer cars = better air quality = less greenhouse gases = see the parking section above for more thoughts.

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?



June 30, 2017

Department of Neighborhoods, City of Seattle

jesseca.brand@seattle.gov

halainfo@seattle.gov

Office of Planning and Community Development

Attn: MHA EIS

MHA.EIS@seattle.gov

Tom Hauger

tom.hauger@seattle.gov

Re: Request for Modification to Northgate Urban Villages Draft Mandatory Housing Affordability (MHA) Map Zoning Designation from LR3 to MR(M1)

Dear All:

On behalf of Wallace Properties – Park at Northgate LLC¹, the owner of the Park at Northgate apartments (the “Site”), we request that the Mandatory Housing Affordability (MHA) Map zoning designation for our property be changed from LR3 to MR(M1) with an 80’ height limit.² In the coming months, we will be applying for a contract rezone from LR3 to MR-60. Through that process we will provide a detailed analysis to support additional density on the Site. Our request here is to modify the MHA Alternatives for the Site to the MR(M1) designation, because MR(M1) is the most consistent with our contract rezone and best meets the City’s housing and affordability goals for the neighborhood. The remainder of this letter describes the Site and provides support for the MR(M1) zoning designation.

The Site is located at 10735 Roosevelt Way NE, on the east edge of the Northgate Urban Center.³ The map to the right is an excerpt from the MHA draft Environmental Impact Statement (DEIS) Exhibit H-41 Proposed Zoning, Alternative 2: Northgate Urban Village, with the Site circled in blue. The land area of the Site is 5.24 acres, it is located within ½ mile

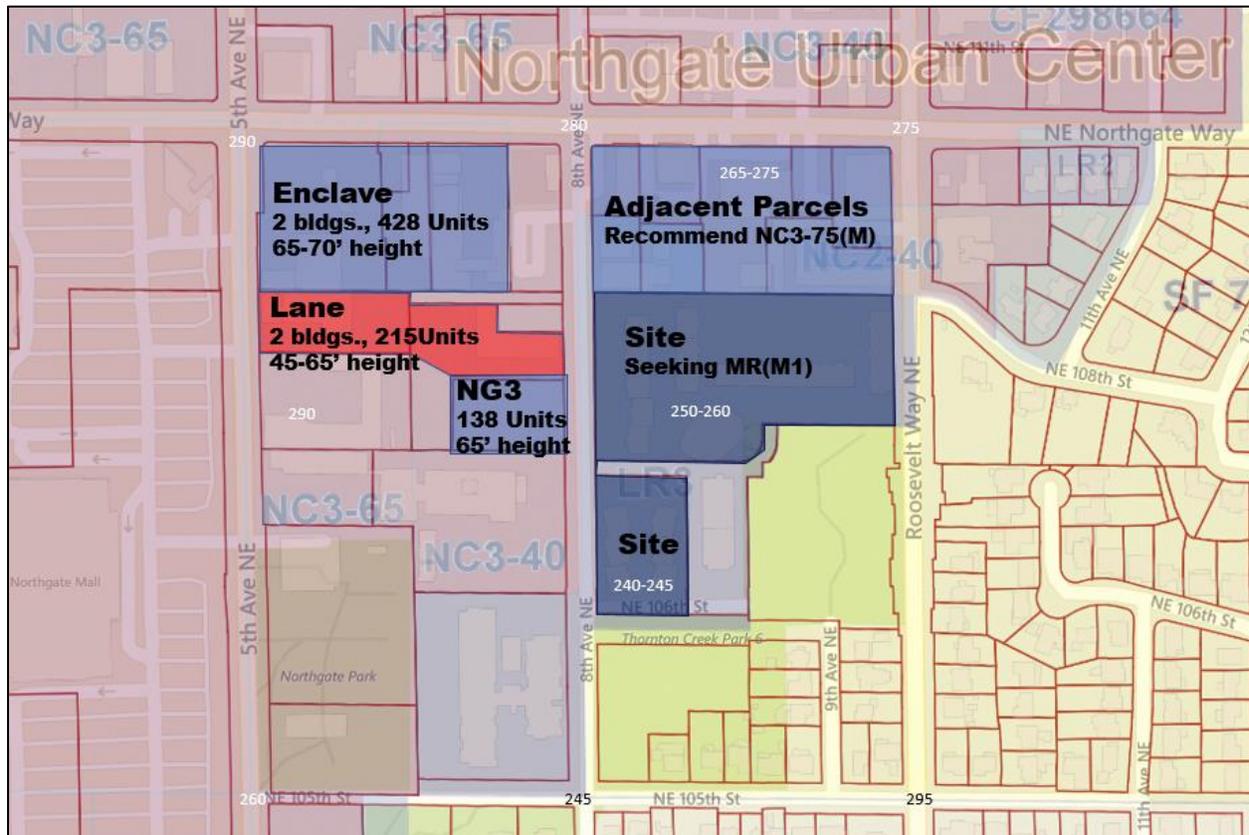


¹ This entity is an affiliate of Wallace Properties. The MHA draft environmental impact statement (DEIS) indicates 1,137 residential units have been built in Northgate since 1996. Wallace Properties built 430 of them, and over 100 of those are rent restricted under the Multi-family Tax Exemption (MFTE) program. This fall we will break ground on another 138 apartments across the street from the Site.

² We are amenable to a 60’ height limit, but there is no proposed zoning category at that height.

³ Parcel # 894423-0005.

of the Northgate Transit Center and light rail station (see map on page 5), and it is adjacent to an existing transit stop on Roosevelt Way NE. The Site is presently developed with the Park at Northgate garden-style apartment complex, with 148 residential units. This low-density complex is well-kept but over forty years old. As such, there is a viable opportunity for a phased redevelopment of the Site with new transit-oriented workforce housing, if sufficient density is provided.

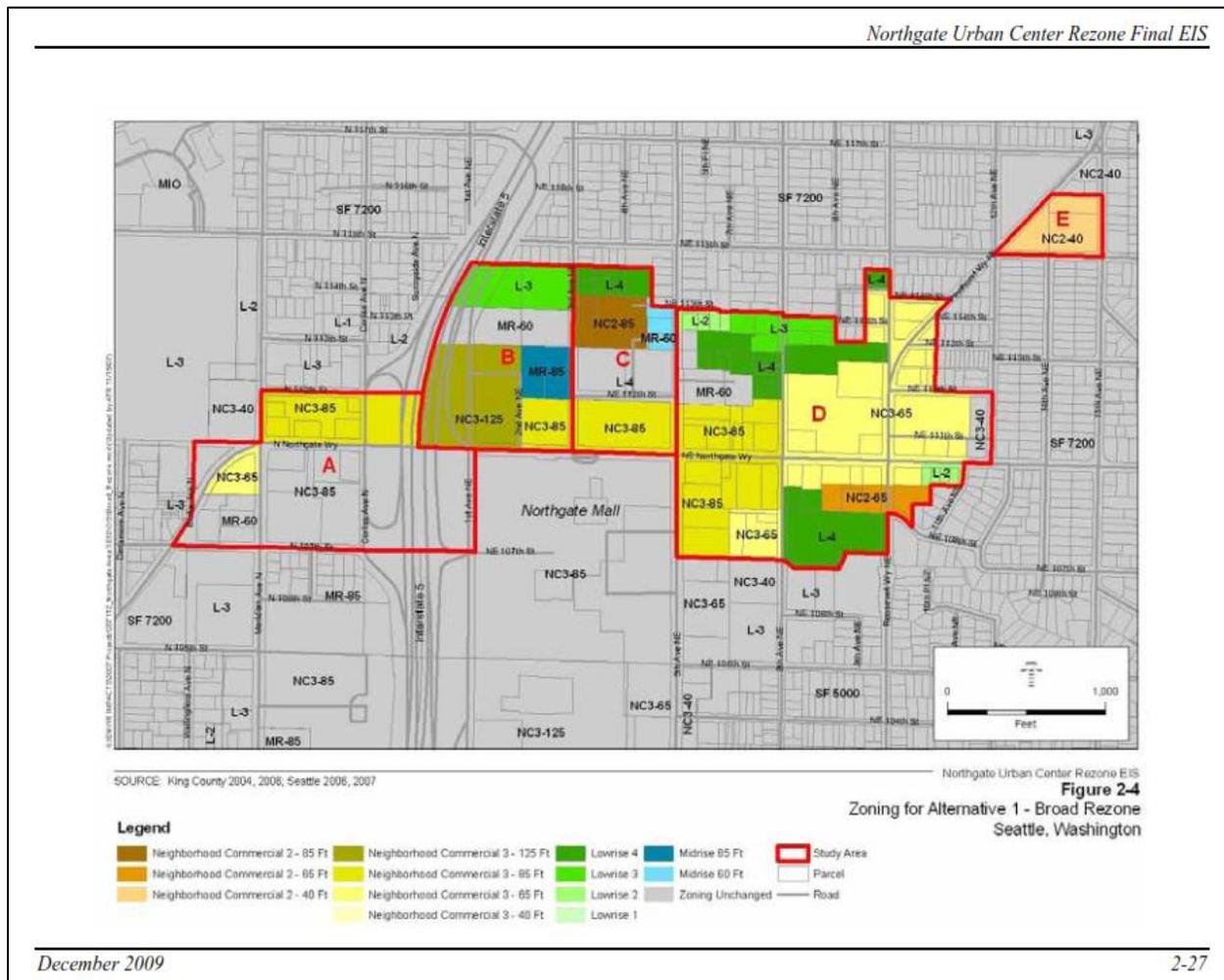


The Site is well suited to the MR(M1) zoning in the sense that the height and density will not have an inappropriate impact on the surrounding properties. Topographically, the Site sits in a depression, below the private properties to the north, south and west. Approximate elevations were provided in several areas of the above map to indicate this fact. The Site is surrounded by higher density commercial zones to the west and north, and a wide buffer to the south. The western parcels contain apartment buildings (Enclave, Lane and NG3) that have either been recently completed, are under construction, or are about to commence construction. Those buildings sit higher than the Site and are predominantly 65-70' in height. As shown in the map on page 1, the adjacent parcels to the north are currently zoned NC2-40 or NC3-40. These parcels are 10-15 feet higher than the Site. We recommend the zoning these parcels be designated NC3-75(M) due to their adjacency to Northgate Way. To the south the Site is buffered from single-family property by the 200-to-380-foot-wide Thornton Creek Beaver Pond Natural Area.

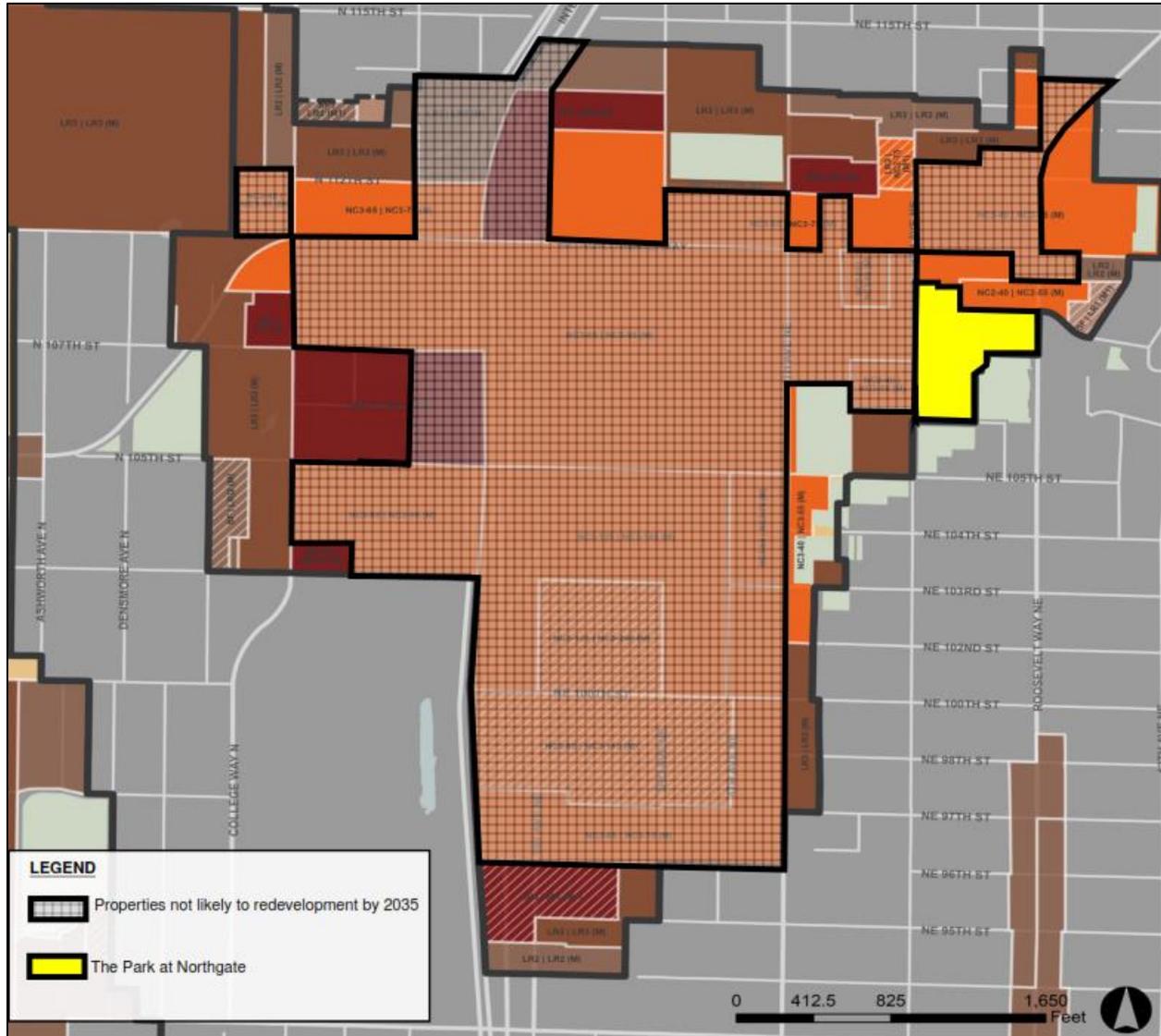
Historical Land Use Context Supports the MR(M) Designation. In 2009, the City completed the Northgate Urban Center Rezone Final Environmental Impact Statement (2009 FEIS). Under the Broad alternative in the 2009 FEIS, the Site was recommended for one increase in zoning height / intensity—that is, from LR3

to LR4⁴. If implemented, the 2009 Rezone would have resulted in an additional story of height (from three- to four-stories) and a 25% increase in density. The 2009 Rezone examined the impacts, including traffic impacts, of up-zoning essentially all properties with the Urban Village, including significant up-zones for most “core” area properties. At the same time the City completed the Northgate Coordinated Transportation Improvement Plan (CTIP) that laid out the path for growth to occur in Northgate’s Urban Center at the densities called for in the 2009 FEIS. Since that time the City has been methodically implementing the CTIP projects. Unfortunately, the 2009 Rezone was never brought to a vote of the Council.

Instead, since the completion of the 2009 FEIS, the City has increased density in Northgate via three contract rezones. The Mullaly family received a contract rezone for their site on NE 1st Street / NE Northgate Way along I-5, going from MR to NC3-85. Wallace Properties affiliates have obtained two contract rezones, increasing the density on land directly to the west of the Site (525 NE Northgate Way and 10711 8th Avenue NE). The adjacent parcels to the north of the Site have not yet sought a contract rezone, but the 2009 FEIS recommended they be increased to NC2/3-65. These increased heights and densities on nearby properties provide additional support for increasing the height and density at the Site to the MR(M1) level.



⁴ The LR4 zoning designation was eliminated in 2010. Currently, the next increment from LR3 is MR-60.



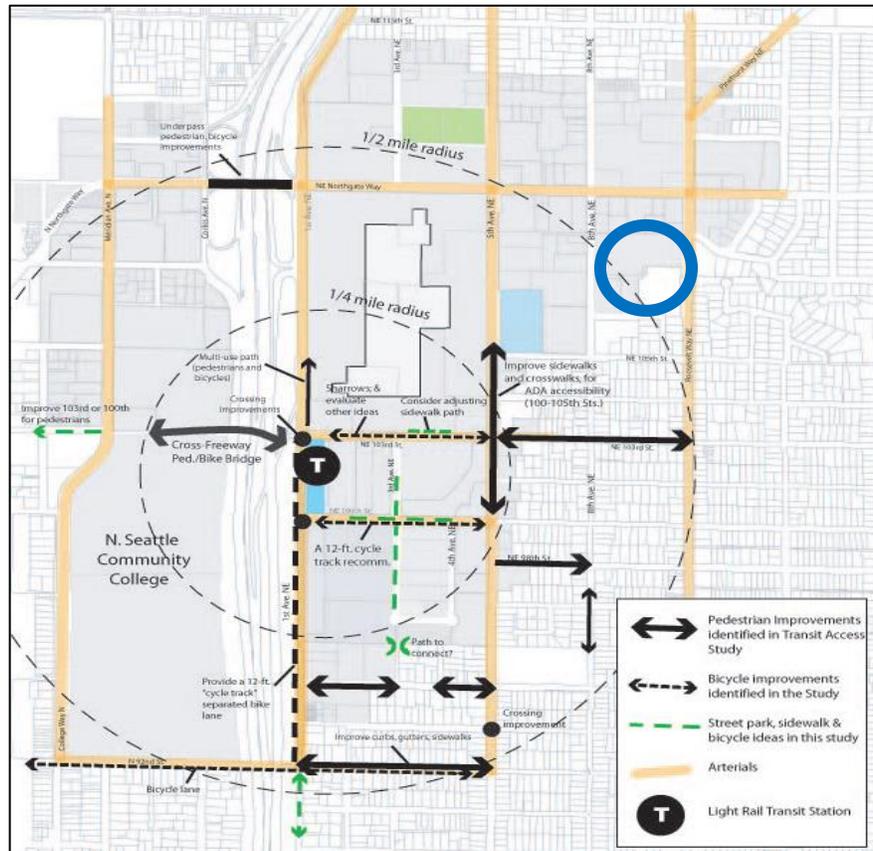
In October 2015, the City released its Urban Center / Village Growth Report, which found that Northgate had only achieved 41% of its targeted residential growth under the City’s adopted growth targets for 2024—only 1,029 of a desired 2,500 units. In late 2016, the City adopted the new Seattle 2035 Comprehensive Plan, which proposes significant additional residential growth targets for the Northgate Urban Village by 2035. As explained in Chapter 3.2, Land Use, of the MHA DEIS, the MHA rezone alternatives are intended to facilitate the planned growth in the Seattle 2035 Comprehensive Plan while ensuring there is a mix of affordable units. According to MHA Exhibit 2-8, the two proposed rezone alternatives for the Northgate Urban Village are expected to increase residential units by approximately 50% over the ‘no action’ alternative.

Based on our understanding of Northgate, we think this projected increase is unlikely to occur under the currently proposed zoning designations. Working with the planning/design firm BCRA, we analyzed properties within the Northgate Urban Village to determine the likelihood that, based on their current use (including type, size and age of structures) and the proposed MHA rezone alternatives, a property was likely to redevelop by 2035. As shown in the map above, nearly half of the land (236 acres) within the

Northgate Urban Village is unlikely to redevelop by 2035, despite the proposed rezones. This is especially true for properties in the “core” of the Urban Village, including the Northgate Mall, Northgate North (Target), Thornton Place, Enclave, Lane and several other properties that have redeveloped within the last 15 years. Accordingly, providing additional density at the sites with development potential is essential to achieving the City’s growth target for the Northgate Urban Center, and should be done so long as the impacts of development can continue to be mitigated.

Per the map to the right (Site in blue circle), the Site is within the ½-mile walkshed for the Northgate Transit Center and soon-to-open (2021) Link Light Rail station. The City, along with Sound Transit, has made significant transit investments to serve the Northgate Urban Center and support the planned land uses. It is essential to leverage the value of the investment in light rail by providing adequate density within ½ mile of the stations.

Site-Specific Impacts can be Mitigated with the MR(M) Designation. Consistent with the principles in the Northgate Revitalization process, the 2009 FEIS Alternative 1-Broad Rezone



and the MHA DEIS alternatives, we are presently pursuing a contract rezone for the Site to increase the development intensity and height one level, to MR-60. The MR-60 zoning designation has a higher height than the former LR4 zoning designation (about 15’, based on application of the City’s height measurement rules), but the Site is surrounded by higher-density properties to the north and west, a significant natural buffer to the south (Thornton Creek and its associated wetland complex) and Roosevelt Avenue NE and commercially zones property to the east. The Site is also lower than the private property north and south.

As noted in MHA Exhibit 3.2-4, a rezone from LR3 to MR(M1) would be associated with a “moderate increase in height limit and FAR . . . and [therefore] density.” The MHA proposal would allow heights up to 50’ on the Site. Due to the topography, our proposed height increase to 60’ per the contract rezone will not impact views or shadow adjacent properties. This is also true should the MHA Map zoning designation for the Site be increased to MR (M1) with an 80’ height limit.⁵ Our rezone application will include shadow studies to support this.

⁵ We would also be willing to condition our Site to a 60’ height limit, if the 80’ height is a concern.

We generally concur with the impact assessment in the DEIS; however, we note that traffic impacts for the proposed Northgate Village rezone alternatives are likely overstated, because (as noted above) many of the properties proposed for rezoning are unlikely to redevelop for several decades or more.⁶ So mitigation of the Site's visual and traffic impacts is possible, and remaining impacts will be mitigated via the contract rezone or entitlement process.

The Site presents a significant and viable opportunity to provide dozens of additional transit-served affordable homes in the Northgate neighborhood, if it is rezoned to either to MR-60 or MR (M1). Like the 2009 FEIS proposal to rezone the Site to LR4, the MHA proposal to rezone the Site from LR3 with a 40' height limit to LR3 with a 50' height limit will not provide sufficient density to justify redevelopment of the existing buildings.

In closing, we ask that the City change the MHA Map's designations for the Site to MR(M1). We will continue to pursue a contract rezone for the Site to MR-60, but we are hopeful that through the MHA process additional height and density may be approved for the Site.

Thank you for your consideration of these comments. Please do not hesitate to contact me if you have questions or comments.

Sincerely yours,



Kevin Wallace, President
Wallace Properties

⁶ These same impacts were studied in detail in the 2009 FEIS—including rezone alternatives with much higher intensities on many sites than those proposed in the MHA DEIS—and the City concluded that planned capacity improvements along with project-specific mitigation would address them.

From: Lorrie Wallace
To: [PCD_MHAEIS](#)
Subject: Draft Environmental Impact Statement comments
Date: Saturday, August 05, 2017 11:39:22 AM

We need to maintain the unique integrity of neighborhoods. It is what makes Seattle. We can do this AND provide adequate and affordable housing options within these very neighborhoods. But we do NOT need destroy those neighborhoods in the process.

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.

From: Rachel Wang
To: [PCD_MHAEIS](#)
Cc: [Randall Olsen](#)
Subject: Comment on Draft EIS Evaluating MHA Implementation with regard to the properties at 3201 and 3211 Martin Luther King Jr. Way S.
Date: Thursday, June 29, 2017 4:33:27 PM
Attachments: [Letter to Office of Planning and Community Development re 3211 Martin Luther King Jr Way S \(6-29-17\) \(03344481\).pdf](#)

Good afternoon,

Attached please find a letter from Mr. Randall Olsen regarding the above-referenced matter. Thank you.

CH& | Rachel Wang

Legal Assistant

Cairncross & Hempelmann

524 Second Avenue | Suite 500 | Seattle, WA 98104-2323

d: 206-254-4485 | f: 206-587-2308

RWang@cairncross.com | www.cairncross.com

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www.cairncross.com

office 206.587.0700
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June 29, 2017

VIA EMAIL ONLY

Office of Planning and Community Development
Attn: MHA EIS
PO Box 34019
Seattle, WA 98124-4019
Email: MHA.EIS@seattle.gov

Re: Comment on Draft EIS Evaluating MHA Implementation with regard to the properties at 3201 and 3211 Martin Luther King Jr. Way S

To Whom It May Concern:

This firm represents Ted Jorve (“Jorve”) regarding his properties at 3201 and 3211 Martin Luther King Jr. Way South (King Co. Parcel Nos. 8116100015 and 8116100005) (the “Property” or “Jorve Property”). An aerial photo of the Property and surrounding area is attached as Attachment A. The City’s Draft Environmental Impact Statement (“DEIS”) for implementation of Mandatory Housing Affordability (“MHA”) evaluates a no action alternative (Alternative 1) and two alternative zoning changes (Alternatives 2 and 3). Attached to this letter as Attachment B are excerpts from the proposed zoning maps for Alternatives 2 and 3 (Appendix H, Exhibits H-39 and H-40), which show the proposed zoning changes for Property and surrounding areas.

As can be seen on Attachment B, the City’s plan for the broader area appears to be to allow for greater zoning capacity in the vicinity of the Mount Baker Link Light Rail Station located west of the intersection of Rainier Avenue South and MLK Jr. Way South. Attachment B shows in light green a mostly consistent plan for SM-NR-95 zoning through the area between South McClellan Street and South Byron Street. The Jorve Property, however, which is located near the center of that zoning area, is shown zoned NC3-75 rather than SM-NR-95, which is otherwise consistent through the area. In order to make the zoning for the area consistent and to better take advantage of the Jorve Property’s size and location relative to the Mount Baker Station, **Jorve requests that the City modify Alternatives 2 and 3 to provide for SM-NR-95 zoning for the Jorve Property.**

The Jorve Property fronts on MLK Jr. Way South along the Property’s eastern boundary. The Property is one block south of the Mount Baker Station, which provides quick access to employment, entertainment, education and other opportunities throughout the City and the broader region. As a result, the Property is ideally situated for a transit-oriented development (“TOD”) project, including the type of

Office of Planning and Community Development / MHA EIS

June 29, 2017

Page 2

mixed-use, dense, urban development projects that the City has been encouraging around the City's light rail and other high capacity transit stations.

With a combined lot area of over 78,000 square feet, the Jorve Property is the largest site in single ownership in the area immediately south of the Mount Baker Station. However, the City has chosen to evaluate only NC3-75 zoning for the Property, while providing for greater zoning capacity (SM-NR-95) for the several much smaller parcels between Rainier Avenue South and MLK Jr. Way South. Not only are those parcels less likely to be developed into a significant project, but they also would require pedestrians to cross four lanes of traffic in order to reach the Mount Baker Station. On the contrary, the Jorve Property is located west of MLK Jr. Way South, which would provide pedestrians with a safe walking path from the Property to the nearby Mount Baker Light Rail Station. For all these reasons, the Jorve Property is uniquely well-suited for development and the City should zone the Property SM-NR-95, which would better match the Property's potential and the City's plan for the surrounding area.

We are at an important turning point in the history of the City of Seattle. The City is growing and will continue to grow rapidly over the coming decades. In order to maximize the benefits provided by our local and regional transit investments and to connect the City's historically underserved neighborhoods to jobs, education and entertainment opportunities, the City should increase the zoning capacity for properties near light rail stations, particularly properties within walking distance of those stations and which are of sufficient size to make dense, urban housing achievable. Increased density will be an important part of achieving the City's goal of alleviating the current housing affordability crisis. Denser development patterns also will support the unprecedented, multi-billion dollar investment in our regional light rail system and will support the continued success of the City's economy.

The current DEIS Alternatives fail to embrace the potential of the Jorve Property for a significant and desirable TOD project that could meet several of the City's planning goals. For all the reasons described above, **we ask that the City revise Alternatives 2 and 3 to increase the zoning capacity for the Jorve Property to SM-NR-95**, which is in harmony with the plan for the surrounding properties and encourages the type of development the City needs to maintain a high quality of life for the City's current and future residents.

Thank you for your time and attention to this important matter.

Very truly yours,



Randall P. Olsen

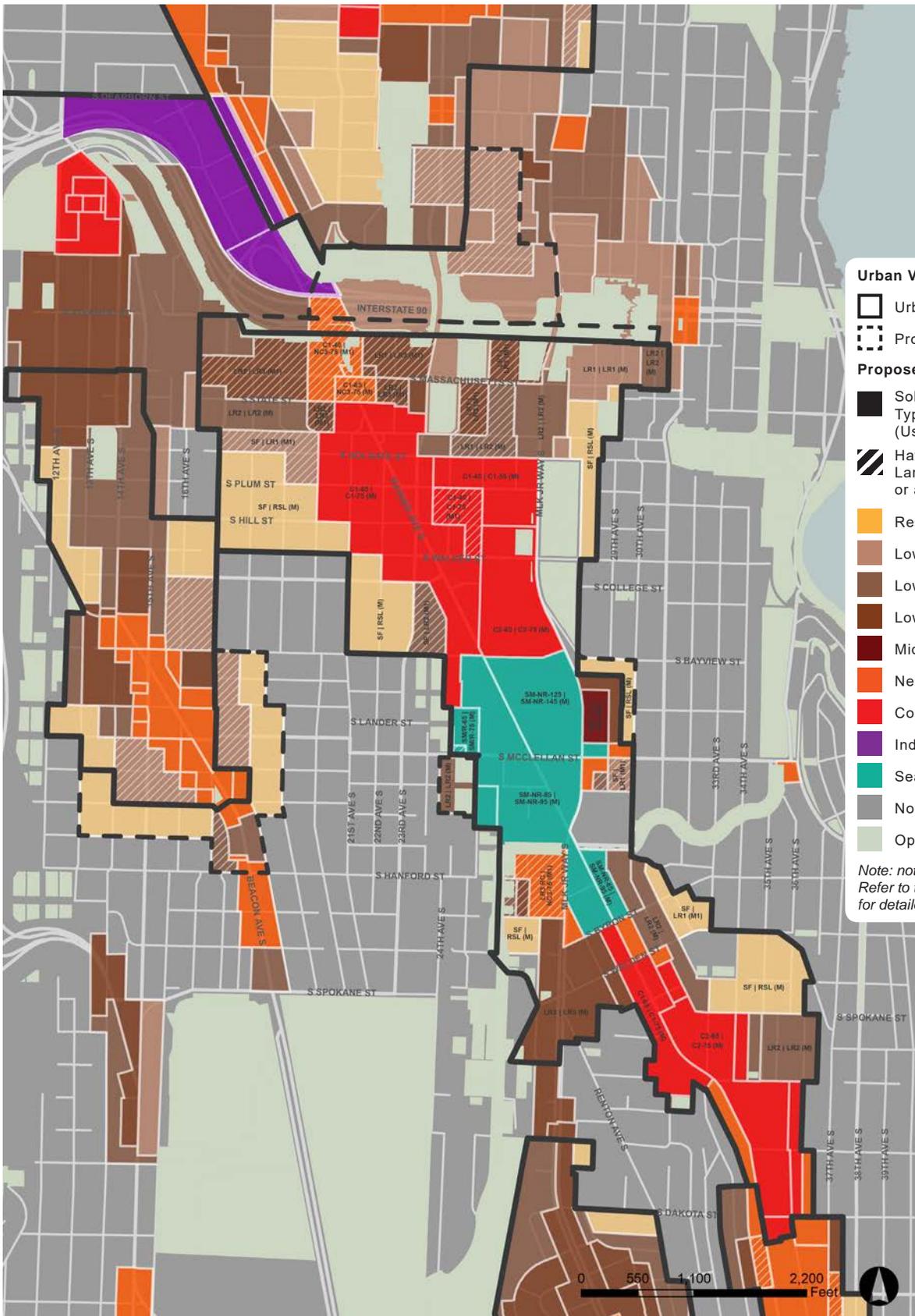
cc: Ted Jorve
Attachments

Attachment A

- Aerial Image of Jorve Property -



Exhibit H-40
 Proposed Zoning,
 Alternative 3:
 North Rainier
 Urban Village



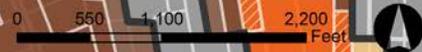
Urban Village Boundaries

- Urban Village
- Proposed Expansion

Proposed Zoning Categories

- 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
- Residential Small Lot (RSL)
- Lowrise 1 (LR1)
- Lowrise 2 (LR2)
- Lowrise 3 (LR3)
- Midrise (MR)
- Neighborhood Commercial (NC)
- Commercial (C)
- Industrial Commercial (IC)
- Seattle Mixed (SM)
- No Zoning Changes
- Open Space

Note: not all zoning changes are labeled. Refer to the MHA interactive web map for detailed zoning labels.



Source: City of Seattle, 2017.

From: David Ward
To: [PCD_MHAEIS](#)
Subject: Extend the Deadline for the DEIS
Date: Friday, July 28, 2017 10:08:59 PM

I ask that you extend the deadline until August 28 to give sufficient time to fully analyze the DEIS and its supportive documents.

Some of the information I have asked for from City or County staff has not yet been sent to me, including some information that was requested ranging from a couple of weeks until nearly a month ago. This delay has

Given that the DEIS proposed actions will impact the entire city, not just those Urban Villages and other areas that are included in the study area, and that the impact on the city will last decades, delaying the deadline until near the end of August will be insignificant.

David Ward

From: David Ward
To: [PCD_MHAEIS](#)
Subject: Each Urban Village and Surrounding Area Needs A Separate and Thorough Analysis
Date: Friday, August 04, 2017 7:38:25 AM
Attachments: [Each Urban Village and Surrounding Area Needs to Be Analyzed Separately and Thoroughly.docx](#)

August 4, 2017

Each Urban Village and Surrounding Area Needs a Separate and Thorough Analysis

"Downtown, South Lake Union, and Uptown Urban Centers; in each of these sub-areas [there was] a separate planning process ... with its own independent SEPA analysis." (p. 1.2)

While the City has created separate SEPA analyses for some Urban Centers, it has not given the same respect due to the people who live in the remainder of Seattle's Urban Villages, ignoring the diversity of different housing types, issues, and growth needs in each.

Out of a 450 plus page document, the DEIS takes up only 14 pages (3.99-106, 3.109-117) and includes only a single paragraph on each of 17 Urban Villages. Throughout the rest of the DEIS there is only occasional and passing reference to specific Urban Villages.

Additionally, as a method or reason to examine all of the Urban Villages together as a group, the DEIS tries to squeeze all the Urban Villages into four Displacement/Opportunity categories, where they do not fit. (Appendix A, p. 22) It's as though those putting together had to think of an excuse of "how can we put all of these Urban Villages together to avoid looking at them separately.

The DEIS also does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined. We all live in both our own neighborhoods and in the City at large, yet this DEIS and the others have failed to analyze both thoroughly and accurately.

The study area of the DEIS also included numerous areas outside the Urban Villages, yet other than appearing on a map showing the study area on page 2.3, there appears to be no references at all to properties in these areas, yet they will be impacted significantly as well.

David Ward

[The attached comment is the same as this email text]

August 4, 2017

Each Urban Village and Surrounding Area Needs a Separate and Thorough Analysis

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David Ward

From: David Ward
To: [PCD_MHAEIS](#)
Subject: Graphic Misrepresentation of Housing
Date: Friday, August 04, 2017 7:41:04 AM

Graphic Misrepresentation of Housing

The graphics that are supposed to show the current and new zoning heights and bulks misrepresent both (p. 3.140-3.151). By putting the houses representing current housing/zoning in the forefront and at an angle, the houses look much bigger than they are and by putting the proposed new zoning housing in the background the housing appears much smaller, when in fact it is larger. The only fair way to represent both is to show them side by side with both in the foreground and neither at an angle for a true comparison.

In addition, those graphics of the current housing/zoning misrepresents the actual housing in many, if not most, areas of the city, including nearly all areas south of the Ship Canal especially the low income areas from 23rd and Union down to Rainier Beach and across to South Park. While the zoning may be single family, with a 30' maximum, in reality the houses are small in both bulk and height, generally no more than 10' in height, not 30'. Changing the zoning to RSL to allow 30' townhouses will destroy the physical nature of the housing in those communities, displace hundreds who can no longer afford the higher taxes caused by the higher property values and additional City services required by the additional growth of wealthier people.

David Ward

August 4, 2017

David Ward

August 7, 2017

The DEIS Fails to Meet Its Stated Objectives

The DEIS fails to meet any of its four stated objectives. Below are the Objectives as stated in the DEIS followed by how the DEIS doesn't meet those objectives.

Objectives (p. 1.3)

- 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.

How The DEIS Fails to Meet Its Stated Objectives

Need for Affordable Housing

The DEIS does not address “the pressing need for housing affordable and available to a broad range of households.” MHA is only creating 5-7% “affordable housing” in the DEIS—a minimal amount of affordable housing that does not represent “a broad range of households,” either for the number of people served compared to the need: one in seven pays more than half their income (p. 1.1), or for the range of people's incomes or races: 60% of Area Median Income (AMI) is beyond “affordable” for large numbers of Seattle residents.

Also that level of rent, based on AMI, will only increase significantly as AMI increases substantially over the next 20 years the DEIS covers, given that we already recently have 11 times more people earning over \$75,000 here than those earning less than that (Seattle Times, 6/10/17) and this appears likely to continue.

Current & Projected Demand

While the alternatives in the DEIS will “increase overall production of housing to help meet current and projected high demand,” that housing is, and will continue to be, almost exclusively luxury housing far beyond the affordability of the majority of people (92% of market rate units are luxury units: Seattle Times 6/10/17). There is a current and projected high demand for *affordable* housing, which should be the key objective, but nowhere are solutions to that high demand for affordable housing addressed in the DEIS.

6,200 Net New Units

This DEIS does not show how to “create 6,200 net new rent- and income-restricted housing units,” because the number of units demolished is not adequately or sufficiently accounted for to attain those units (see below under Displacement), nor does it establish solutions like one-for-one replacement of those demolished units, which would lay the groundwork necessary to achieve those numbers.

Additionally, the DEIS could create far more than 6,200 net new affordable units if it chose a higher required affordable unit threshold among many other policies. The City has refused to do this, both during the HALA negotiations and during the scoping for the DEIS itself (see notably Solutions to Seattle's Housing Emergency, which was developed by housing activists, religious leaders and City Council aides, which provided more than 50 solutions to create more affordable housing than offered in the DEIS).

Distribute Benefits & Burdens Equitably

The DEIS absolutely does not “distribute the benefits and burdens of growth equitably.” In actuality, it does just the opposite: it increases the burden on low income people and people of color, while benefitting wealthier white people. (See “Displacement” below for further explanation.)

Displacement

Loss of Low Income, People of Color Housing Near Transit

The DEIS recognizes there is a strong displacement risk from living near current or future Link light rail (Appendix A, page 44), and also recognizes that new development can contribute to economic displacement at the neighborhood scale. (p. 3.37). The DEIS also recognizes that several [high displacement risk/low access to opportunity areas] have light rail service that is beginning to attract private market investment. (Appendix A, p. 23) While the DEIS recognizes that these problems exist, there is *zero* analysis of how many low-income people and people of color will be displaced by this proximity and further increased with expansions due to supposed “5 and 10 minute walksheds.”

Already hundreds of African-American families have lost their homes near good transit in south Seattle (3.7, exhibit 3.1-2 [note: this exhibit only shows to 2010 and the impact now is significantly worse now]), affecting not only each family personally, but the community as a whole. African-American homeownership has plummeted from 49% to 28% in King County (Seattle Times, 6/12/17), much of it from the Central District and other communities in the south end near good transit.

The proposed HALA upzones will exacerbate that displacement immensely due to numerous factors:

- The increased property values around light rail stations, *without upzones*, has *already* pushed out many low income and People of Color families when they could not afford the higher taxes due to the increased property and land values. The City has done little or nothing to mitigate this through their policies and the DEIS also does nothing to address this issue.
- The DEIS does no analysis of the broad displacement of low-income people and People of Color that will occur around light rail stations due to the further increased property and land values *from the HALA upzones which allow for more and larger buildings and Urban Villages expansions*, the increased taxes stemming from the larger valuations, and the displacement from the inability to pay the higher taxes caused by the new valuations.
- When taller, wider buildings and more units on properties are built, both will be more expensive than the current small houses throughout the south end and create further high taxes that will be difficult to afford for low income people who have been living in those neighborhoods. These buildings will also change the nature of the neighborhood (both physical nature and the race and class of homeowner/tenant), are too expensive for most current residents to afford and therefore will further displacement.
- Citywide, the HALA upzones will create significant growth which will require large investments in parks (434 acres of new parks at \$2.8 billion), transit (\$54 billion light rail and Sound Transit, \$11.3 billion Metro), police, fire, schools, wastewater and water infrastructure, etc. requiring an additional large increase in taxes, which will be a hardship on low income people and people of color and create further displacement.
- Increase in land and property valuations and taxes will also impact the ability of ethnic businesses to survive and losing large numbers of their neighborhood clientele will further undermine these businesses, disrupt their communities, and also encourage further residential displacement.
- “... new growth also has the potential to attract new amenities that could increase housing demand and potentially increase economic displacement in some neighborhoods.
- Displacement can also occur “if new housing brings about amenities that make the neighborhood more attractive to higher-income households, driving up rents and housing prices.” (p. 3.37-3.38), yet there is no analysis of this issue either.
- And finally the DEIS does not address the combination of all of these many factors which can compound the problems for People of Color and people with low-incomes.

And yet, City policies call for reducing racial and social disparities ... and conducting analyses before taking policy actions (page 1.4), but as shown above, this DEIS is not sufficient analysis to take a policy action.

From: David Ward
To: [PCD_MHAEIS](#)
Subject: Areas Outside Urban Villages Are Not Analyzed
Date: Monday, August 07, 2017 8:47:29 PM

Areas Outside Urban Villages Are Not Analyzed

The map on page 2.3 shows that additional areas outside the Urban Villages were part of the study area, as do maps on pages 3.156-7 and 3.162-3, yet there is no analysis of these areas anywhere in the DEIS—or even any reference to these areas. Without that analysis as part of the document, the DEIS is deficient.

David Ward

August 7, 2017

False Statements

Upzone Changes Create Minor Impacts

“Changes in intensity permitted by MHA rezones are generally minor to moderate in degree.” (p. 3.119)
None of the changes in Urban Villages were listed as minor. Each was listed as either Moderate and/or Significant (see table below).

	Alternative 2	Alternative 3
Rainier Beach	Significant	Moderate
Othello	Moderate and Significant	
Westwood-Highland Park	Moderate and Significant	Moderate
South Park	Moderate	
Green Lake		Moderate
Bitter Lake	Moderate	
Roosevelt	Moderate	Moderate and Significant
Wallingford	Moderate	Moderate and Significant
Ballard	Moderate	Moderate
Madison-Miller	Moderate	Moderate and Significant
Eastlake		Moderate
Admiral	Moderate	Moderate and Significant
West Seattle Junction	Moderate	Moderate and Significant
Crown Hill	Moderate	Significant
Columbia City	Moderate	
Lake City	Moderate	
First Hill-Capitol Hill	Moderate	
North Beacon Hill	Moderate and Significant	Moderate
North Rainier	Moderate	Moderate
23 rd & Union-Jackson	Significant	Moderate
Northgate	Moderate and Significant	
Morgan Junction	Moderate	Significant
Aurora-Licton Springs	Moderate	Moderate

Less, Not More MHA Requirements in Strong Market Areas

Higher MHA requirements would apply in strong market areas and lower MHA requirements in weaker market areas.” (p. 1.5) This statement is not true. Downtown and South Lake Union have only 2% MHA, yet have the strongest market area, while South Park, one of the weakest market areas has more than the average MHA.

David Ward

August 7, 2017

Inadequate Analysis

Page 3.133 of the DEIS says: “Given the large scale of the study area, impacts to aesthetics and urban design are primarily discussed in a qualitative and generalized manner. Because MHA is a broadly defined, citywide program, this EIS does not provide a detailed analysis of aesthetic impacts at any specific location because the exact form of a given development cannot be accurately predicted; any such analysis would be speculative.”

There are numerous problems with the DEIS, including those expressed in the above statement:

- An EIS is supposed to give a sufficient amount of detailed information to show that sufficient analysis was done. Unfortunately it is not only aesthetics and urban design which are discussed in a generalized manner, but all of the issues throughout the DEIS—and even “generalized manner” would be an extremely generous term. Only 14 pages of the more than 450 pages addresses the impacts of the Urban Villages and the impact on each Urban Village is described using only a single paragraph. Other than that, specific Urban Villages are only occasionally mentioned by name only with no further information or analysis.
- Based on the City’s housing project data, more than 80,000 units have been proposed, permitted or built since 2015, yet the DEIS does not base their analysis on the projects they already have in the pipeline. If the DEIS had based their analysis on actual projects in the pipeline they would have had a far more specific and accurate analysis of the impacts.
- RCW 197-11-425 (4) says that “The text of an EIS (WAC [197-11-430\(3\)](#)) normally ranges from thirty to fifty pages and may be shorter. The EIS text shall not exceed seventy-five pages; except for proposals of unusual scope or complexity, where the EIS shall not exceed one hundred fifty pages.” Despite being three times the maximum size allowed by state law, there remains insufficient information because the study area is so broad. To do the job necessary to sufficiently examine the impacts on each Urban Village, it’s necessary to analyze each Urban Village individually.

David Ward

August 7, 2017

Determine Seattle Out-Migration

The DEIS should be able to determine the out-migration of Seattle (the first quote below says that net residential migration is not available, yet the second quote below can quote number of households lost between 60 and 80 percent AMI and between 80 and 100 percent AMI and 100 and 120 percent AMI.

“This finding is based on survey data collected between 2011 and 2015. Thus, the estimate reflects the average number of people who moved to Seattle from a location outside of King County per year during this period. These figures represent in-migration only. During the same period, residents also moved out of Seattle. For King County as a whole, the estimated yearly net migration (in-migration minus out-migration) for this period was nearly 14,901 (OFM 2016). However, the number has been increasing over time. Estimated net migration from 2015–2016 was 39,168. Estimates for residential net migration for Seattle only are not available. (p. 3.4)

Exhibit 3.1-26 compares household estimates by income level from the 2000 Census to conditions captured in five-year estimates from the 2009-2013 ACS. During this same period, Seattle lost over 12,000 households with income between 60 and 80 percent of AMI. It also lost households with income between 80 and 100 percent of AMI and between 100 and 120 percent of AMI. (p. 3.33-3.34)

David Ward

August 7, 2017

TRAO as Inadequate Method for Analyzing Displacement

The DEIS uses TRAO (Tenant Relocation Assistance Ordinance) to estimate the number of low-income households who are and could be displaced due to demolitions, yet the 17 percent of units that they use as the definitive number for this estimate is woefully inadequate, even as the DEIS mentions, but then ignores. Since displacement is a core component of the DEIS, failing to adequately address displacement is a fatal flaw in the DEIS. (See pages 3.30-32 and 3.56-58, among others)

Below are the elements that the DEIS and others mention as limiting factors to the accuracy of 17 displacements per 100 as the full extent of displacements:

Footnote 7 on p. 3.30

- * Language barriers or mental health
- * The rate TRAO-eligible households complete the application is not available
- * TRAO data does not include all instances of eviction.

p. 3.32

- * TRAO records don't cover every instance of physical displacement caused by demolition
- * Does not track households with incomes greater than 50% AMI
- * Until recently, there were no mechanisms to deter developers from evicting tenants to avoid paying relocation benefits.

p.3.56

Do not reflect displacement of households with incomes above 50 percent of AMI or households who should have received TRAO but did not for various reasons.

p.3.74

All low-income tenants on a lease are treated as members of one household and granted only one quota of relocation assistance, even if they are roommates who do not intend to seek housing together again.

Not mentioned but relevant is that both many landlords and many tenants are unaware of the TRAO law.

David Ward

August 7, 2017

From: David Ward
To: [PCD_MHAEIS](#)
Subject: Problems With TRAO as Mitigation Measure
Date: Monday, August 07, 2017 11:04:44 PM

Problems With TRAO as Mitigation Measure

There are problems with TRAO as a mitigation measure, in addition to it being after an eviction, rather than something that stops displacement:

Footnote 7 on p. 3.30

- * No information is available regarding what portion of those who receive TRAO are able to find other housing in the neighborhood or city.
- * It's likely that many households also leave the neighborhood or city.

From: Barbara Warren
To: [PCD_MHAEIS](#); nicolaswelch@seattle.gov
Cc: [Alex Gagnon](#); [Kelly Rench](#)
Subject: Comments to the MHA DEIS issued by the City of Seattle on June 8, 2017
Date: Sunday, August 06, 2017 4:12:26 PM
Attachments: [DEIS Letter re Compromise Proposal.docx](#)
[Warren-Gagnon Proposal Map.pdf](#)

Please find attached the written comments to the MHA DEIS and attached map, including a proposed Sub Alternative, by three Ravenna residents who have Co-Sponsored a Compromise Proposal which we think will better achieve the goals of the MHA and potentially expand the reach of the MHA, as well as address adverse impacts and neighbor concerns.

Sincerely yours,
Barbara Warren,
Alex Gagnon,
Kelly Rench

August 6, 2017

Office of Planning and Community Development
ATTN: MHA EIS
P.O. Box 34019
Seattle, WA 98124-4019

MHA.EIS@Seattle.gov;
Nicolas Welch, OPCD, nicolaswelch@seattle.gov

Re: Comments to the MHA DEIS issued by the City of Seattle on June 8, 2017

We make these comments on behalf of ourselves, and for many residents of Ravenna who have supported a Compromise Proposal concerning the expansion of the Roosevelt Urban Village Boundary and proposed new zoning under the MHA. We support Seattle's effort to increase affordable housing and specifically support the MHA inclusionary zoning policy, the subject of the DEIS, and submit the following comments. In addition, we support efforts of ALL Seattle neighborhoods to make Seattle more equitable, not just the Urban Villages; and therefore request the SUB ALTERNATIVE described herein be included in the Action Alternatives:

1. **Require Developers to Build Units, Not Pay Fees:** We strongly support requiring MHA developers in areas designated "high opportunity" to be required to include affordable units in their developments, rather than contribute a fee, as this policy will more directly insure that affordable units are distributed equitably in the City, and minimize displacement.

2. **Sub Alternative Part One: Where appropriate, do transitions outside of Urban Villages, implement appropriate zoning within the adjacent SF neighborhood, rather than move the Urban Village Boundary or Expand the Urban Village**

We affirm much of the increased zoning proposed in OPCD's October 2017 Plan, and parts of Alternatives 2 and 3 of the DEIS, as clarified below. In exchange for the new zoning, and in response to neighborhood concerns, and adverse impacts identified in the DEIS, we believe the MHA program goals can be better accomplished by creating a more effective transition between the Roosevelt Urban Village and Ravenna **outside** of the Urban Village, while keeping the Roosevelt Urban Village eastern boundary along the current border of 15th Ave NE and not expanding the Urban Village to the east.

Sub Alternative: Part Two: Allocate Planning Resources to SF neighborhoods who want to plan proactively for expansion of housing opportunities in their neighborhoods

This proposal would allow Ravenna to study options for increasing housing opportunities in the broader community of Ravenna/Bryant. This policy would reward neighborhoods who want to plan proactively, could extend the reach of the MHA; create more walkable neighborhood business districts; more family-size, ground related, mixed-income housing in the neighborhood rather than on major arterials.

3. Summary of Support for proposed zoning changes and clarifications: See Map

North of NE 65th-

- a. Adopt OPCD's proposed rezoning from SF to LR3 along the East side of 15th Ave NE from NE 65th St. to NE 68th St. (same as OPCD Plan & Alternative 3, higher than Alternative 2). Our design preference would be row houses with backyards to provide more room for the tree canopy and storm water retention, and create a better buffer for lower zoning to the east.
- b. Adopt modified proposed new zoning from SF to LR-1 along the West side of 16th Ave NE from NE 65th to NE 68th. (change from OPCD & Alt 3 LR -2, but higher than Alt. 2)
- c. Change RSL to SF from the East side of NE 16th Ave to the West side of NE 17th Ave. (including the commercial on NE 65th except for the existing NC-40 on 15th Ave NE.)*

South of NE 65th-

- d. Keep Existing NC-40-55 south of NE 65th St along from 15th Ave. NE (same as all options)
- e. Retain SF south of existing NC-40-55 zoning as SF along 16th Ave NE and 15th Ave NE.
- f. *Change all RSL to SF because current policy restricts RSL to Urban Villages, there is some interest in the community for keeping RSL as a future option.

4. Description of Impacts, Mitigation, and Comparisons of Action Alternatives

These proposed changes pertain to local conditions that will result in better, more gradual transitions between MF and SF and will mitigate concerns about land use impacts of bulk and scale, shade, and solar access. Not changing the Boundary will also mitigate impacts to historical resources; aesthetics, transportation & parking, as well as better protect the tree canopy, Ravenna Ravine and Creek and improve storm water management. Concurrently accepting many of the proposed changes in zoning will provide increases in density, promote needed redevelopment of 15th Ave NE and create new opportunities for MHA affordable units. The local impacts and mitigations are described below as well as a comparison of the Action Alternatives.

Land use

The current boundary of 15th Ave NE makes better sense than 16th or 17th Ave NE. The proposed expansion area of the Roosevelt Urban Village is relatively small just one or two blocks east, except for a small sliver in Alternative 3 along the main arterial NE 65th from 16th Ave NE to 20th Ave NE. The boundary of Ravenna has been on 15th since before 1907 when it was annexed to the City. Boundaries normally are articulated on arterials, not on narrow residential streets, such as 16th or 17th Ave NE. In the case of the Roosevelt Urban Village, better, more legible, gradual transitions between urban village densities and SF can be created outside of the urban village, rather than changing the boundary.

The proposed zoning provides a better transition from urban form to SF. The proposed alternative zoning is identical to Alternative 3 in the step down from the Urban Village on west side of 15th Ave, north of 65th where a new 7 story building is being permitted next to Roosevelt High School, to L-3 on the East side of 15th. The compromise proposal then proposes to transition to L-1 on the West side of 16th. LR-1 makes a better transition in bulk and scale than LR2 to SF owners who choose to remain in the LR-1 zone on 16th, and to the SF across the street on the east side of 16th Ave NE.

Accepting the up-zones preserves the same potential for MHA affordable units and density on 15th, and slightly less on 16th than Alternative 3, but provides significantly more on both streets than Alternative 2 or Alternative 1. North of 65th is closer to the light rail station and school than the area south of 65th, where the heights across the street in the urban village are lower. The northern end of the West side of 16th is buffered from the LR3 zone by a joint access alley. The houses on the southern end of 16th are already facing a transition to NC40, a remnant of the older zoning preference in Seattle of putting most MF on arterials. Additionally, south of 65th, the proposed expansion of NC-40(55) from SF is too stark a transition and the compromise proposal keeps it single family.

Alternative 2, proposes RSL on 15th and 16th, would be more compatible in height and bulk to SF, but not necessarily compatible with the established architectural and urban form, and would not produce as many MHA affordable units. The difference between SF, if the boundary remained at 15th under the Sub-Alternative, and the proposed RSL in the Expansion proposed under Alternative 2 or 3 would not be significant. Many of the lots in the area are either too small to support an additional house, or because of the placement of the house on the lot, would require tearing down the existing house and many houses would likely be too expensive and/or sufficiently upgraded to meet current code, energy, seismic, and technology standards to be feasibly redeveloped as RSL within the 20-year framework of EIS analysis. This area already has ADU's, a more likely scenario to create affordable housing in this area.

Proposed increased zoning on NE 65th St needs further study. Alternative 3 proposes expansion along NE 65th to 20th. This area of 65th is topographically challenged as there is a steep slope up the hill from 16th Ave NE to the crest of the hill at 18th, and then an even steeper descent to 20th. There are no alleys serving the north side of NE 65th, both of these factors are noted in the DEIS to potentially be mitigated by adopting less intensive use. (3.121). This idea currently has some interest in the community but needs further study, See Transportation below.

Community Planning recommended by DEIS as mitigation for land use impacts. The DEIS specifically mentions that the current criteria for land use rezones may not be met in Roosevelt (p. 3.118), and that mitigation measures might include, “address potential land use impacts as part of neighborhood level planning efforts.” (p. 3.120) Currently, only areas in Urban Villages have access to city planning resources, and the Sub Alternative Part Two would help areas like Ravenna/Bryant do local level planning.

Aesthetics

Neighborhood Design Guidelines Recommended by DEIS
Historic Ravenna, which includes parts of Bryant, has a consistent, established architectural urban form, and is one of Seattle's well-preserved “bungalow” neighborhoods. Since many

homes in Ravenna/Bryant are historic Craftsmen houses, concerns for historical resources and aesthetics have been expressed by neighbors, impacts which have also been identified in the DEIS. One mitigation measure suggested in the DEIS is Neighborhood Design Guidelines, which Ravenna/Bryant does not currently have. (3.165) This is another potential benefit to neighborhood proactive planning.

Transportation

Alternative 3 Expansion along NE 65th to 20th Ave NE needs further study. As mentioned before, there is some interest in the community; specifically to expand LR1, 1 block north and south along NE 65th from 16th Ave NE to 20 Ave NE. The goal is to promote more rapid redevelopment by creating development pathways that work for single lots because in the current intense real estate market for single family houses waiting for two or more adjacent lots to be assembled could stall development. NE 65th is the most logical walking corridor to the light rail station and could connect the business districts of Ravenna and Roosevelt. Commercial zoning would not be favored in this section, as demand is not strong enough presently. In addition, sidewalks are narrow, parking problematic, and in the shifting retail environment could hinder the health of the neighborhood business districts.

Before embracing this idea, more study is needed because of current neighborhood safety concerns about this particular stretch of NE 65th. RBCA is currently in discussion with SDOT, and expansion of development needs further study to make sure existing problems would not be exacerbated. NE 65th is a major access point to I-5 for commuters, has many buses, steep hills, limited visibility, limited cross-walks, no alleys on the north side and no bicycle lanes. Traffic routinely comes to a crawl, even on weekends. There have been numerous accidents, including a fatality.

Parking is also a concern of many neighbors. The residential streets are very narrow, and many of the old houses do not have garages, so there is already crowded street parking. This is especially intense on 16th, which has parking on only one side of the street and is often used by students going to Roosevelt. Not moving the boundary of the Roosevelt Urban village will provide parking for the incoming residents, mitigating the impact of the new development.

Historical Resources

Ravenna is one of the older neighborhoods in Seattle, resulting in a treasured collection of historic, architecturally significant Craftsmen and Tudor houses, with some Mid-Century homes. The area has not yet been surveyed and therefore potentially historical resources would be lost as development occurs. The DEIS describes “potential decreases to the historic fabric of a neighborhood” when historic buildings are redeveloped or demolished and new buildings are constructed “that are not architecturally sympathetic to the existing historic characteristics of a neighborhood.” (3.252) Since there is significant, but not universal, concern in the neighborhood about this issue, it is another reason to not extend the boundary of the urban village before the opportunity is lost to preserve what is most important.

Biological Resources- Tree Canopy and Environmentally Critical Areas (ECA)

Seattle's urban forest, mostly located in Seattle's SF zones, provides many ecological services such as relief from the urban heat island, cleaning our air and water, and helping with storm water management, as well as being described in the DEIS as "fundamental to the character of Seattle." All Action Alternatives will result in loss of the tree canopy according to the DEIS. Indirect impacts are identified as "changes to stream flows from upstream development" (3.263); cumulative effects of multiple parties actions could potentially alter drainage patterns and/or affect soil and slope stability, and discharges to streams may be impacted by runoff of pollutants from street surfaces. (3.265) Cumulative effects are critical in evaluating future impacts, one construction project may be nothing, many may mean disaster.

Per the pattern of the Programmatic DEIS, these impacts are characterized as not significant city wide because of the relative small amount of acreage. (3.2700) No study specific to the impacts to the Ravenna Park riparian corridor and steep slopes is cited though there have already been problems of erosion and sink holes adjacent to the park. Ravenna Creek is a bit of an anomaly because its original source of water from Green Lake was cut off and diverted to sewer pipes when the Olmstead Brothers created Green Lake Park, thus leaving very local water table sources to provide the flow of the creek.

On a city wide basis, the pattern of growth also needs to be assessed as to whether buffers of SF areas with tree canopy are needed between urban densities that take account of the watersheds as well as just counting acreage. There is no study cited that looks at the future green infrastructure map in comparison with the projections for increasing urban densities and what appropriate policy would integrate them. It is assumed that the Urban Tree Plan protections will suffice, but a new Tree plan is under development to patch recognized deficiencies. The area to the south of 65 Ave NE nearest to the Park is especially important to protect trees to better protect the source of the flow, and to help with storm water management from the city streets.

Ravenna/Bryant has a combined sewer and storm water system which contributes to the CSO overflows and limits the capacity of West Point Sewage treatment plant to function in the new normal of heavier rain storms due to climate change. The city has spent millions of dollars on concrete holding tanks as solutions to this problem, rather than adopting much cheaper Low Impact development methods.

5. Conclusion: We think the above proposal is a reasonable compromise to allow for new growth in the immediate future and make planning for a long term sustainable Seattle more successful.

Respectfully submitted,

Barbara Warren, Ravenna Resident, Co-Sponsor of the Compromise Proposal
6543 19th Ave NE,

Alex Gagnon, Ravenna Resident, Co-Sponsor of the Compromise Proposal
16th Ave NE

Kelly Rench, Ravenna Resident, Co-sponsor of the Compromise Proposal
17th Ave NE

Urban Village Boundary

15th Avenue NE

SF | LR-3

SF | LR-1

NC-40 | NC-55

16th Avenue NE

SF

17th Avenue NE

Warren, Barbara

NE 68th Street

18th Avenue NE

NC-40 | NC-55

SF

SF

NE 65th Street

NE 63rd Street

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:

The city needs to listen to the people who live in these neighborhoods and will be highly impacted by the ~~city's~~ poor choices.

Name: Rose Waterman
Address: 4755 36TH Ave SW.

From: TWWT88@aol.com
To: [Herbold, Lisa](#)
Cc: [PCD_MHAEIS](#)
Subject: Re: HALA in Gatewood
Date: Friday, August 04, 2017 10:52:45 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Dear Councilmember Herbold:

Thank you for taking the time to provide information about my concerns. You are right that I am not in the Morgan Urban Village, but I am literally adjacent to it. Again, my concern is the proposed upzoning of the west side of 42nd Ave SW between Holly and Heights Ave.

I reiterate my support for affordable housing in Seattle, but I take issue with some of the planning.

In addition to the concerns in my original letter below, I add that significant upzoning of this block will adversely affect a fine neighborhood, one of those little gems tucked away all over Seattle. Ours is cohesive and successful in that we know each other, look out for each other, and so on. We have lived here nearly 29 years because of it; others have lived here longer.

If this upzoning proceeds, it will create winners and losers. Winners will sell good middle-class houses to developers for above market value and move on. Losers will see the houses across the street razed and replaced by maxed out multi-unit housing to the extent the Council permits, and their property values will fall because the neighborhood fundamentally changes. Neighborhood conversations confirm this. It was a topic at the recent Night Out this past Tuesday. Some admit they will cash out; others will not be able to.

Everyone will struggle to park because the City will not require off-street parking to replace lost off-street parking. Worse, the situation will be exacerbated by increased housing and population density and inevitably more cars no matter how much the City doesn't desire more cars. Even with good transit, which we don't have, people will keep and acquire cars and trucks for work, convenience, shopping, recreation, hobby, etc. Others will park boats, campers, trailers on the street; they do now. Even electric bikes won't be popular in November or February. If you drive or walk up this short block any evening, you will see the street is already congested with our cars, cars from nearby businesses, and cars from condos and apartments on California and Holly, and beyond. Even permit parking will not suffice because of existing adjacent density.

Still worse, I don't believe developers will build affordable housing, however it's defined. The affected six houses are view houses, so replacement housing will be built to take advantage of that. As far as I can tell from recent reports from other affected neighborhoods, the penalty for developers to avoid including truly affordable housing in new developments is paltry. There is no true incentive to build independent, unsubsidized housing in Seattle, so developers inevitably build to the "highest and best use" standard, which is not the kind of affordability the City needs.

So, I am asking that the six houses in the area I described be deleted from any upzoning or even from the Morgan Urban Village. If that cannot be accomplished, I ask for minimal upzoning, perhaps backyard cottages. and certainly mandatory parking for new development.

I also would like to be constructive and propose you introduce legislation to exempt public school teachers, cops, and firefighters from property taxes in Seattle. That would go some ways toward making housing for our most valuable neighbors throughout the city more affordable. The Portland plan for backyard cottages might also be considered.

I understand you cannot wave a wand and make it so, but this is your district and your neighbors, and I know you are respected on the Council and your opinions carry weight.

Thank you for looking out for one little pocket of West Seattle.

Sincerely,
Tom Weingarten
206-932-6340

In a message dated 8/4/2017 4:53:32 P.M. Pacific Daylight Time, Lisa.Herbold@seattle.gov writes:

Dear Tom,

Thank you for contacting me about the proposed [Mandatory Housing Affordability \(MHA\) program](#) and for sharing your concerns about how this proposal will impact West Seattle. The city is grappling with an affordable housing crisis and rent control is not permitted in Washington State. The MHA proposal is part of the Affordable Housing Incentives Program Act, RCW 36.70A.540, it authorizes and encourages cities to enact or expand affordable housing incentive programs providing for the development of low-income housing units through development regulation or condition on rezoning or permit decisions, or both. According to the Affordable Housing Incentives Program Act, jurisdictions may establish a minimum of affordable housing that must be provided by all residential developments in areas where increased residential development capacity has been provided.

The MHA program will require developers in urban villages to contribute to affordable housing by either building it on-site or paying into a City fund for Affordable Housing. Right now, developers do not have to contribute to developing affordable housing. With the MHA program, the city plans to develop 6,000 affordable units with the implementation of the MHA program. The Full Council has adopted MHA for both [University District](#), [Downtown & South Lake Union](#); [23rd](#) and [Union-Jackson Residential Urban Village](#) and the [Chinatown International District MHA program](#). Right now, the [Planning, Land Use and Zoning Committee](#) is discussing the proposed upzones for [Uptown](#). There is also a MHA proposal for city wide areas that the Mayor and Office of Planning and Community Development is working on that is scheduled to come before Council in early 2018.

Based on the address you provided, 6903 Heights Avenue SW, your address is not located in an urban village or proposed urban village expansion area, the map is located [here](#). I recognize that when we live nearby properties that will be rezoned, that sometimes there are impacts and improvements to the areas that affect all of us, regardless if the property that we live in is itself proposed to have its zoning changed.

In November and December, residents asked me to advocate for a six months delay for review. Eight months later, we are still in review of this proposal. Specifically in response to D1 residents ask for more time to comment on the Draft EIS, I asked OPCD to extend the

comment period, an extension was granted and then she asked for an additional extension, but that was declined. In addition, I have been asking for more time and this request has been declined. I am listening to residents in District one, here are a few blog posts on this issue ([Nov. 4](#), [Dec. 2](#), [Jan. 6](#), [Feb. 10](#)). I have also worked closely with communities that have recently adopted MHA.

I want to emphasize that the city wide MHA proposal has not been transmitted from the Mayor to the Council yet, and we don't expect it to be until the end of the year with the Council acting in 2018. The policy proposal is led by the Office of Planning and Community Development (OPCD) and OPCD reports to the Planning, Land Use and Zoning Committee. The city is grappling with an affordable housing crisis and rent control is not permitted in Washington State. The MHA proposal is part of the Affordable Housing Incentives Program Act, RCW 36.70A.540, it authorizes and encourages cities to enact or expand affordable housing incentive programs providing for the development of low-income housing units through development regulation or condition on rezoning or permit decisions, or both. According to the Affordable Housing Incentives Program Act, jurisdictions may establish a minimum of affordable housing that must be provided by all residential developments in areas where increased residential development capacity has been provided.

The broad principles of the MHA program were approved by the Council in last year's [MHA framework legislation](#), in Fall 2016. This framework legislation laid out how all developers would newly be required to contribute to new affordable housing in all developments in exchange for additional zoning capacity. The steps that we are engaged in today include specifics about how much developers must contribute and how much – and importantly - as well as where additional zoning capacity is added. Prior to the development of the Mayor's initial zoning proposal, the OPCD and Department of Neighborhoods (DON) selected 160 community members (from a pool of 250 people who applied) to participate in a nine-month facilitated focus group process to develop principles and recommendations for zoning change proposals to enact MHA. A summary of the focus group process may be [found here](#). An additional summary may be [found here](#).

Here is the link to the [Open Space and Recreation](#) of the Draft EIS. This chapter provides a programmatic assessment of potential impacts to parks and open space in the EIS study area resulting from increased housing and employment capacity proposed as part of MHA implementation. Also, The [Seattle Parks Department](#) is currently undertaking parks and open space planning, The [2017 Parks and Open Space Plan](#) is required by the Washington State Recreation and Conservation Office to maintain the City's eligibility for state grants that will help realize outdoor recreation development and open space acquisition projects; as such the Plan needs approval by the Superintendent and must be adopted through resolution by City Council. The Plan will be presented to City Council's Parks Committee on July 20, August 3 and September 7, and to the full City Council for a vote on September 11.

In regards to your concerns about parking and development under new MHA proposed zoning. In 2015, the Council passed Ordinance 124608, which specifically requested an analysis of the City's vehicle and bicycle parking requirements for residential uses, here is the [report](#). My concerns with this report are as follows:

- 1) There was little Seattle data on the number of people who have cars living in buildings with reduced parking through the parking exemptions.
- 2) For some of the data points, it is very difficult to disaggregate the Seattle data from King County because the City study was based upon a King County study.
- 3) The study also mixed data from buildings in areas not eligible for exemptions with buildings in areas eligible for parking exemptions to make general conclusions about unused parking capacity that was not relevant to the experience of individual neighborhoods eligible for parking exemptions.

Since mid-2012, the City has not required parking for residential development in urban villages, when the multifamily development is located within 1320 feet (about ¼ mile) from a stop with frequent transit service. You can find maps of urban villages [here](#). The City is currently refining its definition of "Frequent Transit Service." More information on that work is available [here](#). I believe that developers that receive the benefit of parking exemptions in their developments must demonstrate both a greater affordability of their units and ensure that renters occupying those units truly do not have cars.

For more information about local parking permit options, here is the information about the [restricted parking zone program](#) and how to [initiate a RPZ program](#) in your neighborhood. If you have more specific questions about the future of the parking policies, please contact Councilmember Johnson as his office may have additional information as it relates to this issue.

I am concerned about the impact that growth is having on existing residents and neighborhoods. Last February, I sponsored, and the Council passed, [Resolution 31733](#), to request an analysis of both physical and economic displacement as part of the Draft Environmental Impact Statement (DEIS) in order to evaluate whether the proposed city-wide upzones would: (1) increase or decrease direct displacement due to demolition; and (2) either introduce or accelerate a trend of changing socioeconomic conditions that may potentially displace vulnerable populations. Check out my August 2016 [blog post on the topic](#). This resolution put the Council on record declaring its "intent to consider strategies to mitigate any loss of subsidized affordable units and naturally occurring affordable units resulting from an increase in development capacity." It also made very clear the kind of analysis that the Council expected as part of the of the Displacement Risk Analysis being done for the DEIS.

Because the DEIS was not fully responsive to Resolution 31733, in July 7, I sent a letter to Office of Planning and Community Development (OPCD), Director Sam Assefa requesting again that this analysis be completed. Here are the 2 blog posts I wrote on, [June 16](#) and [July 7](#). I have also attached a letter that I sent to Dir. Sam Assefa with OPCD on Friday, July 7 and the July 20 response letter that I received from Dir. Assefa on this matter.

The comment period on the DEIS was announced on June 8 and then was extended to respond to requests for additional time from Sunday, July 23 to **Monday, August 7**.

I am currently work on compiling specific D1 concerns regarding the DEIS to add to a letter that Councilmember Johnson will submit to Director Assefa on Monday, August 7.

Please comment by **Monday, August 7**, by using OPCD's [online form](#), by email to MHA.EIS@seattle.gov, or by mail to:

Office of Planning and Community Development

Attn: MHA EIS

PO Box 34019

Seattle, WA 98124-4019

For more information about the environmental review process watch OPCD's [What is an EIS?](#) video. The Washington State Department of Ecology also has information about [SEPA](#) and the [EIS process](#).

Thank you again for contacting me about this important issue.

Best,



Lisa Herbold

District 1 Councilmember

206-684-8803

lisa.herbold@seattle.gov

P. S. Please feel free to [click on this link](#) to sign up for my weekly blog posts!



From: twwt88@aol.com [mailto:twwt88@aol.com]

Sent: Friday, March 03, 2017 6:26 PM

To: Herbold, Lisa <Lisa.Herbold@seattle.gov>

Subject: HALA in Gatewood

Good morning Councilwoman Herbold,

I am writing about the proposed upzone on the west side of 42nd Ave SW between SW Holly St and Heights Ave SW, and the citywide need for more housing. Clearly Seattle is having a growth spurt and, I read, just topped 700,000 residents. And just as clearly, they do need to live somewhere.

I understand HALA proposes to allow developers to replace six perfectly good, occupied, well-maintained single-family homes with up to 54 assorted dwelling units. That's nine times the number of housing units crammed into a very short block. That's a lot!

While I truly do understand the need for more housing in the city and region, I don't believe this is the way to get it. Part of the need is for affordable--surely a flexible concept these days--housing in addition to just more of it.

Allowing this development in this particular block is not right or effective. There are many reasons,

but I will be succinct and limit this to a few.

First, this is an established neighborhood. The proposed upzone will change it dramatically. It will replace varied housing from different decades and one home with unique built-in art with cookie-cutter developments, the kind that are boring and rapidly turned over and eventually plowed under for other newer development. This would replace quality homes with bang-for-the-buck cheap, mass housing. Seattle is losing its character block by block, with long-term consequences.

Second, it would inevitably reduce green space, needed trees, etc. with pavement and hardscapes. That is bad for the air and bad for nearby Puget Sound.

Third, this block is just a decent golf shot from hundreds of multi-family dwelling units on California, Holly, and the next block north on 42nd, some with inadequate parking and others with no parking. The Morgan Junction neighborhood is already doing its part to accommodate Seattle's growth.

Fourth, we are just a few blocks from High Point. Our neighborhood already has a good share of low income housing.

Fifth, because the property in question has views and view potential, it is likely to be sold as expensive per square-foot housing, not contributing to affordability. I don't regard \$500 - \$750 or more per square foot as particularly inexpensive. Ultimately, this kind of development destroys good neighborhoods to reward bankers and developers.

Sixth, too much of the newer local multi-family housing is already built without adequate off-street parking, so with more units street parking, already in short supply, will become a free-for-all. The row houses on Holly have limited parking that the intended residents seldom use, so they park on the streets, and when they can't they migrate up 42nd. Added to the daily congestion is the employee parking from the Morgan Thriftway. People from condos and apartments on California and Holly regularly park on our block because they don't have adequate or convenient parking. They leave cars for days at a time. I cannot imagine what adding 54 units, most with two cars and no off-street parking would do. It would surely spill onto other blocks, exacerbating everyone's problems.

Finally, I think the City Council and city leaders have a responsibility and duty to consider the residents of existing neighborhoods. This is not a "nimby" issue. It is one of equitable treatment of the people who have invested in the state of their city for years and decades. We have chosen a place. We have paid taxes. We have made improvements. We have made plans. We have planted roots--literally and figuratively. We are your constituents and depend on you to look out for us. It is not right for the City to renege on established and accepted zoning without considering its tenured residents.

Already people, especially highly paid millenials, are leaving for Bremerton and Anacortes and Cle Ellum because Seattle seems unbearable. That is the future voting with their feet on a livability issue.

I know some of our neighbors have invited you to tour our block and neighborhood with them to get a truly local perspective. If you have not, I urge you to do so.

Growth is a problem, but the present growth is the flip side of suburban growth in the past 30 - 40 years. The present trend is to be urban. But that will change again, and it will change faster if the city loses its soul and is no longer desirable. Then we will lose the good jobs, and the rapid growth and return to 500,000 residents with empty buildings that no one really wants to live in. The growth must be organic, not foisted upon neighborhood after neighborhood by a reckless numbers game that ignores local realities. The City should abide by previous agreements negotiated with the Morgan Junction Association, or at least really listen to local residents in these decisions.

Growth is also an opportunity to be thoughtful and deliberate and considerate. I ask you to apply those qualities to the 6700 block of 42nd Avenue SW. I would be happy to help in that process.

Thank you.

Tom Weingarten

6903 Heights Avenue SW

206-932-6340

Name	Margaret West
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 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.</p> <p>Each Urban Village and Surrounding Area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.</p> <p>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.</p>
Biological Resources	<p>2 The analysis of impact on tree canopy should be done on a neighborhood by neighborhood basis, not only on zoning type. Lot sizes vary within the zoning type, and the older the neighborhood, the longer the trees may have had to grow. The reduction in tree canopy under Alternatives 2 and 3 is treated as minor, but since the city's goal is to increase tree canopy, the reduction should not be considered insignificant.</p>
Public Services & Utilities	<p>3 The city has mapped the basics of the existing systems to show size of mains and branches to properties, however, the map does not include data in fixture units (per the Plumbing Code) for those connection points. The necessary tools are not in place to allow the city to accurately determine how close to overload existing utility systems are.</p>
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	

From: Melissa Westbrook
To: [PCD_MHAEIS](#)
Cc: [Herbold, Lisa](#); [Harrell, Bruce](#); [Sawant, Kshama](#); [Johnson, Rob](#); [Juarez, Debora](#); [O'Brien, Mike](#); [Bagshaw, Sally](#); [Burgess, Tim](#); [Gonzalez, Lorena](#)
Subject: HALA EIS
Date: Thursday, July 27, 2017 9:46:55 AM

To Whom It May Concern:

I am a long-time public education activist and writer/moderator of the most widely-read public education blog in Washington state.

I am writing about some terrible omissions in the HALA plan around public schools. Some of what I will say is paraphrased from Rep. Gerry Pollet.

First and foremost, there need to be **impact fees** because of infrastructure issues, including schools, from rapid development.

Second, **the Council should pass an ordinance committing to consider school capacity in all planning decisions.**

Third, **Replace test scores as a criteria for educational opportunity** with data on school class sizes and capacity in school buildings, including capacity to serve higher need children, such as bilingual education and special education programs.

From the report:

Alternative Two (bold mine):

Public Schools

*Population growth would increase student enrollment in various urban villages throughout the city. Approximately 30 percent of SPS's schools are located in urban villages. **Encouraging population growth in urban villages could result in the exceedance of maximum enrollment levels.** SPS has calculated enrollment through the 2021/2022 school year, while the MHA is projected through 2035. **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.** If the MHA program is adopted, SPS would adjust their enrollment projections accordingly for the next planning cycle.*

The rise in enrollment at public schools in urban villages will impact SPS transportation services. The Northgate, Bitter Lake, Lake City, North Beacon Hill,

Othello, Rainier Beach, South Park, Greater Duwamish urban villages are currently experiencing strain on existing deficient sidewalk infrastructure. As a result, the increased school capacity in these villages would subsequently burden the existing sidewalk infrastructure even further, posing a safety risk to pedestrian students.

"SPS would respond?" Look, we're all in this together and the City cannot possibly believe the district - by itself - will be able to respond to all this growth without help. Yes, the district will "pursue future capital programs" but it **won't** be able to keep up with the pace of growth with just BEX.

As well, there are near-zero "closed buildings" and "adding portables" is not a growth solution - it's a bandaid.

Next, the Draft EIS and the City did NOT consider school capacity in proposing these upzones and massive population increases. The Seattle School District's capacity analyses – which were readily available, but ignored by the City – show the areas proposed for massive population increases have the most overcrowded schools. The schools in these areas have NO capacity for additional students; much less meet the constitutional duty to lower class sizes (which requires physical space) or to provide the significant increase in space per student for higher need students with limited English proficiency or special education and tutoring needs.

If the City was serious about working with Seattle Schools and educational opportunity, **the HALA proposal would include plans for using city owned properties and other opportunities to provide much-needed land for new schools to accommodate the students who will need schools** from the nearly 100,000 housing unit increase which the HALA plan proposes for Seattle in twenty years

For example, the **Roosevelt, Ravenna, Lake City, Ballard and Crown Hill** neighborhood urban villages are proposed for additional expansions due to claimed "educational opportunities," coupled with low "displacement" potential. But, as every parent in these neighborhoods knows, there is not space for another student to be crammed into any of the nearby schools; and, the City has already informed the school district that it would violate codes to cram more portables onto local elementary school lots. These upzones would be on top of the massive upzone for the adjacent U District which the City boasts will add thousands of new families. Again, the City refused to consider where those children would go to school - although there is **no school in the U District** and the nearby schools are all over capacity. For the U-District, Roosevelt and Ravenna, the plan could easily consider the City providing the Green Lake Reservoir site for school capacity... but, it fails to even consider that obvious mitigation (mitigation is legally required).

The MHA Draft EIS' claims of high "educational opportunity" justifying additional upzones

are based on test scores, not access to school capacity! (See Tables 4 and 5, “Access to Opportunity Index Indicators,” Appendix A).

The Draft EIS fails to consider school capacity to handle proposed growth in family population from the proposed upzones. The Draft EIS designates numerous areas as “high educational opportunity,” resulting in proposing greater density and increased population of school age children, despite the fact that **there is NO current physical capacity in schools serving those areas.**

The Draft EIS and HALA plan also fail to consider access to programs serving **Limited English Proficiency or high special needs students in Seattle Schools and lack of capacity to serve such students**, which require significantly increased physical capacity in a school (physical capacity and instructional capacity do not exist in many of the proposed upzone areas). **This failure is shocking given the claimed emphasis on equity and desire to add lower income housing serving higher need students in these areas.**

I urge the Council to heed these considerations or proceed without doing so at their own risk. Our district is already groaning under its capacity needs.

Sincerely,
Melissa Westbrook
Seattle Schools Community Forum blog
206-390-0404

Name Email address 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. Comment Form Housing and Socioeconomics	<p>JoElla Weybright</p> <p>myself, only</p> <p>1 I am writing specifically about the Roosevelt Urban Village and the expanded boundaries east into West Ravenna at NE 65th St. The boundary expansion has been on every Alternative, even #1 which is supposed to be "no action" and thus the Urban Village boundary should stop at 15th Ave. NE. This expansion is probably due directly to the Sisley properties that were leased to RDG developers on the east side of 15th Ave NE and 16th Ave NE, north and south of NE 65th. Those properties have been empty and/or derelict, so there will be no displacement at their sites, but the homes near them and in the blocks north, south and across the street have been lived in and maintained well by owners and renters even as they put up with the derelict properties for years. Two comments about this boundary expansion and what I feel are significant adverse impacts:</p> <p>2 1. These current middle and lower middle-class owners and renters will surely be displaced as up-zoning occurs and is, I feel, a significant impact of this expansion east of the original Roosevelt Urban Village boundary. Please keep the boundary at NE 15th and allow the proposed RSL in the what is marked as the expanded boundary to stay SF.</p> <p>3 2. Regardless of what happens with the expanded boundaries, it seems clear that the properties on NE 65th in the one block east of 15th Ave NE will be up-zoned. All three Alternatives have these properties coded at NC2 up to 55 ft. The impact of this is extreme as that height overshadows all zoning around. This is a slight step-down from the zoning west across 15th Ave NE, but seems significantly out of scale with what is now SF or may become LR1 in the very next block to the east of 17th Ave NE. What ever happened to the "step-down" height principle in urban planning? Please reconsider that NC2 label; make it at least LR1, or better yet, SF.</p> <p>4 I am writing specifically about the Roosevelt Urban Village and the expanded boundaries east into West Ravenna at NE 65th St. Every alternative shows up-zoning north and south of 65th, east into Ravenna to 16th Ave NE (Alt. 1--the supposed "no action" alternative) or to 17th Ave NE (Alt 2 and 3). The area south of NE 65th St to Ravenna Park, from 15th Ave NE to 23rd Ave NE is a very cohesive neighborhood. There is currently an active</p>
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Land Use disaster preparedness organization that covers every block in that area, an active Google Group, annual street/alley potlucks and sharing back and forth among neighbors. It is currently zoned SF, filled with some large homes, but mostly mid-sized and smallish places mostly well-maintained by owners or renters, and some with multi-family and extra unit space. I feel that expanding LR1 zoning south to NE 63rd or 62nd St and east to 16th or 17th Ave. NE will have a significant adverse impact on the cohesion of this vital Seattle neighborhood.

Aesthetics 5 In the many areas throughout the city where SF is being up-zoned, I fear the loss of an important Seattle hallmark--the bungalows and arts & craft style homes. The RSL and especially LR1 or LR2 buildings that take their place are generally lacking in character and fresh design. Short of expensive design guidelines, I don't know what can be done, but do feel strongly that the loss of the aesthetic value of the small SF will be a significant adverse impact on the beauty of our city.

Public Services & Utilities 6 As of today (7/19/17) we learn of the report that reveals West Point sewage plant is not well prepared/suited to handle the growth anticipated in the city and county. I'd say that is a truly significant adverse impact on the planning and financing of the city infrastructure.

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?

August 5, 2017

City of Seattle Office of Planning and Community Development

Attn: MHA DEIS

P.O. Box 34019

Seattle, WA 98124-4019

Also sent by e-mail to MHA.EIS@seattle.gov

Also sent by e-mail to:

jessica.brand@seattle.gov; Brennon.Staley@seattle.gov; Nicolas.Welch@seattle.gov; Geoffrey.Wentlandt@seattle.gov; Samuel.Assefa@seattle.gov; Lisa.Herbold@seattle.gov; Rob.Johnson@seattle.gov; Spencer.Williams@seattle.gov; bruce.harrell@seattle.gov; kshama.sawant@seattle.gov; Debra.Juarez@seattle.gov; Mike.Obrien@seattle.gov; Sally.Bagshaw@seattle.gov; Tim.Burges@seattle.gov; Lorena.Gonzalez@seattle.gov

Re: Madison – Miller Park urban village proposal

1 To whom it may concern:

The professional and thorough response by the Madison / Miller Park Community group dated August 2, 2017, in my opinion, deserves very careful consideration. Thank you for your attention to it.

Catherine White 712 17th Ave E, Seattle WA 98112
Janine Estery 717- 17th Ave E Sea 98112
John Estery 717- 17th Ave E Sea 98112
Valerie Lynch 732 17th Ave E Seattle, WA 98112
Patricia Burke 732 17th Ave E Seattle, WA 98112
Thomas & Veronica Spies 708 17th Ave E
Susan Morgensztern 731 18th Ave E Seattle WA 98112

153-18^{1/2} Avenue E
Seattle, WA 98112

SEATTLE WA 980
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OFFICE OF PLANNING &
COMMUNITY DEVELOPMENT

AUG 11 2017

RECEIVED

City of Seattle Office of Planning
and Community Development
Attn: MHA DEIS
~~P.O. Box 34019~~ CH-05-02
Seattle, WA 98124-4019

98124-401919



From: Artistic One
To: [PCD_MHAEIS](#)
Subject: comments to DEIS Amber Williams Date- 8-7-17
Date: Monday, August 07, 2017 2:05:36 PM

I am commenting on the DEIS. I have grown up in South Park as a little girl and I am still a resident there as an adult. I have had to deal with many obstacles while living in South Park. I have seen many homes gone and historic buildings destroyed because of industrial zoning. I have had to live with discrimination from the City of Seattle my whole life living in South Park. From having to fight Long Painting, The oil refinery, The garbage facility wanting to go in, Cedar grove compost, the heavy metal recycling company, lose of the Desimone historic farm to industry which has brought in more crime because we have less and less single family zoning than most Seattle neighborhoods. I should not have had to spend my childhood and young adult life learning about buffer zones and illegal activity from the City of Seattle thinking South Park is just a dumping zone for all of its problems that no other neighborhood wants. I had eight houses on my block and a grocery store that I went to as a child and many other kids went to. All the homes and the store were demolished because of industrial zoning and Long Painting. These images still haunt me. I am now pregnant and I am going to be a first time Mom. I don't want my child or the next generation to feel less than because of where they live in Seattle especially South Park. There are families that live here and we are never considered "**Good Enough**". You need to take South Park off of your list of rezoning. We have had enough!

- **I have never been notified of the potential rezone or the EIS still to this day! The only reason I know about this is because of volunteer community involvement.** You stated that you have been working in the community 18 months. I still have not been notified and my neighbors in South Park. My city council leader Lisa Herbold has not reached out to South Park in this matter. I want part of the DEIS to show there **has not been community outreach in my community.** Many neighbors do not have access to a computer to be reached. You have not sent out any form to all the neighbors to fill out. This is discrimination and borders redlining. You have secretly selected to not reach the community so only a few can comment. You also have not reached out to the School, Library or any of the business owners in South Park.
- **In South Park we have lost many trees and are air quality is one of the worst in Seattle. WE ARE IN A VALLEY!** We don't need more density in South Park! We are on the outskirts of Seattle closer to Burien and White Center. We are surrounded by two freeways and industry without proper buffer zones. We are not connected to Seattle like many other neighborhoods in Seattle. We have to go to Burien just to get any amenities. I have taken the bus from South Park and it takes all day to get somewhere with limited access to bus routes. **You can not live in South Park without a car.** More density of higher buildings would mean less parking (which is already limited) and the bus routes in South Park are not reliable as it is let alone more people and density accessing the same buses. The streets in South Park are also very small

compared to many other areas of Seattle. South Park was a small town and for many years has been the forgotten town that Seattle has dumped it's many unwanted problems on for many years. We are still that small town but with less. The only thing we have left is our **Single Family Zoning and now you want us to give that up. I don't think so!**

- **We do not live in an urban village!** South Park is not an urban village. Urban villages are walkable to amenities. We don't have anything here. 20 plus years ago we thought it would save our single family zoning. We have got nothing from the city for being an "Urban village". We only have one asset left and that is our single family zoning.
- South Park does not have the infrastructure to carry on more density of large buildings from developers.
- I would recommend that you rezone some of the areas of Seattle in the Sodo area that are sitting vacant and will not have the impact of hurting single family homeowners. You are hurting people that have worked their whole lives just to afford a home (the American dream). It wasn't and isn't easier to get a home and it will never be. But it can be done. Don't punish me for working long hours and being away from my family so I could afford my home. I have worked since I was 12 years old paying rent to my single Mom in our home in South Park. Life is not easy for anyone but don't punish me for following the rules. Now you want to give me a slap in the face and tell me my years were all wasted and didn't matter because the single family zoning will be gone. Ask yourself how you would feel if every day you lost something and had to fight in your neighborhood and now the last battle of losing your home. **Yes that is what it is. Developers that is the only reason behind this. Take South Park out of this! This is not a gift to us. Fighting this has taken away time I need to be with my soon to be baby. I am not getting paid to do this like you.**

I hope someone really reads this.

Thank you, Amber Williams 8-7-17

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.

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)

- 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 ~~very~~ 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

From: Bonnie Williams
To: [PCD_MHAEIS](#)
Subject: Pls delay deadline for the DEIS to Aug. 28
Date: Thursday, July 27, 2017 3:58:25 PM

- 1 Thank you for considering delaying the deadline for DEIS responses. It is a big document and more time is needed to evaluate the many sections. Lisa Herbolt suggested a longer timeline which I agree with completely. Bonnie Williams

Sent from my iPhone

From: WilliamsNiki@aol.com
To: [PCD_MHAEIS](#)
Subject: DELAY DEIS COMMENT PERIOD TO END OF AUGUST 28
Date: Saturday, July 29, 2017 9:02:08 AM

1 Hello, 800 pages is too much to respond to in such a short time frame for the DEIS on MHA,

Please delay to August 28,

Thank you. Bonnie Williams

From:
To: [PCD_MHAEIS](#)
Cc:
Subject: WallHALA Public Engagement DEIS
Date: Saturday, August 05, 2017 3:32:21 PM
Attachments: [bj_add"ldeispubeng.pdf](#)
[Bonnie_DEIS_PublicEngagement_07-28-2017.docx](#)

Hello MHA.EIS @seattle.gov,

- 1 I, Bonnie Williams, am submitting two documents on Public Engagement associated with the DEIS for MHA. as Chair of the Wallhala Committee as part of wallingford Community Council I am summarizing the many events and impressions gathered from our engagement process with the city on MHA/HALA since Jan. 2016.

Thank you.

Response to the Public Engagement references in DEIS

By Bonnie Williams, WallHALA Engagement Chair

2 Introduction

This document responds to DEIS (<http://tinyurl.com/HALA-MHA-EIS>) mentions of “Outreach” , “Engagement” and “Public comment” in the following parts of the DEIS:

- Section 1.0 (Summary) references only) 1.7, 1.37
- Section 2.0 (Alternatives to MHA references only) 2.12, 2.13, 2.16, 2.22
- Appendix section “Community Input Summary” ref.to p.7, p.4,6,11.20, 28

Background

I , Bonnie Williams, am the Engagement Chair of the Wallingford Community Council’s WALLHALA Committee, which was established in January 2016 and consists of about 40 members. The WALLHALA committee’s purpose is to engage, organize and inform our neighborhood about MHA/HALA. We, also, follow Land Use legislation and participate in city events related to zoning changes, especially events related to MHA/HALA. There is much to share from the in depth participation of our neighborhood.

Responses to DEIS

3 1. DEIS Section 1.0 (Summary)

Page 1.7, Alternative 2 Heading

This section reads: “Alternative 2 implements MHA, applying specific zoning map changes based on a set of basic planning concepts, policies in the Comprehensive Plan, and MHA Implementation Principles developed during community engagement.”

Claims of “community engagement” rely heavily on feedback from Focus Groups and the online application Consider. It.

Focus Groups were a Failed Experiment. The concept of the “focus group” has been severely criticized from within by participating members and from outside observers. Our team of residents from Wallingford attended and observed nearly all of the focus group monthly meetings for the 10 months for all the Hub, Low Density, Medium Density and Expansion neighborhoods. (WallHALA observers attendance is documented on city sign ins).

- **Focus Group Selection.** The members were handpicked by city departments and the Mayor's office. The city narrowed the applicant pool of nearly 600 (mostly north end residents) to about 140. This experimental method had only 4 or 5 people per urban village who were under no obligation to seek in put from their neighbors nor to share out information they received. These are major flaws in the process. The thousands of people who live in each urban village had token representation in the focus groups.
- 4 The data shows that 33% were renters, 24% owners and 43% would not identify. Again, no assurance this group was balanced in terms of homeowners and renters which is about 50/50 in Seattle or that the "most impacted" group with proposed elimination of single family properties is represented sufficiently.
- 5 ● **Focus Group "One size fits all" method.** The issues of rezoning city wide neighborhoods were discussed in general terms because about 6- 8 neighborhoods were lumped together according to a similar density category such as (hub, low, medium and expansion). The city proceeded with a "one size fits all mentality." The differences in schools, parks, libraries, community centers, assets or deficiencies, topography, view protection, variances in commercial districts, road widths and arterials, historic properties, race and cultural differences were not addressed. There were no map references for comparisons to differences in individual neighborhoods throughout the meetings so application of "**principles**" was general and disconnected from specific neighborhood context.
- For instance, if a **principle** says place housing "**near**" schools, the context for "near" was never defined in terms of distance. However, when translated months later with rezone maps much of SF (single family) would be changed to RSL(residential small lot) including splitting lots across the street from the Hamilton.. This has a huge impact on the residents who live there, but they were not invited to share in determining these principles or decisions. The applications were not clearly explained in individual neighborhood context. The Urban Village rezone maps were not presented until the very end of the focus group process. Again, individual neighborhood application of principles were discussed briefly at the end.. A similar case could be made for all the other principles like views, housing choices and transitions that were not applied in the context of neighborhoods.
- 6 ● **Focus Group Attendance drops off.** The Low density focus group (Wallingford) near the end in late Sept., 2016, reviewed the Urban Village rezone maps just released. 7 observers from Wallingford witnessed the remaining **12 of 40 focus group members going over 8 neighborhood rezone maps. They would spend about 15 minutes on each rezoned neighborhood map. Only 3 of the 12 remaining members could speak**

for Wallingford as residents. A resident possesses more of the intimate knowledge needed to recommend decisions of such magnitude for each urban village. In no way, should the city be able to say that the focus groups were effective in having adequate neighborhood representation. The attendance had dropped off in all the density groups significantly, but the city still uses the focus groups as a credible source for decision making. In reference to 1.7, the focus group feedback is not reliable data to shape Alt 2.

This article appeared summarizing problems with the focus groups.
<http://thecisforcrank.com/2017/01/19/how-seattles-well-intentioned-planning-experiment-went-wrong>.

- 7 HALA Consider.It website is a Failed Experiment.** This is another experimental tool used during a time of very extensive proposed MHA/HALA zoning changes for Seattle neighborhoods. There is no history of success with this experimental online format.
- **The Application was difficult to use.** Based on feedback given to WallHALA, many found the format difficult to use, tedious, confusing and time consuming. **CONSIDER.** It uses urban village rezone maps for reference to answer questions. The maps are too small to read easily. The street names are very fine print to indicate zoning changes are extremely hard to read. We had to enlarge them to educate our neighborhood. The moving of the dots was confusing and contributed to the inefficiency of the tool.
- 8**
- **Format of questions skews results.** In many instances, questions were worded to manipulate responses or force choices. For example, Wallingford disagreed with the question of the placement of RSL. Wallingford disagrees with the locations where single family changes to low rise and disagrees that these locations are appropriate to allow multifamily housing. However, if someone wants to retain single family zoning, there is no way to include that option.. This is the framing and manipulation of responses and again left no option to oppose up zones.
 - **Low Participation.** A total of approximately 541 people participated online. The range in responses by neighborhood was a mere 16 participants in Lake City to an average of 50 participants by neighborhood. Considering that computer use is at an all time high, the level of participation is surprisingly low.
 - **Misrepresentation.** It is more valid to evaluate how many people participated instead of the city's method which is to count the number of opinions shared online There is duplication and overlap in their method.

- **Privacy Concerns.** The city should have discouraged people from using their real names and suggested a system to address privacy. This was a negative for many.
- **Unreliable results.** People signed in with a zip code, but as far as we can tell no priority is given to opinions of residents subject to proposed rezones of their neighborhoods.. The renters and homeowners occupying these properties are most impacted by proposed zoning changes. People who do not know the neighborhood skew the data. There were a number of people who weighed in on all 24 neighborhoods.

Page 1.37

A portion of this section reads: “However, substantial community engagement has been conducted already as summarized in Appendix B, and there will be additional opportunities for community engagement through this SEPA process, and at the time of City Council deliberation on the proposal.”

- 9 I disagree based on insufficient city actions to date to minimize displacement and homelessness happening now . So far the city is unsuccessful in slowing displacement and homelessness which seems to go hand and hand with new development. It appears that until speculation can be minimized , affordable housing plans that rely on inaccurate community engagement data is insufficient reason to implement MHA/HALA rezoning proposals.

The city has no accurate inventory of existing affordable homes outside of what the city knows are rent restricted homes. The city estimates so far of displacement are very “low ball” when demonstrated by the U District MHA advocate John Fox.. Until the city can be more accurate in terms of displacement risks, the city has no business implementing MHA with developer incentives and should delay implementation until an effective displacement prevention plan and an alternative affordable housing plan offered without up zones is in place. If MHA is further implemented by City Council, there will be little deliberation to address displacement issues.

2. **DEIS Section 2 (Alternatives to MHA)**

Page 2.12

10 **Murray’s Equitable Outreach Order, June, 2016**

This section refers to Resolution 31622 which established a two year plan for “community engagement.” Murray’s executive order called “Achieving Equitable Outreach and Engagement for All” was released in June, 2016. The purpose was to inform possible City Council action on specific implementation actions to address housing affordability. Murray’s 2016 Executive Order “stated that doing

outreach and engagement differently is a top priority". The Dept of Neighborhood's charge is to bring equity into public engagement. It's effect has had the opposite result. It limits citizen engagement to just a few handpicked by the Mayor and City Council.

To address the changes resulting from the Executive Order, the most shocking news was that the city cut ties with 13 District Councils. Human resources should be valued by the city and not so callously cast aside. Most people's reaction to the discrediting of councils revealed that the city has an attitude that neighborhood volunteers are not really valued unless the city picks them.

Dismissing District Councils in June, 2016 resulted in assigning responsibilities to a 16 member Community Involvement Commission selected by the Mayor and City Council just starting in July, 2017

The District Councils lost their ability to coordinate budgeting neighborhood projects. These responsibilities will now be moved to the "Community Involvement Commission." selection again by the Mayor and City Council. The CIC group volunteers 3-6 hours a month.. Also, DON reduced their staff tied to geographical neighborhoods.

The city's reformed public engagement touts a program of undefined geographic neighborhoods and a more generic approach known as "community". Specific neighborhood empowerment has been deliberately diminished. This is consistent with the city's selective processes to choose the participants for Focus groups, Design Workshops, the Community Involvement Commission and structuring group participation so numbers of participants are limited to suit the city outcomes.

The city is deliberately marginalizing the influence of homeowners who are as single family property owners "most impacted" by proposed elimination of single family zoning in Urban Villages city wide. Supposedly, the city is seeking to expand engagement, but continues to use a very selective process to manipulate public engagement outcomes. The changes proposed in the Mayor's Executive order to reform public engagement are not Inclusive in serving all taxpayers, residents, income levels, renters, homeowners, various age groups, races and cultural backgrounds equally. This is not equity. This is discrimination.

Page 2.13

- 11 This area seems to repeat with other areas of the DEIS previously mentioned, saying that the public outreach has formed Alternative 2 and is reliant on public engagement that assumes overwhelming support of MHA/HALA rezoning SF city wide within urban villages. The feedback should reflect that there is a lot of opposition to using MHA/HALA incentivized zoning for increasing capacity and more. There should be other alternatives besides Alt 2 and 3 in the DEIS that the city should explore without dependence on up zones in Urban Villages.

HALA Open Houses

- 12 DEIS lists the variety of public outreach formats the city has offered. (Open houses, neighborhood meetings, Consider. it online, HALA hotline) The **DEIS mentions open houses** such as the MOHAI Mayor's , 2016 kickoff event. In general, our experience has been that the format uses displays to market secondary to gathering feedback.

For example, at a north end **HALA/MHA open house** held in May, 2017 at the Northgate library, Sara Maxana hosted a table and several Wallingford people gathered to comment. I listened as Sara Maxana rebutted and deflected every comment a gentlemen made about the West Wallingford/East Fremont MHA/HALA up zoning proposal. His objections were about the proposals of SF zones where he lives changing from SF to Low-rise 2 and L3.

Sara documented nothing about the opposition to up zoning as we watched. More comments by others were rebutted as well. None was documented. Feedback needs to include those who do and do not support MHA/HALA proposed drastic up zones and respond with other alternatives besides Alt 2 and Alt 3.in the DEIS.

Page 2.13, 2.14 and 2.16

- 13 **Hamilton HALA Meeting in Wallingford in March, 2016.** Jesseca Brand /HALA coordinator came with a fairly large city staff and met with several hundred Wallingford residents one evening. There was no training of the city staff on HALA. Thus, our questions had to wait for weeks for email answers from Jesseca Brand after the meeting when our large group of about 200 could not be reconvened easily.

The result was we lost the opportunity for large group neighborhood sharing and education. The residents felt stifled as we were told our comments were not desired, we could only ask questions. Residents were very disgusted and angry with the city for wasting their time. We are taxpayers and have a right to an open and democratic process.

Wallingford Urban Design Workshop in Feb.,2017 at Hamilton. Wallingford was one of the last Urban **Design Workshops** sponsored by the city. Spencer Williams explained how the format should work and how many people and who could come. A maximum of 75 people, but limiting 25 from Wallingford Community Council. Again, WCC members felt this to be a defining opportunity for the future of our neighborhood and bringing true neighborhood representation to the city table was very important. Our neighborhood and residents had been feeling excluded from the process thus far.

We informed Geoff Wendlandt and Spencer Williams during a Wallingford Community Council meeting that we did not want our Design Workshop to be

another 'stack the deck "exercise. The opposition to MHA/HALA proposals to rezone have been largely ignored. The city continues to talk up proposed rezoning of single family neighborhoods as the only good solution per Alt 2 and Alt 3 in the DEIS, we disagree.

Rob Johnson, the Northeast district representative, has told us that we as residents are the wrong demographic. He is not receptive to neighborhood recommendations and he has not been at any of the three Design Workshops that I attended. It appears that he is out of touch with our neighborhood.

Spencer Williams kept saying only the 25 limited number can be invited by WCC to a design workshop. The city for each workshop selected 25 of 75 participants. The city manipulates conversation by inviting their MHA/HALA aligned participants.

WallHALA did the outreach of door belling for the UV Wallingford workshop of the neighborhood, posting on social media and emailing the WCC member list. We wanted authentic neighborhood representation and large numbers of residents for accurate feedback. In contrast, the city picks a few people to represent Wallingford in focus groups. The result of our outreach was about 200 plus neighbors turned out to participate in the Wallingford Design workshop. The city did finally accommodate all our invited residents. Without Wallingford door belling efforts, the workshop would not have been representative of the neighborhood.

The city is not changing or modifying MHA/HALA in response to feedback from the residents. The expectation of taxpayers is that you weigh in on proposed policy and in theory that policy can be modified according to feedback. This is a basic principle of democracy.

The 3 hour Wallingford Design Workshop left about a 1 ½ hours for large group table comments and the recorders captured comments. Our 14 summary pages of comments from the Wallingford Design workshop were recorded from 14 tables of large groups of Wallingford residents. There were many unified messages. They were repeated again and again at the majority of tables. The 14 pages of summary emerged as pretty accurate. However, the one page summary weakened and watered down our stronger messages. Corrected comments were not accepted by Spencer Williams for the summary. **(See corrected comments dated April 5, 2017 from Wallingford Community Council attached).**

A colored map with the recommendations to remove single family rezones from Wallingford's urban village was submitted. It was copied in black in white on the HALA website which essentially makes our message less effective to those reading the Design Workshop summaries from each Urban Village.
Reference Wallingford Urban Village Map proposal and Wallingford Principles (attached in separate document).

Page 2.22

- 14 This section says “In addition to the principles listed above, direct community input about specific locations in urban villages during public outreach was considered in forming the alternatives.”

There were discussions of designs including RSL, L1, L2, and L3 in general terms as each focus group had a general discussion of placing more density on arterials. However, since arterials vary widely in terms of location, traffic widths, topography I would say these discussions lacked in specificity of map references. Without neighborhood map references for each UV and details of various streets these recommendations should not be accepted without further in depth neighborhood study

3. DEIS, Appendix “Mandatory Housing Affordability Community Input Summary”

Page 4

The city efforts to reduce community engagement by specific geographical neighborhoods has exceeded efforts to expand outreach using a generic “community” approach.”One size does not fit all.“ Wallingford residents would not be working so hard to engage residents if the city was doing effective education on the complexity of the MHA/ HALA UV proposed zoning and design changes.

Wallingford has been doing the follow up education to “meet people where they are” because a lot of people have had zero introduction to design and urban village maps. Wallingford has had in depth education meetings that should have been the city’s job.

Page 5

- 15 The urban and architectural character of our neighborhoods will only be as effective as design review allows residents to weigh in on in order to “retention of architectural character.” It is essential that smaller projects less than 20,000 square feet do not get a free pass to skip design review under any alternative in the DEIS. The city is failing to deliver on housing choices for condo ownership options, in scale and compatibility with SF context and family size units with 3 plus bedrooms as promised.

Page 11

- 16 The city claims they doorbelled the SF zones “most impacted” in urban villages with a door hanger inviting residents to open houses. This information is not clearly telling them that the” city with MHA/HALA inside urban villages is proposing to eliminate single family zoning and up zone your property with a uv

map reference. The doorbelling did not happen until late spring, 2017 at the very end of the city's public engagement opportunities. The timing of the doorbelling was negligent, the flyer lacked substance, the doorbellers were not able to answer questions on MHA. That stills leave most of Seattle residents uninformed.

Page 20

Refers to 149 HALA meet ups and 58 city wide and online events

Quantity does not ensure the quality of community in engagement. There needs to be a much higher standard for city representatives to capture comments, answer questions and continual evaluation by audiences.

Page 28

- 17 This page refers to the community outreach process on MHA. "We heard about growing pains felt throughout the city. We cannot tackle all issues in a growing city". The WallHALA response is that it is not responsible to add growth without infrastructure concurrent with growth. The city should not be forging ahead with MHA plans to increase speculation and speed development repeating past mistakes of rapid development from 2015-2017 causing major displacement and homeless problems..

18 Conclusion

Alternative 1 is the best solution of the three options in the DEIS. The city should offer other alternatives not dependent on up zones as Alt 2 and 3. The hottest market in the country should not incentivize market rate housing and invite more speculation. The rapid growth is not well managed by the city. It is clearly overwhelming city resources.

- 19 A broader range of incomes below 60% needs to be addressed as fast as concurrency with infrastructure can be provided per the Growth Management Act. Stop runaway growth with Alternative 1 or produce other alternatives for affordable housing not dependent on the shaky foundation of the Grand Bargain/ up zone tradeoffs and its questionable legal status.

The policy in MHA/HALA on fee percentages, zone increases appear to be pre-set in the Grand Bargain. The public engagement process is disingenuous. If proposed policy cannot be modified by public comment, why are we wasting hundreds of thousands of taxpayer dollars on HALA/MHA marketing? The public engagement process needs to be better than check the box exercises we are seeing.

There has been documented evidence of a high degree of opposition by Wallingford residents to MHA/HALA's plans to eliminate SF zoning in the Wallingford UV. Residents have repeated these messages at public hearings for MHA and the 2035 Comp Plan, in many resident emails to Council, comments from the Wallingford Design Workshop, the Mayor's Find It Fix It Walk in March, 2017 and the sign protest featured on KOMO TV. Wallingford's opposition to the elimination of single family housing and the lack of

confidence in MHA is thoroughly documented. The link to the Komo story is <https://komonews.com/news/local/upzone-protesters-challenge-Seattle-mayor-walk>.

- 20 The SF up zones are unnecessary due to existing capacity as in **DEIS Alt 1**. WALLHALA has distributed hundreds of “NO GRAND BARGAIN UPZONE “signs and residents have voluntarily displayed them throughout the neighborhood. The city does not want to acknowledge the opposition in Wallingford to eliminate 700 single family properties within the Wallingford urban village. Alternatives 2 and 3 in the DEIS do not reflect the desires of Wallingford feedback from public engagement due to dependence on up zones.
- 21 **See second attached document for:**
- 1) **2 photos** contrasting focus group poor attendance evidenced by no show name tags and what Wallingford thinks engagement looks like after doorbelling the neighborhood for an educational MHA meeting in Jan. 2017 prior to the Design Workshop.
 - 2) Wallingford alternate proposals and **colored map** with redlined single family removed From upzone. The black and white version changes the message because the deliberate redlining of sf is not apparent. This was submitted in the Wallingford Design workshop and appears incorrectly in the Summary in black and white,
 - 3) Principles of Hala contrasted with Wallingford values and principles
 - 4) Suggested corrections to the Wallingford Design workshop summary which watered down our comments and request to correct was denied by Spencer Williams

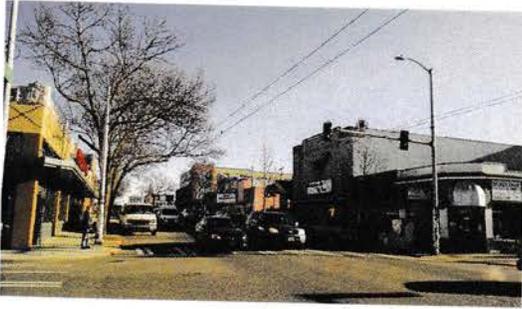


The first photo of name tags left on the table and the very high rate of absentees for focus group members who were "no shows". This was alarming as the city uses their recommendations for basing decisions. The lack of representation for our neighborhood and others is a big concern. The photo is from September, 2016 the night of the Mayor's kickoff event for the first of the UV rezone maps to be released.



The second photo is a large Wallingford Community Council Educational meeting of 200 people on MHA/Hala in Jan. 2017, prior to Wallingford's Feb. Design Workshop. WCC did the doorbelling outreach throughout the neighborhood.

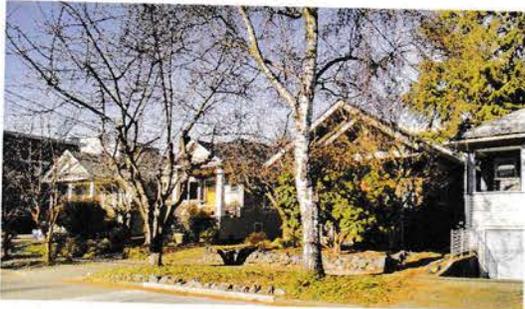
Comparison of current zoning and proposed new zoning



45th St at Meridian is currently zoned Neighborhood Commercial 40'. It has charming scale, with light and trees and inviting store fronts.



This is 56th Street NW in Ballard, which is comparable to the proposed upzone. Notice the canyon effect and shadows.



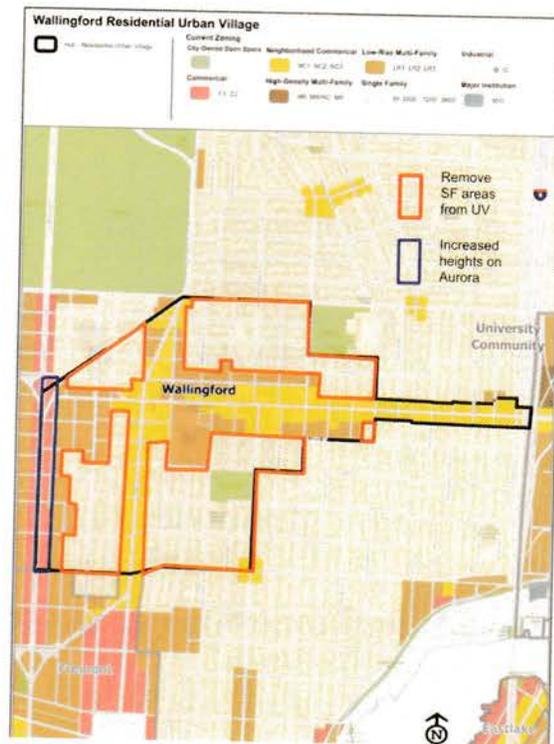
Charming, tree lined street, just West of Stone Way in Wallingford. This area is currently zoned Single Family, but the draft zoning maps propose to upzone this area to Low Rise 3.



The scenario in this picture is possible in a Low Rise 3 zone. This is not a change that blends in with the neighborhood, this is not a little infill as we were led to believe. These are drastic zoning changes and should not be approved.

Alternative positions and proposals:

- Exclude single family areas (outlined in red at left) from Urban Village
- Reject height increases along 45th – narrow east/west street, and zoned heights are already substantially higher than most existing buildings
- Set back upper floors along north/south streets
- Require 15-20 foot front setbacks for multifamily buildings in mostly single family areas
- Retain solar access, so existing houses are not plunged into shadow by new development
- Retain significant trees, 12 inch trunks and up
- Change Aurora zoning from Commercial to Neighborhood Commercial
- Preserve street parking, for businesses, families with children and anyone with mobility impairment
- Take height transitions out of the higher zone, don't raise heights in the adjacent lower height area.
- Impose impact fees on development
- Low income property tax break



HALA Up-zone Principles	Wallingford Principles
1b Encourage small scale, family-friendly housing options like cottages, triplexes and row houses	Encourage homeownership for families with children and extended families by requiring multiple bedrooms and yards. Shrink the village boundary to exclude SF zones. Maintain the SF areas as a greenbelt around the village. Revise RSL, L-1 and L-2 accordingly
3b Provide a transition between higher and lower scale	Transitions in density should be created by conditioning stepping back and diminishing the height development on the edges of higher zones, not by upzoning lower zones.
5 Increase housing options near infrastructure like transit	Focus growth in existing commercial and multifamily zones along Aurora, Stoneway, N 45 th and N 34 th where transit service is best.
5b Allow more housing options near neighborhood assets like parks and schools	Maintain the current zoning that offers a healthy mix of small and medium sized apartments, grandfathered duplexes and triplexes, ADUs, DADUs, townhouses and single family homes.
9 Evaluate MHA using a social and racial equity lens. Expanding the number and range of housing options allows more people to live in the high-opportunity neighborhood.	Prevent displacement of existing residents in modest single family homes and apartments due to property tax increases. Maintain the character of the neighborhood that makes it attractive to families with modest incomes, including homes with multiple bedrooms and yards for children to play and gardens to grow. New projects should contribute to the neighborhood by respecting setbacks and by providing parking, landscaping with trees and contributing to affordable housing, schools, parks and infrastructure.

April 5, 2017

Rob Johnson
Spencer Williams

Thanks for posting the detailed accounts of the January 17 Wallingford Design Workshop.

We have had a chance to review this material, and we're pleased to say that the **table notes** and **map summary** do reflect the dialogue at the workshop.

However, in our opinion the **Summary Themes** document materially misrepresents those documents, and if at all possible we would like to have it reviewed and corrected. In particular, a number of commonly expressed concerns about zoning were omitted. We enclose a "strike-out" edit of the summary to address these issues.

In the following we offer additional explanation for some of the edits we propose.

- **Some tables included comments supportive of the SF to RSL change, though some wanted to ensure that owners still live on site**

There were a few positive comments about RSL, but *nothing* about an on-site owner issue. This comment does appear a couple times about ADU/DADU construction, where it has some legal significance, but it has no such application to RSL and *no one* is recorded as having said any such thing.

If they had concerns about RSL, it was mainly design related - a few tables mentioned pitched roofs, setbacks, etc., or expressed that in terms of consistency with neighborhood character. (That is particularly germane because RSL is really known to us only from hand-waving presentations that often introduce it in its "cottage" form - which is not likely to show up here given Wallingford's typically smaller lot sizes, so community approval of this cottage form is somewhat irrelevant. If they approve of RSL only in the single family residential form that's been presented to them ... then arguably they really don't approve of RSL after all.)

In our opinion, some of the comments that were recorded in favor of RSL were intended to express a *preference for RSL over higher upzones* that are common in the draft.

- **Changing SF to L3 is too big an increase**

This grossly understates that sentiment, which was more often opposed to any multi-step upzones - from LR1 to LR3. This may have escaped notice as such, when the zones weren't called out by name, like Table 4 "Have all SF homes stay SF or 1-level upzone." *Four tables* expressed this point clearly in one way or another - SF should not be upzoned past RSL - and others apparently meant this in comments that look like approval of RSL (i.e., RSL in place of the proposed upzones.)

Moreover, there was a significant trend of comments opposing LR2, LR3 and tall NC zones in specific locations, apart from the question of whether the location is currently SF, for design reasons like inadequately sized streets (Midvale), effect on the parks that would be surrounded (Wallingford Playfield), or wind tunnels and shadow canyons (N 45th), or surrounding LR detracts from parks.

Finally, there is a very conspicuous theme throughout the tables of support for *keeping SF intact* inside the urban village. This was also framed in some cases as an urban village boundary issue, but to mention that alone doesn't do it justice at all. *Five tables* called for SF to be retained, and/or complained that loss of SF here is unfair compared to other neighborhoods that lose none. The *map summary* does recognize this.

- **Need for multifamily housing**

Nothing like that is to be found anywhere in the table notes. The summary author may have intended to convey some sentiment that appears in the notes, but please make it something that can be recognized as a frequent comment (with a clear point if possible.)

- **Design review is needed**

This understates the point, that there was *broad dissatisfaction* with design review process, inadequate consideration of neighborhood input, and the departures that are granted to projects. *Nearly every table* registered some sentiments along those lines, often multiple times. (This implies a tangential point that's important in this context - the community would be less opposed to development if they were more confident that the regulatory environment would guarantee better outcomes.)

- **Need for infrastructure improvements ... and amenities -- schools, parks, trees ...
Developer impact fees could pay for improvements.**

This is more or less acceptable, but since insufficient infrastructure was the most frequently mentioned area of concern, we have elaborated a little on this point.

Seven tables demanded developer impact fees, so that should have its own item. (But we see *no one* explicitly proposing to replace MHA with impact fees, as stated under "**Questions/ concerns about MHA program**".)

Aren't schools more of an infrastructure requirement, than an amenity?

Tree preservation/canopy came up five times as a *development standards issue*, more often than as a public space amenity.

Thanks for entertaining this request! Please call on us if we can help with details of our review of the table transcripts, on any of these points.

Wallingford Community Council

From:
To: [PCD_MHAEIS](#)
Subject: DEIS public comments Historic Resources
Date: Sunday, August 06, 2017 1:56:20 PM
Attachments: [bjhistoric.resourcesdeis3.5.docx](#)

Hello, Here are my comments on 3.5 Historic Resources

Bonnie Williams

From: Bonnie Williams /Wallingford Resident

1 I support Historic Seattle comments and believe neighborhoods in the DEIS are being short changed in terms of identifying impacts and mitigations.

1) Hidden density amidst single family neighborhoods like Wallingford contributes to Livability and Affordability with many older home rentals both in renting out cottages, rooms, basements and student housing.

2) Hundreds of older apartments and duplexes mixed in single family neighborhoods like Wallingford are not recognized as a significant resource for lower rents and housing for far more than just one family. Older rental homes and apartments surround us and add to the beauty and **diversity of housing types** and many extensive remodels make homes and apartments habitable for years to come. Where is the inventory? What is currently affordable? The gain is questionable. You project 44 rent reduced units in 10-20 years in Wallingford under MHA. What a price to pay. The loss is greater than the gain and hundreds of market rate development as a trade off. Not worth it!!!!

3) MHA needs to provide a balanced approach of old and new with better alternatives for affordable housing other than choice of upzones in ALT 2 and 3.

4) The Historic Resources section 3.5 lacks meaningful analysis. There should be details on how to address potential impacts to historic resources by neighborhood.

5) Historic rehabilitation tax credit projects support the creation of affordable housing units in historic buildings

6) Many of the older homes have floor plans and space better designed for families with yards, flexible spaces for kids, elderly, guests, aging in place across the life span, kitchens, bedrooms, living room on one floor.

DEIS 3.5 Historic Resources

The Historic Fabric found in such neighborhoods as Wallingford, parts of West Seattle, Ballard, South Park and others Seattle neighborhoods, offer a cultural asset that the City of Seattle **needs** to remain livable, vibrant and interesting. This cultural asset has to be protected, and simply changing zoning in these areas and stepping back to allow developers to determine how a neighborhood looks and functions is short sighted and wrong. You do not get a do over if historic structures are demolished. There is room for more development in these areas, but should be done with care, working to retain the Historic value that now exists.

A. DEIS takes a generalized approach to all UV. No accounting for various cultural and historical assets offered in different area UV in proposed upzone areas

They discuss the various inventories and surveys that have occurred in different areas. **Wallingford was specifically referred to (pg. 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”**, quoting a historic survey by Sheridan in 2002. The fact that the DEIS specifically mentions some of the historical attributes of Wallingford underscored the need for individual EIS studies for each Urban Village proposed for zoning changes as each UV offers different assets, and the historic value of Wallingford is irreplaceable. The section of Affected Environment does not provide any real understanding of the study area’s history, context, and patterns of developments. It should include details on neighborhoods to adequately assess potential impacts to historic resources such as potentially- eligible individual properties and future historic districts.

B. Unreinforced Masonry Buildings are discussed (p. 3.249).

If the city requires seismic retrofitting to “bolts plus” standard for these older, often historic buildings, a program of financial incentives needs to be made available by the city to offset these costs and preserve existing, affordable housing in these historic buildings. There are several in the Wallingford UV, on N. 46th and Burke, Burke between N 45th and N. 46th, N. 48th across from St. Benedicts, N. 46th between Densmore and Woodlawn, on Midvale, on N. 44th and Densmore, and many commercial buildings, such as the Queen City building on N. 45th and Densmore and offer a good deal of naturally occurring affordable housing while contributing to the historic fabric of the neighborhood.

C. 3.5.2 Impacts. This section discusses that fact that potential rezoning could introduce changes in the scale of Urban Villages. Redevelopments and demolition of historic-aged resources **could** occur within M, M1, and M2 rezoning tiers. Much of the rezoning proposed for the Wallingford UV are M1 and higher. They also discuss the decreases of historic fabric as development continues.

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.**

Defined as an adjective, slight means a small amount, of little importance or trivial.

For a document meant to assess via analytical and objective means the impact of zone changes to our city, the use of this word is disingenuous, and example of the **Alternate Facts** that the current administration City of Seattle has used in presenting and promoting MHA Hala. If a zone simply adds ten feet, from 30 to 40 feet—is that slight? I would not consider 25-30% increase slight. On a much larger comparison-changing a single family lot to M1, M2, or M3, the buildable area changes from 40% of the lot to 80%. The sidewalk set back change from 20’ to 10’ and sometimes none at all. The height increases from 30’ to 40’ and as high as 60’ with bonus floors. This is not at all slight, but rather is a slight, (the noun) to residence both renters and homeowners

currently living in urban villages and surrounding areas that will be affected. **The DEIS uses language that is false and misleading.**

- D. Mitigation.** Mitigation for impacts to historic area in UV are vague and rely solely on existing regulations via the Comprehensive Plan and the City Landmarks process, and continued funding of a comprehensive survey/inventory that has been inactive for years. On page 3.252 is stated **“If adverse impacts are identified, mitigation measures may be required.** Measures could include sympathetic façade, street, or design treatment or reconfiguring the project and/or location of the project. On page 3.255 the DEIS mentions additional systematic neighborhood surveys to identify historic-aged buildings and potential historic districts; establishing new historic districts to preserve the historic fabric of a neighborhood; establishing new conservation districts in order to limit the size of new development and encourage preservation of older structures, and more. These mitigation ideas sound good—**but must be put in place before zoning changes occur to protect historic areas and historic fabric.** Sorry to say, but I do not trust our city government to do what they say. As a candidate Rob Johnson discussed in an article by Kyle Stokes **“City Council Candidates want to make Seattle Grand Bargain Work with the District 4’s Look”.**

<http://knkx.org/post/city-council-candidates-want-make-seattles-housing-grand-bargain-work-district-4s-look>.

Councilman Johnson described allowing a scenario where the neighborhood residents determine how and where the prescribed number of new living spaces would be built and how they would look. Hold him to this.

From: WilliamsNiki@aol.com
To: [PCD_MHAEIS](#)
Cc: williamsniki@aol.com
Subject: Responses to Alternatives DEIS 2.0
Date: Sunday, August 06, 2017 3:35:15 PM
Attachments: [bj_alternatives_2.0.docx](#)
[bj_alternatives_2.1_deis.docx](#)

Hello, These are comments associated to the DEIS on Alternatives section.

Thank you. Bonnie Williams

From: Bonnie Williams/Wallingford Resident

DEIS Comments on Alternatives 2.1

1 Alternatives are not valid alternatives

Alternative 1 is Misrepresented as No Action

Alternative 1 utilizes the housing capacity we have to accommodate growth. This should be obvious and not a misnomer like “no action”. This implies growth would stop or slow and the differences are not radically different enough from Alt 2 and 3 call it no action. Alternative 1 calls for building 76,746 units.

ALTERNATIVE 2 AND 3 ARE NOT TRUE Alternatives

Alt 2 and 3 are just a variation of upzones dependent on the Grand Bargain and nearly identified as identical by the DEIS itself.

These two alternatives are devious for residents of and the city should recognize that .I do not believe your data **can accurately predict who and where displacement will occur based on your limited inventory of market rental units that offer lower rents in older buildings. Alt 3 approach to curb displacement is not convincing and would shift too high a burden on other communities. It would only exacerbate displacement in north end neighborhoods as displacement will occur all over the city with incentivized zoning. This is a reason not use Alt 2 or 3.**

No Alternative 1 map

- 2 Despite the significant number of units Alt 1 would allow, this serves to downplay the importance of this as a viable choice by limiting information. The city has not provide a map for Alt 1 on the website despite requests.**

3 Urban Villages (UV) “Study Areas” were not studied. The DEIS states that the Study Area consists of many Urban Villages (UVs) slated for up-zoning and redevelopment as part of MHA. However, the City pointedly ignores the Study Area impacts and mitigations, instead averaging all changes over the entire Seattle land mass. This approach directly opposes one of the City’s own stated objectives, to “*distribute the benefits and burdens of growth equitably*”. The City of Seattle has failed to examine the direct impact of MHA-driven changes within each UV. Even when this omission is mentioned in DEIS Section 1.6 (Significant Areas of Controversy), the City declines to address the impacts of massive up-zones within the UVs.

UV-specific impacts and mitigations were ignored. The DEIS describes UVs and their up-zone plans at a “micro” level of detail, but it does not address any UV-specific negative impacts or mitigations. Instead, the DEIS uses a “macro” lens which averages negative impacts over the whole city (thus minimize any negative effects), or it ignores them altogether. No assessments of individual UV Study Area-specific resources or impacts were conducted, and no mention was made of any UV Study Area-specific mitigations. UV-specific impacts that were ignored in the DEIS include:

- Increased impacts on local transportation modes (bus, bicycle, light rail, pedestrian, or car).
- Loss of UV-specific local cultural resources such as immigrant- and minority-owned small businesses, non-profit community aid organizations, and places of worship.
- Increased school crowding at local elementary, middle, and high schools in or adjacent to each UV. Enrollment in Seattle Public Schools is largely dictated by family address. SPS is already dangerously overcrowded. Dramatically increasing the number of school-age children in a given UV Study Area will increase school crowding in neighborhood schools.
- Degradation of UV resident pedestrian safety, air quality, and noise pollution as demolition, loss of road and sidewalk rights-of-way, and intensified construction activities within the UV.
- Decreased access to local recreational amenities, such as parks, playgrounds, open space, and Community Centers.
- Increased stress on local infrastructure such as water, electrical service, sewage treatment, combined sewer outfall, and surface water management.
- Loss of tree canopy, green spaces, and parks within each UV.
- Increased risk for local heat islands and landslides as the tree canopy disappears and porous surfaces are paved over. Because each UV Study Area contains unique topology and geology, each UV Study Area must be individually assessed for these risks.

4 Impacts on families with school-age children were not addressed. Displacing or crowding out families from UV Study Area schools guarantees that those families will need to enroll their children in new schools, and/or travel greater distances to get to school. The DEIS does not address these UV-specific negative impacts on school-age children and their families, nor does it suggest a mechanism to align and mitigate the effects of increased neighborhood density on school enrollments.

5 The DEIS does not adequately address the many negative impacts on UV residents, institutions, and environments. Instead, the DEIS implements a city-wide “averaging”, which minimizes or simply ignores the heavy negative impacts to each UV Study Area and its residents. The City appears to regard the UV Study Areas as ‘sacrificial zones’, assuming any negative impacts suffered by the UVs be forgotten or minimized by the wider benefits enjoyed by the city as a whole. UV residents are expected to either move away from their neighborhood or put up with the increased noise, environmental insults, pollution, safety risks, and disruption.

- 6 **No alternatives to MHA were analyzed:** Nowhere in DEIS Section 1.4 (Alternatives) does the City propose any alternatives to MHA Alternative 1 and Alternative 2. Replacement MHA options could include step-wise approaches to up-zoning along urban transportation corridors and rapid transit lines, or distributing the density increases more equitably and uniformly throughout the City.
- 7 **The DEIS did not address displacement of UV Study Area residents by rising land tax rates.** The vast majority (>90%) of MHA-driven new development will be market-rate housing. Up-zoning in the UV “Study Areas” will cause land values and development pressures to increase in those areas. In particular, up-zoned land will be subjected to higher tax rates as local development accelerates. This phenomenon has the potential to drive out middle- and low-income residents, as well as elderly residents, who cannot afford to stay in their own neighborhoods because the land under their homes has risen in value and tax rate as a result of MHA. The DEIS does not address the impact of MHA-driven tax rate increases.
- 8 **Funding option alternatives to MHA were not explored.** MHA relies on increased market-rate development in specifically up-zoned “Study Areas” (UVs) to 1) increase the number of affordable housing units in the UVs, and/or 2) raise revenue for City-managed affordable housing construction. UV-focused up-zoning and increased market-rate development are used by the City to pay for affordable housing. The City did not explore other means, besides UV-focused intense up-zoning and market-rate development, by which funding for the production of affordable housing could be built. For instance, employer head taxes or real estate excise taxes could help facilitate the construction of new affordable housing.
- 9 **Delayed development of affordable housing was not addressed.** The DEIS did not address the time lag between the demolition of existing housing in the UV “Study Areas” and the eventual production of affordable housing units. There is currently a critical shortage of affordable housing units in Seattle. It is therefore given that current UV residents (of all income levels) who are displaced by market-rate housing construction will be left with no options for affordable housing until more affordable housing stock is built. Market rate developers who avail themselves of the payment in lieu option will exacerbate this negative impact of MHA. In addition, the DEIS implies that the City may build affordable housing in affected UV “Study Areas”, but there is no guarantee of a replacement of low- and middle-income housing stocks within the up-zoned UVs.
- 10 **UV Study Area-specific displacement of businesses and cultural institutions was not addressed.** Each UV is unique in its history, built and natural environments, resident history and ethnic makeup, and cultural and civic institutions. The DEIS did not directly assess the loss of these unique local businesses and cultural institutions within each targeted UV Study Area. No inventory of UV Study Area-specific business, non-profits, and cultural institutions was conducted, and no safeguards or mitigations were proposed in order to avoid the displacement of these UV Study Area-specific local resources.
- 11 **Spill-over effects onto adjacent communities were not analyzed.** Density increases in any given up-zoned UV Study Area will have multiple negative impacts on adjacent communities. Community resources such as roads, schools, transit systems, public open spaces, and Community Centers will receive much heavier usage. As a direct result of UV Study Area density increase, adjacent neighborhoods will experience more heavy construction vehicle traffic, crowded buses and public transit, decreased access to parks and open space, more cut-through traffic through adjacent streets, and impaired bicycle and pedestrian safety. None of these impacts on adjacent communities are addressed in the DEIS. An integrated analysis is required that addresses transportation infrastructure, schools, and environmental impacts, on neighborhoods within and between the up-zoned UV Study Areas.

- 12 Links between commercial construction and housing demand were not assessed.** The DEIS focused on residential up-zoning and development; it ignored the heavy effect of increased commercial development on housing demand. Software and other well-financed companies continue to develop large commercial buildings in Seattle. The DEIS did not assess the impact of increased commercial construction on residential demand and housing prices. Until the relationship is established between commercial building permits, job creation, and housing demand, residential growth planning will continue to be retroactive reactive guesswork. The DEIS needs to assess the direct negative impacts of massive commercial construction on the built and natural infrastructure of Seattle, as well as on Seattle's residents and resources.
- 13 The DEIS fails to address integrated planning for concurrent infrastructure improvements.** The DEIS describes MHA-driven residential growth in the UV Study Areas, but it ignores the need for city-wide planning for concurrent infrastructural upgrades, as required by the Growth Management Act. In particular, the DEIS fails to consider the need for integrated city-wide infrastructure network upgrades to schools, transportation, fire and police services, and public utilities, as residential growth occurs. These infrastructure networks are interrelated, and must be considered holistically. For example, poor traffic infrastructure impairs the delivery of fire and police services.
- 14 No alternatives were considered in the event of a successful court challenge to MHA.** MHA and the Grand Bargain were derived with the consent of a small group of developers; however, developers outside that small group have threatened to sue the City of Seattle over MHA. The EIS does not mention what happens if MHA's legality is challenged and overturned. The DEIS should address the UV Study Area-specific impacts if Alternative 2 or Alternative 3 is overturned after UV up-zoning and massive re-development begins.

From:
To: [PCD_MHAEIS](#)
Cc:
Subject: DEIS Transportation 3.4 Parking
Date: Sunday, August 06, 2017 4:15:47 PM
Attachments: [bjparking deis3.4.pdf](#)

1 Hello, Please find the attached comments on Parking.

I live in Wallingford and have never seen so many cars coming to park in residential neighborhoods who either work in new businesses on Stoneway or simply drop a car and take a bus.

So many simply drive part way and bus it to downtown.

The biggest problem is that any neighborhood further along in development like the 8 neighborhoods listed experience maximized parking impacts so we can only predict that if the city continues not analyzing impacts of one Hub like the U District upon another like Wallingford with the astronomical growth for the U District that this is an oversight that should be identified and mitigated.

By not providing more parking in apartment buildings, restaurants on Stoneway and 34th the problems get worse. Why allow these businesses to come into residential neighborhoods with no parking.

People leave their urban villages in cars to go eat and shop elsewhere, they may take a bus to work, but most own cars.

The city should stop allowing apartments and large apt. units to not have parking. This is more money in the pockets of developers and no respect for current residents.

- 2 Also, if you live on a street where buses are more frequent and noisy. Mitigation could be to offer homeowners discounted windows to reduce noise. The increase in delivery trucks and large construction vehicles coming onto narrow streets presents safety risks and truck size should be limited for neighborhoods, Our roads will not be able to take the increased heavy loads and the more reason to collect impact fees from developers.
- 3 Removing street parking for parklets is counterproductive, so are so many bike racks that are obstacles for driving. Roosevelt was redone to accommodate a bike lane making it so narrow that if someone opens the door of a parked car it would be easy to hit them. The street is too narrow with all kinds of cement islands that are an obstacle to drivers and not easily seen. Roosevelt's redesign is poor.

People turning onto 45th right from Roosevelt have a bike lane interception.
Very dangerous for such a high traffic area.

See attached parking information and comments.

3.4 Transportation:

- 4 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:

- 12th 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 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. Williams, Bonnie

“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.”

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

5 **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.”

The City admits the parking crisis, including a number of neighborhoods where parking demand is pre-projects ABOVE 100%! The projects can only exacerbate the crisis.

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 and the City Council has steadfastly refused to reconsider.

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 eliminated 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.

- 6 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.

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.”

The City has NOT seriously considered the parking crisis and the effects of upzoning on that parking crisis. 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

- 7 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.

From:
To: [PCD_MHAEIS](#)
Cc:
Subject: Deis response on Wallingford Growth and Equity misclassification 3.1
Date: Sunday, August 06, 2017 9:24:50 PM
Attachments: [bj 3.1 Deis Growth and Equity.pdf](#)

hello,

- 1 Please see comments in the attached document on the misclassification of Wallingford as " High access to opportunity and low risk of displacement. putting Wallingford above many neighborhoods in this ranking seems wrong for many reasons. Light rail from north to south and vice versa gives other neighborhoods equal or better access than Wallingford residents to the UW and downtown and later Roosevelt and Northgate.

The system for predicting displacement is not a reliable method unless you do studies in all urban villages as Lisa Herbolt has recently asked for more accurate reporting.

- 2 MHA if implemented will displace in all neighborhoods at both low and middle income levels as property taxes rise due to rezones as we see with rapid market rate development which MHA will only exacerbate displacement with capacity incentives. It is a poor remedy for affordable housing and without impact fees will leave residents to pick up the tab for con currency.

The Displacement risk /Access to opportunity is unquantified, unsubstantiated, and not an accurate predictor of displacement. The rubric is not justified for as the basis for zoning changes.

Thank you Bonnie Williams

- 3 – [Seattle 2035 Growth and Equity](#) - to determine what growth should look like in different neighborhoods. While I don't claim to understand the calculus that has gone into developing this approach, I do know that the resulting analysis suggests Wallingford is one of the most well-resourced neighborhoods in the city. We are ranked as both "high access to opportunity" and "low risk of displacement." I believe the bulk of that assessment comes from our high property values, high performing schools, and access to jobs; all of these are true, and Wallingford is, in some ways, a well-resourced and fortunate neighborhood. However, the other elements in the city's analysis include access to transit, a library, a community center, and parks and playfields. On those elements, Wallingford falls short.

The "high access to opportunity" categorization means the city thinks that all Wallingford needs to be an exemplary urban village is to become more affordable and accessible to a broader range of residents. Therefore, the plan for Wallingford as an urban village fails to come with any concurrent planning for how new and existing residents will be served by the already over-crowded schools, parks, libraries, and roads in our urban village. While the title of HALA includes both Affordability and Livability, in Wallingford, at least, livability is a non-issue for the City Council. Here are the reasons we should be concerned about that for ourselves as residents and for the new residents who will live in the urban village:

- 4 1) We are the ONLY neighborhood in Seattle without sufficient access to a community center. According to the [Seattle Parks and Recreation 2016 Community Center Plan](#), "A community center should be located within one mile of every Seattle household; and/or one full-service center to serve a residential population of 15,000-20,000 people. Each Urban Center of the City is to be served by a community center" (SPR Plan, 2016, p. 44). The plan goes on to say that "In 2016, the most significant gap is in the Wallingford neighborhood" (p. 44). So, while we are home to a middle school of 1100 and about to have a high school of approximately 1600 – both of which are smack dab in the middle of the urban village– we have very limited opportunities for recreation for our residents and those almost 3000 students. The tiny Boys and Girls Club on 45th can serve approximately 200 kids (elementary through high school) in its after school program and are just about at capacity. Community Centers around the city are strategically placed to serve neighborhoods and support the health and well-being of all its citizens including seniors, the disabled, and families with young children. Our neighborhood needs and deserves the same consideration.
- 5 2) Lincoln high school, which is slated to open in 2019 was planned as if it will not be in the midst of an urban village. At a recent meeting to review the Environmental Impact Study and associated mitigation, the planners and school board member present expressed surprise that the area around the school would be heavily upzoned. This is what happens without concurrent planning. Seattle Schools has designed a high school to fit in with the population, traffic, parking, environmental, and recreational needs of the current neighborhood and yet, by the time Lincoln is completed, 100s more people will already live in the area immediately surrounding the school. The impact to both students and neighbors will be much more significant than anyone has suggested; this merits attention prior to more growth.

- 6 3) More on Lincoln: part of the planning for Lincoln included the assessment that all of the high school's athletic teams could readily use Lower Woodland fields. While, theoretically, that is a reasonable idea, the fact is that Lower Woodland has the second highest use rate in the city – currently! The average annual use-hours on a Seattle turf field is 1900; Lower Woodland is at 2400 annual use-hours. Only Jefferson Park is more used. Can the city and parks department explain how the most-used fields in the city, on which some soccer teams currently get 1/6 of a field for practice, will support hundreds more high school users along with 100s more recreational users as people populate the urban village? It is a completely unfeasible proposition that will, again, impact the health and recreational opportunities available to all the residents of the village.
- 7 4) We have the second smallest library in the City. At 2,000 square feet, the Wallingford library is 1/5th the size of the libraries in other neighborhoods our size (average neighborhood library size across the city is 10,000 square feet). Located directly adjacent to the coming high school, the library could offer more excellent opportunities for after school programming and tutoring, as libraries do in other areas. However, the size and hours restrictions means that Wallingford residents cannot use this communal resource in this way. In many neighborhoods, the library also serves as a hub for community meetings, provides internet access to those who do not have it, and offers robust educational programming and support for families and residents. Wallingford – without a suitable library or community center – does not have such a hub.
- 8 5) We are one of the only urban villages without a walkable neighborhood school (The UDistrict, with even more substantial proposed upzones, is another). The neighborhood school for the Wallingford urban village is BF Day, which is across Aurora Ave. Since there are no parking requirements for new housing developments in the upzone area, and one goal of City Council is to reduce the number of residents with cars, we should expect that families and children can safely walk to school (and other services). Children in Wallingford cannot safely walk to BF Day especially given new early start times and the danger of walking over and around the highway on dark and rainy mornings.
- 9 6) Transit: the laughable notion that Wallingford is effectively served by transit merits an article all to itself. Suffice it to say that, yes, Wallingford is optimally positioned between Seattle's two main North-South highways; however, the three one-lane roads that run East-West through Wallingford (50th, 45th, and 40th) do not allow buses to run separately from traffic; there is no dedicated bus or bike lane on any of these roads, and no plan for Wallingford to have light rail within the timeline of the 2035 plan. That means that as more and more people move to the area (and high school students drive and bus to the area), the bikes, buses, and the cars (it's true – some people moving here will indeed bring cars), are stuck on the same unsafe, congested roads that they are now. SDOT, in a recent traffic study of the Route 44 bus which runs on 45th street, is seeking alternatives to address what it calls "the lack of competitiveness of transit in serving east-west cross town trips." Even they have failed to come up with solutions that wouldn't adversely impact the business in 45th corridor, an essential element of the urban village. You only need to spend a few minutes stuck at one of the horribly dangerous cross roads in our community (45th & Wallingford with QFC pedestrians and parking; the 40th, University

bridge, Burke Gilman trail, I-5 entrance intersection; the 50th, Stone Way, Greenlake Way nightmare recently [deemed the most unsafe intersection in the city by the Urbanist](#)) or drive along Wallingford Ave. when Hamilton middle school gets out to recognize that the infrastructure does not exist to get more people in and out of the urban village safely and effectively.

This is not an exhaustive list of the concurrent issues that viable urban planning requires. It is a list of some items that Wallingford residents – homeowners or not – should be concerned about as our neighborhood is subjected to major restructuring and growth without a holistic plan and without community input.

This list also points out where the city's own planning documents contradict its categorization of Wallingford as having "high access" to the resources essential for healthy and safe urban living.

From:
To: [PCD_MHAEIS](#)
Cc:
Subject: deis comments on sections 3.6, 3.7, 3.8 3.9
Date: Monday, August 07, 2017 9:01:11 PM
Attachments: [bj 3.6 trees 3.7 Open Space.docx](#)

Here are the DEIS comments from Bonnie Williams/Wallingford resident

[Note that numbering below groups similar comments]

DEIS Response form Wallingford resident Bonnie Williams
3.6 Trees, 3.7 Open Space 3.8 Public Services 3.9 Air Quality are included

1 3.6 Biological Resources (Trees)

1. The EIS should distinguish between evergreen and deciduous trees, when considering impact on tree canopy. Evergreen trees are more effective at intercepting rain, and especially more so during Seattle's rainy season, when deciduous trees are bare. Most evergreen trees are located on currently zoned single family residential due to yard space. The city does not encourage evergreens as street trees, so zoning changes proposed in Alt2 and Alt 3 will have a significant environmental impact on the decreasing proportion of evergreen trees we see disappearing now with greater far. The cement jungle is not pretty, we need relief and more of it included in zoning codes. The emerald city is fading away. I was not a tree lover, but have become one as the bland new development which clears the lot of all vegetation to do away with room for evergreens. They take time to grow and need space. So reducing what a developer can build on a lot will preserve space for trees, create tree space as the long term consequences are irreversible.

3.7 Open Space and Recreation

- 2**
1. Measures proposed to mitigate impacts on parks and open space (section 3.7.3) must be realistically likely and plausibly effective. Developer impact fees have been resisted by the city for many years though adopted in every other major city in the state. Transfer of development rights have not been widely used and evidence should be presented that they can be effective for this purpose. If other incentive programs are supposed to have potential to mitigate impacts on parks and open space, they should be identified in the EIS.
 2. Having identified a need for 40 additional acres of open space in Alternative 1, and 434 acres in Alternatives 2 and 3, the EIS should account for how potential mitigations could supply the needed acreage, or it should conclude that there are significant unavoidable impacts.

3.8 Public Services & Utilities

- 3**
- 4**
1. Libraries should be included as one of the assessed public services
 2. The EIS underestimates impact on Police service, by supposing that the city will identify and manage demand as growth occurs, while ignoring reports commissioned by the city that police service is currently inadequate – clearly suggesting that demand will likely not be adequately managed in the future.
 3. Average response times are not an adequate measure of Police service. Police response times vary considerably, and are not consistent from one area of the city to another.

4. Timely police response is a critical need, and averaging hides failures – Seattle Times analysis of five years of priority-one 911 data found that 4% took longer than a half hour, despite average response of 7 minutes. This is relevant to the alternatives, in that response times have been slower in the north end – which would grow more in Alternative 3 – due to its geography. Response times should be assessed using 90th percentile.
5. The Seattle Fire Department does not currently meet NFPA response times for EMS or Fire suppression services. The EIS should account for the role of traffic congestion in this connection, for each alternative, as well as the increase in calls due to growth.
6. The EIS should consider current failure to maintain adequate fire fighter staff levels, which contradict its assertion (p. 3.309, 3.310) that “impacts on fire and emergency services as a result of demand increases would be identified and managed.”
7. If a compact pattern of growth is expected to reduce travel distances for emergency vehicles (p. 1.32), the EIS should explain how it would do that in the context of the alternatives.
8. The EIS should consider impacts on the 911 call center.
9. The EIS should consider impacts on schools in more detail, since neighborhoods are significantly impacted by local capacity problems. This is relevant to Alternative 3's different distribution of growth – its impact will not be the same as Alternative 2 (p. 3.310.)
10. The EIS should consider the School District's ability to meet capacity needs more carefully than it does on page 3.310: “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 responses depend on buildings, land and money, and the EIS should present evidence as to whether these resources are likely to be available as required.
11. The EIS should consider the effects of construction activity on sidewalks – heavy equipment traveling over the sidewalks during construction causes extensive damage.
12. The EIS notes (p. 3.302) that “Some parts of the City are served by sewers that are less than 12-inch diameter. These areas are likely at or near their capacity and downstream pipes from new development would have to be upgraded to a minimum 12-inch diameter.” These areas should be identified, along with the extent of the downstream pipes in question.

3.9 Air Quality & Emissions

- 5
 1. The EIS should consider the impacts of construction and density on local ground level air quality, in addition to impacts on general air quality as typically monitored. Exhaust gases and dust from construction clearly have the potential to pose significant impact on nearby residents.
 2. The EIS should consider lead emissions potentially resulting from demolition of older houses with lead paint.
 3. The EIS should consider exposure to silica, from construction work using Hardie material siding, concrete and other construction work that may distribute significant amounts of silica to adjoining properties.
 4. The EIS should consider asbestos exposure impacts, based on realistic regulatory compliance expectations and regulatory limits (e.g., materials that contain asbestos at levels lower than 1%.)
 5. The EIS should consider neighborhood exposures to sulfur dioxide and nitric and nitrous oxide gases, due to operation of diesel equipment during construction.
 6. The EIS should consider neighborhood exposure to carbon monoxide, due to demolition and construction.
 7. Research in California establishes a significant impact of pollution from construction equipment on public health.
 8. The EIS should not assume that OSHA regulations mitigate pollution impacts on workers, without a realistic assessment of compliance with those regulations.
 9. The EIS should not assume compliance with PSCAA regulations controlling dust, and it should recognize that the PSCAA standard of “no visible emissions” is ineffective for very fine particulates that are not visible.
- 6
 10. The EIS should consider the greenhouse gas effects of extended motor vehicle trip times due to congestion.
 11. The EIS should more carefully consider greenhouse gas emissions from off road construction equipment.
- 7
 12. The EIS should correctly note that the Seattle Community Greenhouse Gas Emissions Inventory includes years to only 2012, not 2014, and thus misses the current construction boom.
 13. The EIS should not depend on a 2008 PSCAA estimate of particulate air quality, from a long time ago during a dramatic economic downturn.
 14. The EIS should not expect federal regulations to mitigate pollution impacts from off-road equipment, because new equipment is not frequently purchased and most construction involves older equipment built to older standards.

15. The EIS should recognize that construction activity is not a transient phenomenon, but rather a continuous factor in urban villages exposed to rapid growth.
- 8 16. The EIS should consider the use of building waste as industrial boiler fuel, as a source of greenhouse gas emissions.
- 9 17. The EIS should consider more realistic fuel economy projections, in view of actual improvements in recent decades, when assessing transportation related greenhouse gas emissions.
18. The EIS should not assume that area residents will shorten trips in response to traffic congestion.
19. The EIS should recognize that increases in pollution and greenhouse gases associated with Alternatives 2 and 3, constitute adverse impacts.

Noise

- 10 This impact is not evaluated at all and simply references the 2035 comp plan noise which does not allow for wholesale conversion of single family to massive apartment complexes. Under the Hala plan, entire residential neighborhoods could be surrounded by continuous and ongoing demolition and multiple projects in all directions for months, if not years.

The health effects on residents is completely minimized or ignored.

The hours that construction is allowed is on weekends until late evening and on Sunday. Most cities do not allow Sundays. It disturbs the peace. This needs to be modified considering the amount of construction and disruption with trucks, machines, hammers and whatever else is going on in Seattle. Stop giving developers all the perks and balance it for neighborhoods.

From: Natalie Williams
To: [PCD_MHAEIS](#)
Subject: Fwd: HALA DEIS Comment Schedule
Date: Saturday, June 17, 2017 5:07:06 PM

I am petitioning for an extension of the comment period to Sept. 30, which allows a more appropriate time period to review and comment on an 800-page document.

-- Natalie Williams

"The best way to predict the future is to create it." -Peter Drucker

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"The best way to predict the future is to create it." -Peter Drucker

From: Natalie Williams
To: [PCD_MHAEIS](#)
Subject: Comments on the DEIS
Date: Sunday, July 09, 2017 7:47:45 AM
Attachments: [3x5-Light&Livability.docx](#)
[3x5-Noise&Air.docx](#)

Hello urban planners! Thanks for the opportunity to comment. I'm adding a comment on noise and air pollution design guidelines, and I have 'condensed' my comment on Light considerations for easier communication.

Thanks!

-- Natalie

"The best way to predict the future is to create it." -Peter Drucker

Noise and Air pollution effects on High Rise buildings – from a dweller therein (2012)...www.indianrealestateforum.com

AIR - “You can avoid sand and dust particles, by moving to a higher floor, but will be exposed to higher levels of poisonous gasses emitted from the vehicles. These gasses are lighter, and hence rise above instead of staying at ground level.”

Fact: The World Health Organization recommends that the indoor air level for CO be below an average of nine parts per million (ppm) for any eight-hour period, and below 25 ppm for any one-hour period. One ppm means one part of CO per million parts of air. Each year, approximately 160 people in NYC die from CO poisoning.

NOISE - “There won’t be much difference in noise levels. I tested the noise levels between our ground floor and my 10th floor apartment. There was hardly any difference.

It can get worse due to echo from the closed buildings along the street. The higher floors experienced more noise due to being enclosed by two other buildings, creating an echo.”

ENERGY - The only environmental advantage to taller buildings is IF they are built with a Centralized Air Handler. The developer would then prohibit individual noisy, inefficient window units. The benefit is higher if the building occupancy rate is higher. (‘Environmental Issues in High-Rise Residential Building in Urban Areas’, Jianlei Niu, Hong Kong Polytechnic University)

Argument for Light and Livability in Neighborhoods –

One indicator of a neighborhood's economic and cultural vibrancy is direct sunlight that reaches the sidewalk. One thing that life on earth requires is light. Fruit trees and vegetable beds thrive on light. Some things can survive with less light, for example, most roses can survive with only six hours of direct sunlight. Many studies have shown however, that quality of life goes down dramatically due to light deprivation. Rates of depression go up (<https://www.scientificamerican.com/article/down-in-the-dark/>), and productivity goes down both physically (<https://www.ncbi.nlm.nih.gov/pubmed/26297803>) and economically (http://journals.lww.com/jbisrir/Fulltext/2010/08161/The_effects_of_exposure_to_natural_light_in_the_e.5.aspx).

It follows that with light deprivation, and the resulting lower morale, that crime rates would go up. Many studies confirm this. (<http://onlinelibrary.wiley.com/doi/10.1111/j.1745-9125.2006.00056.x/abstract>) Light is a resource, and lack of light is resource deprivation. Resource deprivation has long been recognized as the leading cause of violence on an individual as well as neighborhood level.

Let's make Morgan Junction a place where discerning, urban folks want to live. Let's attract them with our businesses, character and livability. Let's keep our economy vibrant, our neighborhood safe and livable by preserving our light.

From: Natalie Williams
To: [PCD_MHAEIS](#)
Subject: Requesting further extension...
Date: Friday, July 28, 2017 6:39:41 AM

Hi Geoff - Thanks again for the hearing last month. There is so much information to review though, I believe a few more weeks is needed. I also had a family emergency in the middle of August. Can we move the date out to the end of August?

-- Natalie Williams

"The best way to predict the future is to create it." -Peter Drucker

Name	Natalie Williams
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 The exact details of where, when and how the "fund" that these developers will be paying into will be allocated and spent needs to be determined right up front, or it will become another slush fund for the City. The statement "...or paying into a fund to support the creation and preservation of affordable housing throughout Seattle.To put MHA in place, the City would grant additional development capacity through area-wide zoning changes and modifications to the Land Use Code.", invites developers to build small, maximum priced units, and just pay the City's MHA 'tax'. This initiative therefore does NOTHING to address affordable housing in Seattle, and in fact, drives out the less expensive rental houses that do exist for working families.</p>
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?

Name	Natalie Williams
Email address	
Comment Form	
Public Services & Utilities	<p>1 This section does not address how our Fire responders will be trained and supplied to put out fires in the proposed 8+ story upzones. Battalion 7 is not staffed or supplied to respond adequately to one of the new 8+ buildings in AK Junction going up in flames. If the City disagrees with my assessment, where is the proof? Where are the scenarios showing adequate water pressure to put out a multi-story fire above the fifth floor in August? What are the staffing projections and timeline for this scenario? What new training programs have been done or are planned to simulate and train for this? The training tower in SODO is only four stories high, so how are our firefighters being trained to respond to high-rise fires?</p>
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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resided in the city of Seattle? (total number of years)

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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?

From: WilliamsNiki@aol.com
To: [PCD_MHAEIS](#)
Cc: williamsniki@aol.com
Subject: Aesthetics 3.3 and Land Use 3.2
Date: Monday, August 07, 2017 7:43:27 PM
Attachments: [bj_deis 3.3 Aesthetics 3.2 Land Use.docx](#)

Hello, comments on Aesthetics 3.3 and Land Use 3.2

From Bonnie Williams 8/7/2017

3.3 Aesthetics

1. Analysis of general urban form fails to account for neighborhood character.
2. Comparison graphics between no-upzone and upzone alternatives, in single family residential, should not feature hypothetical modern single family structures on the assumption that this "infill" is a trend that will reliably produce modern structures in an established neighborhood of older houses. This artificially discounts the visual impact of upzones, in neighborhoods where well maintained older homes are actually highly valued and unlikely to be replaced within the 20 year interval.
3. Where Design Review is cited as mitigation, the EIS should clearly indicate the thresholds, under which projects are exempt from Design Review, or would be exempt after proposed revisions to Design Review. This is particularly significant in areas to be upzoned from Single Family Residential, to low rise categories that would so commonly be exempt that it isn't much of a mitigation at all.
4. Specific public views should be identified, that would potentially be impacted in areas subject to rezones.
5. Design Review should not be cited as mitigation for protection of public views, in areas where most projects will be exempt from Design Review due to small size.

Land Use 3.2

1. An alternative should be included that is based on use of publicly owned land for affordable housing.
2. An alternative should be included that upzones more land outside Urban Villages and Urban Centers.
3. An alternative should be included that increases development in selected areas, where current zoned capacity is under-utilized, by directing transportation and other infrastructure improvements to those neighborhoods.
4. An alternative should be included that levies impact fees on developers to fund transportation and other infrastructure improvements in neighborhoods where current zoned capacity is under-utilized.

- 5.The EIS should analyze Alternative 1's compatibility with the 2035 Comprehensive Plan, specifically with respect to development capacity.
- 6.Historical growth cycles suggest that it is incorrect to base analysis of alternatives on the current growth rates. Each analysis should be repeated for low, middle and high growth trends.
- 7.One or more alternatives should have been included with incremental upzones over a 15 to 20 year period, allowing more locale-sensitive planning, better course-correction and better targeting of environmental mitigation and concurrent infrastructure.
- 8.The EIS should present maximum zoned density information.
- 9.Alternative 1 was not adequately analyzed for sufficiency to meet current and projected demand. Current construction rates of 10,000 new units built per year may well be enough to support the 70,000 estimated in-migration over the life of the 2035 Comprehensive Plan.
- 10.The Seattle 2035 20-year growth strategy should be used to evaluate Alternatives 2 and 3.
- 11.It is incorrect to simply assume that MHA subsidized affordable housing will allow low-income households to live in areas with high access to opportunity, near transit centers, or make any assumptions about their location based on zoning decisions. Developers have an in-lieu fee alternative to providing affordable housing on site, and subsidized affordable housing created via that means is not tied to the neighborhood of the building site.

Other

Other major concern:

- 1.The proposed allowable housing types suggested especially for Low eise one being assigned in many single family neighborhoods is not encouraging family housing, but just the opposite especially if changed to "NO DENSITY LIMIT". It becomes rather unpredictable as to what can be build next door and single family neighborhoods have been successful in building community through connections in neighborhoods. If 30 units go up next door this diminishes the allure of a safe,friendly personal environment. The biggest contention now is the apodments, studios without parking and the no density limit without design review for lots under 20,000 feet as proposed is a combination for disaster and destruction of fundamental family values not seen in current designs. This zone should be scaled way back to balance what works now.

Land Use Continued

2. Neighborhoods fraught with bigger buildings, inadequate setbacks, little or no yard, lack of the beauty of trees, birds singing and the peace and serenity of nature are being tossed away too easily without considering the loss and long term consequences. The city is creating a high stress environments with density we now see in Wallingford, traffic congestion, increased safety concerns walking, driving and biking with just too many people coming in and more planned. Parks you want to stay away from on weekends when everyone is out. Does vibrant really mean chaotic?

From: Ruth Alice Williams
To: [PCD_MHAEIS](#)
Subject: Draft Mandatory Housing Affordability Environmental Impact Statement - Openspace and Recreation
Date: Monday, August 07, 2017 5:15:09 PM

BY Email Only

Ruth Alice Williams
1219 NE 107th Street
Seattle, Washington 98125

Office of Planning and Community Development
Attn: MHA EIS
PO Box 34019
Seattle, WA 98124-4019

Greetings:

I am writing to request reassurance that all of Seattle's designated natural area parks and sections of groomed parks remain in their current category and limited to their currently allowed uses.

As it stands, the primary purpose of our natural areas is to create and enhance habitat for native biota. These special parks are used for passive, low impact, recreation, restoration, and scientific study, activities that contribute to the well-being and relaxation of residents as well as to the survival of our local flora and fauna.

Protecting our natural areas is especially important in our uncertain era of climate change, with its high summer temperatures and droughts that are stressing natural systems in ways we don't completely understand. For example, what is causing the die-off of the Seward Park Sword Ferns? (These die-offs are happening in other parts of Washington State as well.)

Keeping nature as natural as possible in the city is also a matter of equity for those who don't keep a car or can't afford the time it takes to use public transportation to get out of town and into state and national forests.

Keeping our natural areas for nature and passive enjoyment is a simple matter of reason and fairness.

Thank you for your consideration.

Sincerely,

Ruth Williams,
Thornton Creek Alliance
board member and past president,
writing as an individual

From: Don Williamson
To: [PCD_MHAEIS](#)
Subject: Response to DEIS Don Williamson 8-7-17 (South Park)
Date: Monday, August 07, 2017 2:28:45 PM

I am responding to the DEIS.

I have worked in South Park for 12 plus years and I am responding from the impact of someone that works in South Park in the industrial area.

- **First thing is South Park is in a flood Zone.** When it rains in South Park there is no where for the water to go. I have seen many floods in South Park. More density would make this worse. The single family homes and gardens actually keep the flooding in South Park down.
- **There is already no parking for the workers of South Park.** Having more density and the rezone would result in less parking.
- **There are hardly any trees in South Park especially in the industrial area.** Most of the trees come from single family homeowners in their gardens.
- The streets have huge pot holes in them all through out South Park. I get the feeling Seattle could care less about fixing the streets.
- I live three miles away and it would take me three hours to catch a bus to get to my job. The buses don't connect and they don't run enough in South Park. I can't work in South Park without a car.
- My boss (owner) and myself have NEVER been notified of the rezone or the DEIS. I found out from a homeowner that lives in South Park. My job will be affected if this rezone goes in and many other jobs in South Park. I don't want to go to work and fight traffic coming out of South Park 5 mins away. Also there are two bridges that go up during rush hours.
- **I think South Park needs to be out of this rezone process all together. South Park already needs help and you are taking away what little it has left. Keep the Single Family Zoning. There is more that will be affected by this. I have a family and don't to loose my job because of this rezone. That is what will happen. I've seen it too many times already in other parts of Seattle. The industrial area work and count on the single family homeowners to be neighbors. We support the single family homeowners to keep their single family zoning.**

Please read this.

Don Williamson 8-7-17

From: Elise Willis
To: [PCD_MHAEIS](#)
Subject: Land Use for Photographic Center NW
Date: Monday, August 07, 2017 7:10:18 PM

To Whom It May Concern:

I am writing as a board member 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 photography. It has been located at 900 12th Avenue and Marion Street for twenty years, and in Seattle for nearly thirty.

PCNW's site is comprised of 4 real estate parcels underlying our building and parking lot on the corner of Marion and 12th Avenue, and between 12th and 13th 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% 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 (including both the executive director and associate director). 20% of our staff identify as Latino or mixed race. No-one earns more than \$50,000 a year. Most of our adjunct faculty also fall into this income bracket.

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,
Elise Willis

Name	Paul Willumson
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 The draft EIS does not meet SEPA requirements for the consideration of alternatives
Housing and Socioeconomics	2 Allowing developers to pay into a fund so they don't have to build low income housing is wrong. I live in Wallingford and it is quickly becoming an enclave for the rich.
Aesthetics	3 Uniform box buildings with no setbacks should be discouraged. It creates a walled city affect.
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?

Name	Tom Wilson
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I am for no change to the current study area. There's a lot of untapped space and growth. I'd prefer to be more reactionary so as the growth grows outward from the central core rather than upping the zoning overall and get pockets of denser development away from the core. There is so much untapped and yet to be built on land in the Roosevelt neighborhood.</p>
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: South Delridge
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Comments
Date: Monday, August 07, 2017 12:38:30 AM

Attn: Office of Planning and Community Development

Dear *MHA EIS Project Team*,

We are submitting these comments as concerned residents of the South Delridge community in response to the Mandatory Housing Affordability Draft EIS. From an initial read and conversations within our community and with neighboring communities, we believe that the DEIS fails to honestly assess the negative impacts of MHA to the Westwood Highland Park Residential Urban Village (WWHPRUV) and neighboring communities. The DEIS also does not provide any specific options to mitigate the negative impacts it does identify.

The WWHPRUV, including South Delridge, Westwood, and Highland Park, is one of the most diverse neighborhoods in the City and has both a high risk of displacement as well as low opportunity. Because of these conditions, the WWHPRUV needs a plan that considers the unique challenges we face and provide specific plans to mitigate the negative impacts of rapid population growth. We list below some of our priorities for livability.

1) With the highest proportion of citizens under the age of 18 in all of Seattle, development and planning in our area needs to consider the negative impacts of increased population on area schools, which are already struggling to meet the needs of students across the social and economic spectrum. As recently as 2014, Highland Park Elementary was the lowest performing elementary school in the city, and the school faces the same challenges now as then.

2) Adequate access to public spaces for recreation and socializing, such as community centers, parks, play fields, and green spaces. Currently the WWHPUV is one of four urban villages that lack sufficient internal park space area to meet residents' needs and does not meet the minimum requirement of a park within a quarter mile for all residents (Steinbrueck Urban Strategies LLC. (2014). SEATTLE SUSTAINABLE NEIGHBORHOODS ASSESSMENT PROJECT. Retrieved from https://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2233677.pdf).

3) MHA does not do enough to protect renting families from displacement. With our current zoning we are seeing land which previously housed two to three large families each being replaced by large apartments comprised of studios and one bedrooms. Assuming 9% affordable

housing requirements that provides three smaller sized affordable units. Those original families will be unable to make the economics work in order to stay in the neighborhood.

4) MHA/HALA must include plans to promote a vibrant, engaged small business community serving the diverse needs of our diverse community.

5) Real, sustained pedestrian and bicycle infrastructure investment to enable a connected and healthy community that does not rely solely on cars for transportation and is aware of our local topography constraints.

6) Comprehensive East-West / North-South public transit service to promote vibrant, interconnected communities throughout the WWHPRUV and West Seattle.

7) Development of policy and programs to guide development of economic and educational opportunities in the local area to build the WWHPRUV beyond a bedroom community and into a destination.

The original WWHPRUV vision has languished for decades largely unfulfilled, with little to no capital improvements or updates to infrastructure in our neighborhoods while the community continues to grow quickly regardless of any official City plan.

We encourage the Office of Planning and Community Development to seize this opportunity to deliver on long-standing commitments to this community by designing a thoughtful MHA implementation plan that creates vibrant, livable, and interconnected communities. One size does not fit all.

Sincerely,

Darryll Wolf

Chair, South Delridge Community Group



August 4, 2017

Via E-mail

**PRESERVATION DEVELOPMENT
AUTHORITY COUNCIL**

KATE KRAFFT
Chair

ALYSSA ALCANTARA
CONNIE WALKER GRAY
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Ex Officio

Office of Planning and Community Development
Attn: MHA EIS
PO Box 34019
Seattle, WA 98124-4019

Re: Comments on Mandatory Housing Affordability
Draft Environmental Impact Statement

Dear OPCD:

Thank you for the opportunity to comment on the Mandatory Housing Affordability Draft Environmental Impact Statement (MHA DEIS). Historic Seattle is the only citywide nonprofit dedicated to protecting Seattle’s unique character through our efforts to *educate, advocate, and preserve*. Since 1974, Historic Seattle has been advocating for “thoughtful and meaningful preservation and rehabilitation of historic buildings,” and as our mission states, “the creation of a more livable environment.”

We’ve brought back to life threatened and neglected historic properties throughout Seattle, several of which provide affordable housing – “Bel-Boy Apartments,” Victorian Row Apartments, Phillips House, and Good Shepherd Center artist lofts. Currently, Historic Seattle owns and maintains 47 affordable housing units at these properties.

Historic Seattle shares the City's concern about the lack of affordable housing **and** supports a number of HALA's recommendations. However, in our opinion, what's being proposed for MHA will have a potentially significant adverse impact on the livability and quality of Seattle's neighborhoods. MHA should provide a more balanced approach to achieving growth.

The historic resources analysis contained in the MHA DEIS should reflect a better understanding of what exists that's currently 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, net gain of housing, and how much is "affordable"?***

Historic Seattle submitted a comment letter on HALA and MHA to OPCD Director Samuel Assefa on June 30, 2017 addressing how historic preservation relates to both *affordability and livability*, and sharing our concerns about the HALA/MHA process and outcomes. This letter specifically addresses the Historic Resources Section (3.5) of the MHA DEIS.

1117 Minor Avenue
Seattle, WA 98101

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INFO@HISTORICSEATTLE.ORG
WWW.HISTORICSEATTLE.ORG

THE HISTORIC RESOURCES SECTION (3.5) LACKS MEANINGFUL ANALYSIS

The section on **Affected Environment (3.5.1)** does not provide any real understanding of the study area's history, context, and patterns of development other than describing when certain neighborhoods were formed or annexed to the city. It should include details on neighborhoods to adequately assess potential impacts to historic resources such as potentially-eligible individual properties and future historic districts. Added development pressure will result in increased demolition of potentially historic buildings and neighborhoods and adversely impact the character and scale of neighborhood blocks.

Listing the existing locally designated and National Register-listed districts is a start but there's nothing more. ***How can impacts be addressed if there's no substance in the Affected Environment section?*** Seattle is distinguished as a city of neighborhoods—each has its own character and history. A description of all the neighborhoods in the study area should be part of the analysis. This should include a brief historic overview of each neighborhood, periods of development, and types of cultural resources that define the area. Without this basic information, there's no way to assess the impacts of MHA on historic resources including existing and potentially-eligible landmarks.

Exhibits 3.5-1 and 3.5-2 (NRHP Determined Eligible Historic Properties, Alternatives 2 and 3) appear without any context. Tables such as these should be clear in meaning with some explanation in the body of the document or in a footnote. There is reference to the exhibits on page 3.244 but it's not clear what it means to have a count of National Register-eligible properties in the M, M1, and M2 zones in relation to the level of displacement and access. One would have to read the rest of the DEIS and appendices to even understand what M, M1, and M2 refer to and what the descriptors of "displacement" and "access" mean. Additionally, these tables are misleading by crediting the source as the Department of Archaeology and Historic Preservation (DAHP). DAHP did not create these tables; the City of Seattle obtained the numbers of National Register-eligible properties from DAHP's WISAARD database. Furthermore, DAHP does not use displacement and access or the zones to determine eligibility.

Since the City is using an equity lens for its analysis and framework throughout the entire DEIS, then it would be helpful if the Historic Resources section actually looked at the historic context of social inequality in the development of the various neighborhoods in the study area and connect that to historic resources.

THE DEIS DOES NOT CONNECT MHA TO UNREINFORCED MASONRY BUILDINGS (URM)

Discussion of URMs appears in both 3.5.1 (Affected Environment) and in 3.5.3 (Mitigation Measures). However, the DEIS does not reference the Seattle Department of Construction and Inspection's (SDCI) list of over 1,100 URM properties in the city. They are listed by neighborhood, address, and year built. This appears to be a critical omission and it would be very informative to identify the number of URMs in each of the study area neighborhoods to gain a better understanding of how MHA might impact these properties. Ballard, for example, has just under 70 URM properties. The mitigation measure offered in the DEIS on page 3.255 references use of the Secretary of the Interior's Standards for Rehabilitation to provide guidance on retaining a building's historic character. While we support the use of the Standards for such projects, if the building is not a designated Seattle Landmark or located in a locally designated historic district then there is no mechanism for the City to require adherence to the Standards. The Governor's Executive Order 05-05 and Section 106 of the National Historic Preservation Act may come into play in only a handful of projects. ***This suggested mitigation measure to adhere to the Standards would be strengthened by laying out how the City could make following the Standards a requirement and how it would be implemented.***

The DEIS does not connect MHA to URM. Complying with a possible mandate by the City to seismically retrofit URMs to "bolts plus" standard will present a substantial financial burden on many property owners. ***A financial incentive would be to use a portion of MHA developer fees for the seismic retrofit of historic URMs that are rehabilitated for affordable housing.*** Not all URMs are historic so there would need to be some eligibility

threshold. Perhaps a URM that is eligible for local landmark designation or National Register listing would be eligible for the incentive. "Preservation of existing affordable housing" is a goal of HALA, so it would be natural to offer strong financial incentives to property owners who preserve historic URMs and provide affordable housing.

THE DEIS MINIMIZES MHA IMPACTS ON HISTORIC RESOURCES

Upzoning in the study area will result in increased assessed value which then translates to more development pressure. As we're well aware, little value is placed on the existing improvement with almost all the value placed on the land. This all goes hand-in-hand with increased growth rates. It logically follows that there will be more significant adverse impacts on historic resources. ***To state that the "MHA program would not directly impact any historic or cultural resources, but development allowed by the MHA program could impact these resources by affecting decisions to demolish or redevelop historic-aged properties or construct new properties on land that may contain belowground cultural resources" is double-speak.*** There is a direct causal relationship the MHA program will have on historic resources. Even without MHA (as exists now or under Alternative One), there is already a significant amount of development and demolition of historic and potentially historic resources. Demolition will be exacerbated by the MHA program because a false choice will be created between affordable housing and historic preservation (except in some instances where existing affordable housing is preserved).

The upzone will have direct impact on 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 and more of these areas are changing every day with new development in which generic six to eight story buildings are constructed, usually out-of-scale with the historic pattern of development. Increasing the height "just one story or two" may not seem to have much impact to the City, but it will have considerable impact to the people living in the neighborhood.

For example, one needs to look no further than the 3800 block of Ashworth Avenue N in Wallingford. Years ago, what was once a single-family neighborhood was rezoned LR1. The block that was once characterized by older houses of different styles, form, and scale (especially bungalows) is now dominated by townhouses that are not "single-family" in character or scale. The remaining few older houses are dwarfed by looming new construction that is generic in design, typifying what's being built everywhere. Not only has the historic character of that Wallingford street been destroyed, but the only more "affordable" housing that exists are the older single-family houses that are retained by long-time owners. This real life example portends the future of this neighborhood and other older communities throughout the city.

Existing historic districts seem to get a free pass from upzoning—for now. The DEIS states that "None of the Alternatives propose zoning changes within the boundaries of the eight designated Seattle historic districts or within the seven National Register historic districts that are located within and are abutting the study area. Zoning changes are proposed in areas abutting several historic districts...These changes may have indirect impacts on historic districts if buildings are demolished or redeveloped adjacent to, or across the street from, these boundaries." ***The DEIS does not address if and how MHA applies to newly-created historic districts (whether locally designated or listed on the National Register of Historic Places). Will future designated local and National Register historic districts be exempt from MHA?***

THE DEIS SHOULD PROVIDE SUBSTANTIVE MITIGATION MEASURES

Section 3.5.3 focuses on two mitigation measures that are already in place--Comprehensive Plan policies and City Landmarks process, and proposes a third to continue funding of comprehensive survey/inventory efforts that have been inactive for years. A list of other potential mitigation measures follows in a separate paragraph but it is unclear whether any of these have any import or will be considered seriously. This is a very passive

approach toward mitigation. **Mitigation should actually respond to the potential impacts and not rely only on existing policies, programs, and regulations without ways to implement through added funding and staff resources.**

We support the increased identification of individual historic resources and potential historic districts through the continuation of a systematic and comprehensive survey/inventory of the study area. But it should not stop there (survey and inventory serves as a framework for identifying significant historic resources; it does nothing to protect them). **To be proactive, the City should take the next steps, including preparation of landmark nominations for individual properties and potential historic districts.** There is precedent in this approach with the 2007 Downtown Survey and Inventory conducted by the Seattle Historic Preservation Program which resulted in the designation of numerous Downtown properties. **In order to engage communities and gain their support for this work, Historic Seattle could help the City with outreach and education efforts.**

Furthermore, Historic Seattle supports taking a closer look at conservation districts and not use the Pike/Pine Conservation Overlay District as a model because it has not resulted in true preservation. Facadism is not historic preservation. What's proposed under HALA/MHA should be aligned with the Seattle 2035 Plan, which includes a policy (LU 14.5) about "the use of conservation districts to recognize and sustain the character of unique residential and commercial districts."

The City currently does not have an effective demolition review process. We support creating a demolition review process that would assess properties (25 years or older) for Landmark eligibility. This would not necessarily be tied to SEPA review because current threshold requirements for SEPA exemption often times results in historic resources being demolished.

Finally, we support meaningful incentives for preservation beyond what currently exists. Historic Seattle could work with the City to develop new incentives for historic properties—including but not limited to the aforementioned use of a portion of MHA developer fees for URM's rehabilitated for affordable housing; grants for capital improvements; lower property taxes above and beyond Special Tax Valuation; a more effective and active TDR program; and revision of the building and energy codes to provide a better path for older, traditionally constructed buildings so that meeting code requirements do not result in damaging historic buildings.

CONCLUSION

MHA needs to include strategies for adding density and equitable development using vacant and underdeveloped areas. There are numerous opportunities for sensitive and compatible infill that can enhance urban character, rather than detract from it by making it easier to demolish existing housing that is already affordable for more units that will be less affordable.

We believe the City should invest in its future by striking a balance between new development and historic preservation to ensure that *how we grow* is sustainable and resilient – and retains urban character and sense of place. If we continue the tear-down mentality, then Seattle will lose what makes it a vibrant, livable place for all who call it home.

Thank you again for this opportunity to comment.

Sincerely,



Eugenia Woo
Director of Preservation Services

From: Vickie Woo
To: [PCD_MHAEIS](#)
Subject: MHA Analysis & Recommendations
Date: Thursday, July 06, 2017 9:32:38 PM

Hello,

It's very clear that many people way smarter than me have done a tremendous amount of analysis regarding affordable housing. So, I don't believe I can add anything to the analysis. However, like all other "communities," there should be some resident rules. I currently live in a condo in Belltown. There are rules such as "quiet time" from 10:00pm to 8:00am, etc. As such, any affordable housing provided should include resident rules for all tenants. Some suggestions:

1. There should be a community board made up of tenants.
2. Tenants are responsible for maintaining their own units and common areas to specified standards established by the property management company and community board.
3. There should be consequences for not following the resident rules.
4. All major actions, e.g., property improvements, etc., should be communicated to and voted on by the entire community.

There are others and you've probably already thought this idea through, but just in case...thank you for the opportunity to make a comment. Also, thank you for all the work you've done so far on this topic. I'm a Seattle native and while I've enjoyed the growth of our city, it's also be sad to see more and more people pushed out because they simply cannot afford it any longer at the same time our homeless population has increased.

Vickie Woo
98121

From: Marilyn Wood
To: [PCD_MHAEIS](#)
Cc: Newsletter@seattletimes.com; news@crownhillurbanvillage.org
Subject: Proposed changes to Crown Hill
Date: Wednesday, August 02, 2017 10:49:51 AM

The City's proposed changes and reasoning for Crown Hill are deeply disturbing. The drastic proposed increase in height of buildings and density would mean an extraordinarily negative impact on the Crown Hill community. I am deeply concerned that the draft EIS does not adequately reflect the true impact of the proposed changes. It does not take into account the rapid development currently occurring in Crown Hill. It does not address the huge added burden on Crown Hill's infrastructure, particularly transportation and local schools. It does not address the impact the added traffic will have on arterial and side streets, and the anticipated shortage of adequate parking.

The residents of Crown Hill have brought their concerns forward at community meetings and via written comments. I've attended many of these meetings and it is clear these concerns and requests have still not been adequately addressed. There is no plan to establish a light rail station in Crown Hill, yet the assumption is made that the current transportation system is adequate. The proposed rezoning and the draft EIS fail to adequately address the added growth, density and traffic.

These concerns need to be more fully addressed and appropriate changes made, BEFORE the City approves rezoning changes for Crown Hill. Failure to do so, and forcing the proposed rezoning changes onto Crown Hill places an immense, unfair burden onto this community.

Marilyn Wood

From: Nancy Woodland
To: [PCD_MHAEIS](#)
Cc: tmwoodland@gmail.com
Subject: West Seattle Junction HALA and MHA comment
Date: Sunday, August 06, 2017 9:55:00 PM

I live in the WS Junction and have owned our home with my husband since 1999. Our family of four loves this area, our neighbors and the incredible character of the Junction.

As a whole, we are very supportive of affordable housing and solutions to incorporate more affordable units in developments. The highest number I saw in projections was 56 units added. I don't understand how that number of units could not be incorporated into current zoning over time.

I don't think the DEIS planning has been specific enough to the areas and I know local schools and parking are completely maxed.

As a whole, we are also very tolerant of the growth in WS. We have a 6 story condo in our back yard that arrived (taking away much of our Western sunlight and all of our view) around 2011. We participated in the planning meetings and felt heard by the developers. Some of our neighbors concerns weren't met and they have since moved because of lights glaring into their windows all day and night and a trash compactor that registers like an earthquake.

I think more consideration, planning, respect for incredible local citizen input are in order so we can come up with a win:win.

Nancy and Tim Woodland
5023 42nd Ave SW
Seattle, WA. 98136

Sent from a tiny device. Please excuse brevity and typos.

From: Janet Woodward
To: [Brand, Jeseca](#); [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@seattle.gov; [PCD_MHAEIS](#)
Subject: Draft EIS comments
Date: Tuesday, August 01, 2017 8:33:27 AM

To the City Council and HALA Team,

I am in complete agreement with the comments that have been submitted by the Madison-Miller Park Community Group in response to the MHA Draft Environmental Impact Statement for our neighborhood-Urban Village.

I especially highlight the following observation:

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

A recent op ed in the Seattle Times by 3 of the city council members (Herbold, Bagshaw and O'Brien) underlines this idea by asking for impact fees from developers. This concept is long overdue in our city which has seen burgeoning growth but not much infrastructure benefits.

Our streets still have potholes, the community center at Miller has limited hours and there have been no new parks added in our area.

In fact, the city seems to be still practicing cutbacks based on an austerity mentality while clearly there are growth and profits to be seen everywhere. In fact our property taxes continue to rise steeply and we keep being asked to pay more for amenities, basic operations and transit.

It is time to re-establish neighborhood councils and to address the concerns of the residents who have creative and innovative ideas on how to expand density and affordability while preserving a reasonable quality of life.

Janet Woodward
346 22nd Ave east
Seattle, WA 98112

From: Linda Wordeman
To: [PCD_MHAEIS](#)
Subject: Ballard Schools are Full - no up zone
Date: Friday, July 28, 2017 8:19:52 AM

Do not upzone in Ballard. Ballard schools are packed full.

From: Barbara Wright
To: [PCD_MHAEIS](#)
Subject: Zoning
Date: Saturday, August 05, 2017 1:15:58 PM

Do not upzone single family lots in Seattle. Neighborhoods are what make Seattle special and you gain nothing by destroying them. If you upzone single family lots you will end up displacing the elderly and others who live in small neighborhood houses. Once you change the zoning developers will buy and tear down the little houses thereby displacing lower income residents of neighborhoods.

From: Barbara Wright
To: [PCD_MHAEIS](#)
Subject: Stop rezones
Date: Monday, August 07, 2017 11:45:34 AM

Stop the proposed rezones if the West Seattle junction. The city analysis is inadequate and does not accurately address parking, transportation, displacement and most important of all, neighborhood character.

Redo the analysis in a non-biased manner and see what your proposed rezone will really do to a quaint city shopping area.

Barbara Wright

Name	Stacy Wright
Email address	
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.	Roosevelt Froula Park Neighborhood
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 The EIS presents three alternative (1 no change, and 2 different options for upzone). These are only slight variations of the "Grand Bargain" and there is no analysis or discussion of other true alternatives that might reach the city goals - for example more gradual upzoning across broader areas of the city, or economic incentives to develop land that is already appropriately zoned but underutilized.</p>
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?

816 Second Ave
Suite 200
Seattle, WA 98104



(206) 343-0681
fax (206) 709-8218
futurewise.org

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

August 7, 2017

Dear Mr. Wentlandt:

Thank you for giving us the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for the citywide implementation of Mandatory Housing Affordability (MHA). For over 25 years, Futurewise has worked to prevent sprawl in order to protect Washington's resources and make our urban areas livable for and available to all. We focus on preventing the conversion of wildlife habitat, open space, farmland, and working forests to subdivisions and development, while directing growth and ensuring livability, affordable housing, effective transportation, social justice, environmental justice and environmental quality in our urbanized areas.

Futurewise Priorities

Futurewise is not supporting a preferred alternative, but rather, we are requesting that the City of Seattle to focus on key principles that will ensure the successful implementation of MHA across Seattle. Those principles can be achieved by moving forward with a hybrid approach to the alternatives outlined in the Final Environmental Impact Statement (FEIS), which will achieve the following:

- Expand all urban villages to within a 10-minute walkshed of frequent transit service;
- Increase development capacity in high access-to-opportunity neighborhoods with low displacement risk;
- Provide a broad array of housing types and sizes at all income levels across the City.

Moving forward with a hybrid approach that further studies the risk of displacement, provides uniform access to frequent transit service, and provides a broad array of housing types is key to making MHA a success. These principles will result in the best outcomes for all parts of the community, and are consistent with the goals and policies outlined in Seattle 2035:

- **Policy GS 1.12** – “[To expand urban villages,] include the area that is generally within a ten-minute walk of light rail stations or very good bus service in urban village boundaries.”
- **Policy LU G2** - “Allow a variety of housing types to accommodate housing choices for households of all types and income levels.”

- **Policy H 5.3** - "Promote housing affordable to lower-income households in locations that help increase access to education, employment, and social opportunities while supporting amore inclusive city and reducing displacement from Seattle neighborhoods or from the city as a whole."

We commend the City of Seattle for using the Growth and Equity Analysis as the framework in which to evaluate Alternative 3 within the DEIS, and request that the city continue to use that frame in preparation of the FEIS. MHA is critical to providing greater housing capacity while at the same time providing funds for housing units below 60% AMI. Futurewise supports this program and hopes the City of Seattle can implement other complimentary policies, in addition to MHA, that will increase housing choices while limiting displacement.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bryce", with a long, sweeping flourish extending to the right.

Bryce Yadon
State Policy Director

From: Steve Zemke <stevezemke@msn.com>

Sent: Monday, August 7, 2017 12:31 PM

To: MHA.EIS@seattle.gov

Subject: Comments by Friends of Seattle's Urban Forest to MHA draft EIS

MHA Draft EIS Comments by Friends of Seattle's Urban Forest

August 7, 2017

From Steve Zemke – Chair Friends of Seattle's Urban Forest

To: Office of Planning and Community Development

Attn: MHA EIS

PO Box 34019

Seattle, WA 98124-4019

1 The Friends of Seattle's Urban Forest appreciates the recognition and analysis that the MHA Draft EIS did in its study, emphasizing the significance and importance of our urban forest in keeping Seattle a livable city and recognizing the many positive ecological, environmental, esthetic and health benefits a healthy urban forest provides. Seattle is striving to increase its urban forest canopy to 30% by 2037. The longer range goal in the 2035 Comprehensive Plan remains a 40% canopy goal.

It is important to note that the American Forestry Association, which came up with the original 40% recommendation recently stated "According to a national analysis by U.S. Forest Service researchers David Nowak (also on our Science Advisory Board) and Eric Greenfield, a 40-60 percent urban tree canopy is attainable under ideal conditions in forested states." (AmericanForests.org)

2 **Calculating Total Tree Canopy Loss under Scenarios 1, 2 and 3 is necessary to understand impact of MHA additional canopy loss.**

Friends of Seattle's Urban Forest disagrees that the proposed development of additional housing under MHA is not significant. The impact is cumulative, added on top of the projected growth of housing under the 2035 Comprehensive Plan. The draft EIS by not stating the projected canopy loss under existing projections presents a very misleading and incomplete analysis of the changes occurring in this study area through 2025 when the additional affordable housing units will be added.

The baseline for the EIS should start with the current urban forest canopy in the study area as of 2016 when last studied so that the total projected change over time can be calculated under alternative 1 –No action. Under alternative 1 some 43,631 new units are projected to be built and significant tree canopy will be lost. The statement on page 3-284 is thus very misleading stating "The resulting change in canopy cover is assumed to be static." The projected tree loss through 2025 under scenario 1 is nowhere quantified in the draft EIS. The premise that "This study does not quantify tree loss resulting from current development patterns" is not acceptable because without understanding the total tree canopy change in the area through 2025 it is impossible to put in perspective the impact of the change that would result from the additional development proposed under HALA.

When you add in the additional housing units proposed under alternative 2 (17,709) and alternative 3 (17,479) they comprise about 28% of the total new growth in the area. To evaluate the addition of this growth to the area under study you have to add it to the projected growth already assumed under Scenario 1 through 2025. If you have not assessed the impact of the growth quantitatively under Scenario 1, it is impossible to then state that this additional growth will have no significant impact.

Scenario 2 $17,709/63,070 = 28.1\%$

Scenario 3 $17497/62,856 = 27.8\%$

Rounding up to 28% and assuming the tree loss in alternative 1 is at the same rate (not necessarily true) as alternative 2 and 3 you get the following projected canopy acreage loss as Loss current development under scenario 1 plus additional loss scenario 2:

Scenario 2 – total tree loss through 2025

28% x total tree loss = 5 acres canopy total tree loss = 17.86 acres low estimate

28% x total tree loss = 11 acres canopy total tree loss = 39.29 acres high estimate

Scenario 3 – total tree loss through 2025

28% x total tree loss = 8 acres canopy total tree loss = 28.57 acres low estimate

28% x total tree loss = 16 acres canopy total tree loss = 57.14 acres high estimate

By way of size comparisons, please note the following city parks and their acreage:

- Seattle Japanese Garden - 3.5 acres
- Myrtle Edwards Park - 4.8 acres
- Freeway Park – 5.2 acres
- Olympic Sculpture Park - 9 acres
- Kubota Gardens- 20 acres
- Northacres Park – 20.7 acres
- Volunteer Park - 48.4 acres
- Schmitz Park – 53.1 acres

It is in error for this EIS to not provide any information on the total tree loss in acreage through 2025 that is projected for Alternative 1, 2 and 3 due to the total development projected under each of the scenarios. Please provide the total projected tree loss in scenarios 1, 2 and 3 so that we can understand the total tree and canopy loss in each of the scenarios through 2025 relative to the additional tree loss projected in scenarios 2 and 3 that would be added.

No analysis made of potential acreage lost due to development that could be used for increasing tree canopy to meet city canopy goals.

The city is striving to increase its tree canopy. This means looking for places where no trees exist or where more trees could reasonably be planted. While the EIS evaluates existing canopy that would be lost, no analysis is made of the loss of potential canopy area for planting trees that if planted would help the city reach both its short term and aspirational goals. SDOT for example has looked at potential planting sites to help increase tree canopy. The reality is that

as increased intensive development occurs the number of potential planting sites that could be used for planting trees is permanently lost as building density increased and covers more lot area.

What amount of potential planting area is lost due to this increased development under scenarios 1, 2, and 3?

4 **Need to evaluate changes in growth projections and potential housing units over time based on low and high growth in recent history**

The development projected under Alternative 1 should really be a range of projected low and high development in housing units. It is impossible to project development impacts out 8 -10 years with precise accuracy as Seattle has found in other projections when growth has greatly exceeded expectations in recent years.

As the Urbanist noted recently, “The 2010 Census pegged Seattle at just 608,660, meaning we’ve grown by nearly 100,000 new people in just six years ... Housing supply tends to lag behind housing demand; it could be in the coming years supply finally approaches demand. About 10,000 apartments are set to open in 2017, and more than 12,000 more are slotted for 2018. At the very least, with record-setting apartment growth expected, we have ample reason to expect the population growth trend to continue. Since King County averages 1.8 people per apartment, we could see growth in excess of 20,000 per year continue a bit longer if those expected apartments are filled.” (<https://www.theurbanist.org/2017/02/27/seattle-700000>)

What is the estimated range of housing units under scenarios 1, 2 and 3?

5 **Mitigation Recommendation – To track tree and canopy loss require Urban Forest Canopy Impact Assessment on all development**

The Seattle Urban Forestry Commission asked DPD in a letter dated June 25, 2014 and also in a letter dated June 10, 2015 to do an **Urban Forest Canopy Impact Assessment** on all development so that tree and canopy loss could be tracked. The Seattle Urban Forestry Commission also sent detailed comments on the draft EIS for the Seattle 2015 Comprehensive Plan urging this action. Our recommendation was not included in the final EIS proposed mitigation. This recommendation should be included as mitigation assessment in this MHA EIS as a condition for proceeding so that canopy and ecological function lost can be more accurately followed and compensated for during development.

From the June 10, 2015 letter of the Seattle Urban Forestry Commission (<https://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDCompPlandraftEISLetter.pdf>) :

“The Commission has discussed several ideas to improve submittal documentation and final reporting for projects under DPD’s permitting.

- Currently, the City, through OSE and the Urban Forestry Interdepartmental Team, keeps track of the number of trees planted and removed on public property every year. The Commission recommends tracking trees lost on private property undergoing development to assist in

determining where we are gaining or losing trees and canopy. This would add information to the overall city canopy coverage assessment data. By knowing more about canopy trends on different types of land, we can better direct policy and programming to ensure we are on track to meet our 30% goal.

- What would help the City better understand what is happening with tree canopy protection and enhancement is to require that all development projects submit an Urban Forest Canopy Impact Assessment prior to any construction project being approved.

The Urban Forest Canopy Impact Assessment would include a map of the property with the trees numbered, canopy area of trees drawn, and trees to be removed clearly labeled. Under current guidelines it would minimally require that all trees 6 inches DBH (diameter at breast height) or larger be inventoried on the property. The suggested data points required would be:

- Species: speaks to size of canopy and amount of storm water benefit.
- DBH: speaks to age of tree and canopy coverage.
- Tree Height: speaks to canopy volume and amount of environmental benefit.
- Canopy Width (area): speaks to canopy volume and amount of environmental benefit.
- Tree Condition: speaks to overall forest health and environmental impacts.
- Photographs of the trees on the parcel and adjacent properties.
- Canopy coverage as a percent of area pre- and post-project development.”

Please consider and discuss benefits of using Urban Forest Canopy Impact Assessments as part of development process.

Mitigation Recommendation – Update City Tree Ordinance to require replacement on or off site of tree canopy lost or payment into City Tree Replacement and Maintenance Fund

In terms of loss of ecological function due to canopy loss, mitigation options to be explored should include total compensation of both canopy loss and ecological function projected such that trees that are not replaced on site should be mitigated by compensation into a **City Tree Replacement and maintenance Fund** for replacing and maintaining trees elsewhere. Development should pay for losses to the city’s green infrastructure that transfer development impact costs onto the general public while developers pocket the profits. It is not acceptable that the costs of mitigating for tree and canopy loss should be picked up by all city taxpayers rather than the developers who are removing existing tree canopy the city is trying to maintain and increase. This EIS should recommend that Seattle update its existing tree ordinance to reverse the ongoing tree and canopy loss by the rapid development occurring in Seattle.

Please consider and discuss creation of a City Tree Replacement and Maintenance Fund for mitigation of projected tree canopy loss.

Reference Links needed

Please provide links to references where they are missing on documents that are not readily available to the public including:

- City of Seattle. 2017a. Tree Regulations Research Project—Phase II Final Findings and Recommendations. March 27, 2017.
- Seattle Parks and Recreation (SPR). 2011. Seattle’s Parks and Recreation 2011 Development Plan.
- Adopted November 28, 2011. Resolution: 31336. Seattle Parks and Recreation (SPR). 2016. 2016 Seattle
- Recreation Demand Study. Seattle Parks and Recreation (SPR). 2017. 2017 Parks and Open Space Plan, May Draft.

Submitted by Steve Zemke
Chair – Friends of Seattle’s Urban Forest
steve@Friends.UrbanForests.org
2131 N 132nd St
Seattle, WA 98133

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:

Name: LISA ZERKOWITZ
Address: 3237 SW GENESEE ST.

From: nancy spaulding
To: [PCD_MHAEIS](#)
Subject: MHA for South Park
Date: Wednesday, July 05, 2017 7:19:19 AM

The Draft Environmental Impact Statement prepared for HALA's Mandatory Housing Affordability is unusually large and too broad to completely study and respond to in a 45-day comment period. South Park has very particular, often very severe environmental challenges due to the federal Superfund site located within its borders. These challenges cannot possibly be addressed by an EIS that is not specific to this area.

To ignore or to not fully appreciate the deep-seated environmental issues we face in South Park (such as the lowest tree cover and the worst air pollution in the city) is to propagate the adverse effects. For example, how does the city-wide DEIS address South Park's childhood asthma rates, which are the worst in the city? Or South Park's life expectancy rate, which is 8 years lower than the city-wide average?

South Park's environmental needs are far different than any other area in the city. In addition, many South Park residents have been historically overlooked in matters of policy. As a community composed primarily of people of color, non-native English speakers, and families living in poverty, we need more outreach than most. We need more time to study the DEIS to see that it meets the needs of this community.

I am requesting an extension to the MHA DEIS comment period of at least 80 days, as well as city resources to conduct genuine, effective outreach.

Thank you for your consideration.

Sincerely,
Nance Zugschwerdt
South Park concerned resident