

Name	Hugh Geenen
Email address	
Comment Form	<div><div>1</div><div><p>Main Points:</p><ol style="list-style-type: none">1) Alternative 1 of doing nothing is not an option.2) The Alternative 3 strategy is preferred for the neighborhood of Ballard.3) The best strategy overall for the City of Seattle is likely a mix-and-match of Alternatives 2 & 3.4) I am supportive of expanding the urban villages as much as possible because of the extra density provisions that come with them, such as having no parking minimums for new development.5) The City of Seattle <i>*must pursue*</i> legalizing all types of housing throughout the entire city, including single-family zones.6) BONUS: When do we get a Superblock?<p>Ballard Comments</p></div></div> <div><div>2</div><div><p>As a current resident of the Ballard Urban Village, the focus on some of my comments necessarily involve my own neighborhood.</p><p>In general, I feel that increasing density – however it is accomplished – is an important goal to lessen the overall impact of our human activities on the environment and helps mitigate our contributions towards climate change. The exact strategy isn't as important as is making large-scale changes NOW towards how we design and build our neighborhood and the City of Seattle into the future.</p><p>That said, I believe that MHA Alternative 3 is best suited to Ballard.</p><p>Ballard needs to do <i>*more*</i> than its share in taking on more density because we are a neighborhood that has a low risk of displacement for current residents but has high access to opportunities for people in the future. That is, our neighborhood has things that others want — so we should allow new neighbors access to the same amenities that we have and not hoard them for ourselves. These are values that Seattle espouses with respect to being a sanctuary city and I am fully aligned with them.</p><p>This will allow other neighborhoods to grow at a slower pace that may help lessen the effects of displacement. Historically sensitive neighborhoods can then take the time to more fully consider how and at what rate they want to grow if areas that can absorb more growth (like Ballard) are doing so. The way to do this is that we should funnel more growth towards Ballard with M2 upzones (which come with a higher affordability</p></div></div>

requirement) and with urban village expansions.

- 3 My second Ballard-centric point is to say that the MHA upzone provisions are somewhat conservative for this neighborhood considering that we are due to get a light rail station in the future. The city should begin increasing the zoning now within the walk shed of the light rail station (corner of Market and 15th Avenue NW) in preparation for this eventuality.

Mid-rise or lower zoning as well as cautious urban village expansions are not sufficient. To take full advantage of future transit we should be taking more bold steps to prepare for development at a level fully commensurate with densities associated with light rail, not unlike what is being planned for in the U-District. Zoning at the level of 95 feet seems tepid when compared to U-District zones of 240 or 320 feet. While that may be out-of-scale for Ballard, there seems to be less argument for zoning that maximizes buildings at less than 160 feet. To fully capture the affordability potential of MHA, 160 feet seems like a more realistic common building height within the walk shed of the future station.

Description of the Proposed Action and Alternatives

- 4 Lastly for Ballard, I wish to see my neighbors at the 3200 block of Market Street (being organized by Scott Brown, 3218 NW Market St) be allowed to join the Ballard Urban Village at a tier at least equivalent to those that surround them, which is, at Lowrise 1 (LR1) which is an MHA increase at a magnitude of M1. This block of ten lots has inexplicably been surrounded on three sides by LR1, LR2 and NC1-40 zoning which brings them out of alignment with the rest of what their neighborhood is doing. Returning this block to their previous zoning for multifamily allows those folks to make choices that are equivalent to their neighbors on a block that is changing. It only seems fair to me.

[BONUS COMMENT: Ballard is a ripe experimental location to try out a Barcelona-like Superblock. No, really. We want a Superblock!]

Citywide Comments

As for commenting on the overall environmental impact of MHA on the City of Seattle as a whole, my feeling is that taking the best features of Alternatives 2 & 3 is the most viable strategy. It allows for flexibility depending on neighborhood factors too specific to cover in a broad, future and guide-based policy such as MHA.

I am supportive of expanding the urban villages as much as possible because of the extra density provisions that come with them.

- 5 Parking minimums should be removed city-wide.
- 6 Single-family zones should be removed altogether. The baseline zone for all of Seattle should be residential small lot (RSL) or whatever equivalent would allow for the maximum kinds of

housing types in the future: cottages, tiny home villages, row houses, co-housing developments, community land trust developments, limited equity housing cooperatives, ADU/DADUs and townhouses, as well as sprinklings of four-floor multifamily structures that would allow for neighborhood corner-store retail.

- 7 There is no reason to outlaw duplexes, triplexes, attached and detached accessible dwelling units. Corner stores should also be allowed. This retail would provide necessities in local, walkable neighborhoods that would decrease the call for residents to have to drive further away to get what they require. This would result in smaller carbon footprints as well as healthy outcomes associated with more physical movement and less time in the seat of a car.
- 8 There is no more crucial environmental challenge than the future threats associated with the effects of climate change. Decisions regarding urban infrastructure must begin adjusting with this future in mind. Cities are going to be the front lines in the fight against climate change.

As such, the City of Seattle **must pursue** legalizing all types of housing throughout the entire city, including single-family zones. There are too many areas of the city where less is required of their residents. If we're all in this together, everyone has to pitch in and do their share.

[BONUS COMMENT: If not Ballard, where might we try an experimental location to try out a Barcelona-like Superblock? No, really. We want a Superblock! We should try recruiting a neighborhood that wants to try this as soon as possible...]

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: Jacob Gelb
To: [PCD_MHAEIS](#)
Cc: [Becky Bicknell](#); [Richard Loo](#)
Subject: MHA EIS Comments for Parcel 8113100005
Date: Monday, August 07, 2017 11:54:40 AM
Attachments: [MHA EIS Comments for Parcel 8113100005 - Bellwether Housing.pdf](#)

Please find our attached comments on the MHA Draft EIS for Bellwether Housing's property at 5900 37th Ave S, parcel number 8113100005. If you have any questions about our comments please contact me.

Kind Regards,

Jacob Gelb

Housing Developer

bellwether housing

Create. Sustain. Advocate.

E jgelb@bellwetherhousing.org

P 206.588.4795 | F 206.634.9407

Mailing: 1651 Bellevue Ave, Seattle, WA 98122 | Visiting: 433 Minor Avenue N



August 7, 2017

Office of Planning and Community Development

ATTN: MHA EIS

PO BOX 34019

Seattle, WA 98124-4019

Regarding: MHA EIS Comments for Parcel 8113100005

1

Please accept Bellwether Housing's comments on the MHA Draft EIS for our property at 5900 37th Ave S, parcel number 8113100005. **We are requesting that this entire parcel be rezoned to NC2-55 from its current LR3 designation.** Increasing the zoning of this parcel supports the goal of the MHA while mitigating adverse impacts to the surrounding neighbors. Our proposed zoning change:

- Maximizes future affordable housing development
- Provides a continuation of the zoning of neighboring properties
- Provides more flexibility in the site layout of future developments
- Uses the topography of the site to mitigate the transition in scale and height
- Maximizes density within the Urban Village and close to future Light Rail

While the site is currently zoned LR3, the neighboring properties to the south and west are both to be rezoned to NC2-55 and the properties to west across MLK from the site are NC2-75. Additionally, the property is within the Urban Village boundaries, thus, increasing the zoning of our site to NC2-55 would not create an abrupt transition in scale but would rather be a continuation of the neighboring zones within the Urban Village. Although the site to the north is proposed to be rezoned to RSL(M), this zone is across S Juneau street from our property, creating a natural barrier and transition in zoning from our property and the neighboring properties to the north. Similarly, the neighboring properties to the east are to be zoned LR3 (M2). Two of the properties directly to the east (fronting on 39th Avenue South) include the Kingdom Hall of Jehovah's Witnesses and Cham Refugee Center. The rezone of our property to 55 feet in height would have minimal impact on these community uses. Other properties located on 39th Avenue South include existing single family homes. These properties are located upslope from our property, lessening the effect of the new 55-foot height zone and creating a gradual change in height to the LR3 zone. Any transition requirements for the properties to the east can be negotiated through the Design Review process. Lastly, the site is a block away from the future Graham St Light Rail station, making it an excellent location to increase density close to transit.

The entire site is owned by Bellwether Housing, a non-profit affordable housing provider. The property is currently operated as affordable low-income housing and has regulatory restrictions in place that



require it to remain affordable until 2028. The buildings located on this site were built in 1964 and will likely need to be redeveloped within the next 10 years as the buildings are at the end of their useful life. Rezoning the site to NC2-55 gives Bellwether the most flexibility to redevelop the site in a manner that maximizes the number of affordable housing units while blending the development with its surrounding neighboring properties. This strongly corresponds with the intention of this MHA rezone.

Changing the zoning at parcel 811310005 to NC2-55 supports the MHA Draft EIS objectives by increasing density to allow for more affordable housing, creating a gradual transition in building height and scale with the surrounding properties and improving the usability of the site to create a development that better meets the needs of residents and neighbors.

Thank you for your consideration of our comments. We are excited about the increase to affordable housing supply that will result from these changes across Seattle. Please let us know if you have any questions.

Sincerely,

Richard N. Loo

Director of Real Estate Development

206.957.2729 | rloo@bellwetherhousing.org



August 7, 2017

Office of Planning and Community Development

ATTN: MHA EIS

PO BOX 34019

Seattle, WA 98124-4019

Regarding: MHA EIS Comments for Parcel 3524049133

2 Please accept Bellwether Housing's proposed zoning changes for this MHA Draft EIS, specifically as it relates to parcel 3524049133 at 7930 Rainier Ave S. **After engaging an architect to assist us in assessing the constraints and challenges of developing the site as affordable housing, we propose that the eastern 2/3 of the parcel be changed from the NC2-40 and SF 5000 to LR2. This change would improve the usability of the entire site and create more flexibility with regards to site planning, allowing us to better integrate with the surrounding uses while creating thoughtful open spaces and circulation routes to best serve existing and future residents of this site.** This parcel is currently split between NC2-55, LR3 and SF 5000. We support changing the northern portion of the parcel to NC2-55 as shown in the Alternative 2 zoning map, and propose changing the entire eastern portion of the parcel to LR2, thus splitting the entire parcel between NC2-55 along Rainier Ave S and the eastern portion to LR2. Under the current proposed 3-zone concept, the most logical development is one large 150-unit + development sited on the NC2-40 and NC2-55 zones with a discreet SF-5000 development on the eastern 1/3 of the site. We believe this option is not ideal for the neighborhood or the owner for the following reasons:

- The SF-5000 parcel has no direct access from any existing right of way. Providing access to single family homes here would be costly and still not very well-integrated to the surrounding single family neighbors to the north and east. Bringing utilities to this part of the site for single family use will also be challenging.
- The homes created in the SF 5000 portion of the site would be close to and in the shadow of the larger multifamily portion of the development in the NC2-40 zone. There would be limited pathways or open space connections between these two developments as the NC2-40/55 building would likely be built right out to the property line.

By amending the current EIS map to an NC2-55 and LR-2 zoning designation, Bellwether believes the following positive outcomes would result compared to current proposed 3-zone concept:

- Access to the site could be created along the current NC-55/NC-40 boundary. This pathway could be connected to existing right of ways and circulation routes in the neighborhood. This would also be the logical access point for a below-grade garage, garbage and fire truck access.
- The site would then have a logical 2-building concept development, with a denser, taller development in the NC-55 zone along Rainier and a lower density LR-2 development along the back 50-60% of the site. The lower-density building would orient towards the center of the site, with play areas and outdoor space situated in a safer and more visible area that is connected to the NC-55 building and the adjacent apartment buildings and single family homes.



- LR2 setbacks to the north and east would create a desirable buffer to those existing homes and other design transitions could be considered to minimize impact on those neighbors.

Changing the zoning on the east portion of this parcel from SF 5000 to LR2 still provides a gradual transition in building height and scale from the NC2-55 zone along Rainier Ave to the lower-scale residential areas to the east. This corresponds with Policy LU 1.4 in the MHA Draft EIS, which states that the rezone should provide a gradual transition in building height and scale where it borders lower-scale residential areas. The adjacent property directly south of this parcel is a development of 2 story houses on Wolcott Ave. Directly east of the property is a single-family residence which is set back from the property line. A larger LR2 zone allows the development here to have sufficient setbacks so that it would not create a shadow over the single-family residence directly to the east. The LR2 zone maintains a step down in height from 55' to 30' and would still create a gradual transition in density from the NC zones to the SF zones nearby.

In addition to the land use advantages described above, there are also economic and community advantages to amending the site to an NC2-55 / LR-2 designation. Increasing density on the east portion of this parcel allows for slightly more affordable housing units to be built, supporting one of the primary objectives of this MHA Draft EIS. Bellwether anticipates developing this site as 100% affordable rental housing to families and small households, building on the success of our neighboring property, the Rose Street Apartments at 8124 Rainier Avenue South. Currently we estimate that we could build an additional 15-25 apartments under the NC2-55-LR2 zone, with the potential to add up to 180 new apartments to address Seattle's affordable housing crisis. Increasing the density allows Bellwether to build more affordable housing units in a more thoughtful site layout while maintaining a transition in height and scale that allows the building to blend in with the existing neighborhood. Additionally, this change does not pose any risk of increasing displacement since the east portion of the property is currently vacant. It would also not extend to other areas of the SF 5000 zone and therefore would not increase the risk of future displacement in the surrounding area. Splitting the parcel into NC2-55 and LR2 zones also allows Bellwether more flexibility with how to develop the property allowing us to develop the two buildings in phases, if that is necessary for financing purposes, thus increasing the ability for affordable housing to be realized on this parcel.

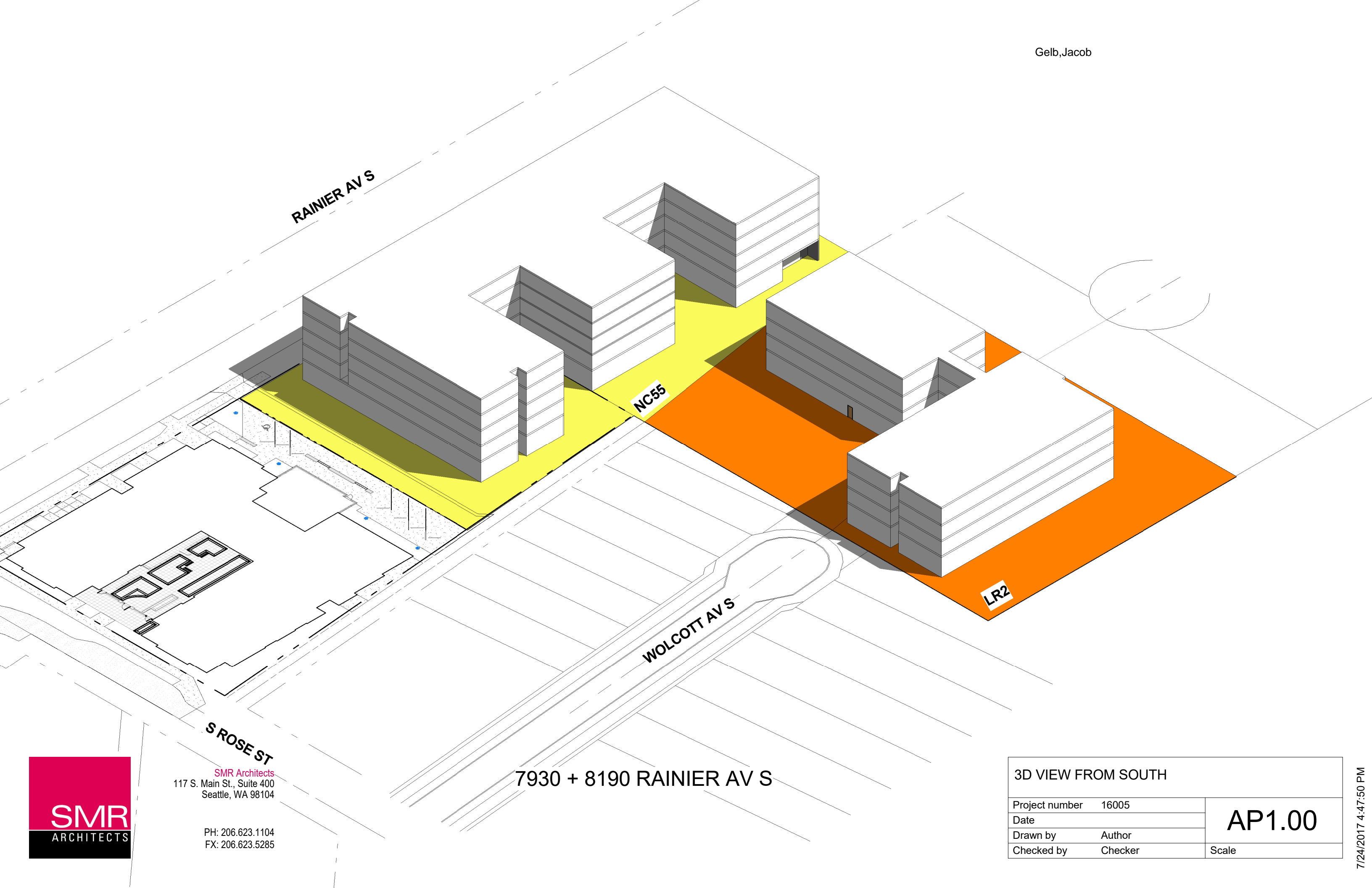
Changing the zoning at parcel 3524049133 to NC2-55 along Rainier Ave S and LR2 on the eastern portion supports the MHA Draft EIS objectives by creating a gradual transition in building height and scale, increasing density to allow for more affordable housing and improving the usability of the site to create a development that better meets the needs of residents and neighbors. Thank you for your consideration of our comments. We are excited about the increase to affordable housing supply that will result from these changes across Seattle. Please let us know if you have any questions.

Sincerely,

Richard N. Loo

Director of Real Estate Development

206.957.2729 | rloo@bellwetherhousing.org



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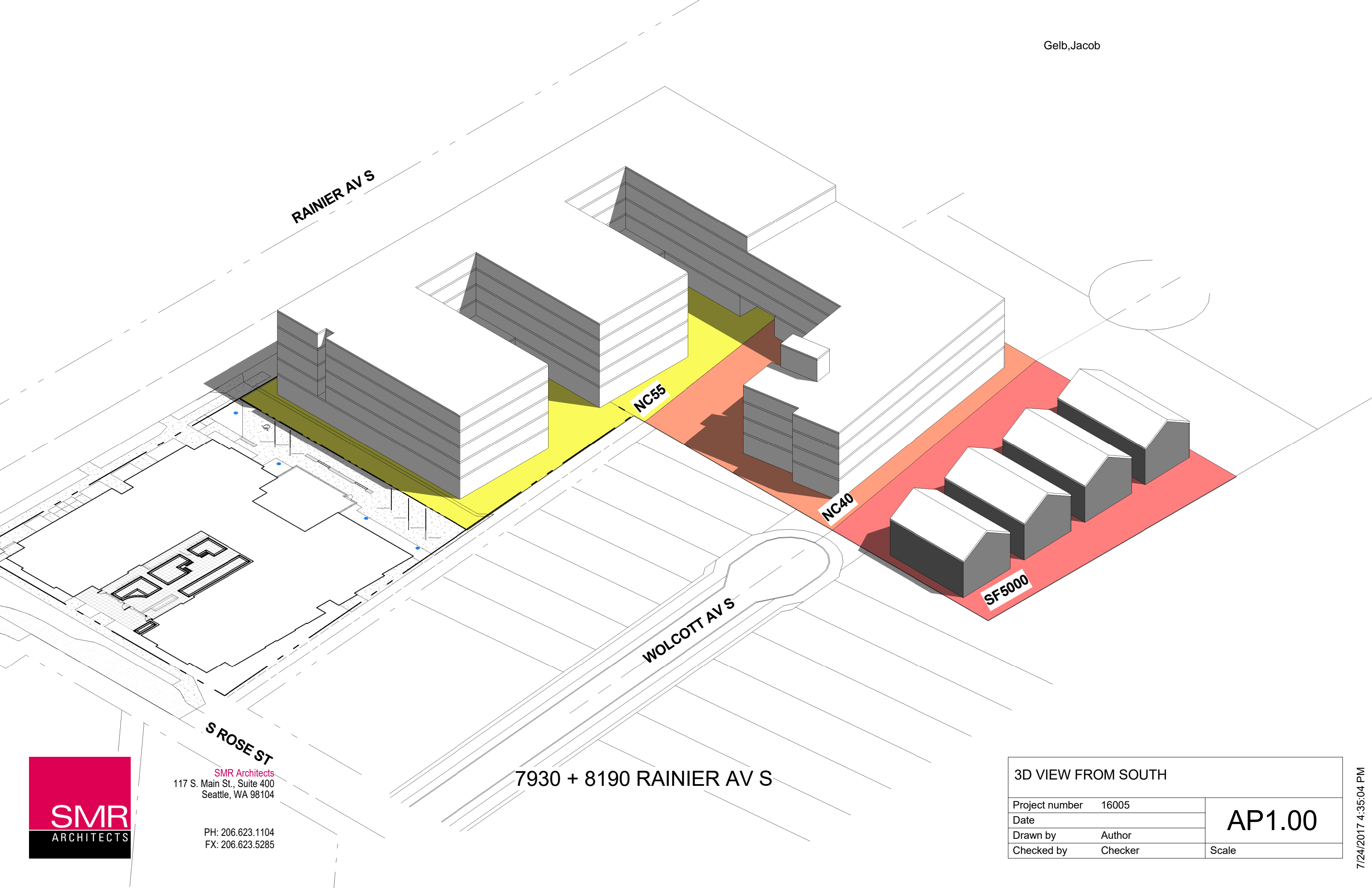
7930 + 8190 RAINIER AV S

3D VIEW FROM SOUTH

Project number	16005
Date	
Drawn by	Author
Checked by	Checker

AP1.00

Scale



SMR Architects
117 S. Main St., Suite 400
Seattle, WA 98104

PH: 206.623.1104
FX: 206.623.5285

7930 + 8190 RAINIER AV S

3D VIEW FROM SOUTH

Project number 16005

Date

Drawn by Author

Checked by Checker

AP1.00

Scale

Name	Nicholas Gellert
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 The DEIS does not adequately address the alternatives' in relation to specifics in each urban village area and with relationship to other pending, proposed, or anticipated changes to or impacting those urban village areas, including whether the pending or proposed changes or impacts are even feasible or likely to occur.</p>
Transportation	<p>2 The alternatives do not adequately address the impacts on transportation in at least several critical ways.</p> <p>3 First, the alternatives fail to consider the impact of development on pedestrian transportation. Using my neighborhood (Wallingford) as an example, the alternatives fail to address the impact on already narrow sidewalks in the commercial core of increasingly tall buildings hovering over same. The entire concept of an urban village is that there will be a walkable core; the alternatives fail to address how the zoning changes will improve or at least maintain the pedestrian experience.</p> <p>4 Second, the DEIS identifies that certain areas are already below standard for mass transit, but assume that mitigation will or can address. Again using my neighborhood (Wallingford) as an example, the City has explores ways to make Route 44 bus move more efficiently through Wallingford and the U-District, but the City has yet to identify any improvements that are likely to make much difference in that corridor. Yet, the fact that the same corridor has been proposed for enhancement appears to be taken into account in the DEIS. This seems improper. Moreover, the transportation discussed in the report addresses getting people in Ballard to and through the U-District, rather than on focusing on transportation that is used by the people of Wallingford. The buses serving Wallingford to get downtown are too infrequent and too crowded. This is not studied or addressed sufficiently in the DEIS.</p> <p>5 Third, the DEIS does not take into account other changes affecting transportation. Again, for example in Wallingford, the DEIS does not appear to address at all the re-opening of Lincoln H.S. and the impact on transportation and parking that will have, as reflected on the fact that the EIS for Lincoln project contemplating mitigation efforts in the neighborhood.</p> <p>The DEIS does not appear to address at all the impact that more people is having on true recreational space. Small open areas do not offset the need for more true recreational areas, including especially play fields. The increased density must be accompanied by more such space. More schools (re-opening of Lincoln H.S.) will require even more playfields for our youth.</p>

Open Space & Recreation	<p>One important idea being considered in the community, but not addressed in the DEIS, is the potential to offset impacts to the Wallingford, U-District and Greenlake urban villages by capping I-5 between 45th and 50th, and putting play fields on some of this capped area. Other such big thinking is needed.</p> <p>In addition, open space also must be found by improving set backs so that sidewalks really are useable by pedestrians. Vibrant cities have wide sidewalks where people can walk, linger, and sit -- not just squeeze by each other with no interaction.</p>
Public Services & Utilities	DEIS does not appear to adequately address impact of increased density on the combined sewer / storm system in the City, or areas of the City.
Demographic Survey (optional)	
Have you been or are you at risk of being displaced from your neighborhood?	
Have you been or are you at risk of being displaced from Seattle entirely?	
Are you now or have you ever experienced homelessness?	
Do you live in rent- and income-restricted affordable housing?	
How many people are in your household?	
Are there children under the age of 18 in your household?	
What is your household income?	
Do you own or rent your residence?	
How long have you resided in the city of Seattle? (total number of years)	

From: ann
To: [PCD_MHAEIS](#)
Subject: MHA.EIS@seattle.gov
Date: Saturday, August 05, 2017 3:16:07 PM

Subject: To: MHA.EIS@seattle.gov

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

Our neighborhood prefers Alternative 1 (with modifications as stated on the Madison-Miller Community Group August 2, 2017 map). We recommend that MHA (*Mandatory Housing Affordability*) **requirements be implemented into the existing zoning** in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (*Accessory Dwelling Unit*) and DADU's, (*Detached Accessory Dwelling Unit*) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units.

Other issues raised in the Madison-Miller Park Group document

1. **Housing and Socioeconomics:** Both the "Low Displacement Risk" and the "High Access to Opportunity" designations misrepresent our neighborhood and need further analysis and mitigation. **We are concerned about the displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents,** (a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.
2. **Transportation:** Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk.

3. **Transportation:** The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
4. **Open Space:** We have virtually no neighborhood park or open space, as the vast majority of “Miller Park” is utilized as a regional playfield for league sports and summer sports camps and is not available for public or neighborhood use. This playfield will also be used as the sole recreational field for Meany Middle School starting this Fall.
5. **Public Services:** Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded power lines are already compromised due to their age and condition. Garbage pickup on our historic and narrow streets creates traffic backups now, and additional volume of apartment buildings will increase that problem.
6. **Historic Resources:** MMRUV (*Madison Miller Residential Urban Village*) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS does not address the impact of losing this historic housing stock.

Ann Gensler

Name	Janet Gibb
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Why are you still including 20th Ave NW north of 85th (Crown Hill) in either alternative? It is a dead-end, 12' wide alley with zero option for sidewalks. Increasing capacity will be dangerous for the many children and adults that use the alley. It does not have the capacity or the ability to create the capacity to handle the increased density. Cars often have to back-up to allow a car to pass since two cars cannot pass in the alley. The street is narrow with young children running across and playing so backing up is a major safety issue. Delivery trucks and emergency vehicles often block the alley leaving no way for residents to leave or access their homes. There is no ability for the City to provide the amenities they are processing given the width of the street. Again, there is NO OPTION for sidewalks. There is zero off street parking (not that you care) which will be needed (whether you want to admit it or not). I'm for increasing density, but the lack of consideration for the special circumstances the alley requires is appalling and short-sighted. The residents have been giving the same input since the beginning of this process and they continue to be ignored.</p> <p>2 You are putting an extreme amount of pressure on a few small areas in the City. Increasing density should be spread out to other areas, especially to areas closer to downtown such as Magnolia. Instead, you are choosing to ignore real issues for the areas you are proposing and making decisions that will impact my community that I have lived in and been committed to for close to 20 years. This is all very short-sighted. The lack of response from HALA and the City is very, very disappointing.</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?	

Name	Mary Jean Gilman
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I strongly protest the upzone of Crown Hill Urban Village without benefit of a neighborhood planning process. No area should be subjected to this kind of major, irrevocable alteration without citizen participation. The elimination of neighborhood advisory councils was the first indication that citizen input is not wanted or valued. This must be reversed and planning for CHUV done prior to any upzone.</p>
Housing and Socioeconomics	<p>2 The recent approval by City Council of the upzone of Chinatown/ID does nothing to address the reduction in amount of affordable housing and displacement of current residents of low to moderate income. The City Council acknowledges this and “resolved” to “pledge” to address this serious issue retroactively. This is completely unacceptable. No further upzones should be approved without addressing it within the context of the HALA process. There is no point in removing affordable housing and long-term residents for the sake of developing new, “affordable” housing which is actually less affordable than what it replaces. This is hypocrisy.</p> <p>3 The detrimental effects of increased bulk, height and density alters negatively the way a single-family residence’s outdoor spaces can be used and enjoyed, affecting the inhabitants as well as the resale value.</p>
Land Use	<p>4 The proposed alternatives do not address the removal of green space from neighborhoods that are upzoned. Most trees on private property are removed for the sake of increased developed space. Many trees along the street are removed for the sake of driveway cuts. What remains is a barren urban streetscape that does not resemble a neighborhood. This is the reality. Trees on private property and along the streetscape must be protected during development planning.</p>
Aesthetics	<p>5 residential areas is not consistent with the existing neighborhood context. Bulk, height and density should be concentrated around arterials and properly buffered from single-family residential areas. As noted under land use, with the proposed upzones the sense of a green, leafy streetscape is lost. Light and air are lost from the (former) outdoor living areas of private properties. This alters negatively the way an outdoor space can be experienced and enjoyed. Setbacks should be increased so that existing housing stock can still have light, air and quiet enjoyment of the outdoors.</p> <p>Another problem is locating driveways along the property line. This is negatively affecting the environment of people living in single family homes adjacent to new developments.</p>

Transportation	<p>6 Ballard, and by extension, Crown Hill have been moved to the back of the line for light rail expansion. The proposed upzones, while touting the frequency of bus service (which was increased immediately preceding the HALA process) , are already woefully inadequate for the needs of commuters. No increase in density should go without real, substantial improvements in mass transit, and most specifically, light rail for Crown Hill and Ballard access to downtown and other areas.</p>
Historic Resources	<p>7 Streamlined approval for certain kinds of smaller projects does not give the ability of citizens to participate in decisions about historic value or neighborhood value of structures within the upzone.</p>
Biological Resources	<p>8 I am very concerned about increased stormwater runoff both from increased density and increased impervious surfaces. The current stormwater regulations are not adequate to address this problem. Combined overflows containing sewage are now flowing into Puget Sound and this problem will only be exacerbated with increased density and impervious surfaces. The result is reduced water quality in Puget Sound for the biota that exist there.</p>
Open Space & Recreation	<p>9 Specifically, look at a map of Crown Hill. While City of Seattle statistics indicate a moderate shortage of parks and open space, the map indicates otherwise. Most of the parks and open space are beyond the boundaries of Crown Hill Urban Village. This area has fewer parks than most other areas of Seattle. This is not a livable situation when increased density occurs, leaving very little private open space (yard space) for outdoor activity. New park sites of significant size should be identified and reserved from development. As with transportation, it will be difficult to impossible to retrofit Crown Hill with adequate open space without any advance planning.</p>
Public Services & Utilities	<p>10 Impact fees that are under consideration are inadequate. Impacts to parks, open space opportunities, police, fire and schools are not being addressed. Do not create pocket ghettos within urban villages, specifically CHUV, where people are warehoused without adequate services.</p> <p>11 I am very concerned about increased stormwater runoff both from increased density and increased impervious surfaces. The current stormwater regulations are not adequate to address this problem. Combined overflows containing sewage are now flowing into Puget Sound and this problem will only be exacerbated with increased density and impervious surfaces. The result is reduced water quality in Puget Sound for the biota that exist there.</p> <p>12 Policing is a serious concern. Level of police service is inadequate currently. With increased density, less light and air, fewer places for quiet enjoyment of private open space, crowding, etc. more civil and criminal offenses will take place</p>

without benefit of adequate police presence and involvement in the community.

- 13 I am also very concerned about the continued availability of affordable and adequate potable water supplies with increased density.

Air Quality & Green House Gas Emissions

- 14 Air quality is negatively affected when new residents dwelling in areas of increased density use automobiles for transportation. As noted under Transportation, current bus service is completely inadequate, even with increase in service frequency which were made immediately prior to the HALA process. Further steps must be taken to implement light rail in less than the completely unacceptable estimated 35 years to completion.

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

Name	Matt Gilmore
Email address	
Comment Form	
Land Use	<p>1 This plan involves expanding the Morgan Junction Residential Urban Village in West Seattle further West of California Avenue SW than where it is currently drawn. Please protect our neighborhood. I'm all for density but please keep it on major roads (Cali. Ave) and don't encroach into single family areas. Or keep it between two major roads (Cali. Ave and Fauntleroy Ave). We have a street filled with friendly neighbors and kids that love to run around our neighborhood. We're at risk of losing that kind of livability.</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?	
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From: Kristina
To: [PCD_MHAEIS](#)
Subject: Mandatory Housing Affordability (MHA) and Draft Environmental Impact Study (DEIS) Date:
Tuesday, July 04, 2017 10:16:30 AM

1

he 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?

2

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,

Kristina Goetz

South Park, Seattle

Name	Kristina Goetz
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I am concerned about the rezoning in my neighborhood, South Park, which has been traditionally marginalized.</p> <p>2 Rising property taxes and rents that come with rezones will adversely affect an already marginalized neighborhood.</p> <p>3 More needs to be done to save current housing stock, and preserve single family zoning around Concord Elementary School where many marginalized families now live, and is currently slated for upzoning to Residential Small.</p>
Housing and Socioeconomics	<p>4 South Park is one of Seattle most diverse neighborhoods - just on my street alone probably are residents from eight or more non-European backgrounds. This is close to the heart of our neighborhood, but MHA and HALA does not plan to keep these folks in the neighborhood.</p>
Aesthetics	<p>5 Our neighborhood is a mix of historic homes, with some duplexes, apartments, and townhomes. While it makes sense to add some new duplex and townhomes, we do not want luxury apartments in our neighborhood.</p> <p>6 We do want small rise, green space, and amenities that serve the current residents and attract like-minded future residents.</p>
Transportation	<p>7 Currently our neighborhood is transportation challenged, with only one bus giving access to Seattle light rail.</p>
Air Quality & Green House Gas Emissions	<p>8 Our neighborhood has some of the worst air quality in the city. We are concerned what additional development means for that.</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?	

Name	Eldan Goldenberg
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I support the proposed upzones, and generally prefer Alternative 3 as I believe the displacement risk analysis on which it is based is both important and largely correct.</p> <p>For my area, the Madison-Miller urban village, I strongly prefer Alternative 3. This is appropriately considered a high opportunity area because we have a short walk to the existing light rail station & 23rd Ave buses, as well as the coming Madison BRT project, along with multiple schools, retail including a comprehensive range of grocery stores, and at least one large employer. More people should be able to live in places like this, and I see nothing in the details of Alternative 3 for this area which would damage it. The taller zones are appropriately concentrated right by the BRT route and where there are already large buildings, and as a resident of one of the existing LR3 portions I will be happy to see LR2 & LR3 zoning extended. It provides a very comfortable transition between taller buildings and single family zones, and projects built out to the current LR3 zone are not detracting from the remaining detached houses by them (some of which are quite beautiful). The best thing we can do for the area is pack a few more residents in, allowing Metro to increase bus frequencies and local businesses to thrive on more foot traffic.</p> <p>2 I am concerned that an opportunity is being missed to expand the urban village, particularly in the strange gap to our NW in which about 10 blocks between 15th & 18th Avenues and Thomas & Roy Streets are missed out in spite of being almost surrounded by existing or proposed LR & NC zones, a shorter walk to light rail than most of the existing Madison-Miller urban village, and steps away from the Kaiser campus, a couple of the local schools and the 15th & 19th Ave business districts. I worry that pandering to some wealthy homeowners is causing us to miss out on a significant number of housing units that could be added in a very walkable area, without needing to radically change the character of the place.</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?	

From: Michael Goldman
To: [PCD_MHAEIS](#)
Subject: public comment on MHA EIS draft dated June 8, 2017
Date: Monday, June 19, 2017 10:27:13 PM

I have two comments/questions:

1. In the MHA EIS Scoping Handout located here

<https://www.seattle.gov/Documents/Departments/HALA/Policy/MHA_EIS_scoping_handout.pdf>
 a footnote on p. 2 states, "MHA is expected to yield approximately 6,000 new affordable housing units over the next 10 years. For purposes of this EIS analysis, this number has been extrapolated to maintain consistency with the Seattle 2035 Comprehensive Plan's 20 year planning horizon. For this reason, the City estimates approximately 8,400 affordable units will be added within 20 years."

Why does the production of affordable units fall so dramatically in the second decade? Is the 6,000 units in 10 years an estimate based on a reliable and tested method? Is it more likely that the actual production will be closer to half the 8,400 in the first 10 years (i.e., 4,200 affordable units?). Is the methodology used to estimate 10 years of affordable units the same used to estimate of the total 20 years of affordable housing. If not, why not?

2. Exhibit 3-1.30 "Gain or Loss of Low-Income Households and Net Housing Production by Census Tract, 2000 Compared to 2009–2013" does not provide a valid unit of comparison tract to tract so any conclusion based on this data, as presented, is invalid. Census tracts can vary wildly in population. Because of this a y-axis that measures absolute change instead of proportional change is unhelpful. (It's like plotting the weight of individual fruit to price and then making conclusions about that relationship. Are watermelons really more expensive than blackberries? Only when you compare 1 watermelon to 1 blackberry.) So a census tract with a large population could be expected to, on average, have larger absolute changes in population over time.

Further, the data presented do not show what proportion of the population has a household income <50% AMI. Quartiles are not easily constructed from Census data so I understand using the 50% AMI but it is a moving target. For example, in Seattle the <50% AMI group represents 25.59% of the household population in the HUD CHAS 2000 survey but 26.21% in the HUD CHAS 2009-2013 survey. This is a small change but it is also an average, meaning there will inevitably be variation among the Census tracts. The EIS does not account for an expanding population at <50% AMI simply due to what appears to be rising inequality. The EIS essentially interprets this rising inequality as evidence that development is not correlated with displacement of poor households. It's more likely that there are just more households "falling into" this category as the median is pulled up by much wealthier households.

Assume the EIS did reconfigure these data so that the y-axis is proportional instead of absolute. As an example, assuming <50% AMI is steady at 26% of the household population in Census Tract 47 (Ballard), population in this tract was 4,916 in the 2000 Census and 6,739 in the 2010 Census. Assuming again that inequality remains constant over these two periods, and that there are two people per household, the number of households <50% AMI should be 639 in 2000 and 876 in 2010 just to keep up with the general population growth in Tract 47. That's an expected absolute change of 237 <50% AMI households. The scatter plot in Exhibit 3-1.30 shows about a 200 household gain for this tract. This means <50% AMI households proportionally lost representation in this tract, even before accounting for the fact that the <50% AMI bucket expanded in the city during this period. Similarly, the x-axis should also be proportional, showing net housing production as a proportion of total housing units in each census tract.

Would the other data points also fall below the x-axis? It's hard to say without recalculating each

census tract for proportional changes but generally many would fall from their current position on the y-axis, possibly showing the opposite relationship between displacement and new housing claimed in the draft EIS.

Thank you,

Michael Goldman
Seattle, Washington

From: RUEL I Gonzales
To: [PCD_MHAEIS](#)
Subject: SUGGESTIONS: MHA Environmental Impact Statement
Date: Thursday, June 15, 2017 6:50:23 PM

All low income units are to have a minimum of 400 sq ft of space, with no maximum.

All low income units are to be semi-furnished, with a refrigerator, and a stove.

This is important for two reasons:

1. Being a low income person myself, I don't **need** a large space to live in. I'd much rather pay for a significantly smaller space if it means I get to keep more of my income in my pocket. I strongly suggest visiting IKEA and looking at their 400sq ft apartment model.
2. Not having a maximum sq ft requirement is a means for the developer to see it as a 'loophole', and to make the requirement more financially palatable to them.
3. Having the units be semi-furnished means spending less on moving costs. It's low-income people you're talking about here.

=====

Is it possible to raise the percentages of low-income unit requirements given the aforementioned condition?

=====

The percentage of low-income unit requirements should be based on the average rent in the area in which the development is to be constructed.

The higher above the average the rent is in a particular area, the higher the percentage of low-income unit requirements should be. For every \$100 above the average rent is in a particular area, the low-income unit requirement goes up by 1%.

For example:

Average rent in Seattle is \$2,000 (to keep it simple).

Low-income unit requirement is 10% (to keep it simple).

A developer wants to build in an area where the average rent is \$2,200.

That's 2 x \$100 higher than the average rent in Seattle.

The low-income unit requirement would then be 2% higher than the base of 10%, which is 12%

=====

Developers can be taxed lower for each percentage point higher than the required 10% for a set number of years.

For example:

Development is for Seattle where the median rent is \$2,000.

Low-income unit requirement is 10%.

If the developer builds 12% low-income units, 2% higher than the required 10%, they can enjoy lesser taxation by X-amount for Y-number of years.

=====

Developers are taxed higher in areas that are higher than the average rent in the city. The higher above the average rent an area is, the higher the tax rate is.

=====

Please consider using the 'median' instead of the 'average'.

Whichever is lower in value should be used as the metric.

=====

Thank you for listening,

Ruel Gonzales

Name	Jeremy Goodman
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I understand that this city needs more housing. We are now at 140 percent of the national average for rental housing costs. Apodments are not a magic bullet but one tool in a chest for addressing this issue. We need to understand the effect apodments will have. They are exempt from design review, and mostly from SEPA, and they will have no parking spaces provided. I can see how these could be done well and be a benefit to the right area, but I can also easily see how they could be a problem. There are real and valid concerns around what could turn into tenement housing if not regulated properly. One way to think about it is, what would Seattle be like if everyone built like this? The city would become completely unmanageable in short order.</p> <p>I think that the way this whole debate gets framed is awful. Worse than awful, wretched beyond belief actually.</p>
	<p>2 I understand that this city needs more housing. We are now at 140 percent of the national average for rental housing costs. Apodments are not a magic bullet but one tool in a chest for addressing this issue, and we need to understand the effect apodments will have. They are exempt from design review, and mostly from SEPA, and they will have no parking spaces provided. I can see how these could be done well and be a benefit to the right area, but I can also easily see how they could be a problem. There are real and valid concerns around what could turn into tenement housing if not regulated properly. One way to think about it is, what would Seattle be like if everyone built like this? The city would become completely unmanageable in short order.</p>
	<p>3 By lowering building standards to maximize the profits of investors, the City of Seattle is IS making a racially charged statement. Don't kid yourself otherwise.</p>
	<p>4 It's essentially an de-facto admission that The City thinks that different races deserve different standards. It's saying that tenement housing is o.k. to accommodate racial diversity, and therefore tiny living spaces, lack of parking, lack of fire escapes, lack of space or yards for children, lack of quality of construction materials, the DPD has bowed so low to developers that some new high-rises are erected without two ways out of the building in case of fire, without outside fire escapes. Requirements for incombustible materials above certain heights have been eliminated as too costly for the developer. How, is any of that fair to the underprivileged races? There is a perverse alliance going on here between developers and low-income housing advocates. Flood the city with housing built to higher</p>

standards and watch the market drop the housing prices for ALL types of housing, that would be the socially just thing for Seattle to do.

- 5 The city is saying, if you're low to middle class, you're only "allowed" to live in a high-density dwelling unit inside City limits.
- 6 Because to make way for all of this high-density, the small, affordable, single family homes must be demolished,
- 7 along with the trees, gardens, and other green assets on a normal single family lot. Naturally, this will affect only the low and lower middle-class neighborhoods, as the politically influential and protected upper class neighborhoods will be too expensive to purchase houses for bulldozing and replacement with small or micro-housing projects. Contrary to the rhetoric, this proposal doesn't provide "freedom and choice" of housing stock in the City, it reduces it, because when all is said and done, all that's left is very expensive, large homes and modern-styled tenement housing.
- 8 Clearly those of us who chose to live in Seattle because we could find family-friendly housing with yards, real neighborhoods, good schools, close to so many urban amenities are now being shoved aside without any opportunity to have a real voice in this debate. Missing in this government-sponsored private conversation, are the people who already live here.

I don't plan to retire here, so ultimately, none of this will be my problem, and so truthfully I've got no dog in this fight. But I also don't want to see America lose an excellent city and go down a stupid path just because those in city government are too naive, stupid, greedy, corrupt, and/or lazy to have learned the original lessons of the great fires of Chicago or San Francisco or "donut hole cities" like L.A. or Detroit. You don't remedy one problem (expensive housing) by slamming the pendulum to the other extreme (destroying single family homes).

- 9 Inequities are in the eye of the beholder. I worked for years, saved and saved, and finally bought a home that I could afford, and don't feel that I had inequitable advantage over anyone.
- 10 Now the Mayor and City Council want to raise our taxes while simultaneously conniving to change zoning laws that degrade our neighborhood and house values. There is indeed a need for change in the City of Seattle! People are starting to see that you are the pigs on this Animal Farm, and the equality of which you preach is a very unequal equality.

By lowering building standards to maximize the profits of investors, the City of Seattle is IS making a racially charged statement. Don't kid yourself otherwise. It's essentially an de-facto admission that The City thinks that different races deserve different standards. It's saying that tenement housing is o.k. to accommodate racial diversity, and therefore tiny living spaces, lack of parking, lack of fire escapes, lack of space or yards for children, lack of quality of construction materials, the DPD has bowed so low to developers that some new high-rises are erected without two ways out of the building in case of fire, without outside fire escapes. Requirements for

incombustible materials above certain heights have been eliminated as too costly for the developer. How, is any of that fair to the underprivileged races? There is a perverse alliance going on here between developers and low-income housing advocates. Flood the city with housing built to higher standards and watch the market drop the housing prices for ALL types of housing, that would be the socially just thing for Seattle to do.

The city is saying, if you're low to middle class, you're only "allowed" to live in a high-density dwelling unit inside City limits. Because to make way for all of this high-density, the small, affordable, single family homes must be demolished, along with the trees, gardens, and other green assets on a normal single family lot. Naturally, this will affect only the low and lower middle-class neighborhoods, as the politically influential and protected upper class neighborhoods will be too expensive to purchase houses for bulldozing and replacement with small or micro-housing projects. Contrary to the rhetoric, this proposal doesn't provide "freedom and choice" of housing stock in the City, it reduces it, because when all is said and done, all that's left is very expensive, large homes and modern-styled tenement housing. Clearly those of us who chose to live in Seattle because we could find family-friendly housing with yards, real neighborhoods, good schools, close to so many urban amenities are now being shoved aside without any opportunity to have a real voice in this debate. Missing in this government-sponsored private conversation, are the people who already live here. The home owners who have the misfortune to be the last barrier keeping these constituencies from getting their hands on what they want, more land to develop. Additionally, they don't want just any land, they want NICE land in desirable neighborhoods.

Housing and Socioeconomics

- 11 There is plenty of land, it's just not desirable. Drive down Lake City Way, or Aurora Ave North, and see vast swaths of old auto-rows and cheap no-tell hotels that could be rezoned to house thousands of people. If that's not enough, keep driving up Highway 99 through Shoreline and Lynnwood, all the way to Everett, to see hundreds of acres of wasted land.

I saved enough money to buy a modest house. I pay thousands of dollars in taxes for the privilege of owning said house and I detest the Mayor's efforts to devalue what I saved for and purchased. I am not a freeloader, nor an obstacle. I've lived in every kind of dwelling/density and worked hard all my life at all kinds of jobs, saving money. I've lived where I could afford, no complaints, and commuted to work by bus. I decided not to have kids because I didn't think I could afford it. My wife and I were finally able to buy a single family home here in our 40s. Where you live is a result of hard work, choices and sacrifice; it is not a right. Sometimes you just don't get to live where you want to or where it's most convenient. What, you think Bitter Lake was the total summation of my life long ambitions? I'll never be able to afford a single family house in Ballard; what I can afford is here. That is reality. Do not ruin this city, and the quality of life for those who have worked hard for their single family dwellings, with this plan. The city did a

12

recent survey of developable land in Seattle and found there's enough capacity under current zoning laws to add 224,000 housing units — 73% more than the current existing stock of 308,000. There is no need to eliminate single-family zoning in order to accommodate more density.

- 13 Additionally, why not increase heights and density in non-single family parts of the city. That's where light rail and other transit projects are going, put people in those areas, and leave the quieter parts of the city alone. Changes have been discussed, however there are also conversions, several of which are not allowed in public today. How on Earth could such a panel be allowed to meet in secret? Not very transparent on the Mayor's part! This should be a huge red-flag to anyone paying attention.

You don't remedy one problem (expensive housing) by slamming the pendulum to the other extreme (destroying single family homes). Inequities are in the eye of the beholder. I worked for years, saved and saved, and finally bought a home that I could afford, and don't feel that I had inequitable advantage over anyone. Now the Mayor and City Council want to raise our taxes while simultaneously conniving to change zoning laws that degrade our neighborhood and house values. There is indeed a need for change in the City of Seattle! People are starting to see that you are the pigs on this Animal Farm, and the equality of which you preach is a very unequal equality.

- 14 So, according to the conventional rhetoric, the answer to everyone enjoying Seattle, is to turn it into tenement housing with as many people crammed in per square foot as possible? Where is the enjoyment in that? With no families raising kids in Seattle, the future Seattle will not have anyone living in it who has fond memories of "where I grew up" and no one will want to come home. In a few years, Seattle will be done.

- 15 Relaxing the rules on DADU and ADU's and giving home owners a few more options, like back yard cottages or mother in law apartments would overwhelmingly take place on small lots with homes on them already. Thus Adding density to the area, hence the "A" at the beginning of each acronym. Such projects are smaller in scope than a developers tear-down-and-build something huge model, and so such additions are accessible for non-developer land owners to add capacity, rental income, and the like. With the cost of housing now approaching unreachable levels for so many people, the ability to put another 1 or 2 homes on a reasonably sized lot to help assuage the cost of holding on to that home, having the ability to put in an apartment, without a 3 year long delay by the city, would be a godsend to both middle-class homeowners and, lower income renters alike. Which is why it'll never be allowed to happen.

The home owners who have the misfortune to be the last barrier keeping these constituencies from getting their hands on what they want, more land to develop. Additionally, they

Land Use

don't want just any land, they want NICE land in desirable neighborhoods. There is plenty of land, it's just not desirable. Drive down Lake City Way, or Aurora Ave North, and see vast swaths of old auto-rows and cheap no-tell hotels that could be rezoned to house thousands of people. If that's not enough, keep driving up Highway 99 through Shoreline and Lynnwood, all the way to Everett, to see hundreds of acres of wasted land.

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

Name	Amanda Goodwin
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, infrastructure. Fails to take into account impact of other contemplated City projects including Terminal 5, ST3
Housing and Socioeconomics	2 DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.
Land Use	3 Looking at the Future Land Use Map, it seems like very large areas of the City. It seems to call for sweeping changes. Also, in the Future Land Use Map, it is hard to see exactly where the boundaries are of the areas marked out for future land use. The proposed changes seem at the same time to be both very sweeping and vague. DEIS reflects City's failure to honor neighborhood plan.
Aesthetics	4 DEIS fails to accurately describe existing neighborhood character in West Seattle and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts. DEIS fails to propose meaningful mitigation with respect to loss of light and air on ground floor of existing buildings DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation. x
Transportation	5 DEIS analysis is flawed; Fails to utilize meaningful data in West Seattle. DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times, etc.
Historic Resources	6 DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.
Biological Resources	DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.
Open Space & Recreation	DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.
Public Services & Utilities	7 DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed. DEIS fails to note existing lack of school capacity in West Seattle and impact of increased density thereon.
Demographic Survey (optional)	
Have you been or are	

From: Susan Goplen
To: [PCD_MHAEIS](#)
Subject: No increased density without increased school capacity!
Date: Thursday, July 27, 2017 12:17:40 PM

I am furious.

You are proposing increased housing capacity in my neighborhood (the northern end of West Seattle). You are simultaneously failing to increase school capacity, and our schools are terribly overcrowded.

My children are 7 and 9. For the first three years of my elder daughter's educational career, she attended Schmitz Park Elementary. The last year of her attendance, there were 19 portables, more than classrooms in the main building. The school had 1 BATHROOM FOR EACH GENDER. It was a nightmare.

My daughters now attend Genesee Hill Elementary. It has been open one year and is overcapacity. The school will have over 725 kids next year in a facility designed for 675. There is no more room at the inn. We don't have a space for portables, unlike the old Schmitz Park. And Schmitz Park is likely going to be used as a temporary location for the rebuild of the woefully outdated Lafayette and Alki Park elementary schools.

YOU HAVE A DUTY TO THE PEOPLE WHO LIVE HERE. WE ARE YOUR CONSTITUENTS. YOU NEED TO LOOK OUT FOR OUR INTERESTS. YOU NEED TO LOOK OUT FOR OUR KIDS' INTERESTS.

You cannot upzone without infrastructure. Schools are infrastructure.

Susan K. Goplen

Law Offices of Susan K. Goplen, PS
1420 Fifth Avenue, Suite 3000
Seattle, WA 98101-4082
206.686.2700
susan@goplenlaw.com

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From: [Graves, David](#)
To: [PCD_MHAEIS](#); [Wentlandt, Geoffrey](#)
Cc: [Graves, David](#)
Subject: MHA Draft EIS - Seattle Parks and Recreation Comments
Date: Wednesday, August 02, 2017 3:07:23 PM
Attachments: [image001.png](#)
[DEIS_Ch3_SPR_Comments.pdf](#)
[image003.png](#)

Thank you for the opportunity to review and comment on the MHA Draft EIS. Seattle Parks and Recreation (SPR) support's the City's Affordable Housing agenda and works to provide recreational opportunities for all of the City's residents and visitors alike. Attached are detailed comments and suggested edits on Chapter 3.7 Open Space and Recreation in track changes mode. At a higher level, SPR has the following general comments:

- Why are impacts identified as "significant"? With increased population likely comes increased demand for recreational opportunities. However, without additional analysis, there is no way to ascertain that any impact is going to be significant. No specific significant impacts have been identified. This chapter contains generalities without any analysis of actual demand for open space and/or recreational opportunities.
- What is a "substantial" gap in the open space network? Is there a number or other quantitative value that OPCD is using to determine the open space gap. In SPR's analysis, we identify gaps but do not quantify them.
- The walkability guidelines and analysis needs to be decoupled from the Level of Service (LOS) discussion. Under the 2017 Parks and Open Space Plan, the Citywide LOS is 8 acres/1,000 residents. The 2011 Development Plan, which is still in place until the 2017 Plan is adopted, identifies a Citywide LOS of 3.33 acres/1,000 residents. The walkability guidelines inform SPR's long-term acquisition strategy and are not a LOS.
- Where did the population numbers come from for Alternatives 2 and 3? SPR's analysis is based on regional growth as projected by PSRC. How are you justifying this increase in growth above PSRC numbers?

Please do not hesitate to contact me if you have any questions and/or concerns.

Regards,



David Graves, AICP
Strategic Advisor
City of Seattle, [Seattle Parks and Recreation](#)
O: 206-684-7048 | M: 206-240-5968
[Facebook](#) | [Twitter](#) | [Blog](#)

Green, Rahsaan

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.

I am a South Park resident that would like to raise a family here. I have already been priced out of a lot of Seattle neighborhoods. It this happens everywhere then I will have effectively been kicked out of the city. I only recently found out about the planned changes. There have not been enough of an effort to inform the community. We have not been able to voice our opinion until now.

Thanks,



Rahsaan Green
South Park resident

Name	Will Greene
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I prefer Alternative 3 but support Alternative 2 as well. I am in favor of wide upzones across the city, in all neighborhoods, all urban villages, and in single family neighborhoods.</p>
Aesthetics	<p>2 I believe a denser city with narrower streets and taller buildings with windows oriented to the street creates fantastic street life and a safer, more affordable city. I do not think bulk regulations such as setbacks, FAR, lot coverage, should drive unit count and need to be lessened or removed as a part of this the MHA upzone.</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	

Name	Penny Griffen
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 It is a bad sign that you no longer want to deal with neighborhood councils. It really doesn't look like you value citizen input. This upzone of Crown Hill Urban Village should have the benefit of a neighborhood planning process before going through this major alteration.</p>
Housing and Socioeconomics	<p>2 It seems that the displacement of current affordable housing doesn't result in more affordable housing, but expensive units that are not affordable. Sorry it makes no sense.</p>
Land Use	<p>3 We need more green space! not less...</p>
Aesthetics	<p>4 Losing space and greenery is a real quality of life issue. Since mini-mansions were allowed, we no longer get light or weather from the south. To take trees to allow for housing density leaves us diminished in our environment.</p> <p>5 Taller buildings along the arterials are one thing, but inside our neighborhoods they are out of scale.</p>
Transportation	<p>6 We all know that bus service, although slightly improved, is woefully inadequate. If we had our lovely new monorail it would be a different story. How can any bus system work when it is on the same clogged up streets as the cars?</p>
Biological Resources	<p>7 Our family business is doing rain gardens and cisterns for the RainWise program of Seattle and King County. We already know that most large rains produce extra runoff into Puget Sound. How do we add density, remove natural areas that soak up rainfall, supply more parking because bus service is inadequate and light rail is so many years in the future, and not contribute to the problem? I don't think you can.</p>
Public Services & Utilities	<p>8 Policing inside the north end is already kind of a joke. The police are sent to where there is most need (apparently not here), but when we have a police problem we do not get fast service, or sometimes no service. So, putting in more density is not helpful.</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	

From: Griffith, Greg (DAHP)
To: [PCD_MHAEIS](#)
Cc: [Griffith, Greg \(DAHP\)](#)
Subject: Comments on MHA DEIS
Date: Monday, August 07, 2017 5:00:27 PM
Attachments: [2016-06-04197_080717.pdf](#)

Attached please our comments for your review. Thank you



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

August 7, 2017

Mr. Geoff Wentlandt
City of Seattle
Office of Planning and Community Development
PO Box 94788
Seattle, Washington 98124-7088

In future correspondence please refer to:
Project Tracking Code: 2016-06-04197
Re: Comments on Mandatory Housing Affordability Program Implementation Draft
Environmental Impact Statement

Dear Mr. Wentlandt:

The Washington State Department of Archaeology and Historic Preservation (DAHP) has taken the opportunity to review the Draft Environmental Impact Statement (DEIS) to implement Mandatory Housing Affordability (MHA) requirements for multi-family residential and commercial development in the city by granting additional development capacity through area-wide zoning changes and modifications to the Land Use Codes. The DEIS has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under the auspices of the State Environmental Policy Act. Additionally, the City of Seattle has entered into a partnership with the SHPO and the National Park Service (NPS) in support of the work of the Seattle Landmarks Preservation Board. This partnership is formalized through DAHP's Certified Local Government (CLG) agreement. The CLG program was authorized under the National Historic Preservation Act of 1966 (as amended).

As a result of our review of the DEIS, we are providing the following comments and recommendations:

- 1) While DAHP supports the goal of the MHA to increase supply and access to affordable housing, the DEIS makes it clear that historic properties (including buildings, structures, sites, districts, objects, and landscapes) will be demolished or disturbed under all three of the studied alternatives.
- 2) While we appreciate consideration in the DEIS of the impact of implementation of the MHA on Seattle Landmarks and National Register of Historic Places, an overall recommendation for the MHA is to be more pro-active in using existing and new historic preservation tools and programs to provide more affordable housing options. Essentially, preservation programs are not mentioned or considered as aiding the City in its goal to increase affordable housing units.
- 3) Mitigation measures discussed in the DEIS do not appear to provide substantive and effective approaches to mitigate for the loss of the city's significant built environment. We



recommend that discussion include examining the use of existing historic preservation incentives to rehabilitate buildings and preserve community character. Also new measures or programs should be explored and discussed that could bring a positive outcome for both preserving archaeological and historic resources as well as affordable housing.

- 4) There is concern that SEPA exempt thresholds may support projects affecting archaeological and historic properties to move forward without review.

Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.

Thank you for the opportunity to review and comment. If you have any questions, please contact me at 360-586-3073 or greg.griffith@dahp.wa.gov.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer

C: Chris Moore, Washington Trust for Historic Preservation
Sarah Sodt, Seattle Historic Preservation Officer
Eugenia Woo, Historic Seattle



From: mark griswold
To: [PCD_MHAEIS](#)
Subject: Extend comment period for Draft EIS on HALA upzones
Date: Wednesday, June 28, 2017 5:31:00 PM

1

Asking the public to review an 800 page Draft EIS in only 45 days effectively shuts the public out of a public process.

Please extend the Draft EIS for the proposed citywide HALA upzones comment period to 90 days.

Thank you,

Mark Griswold

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:

Mack Greenwood

Address:

3406 - 40th Ave SW

Name	Nancy Gruber
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Of the 3 Crown Hill Urban Village options offered, I oppose Option 3. We live on a small section of 20th Avenue NW that continues - despite our repeated alerts -- to be included on that expansion plan. As we have said over and over, 20th Ave NW north of 85th is a narrow one-car-wide alleyway converted to a city 'street' which is not suitable for expanded traffic. With no fire hydrants, sidewalks (or room for sidewalks) this street would be unsafe for pedestrians, cars or bikes if it were carrying even modestly increased traffic. In addition, there are no fire hydrants. Option 2 puts the CHUV western border slightly east of 20th Ave NW, so the border falls in the middle of 19th Ave. NW. That could be workable, though the lack of sidewalks and underground drainage and other infrastructure makes me dubious about infrastructural support for such expansion. Plan 2 does emphasize containing the growth more toward 15th Ave NW, which was the neighborhood preference I heard at many meetings. I do think the CHUV expansion to the east along 85th does make some sense since 85th is a major thoroughfare.</p> <p>2 Although I appreciate the work that has gone into this study, I continue to be amazed that sections of the map that we have been told with certainty have, in fact, already been altered (for instance, the portion of proposed expansion into Olympic Manor has already been taken away from the expansion plan) continue to be shown in the maps presented. At meeting after meeting we have talked about our narrow alley-street, and each time been told that our point makes sense, and yet, it continues to be in the proposed expansion. Frustrating. I am all for density and creating affordable housing in a planned way, but when points continue to be made over and over again, without feedback or response, it makes those of us to keep repeating the issues about our 'little piece' of knowledge rather than being able to focus on the larger pieces of the grand plan.</p>
Aesthetics	<p>3 A major concern about the expansion is building height limits - even on 15th Ave NW. I would prefer 5-6 stories, rather than 7 stories as a maximum ... and I think variation of building heights would keep the structures from forming 'canyon walls' along 15th that would block breezes/sunlight and take away the desired Urban 'VILLAGE' feel we are hoping for.</p> <p>4 Also, we need to keep shops/businesses/restaurants on ground floors of those buildings, or the neighborhood becomes a bedroom community, rather than a village.</p> <p>5 We need an art element plan. Creative benches or other thematic thread seems doable with so much new construction. This would invite foot traffic and improve neighborhood identity and appeal.</p>

Transportation	6 New buildings and businesses should have bike parking if we are expecting folks to abandon cars. This also builds on the bikeway we currently have on 17th. We need sidewalks for pedestrian safety. Light rail sooner rather than later, please!!
Historic Resources	7 The overpass should remain as a neighborhood landmark and community focal point.
Public Services & Utilities	8 One word: Drainage. It's a nightmare currently. We have a pool of water at 87th and 17th often in the winter.
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: Carl Guess
To: [PCD_MHAEIS](#)
Subject: Please Extend DEIS Comment Period
Date: Tuesday, June 20, 2017 11:15:29 AM

HALA Team -

1

The 45-day comment period for the draft EIS is simply too short – especially since it has a implications across the City and has come to be available at the start of summer when many people have plans to be away.

Please extend the comment period another 90 days to allow for proper review and neighborhood input.

Best,

Carl Guess

From: Tony Hacker
To: [PCD MHA EIS](#)
Subject: MHA DEIS Public Comment
Date: Saturday, August 05, 2017 3:31:38 PM

1

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.

Respectfully,

Tony Hacker

Name	Ashly Hale
Email address	
Comment Form	
Land Use	Beacon crossing (Beacon Ave and 15th) - new housing development for 99 units that was approved with no parking. I live in the area and am concerned that parking will become difficult. It would be better to include some parking spots in the building. Also would be great to have retail on the first floor.
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?	

From: McAleer
To: [PCD_MHAEIS](#); [PRC](#)
Subject: Comment letter on MHA
Date: Monday, August 07, 2017 4:55:44 PM
Attachments: [LCC preservation comments for MHA.doc](#)

Hello Seattle Office of Planning and Community Development:

Please see our comments about more resources and consideration for existing historic buildings in the EIS for Mandatory Housing Affordability.

Sincerely,

Jeannie and Colleen
Laurelhurst Community Club

Laurelhurst Community Club

Serving Seattle's Laurelhurst Community since 1920

August 07, 2017

City of Seattle
Office Planning and Community Development
Attention: MHA DEIS
PO Box 34019
Seattle, WA 98124-4019

Re: Historic Preservation Compatibility with Mandatory Housing Affordability

Dear City of Seattle Office of Planning and Community Development:

The Laurelhurst Community Club (LCC) supports the goals of the Housing Affordability and Livability Agenda (HALA) and . We offer these comments on the Draft Environmental Impact Statement .

1. The DEIS falls short and only generally acknowledges the role of Historic Resources in Section 3.5 in the draft of June, 2017, but offers no real protection for the older structures and preventing the displacement of their existing tenants, both residential and small businesses.

Older buildings with their eclectic character, often provide long term affordable housing options for diverse populations. In addition to providing a home for immediate family units, these structures have "hidden density", providing multi-generational housing options for elderly family members, students living-at-home and saving rent while pursuing higher education, and renting out the basement for income. Older housing stock was often built with flexibility with larger spaces, and can offers more density in some cases, than the traditional rectangular boxed studio apartments that replace them for double or triple the existing rents.

Developers of new properties squeeze out every square foot for rentable units, rarely providing for family sized apartments that offer more "hidden" density for a variety of occupants.

Further, tear downs of the more historic buildings does not provide for more affordable small business offerings, but instead can destroy the livable character of Seattle's most historic neighborhoods.

Seattle is uniquely built upon the diverse character of these unique neighborhoods.

Conversations among office mates, and friendships often begin, "Where do you live?"

Maybe it is the comments with pride about a favorite restaurant in Columbia City, or ice cream shop in Wallingford, or specialty shop in Fremont or on the Ave that opens up even more conversations.

The Mandatory Housing Affordability DEIS needs to include broader protection for saving such existing historic resources and small businesses throughout the City , especially Downtown, South Lake Union, the University District and in all residential neighborhoods, whether they are in an Urban Village, or not. HALA policies have begun in these neighborhoods without policies of preservation.

Not only does the historical character define Seattle's history through its buildings, but these older units were built to last with proper maintenance, and cannot be replicated with more expensive new buildings, and can be more affordable.

As part of their history, neighbors formed a variety of local community organizations that are steeped in hosting a variety of historic traditions (Salmon Bake or the U District Street Fair, etc), parades (Fremont and Capital Hill) and are usually focused around a central cluster of historic buildings in the neighborhood. This creates that intangible character and livability of the community.

To understand the importance of the role of retaining existing buildings, or not, and the connections between livability, affordability and its history, we can look to our small neighborhood's affordable housing units and small businesses, and extrapolate the concepts.

Laurelhurst is usually characterized by its mature trees, hilly sidewalks, old community center, two old brick schools, three churches and two business centers-along NE45 St., and at Sandpoint Village. Neighbors catch up for a chat there, and "know the specials" of each small business that they frequent. The local barber shop is one such hub, and neighbors were devastated when "Ed" suddenly passed away. The images of hair clippings everywhere, the small sign stating no appointments needed Saturday mornings- line up starting at 6:30am were part of the casual business strip history, and carried on to this day. Neighbors know about the Monday night prime rib at Jack's, the perpetual senior discount at City People's and the 3 for \$35 special at the Sandpoint Grill. Gordon at the Laurelhurst Wine Shop is known for great recommendations for hidden wine gems, and re-cycles corks for all neighbors. The Kim family who owns the dry cleaner is in its 3rd generation. Neighbors wrote letters of concern to owner Amy when China Village closed for 3 months, and were glad it reopened with her brother as Uncle Lee's. Erik at Baywolf Dalton has re-done half the neighborhood's kitchens, and the Petit Boutique children's consignment shop was the first re-cycle experience for clothing for kids. Beverly, the head pharmacist at Katterman's helped get the much needed vaccines out to families during the H1N1 flu scare.

These small businesses are examples of the "go to" resources supported by the local residents and provide jobs and stability for Seattle's economy. **All of these small businesses are housed in older, low rise buildings with eclectic character, with sidewalks and parking and bike racks nearby for access for all, and in very small footprints to make their rents affordable.**

2. Another key component needed in the DEIS is social equity of retaining existing buildings which offer livability for diverse sized living units.

The Laurelhurst neighborhood experienced a significant loss in affordable housing units when the older, 136 affordable Laurelon condos with gardens, and spacious family-sized units were demolished to build a tower for the new wing of a hospital. The City was compensated for the lost housing stock with some funds from the hospital to partially subsidize a high rise building in the University District. The new units were built in a different place and scale from the existing neighborhood, and now its tenants are mostly transient students, rather than to families or community members. It was deemed "affordable housing" replacement by the City, even though residents gave up their old building and garden, and moved to a dense 65foot apartment building. Ironically and sadly, LCC recently received letters from several displaced tenants from Laurelon, about the new astronomical rent increases in this new building. These same

displaced families were forced to move out again as rents increased with the "new and improved" apartments, rather than the managing the small rent increases that prevailed in the demolished existing old condo rentals.

The concept plays over and over again that upzoning, does not create necessarily create long term affordable housing options . New buildings are expensive to build, and to maintain at a higher tax basis. Retaining existing housing stock, which is already affordable, can help prevent more displacement. In addition, the character of livability important to retain. The towering rectangles of the up-zoned high rises does not offer the same historic reference, and sense of identity and place for either old and new residents, and the small businesses community.

3. LCC requests that the City consider more rigor in the Historic Resources section 3.5 to include details about all neighborhoods' history, context and place in its analysis of evaluating impacts of any zoning changes. Because developers only want to build "new", preserving the historic character falls as the responsibility of the City to help preserve its cultural resources.. For example, until a Landmark Board research was done, it was little know that the Duwamish Indians worked in the local lumber industry , trading with Henry Yesler. During the winters, the tribe built a longhouses near Yesler Creek and which runs through the lower corner of Laurelhurst and rolled logs through Union Bay. Capturing this history informs the need to preserve these cultural references.

The DEIS falls short in the "Affected Environment" (3.5.1) , stating just generalities, The DEIS should provide more funding mechanisms and tools for all neighborhoods to analyze and preserve their history and character in some of their existing architecture. Future development impacts should be evaluated with resources on how to best preserve these historical pieces, while providing real building growth opportunities for the City and developers in the DEIS . Specific allocations of financial resources for mitigation measures in section 3.5.3 are missing. Having attended many of the Seattle Landmarks Board public meetings, it is clear that the board and staff are truly dedicated to this important work, and their rigor is very commendable. The amount of work done on preservation, resources for the landmarking process, and establishing compatible controls and incentives are vast. Yet, the resources are very thin to support this work, compared to the funding the City allocates to all of the "development" departments. The "preservation" resources should be equally valued, and a more balanced priority budget should be the goal for a city the size, and scale of Seattle.

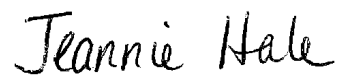
In summary, LCC requests that the DEIS for the Mandatory Housing Affordability policy use a broader approach to include more preservation policies in the mandatory affordable housing policies.. Section 3.5 needs to include all districts and neighborhoods in Seattle. Preservation of existing housing stock, and small businesses should be of the highest priority. In addition, the DEIS should provide for more funding, and detailed resources for preservation of existing buildings, historic districts and its diverse neighborhoods so that the character and livability of its history are preserved for future generations.

Thank you for your attention and work on this important issue for affordable housing,

Sincerely,



Colleen McAleer, Vice President
3137 West Laurelhurst Drive NE
Seattle, Washington 98105
206-525-0219
billandlin@aol.com



Jeannie Hale, President
3425 West Laurelhurst Drive NE
Seattle, Washington 98105
206-525-5135
jeannieh@serv.net

From: Cameron Hall
To: [PCD_MHAEIS](#)
Subject: Capitol Hill upzone
Date: Tuesday, August 01, 2017 8:42:46 AM

- 1 Greetings, I am a Capitol Hill resident and property owner living near Cal Anderson Park and the Light Rail Station and I walk to work in Pioneer Square.

Of the 3 options, I am in strongly in favor of the option which affords the most density: Alternative 2. We have an opportunity to create new affordable and market rate housing in what is one of the most vibrant and walkable neighborhoods in the country. We'll also reduce per capita carbon emissions and be a model for progressive, inclusive urbanism. Alternative 2 is the only plan that does that in my neighborhood: the only true upzone to midrise immediately adjacent to the light rail station, a common sense approach to density, affordability, walkable and sustainable urbanism.

I'm excited about MHA / HALA and support the max density Alternative 2 proposal. Thank-you.

Cameron_Hall

From: Charles Hall
To: [PCD_MHAEIS](#)
Cc: [Jeremy Wilkening](#); [Walter Zisette](#)
Subject: MHA draft EIS comment letter
Date: Monday, August 07, 2017 6:04:54 PM
Attachments: [MHA EIS Public Comment - signed.pdf](#)

To whom it may concern,

Please see the attached comment letter from Capitol Hill Housing on the draft EIS for the citywide mandatory housing affordability zoning changes.

Sincerely,

Charles Hall | Housing Development Associate

Capitol Hill Housing
1620 12th Avenue, Suite 205
Seattle, WA 98122
office 206-204-3826
www.capitolhillhousing.org

Building vibrant and engaged communities



1620 12th Avenue, Suite 205
Seattle, Washington 98122
206 329-7303
www.capitolhillhousing.org

August 7, 2017

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

Draft Mandatory Housing Affordability Environmental Impact Statement Public Comment

Capitol Hill Housing (CHH) appreciates the opportunity to review and comment on the draft Mandatory Housing Affordability (MHA) Environmental Impact Statement (EIS). As a public development authority, CHH works to build vibrant and engaged communities through affordable housing and community development and strongly supports the MHA policy. We believe that MHA is an important strategy for addressing our affordability crisis and strongly support focusing growth in urban centers and urban villages in order to advance racial and social equity, promote affordability and mitigate displacement.

Of the alternatives presented, CHH generally prefers Alternative 2 for the Capitol Hill-First Hill Urban Center with its emphasis on a larger upzoned area around the Capitol Hill Light Rail station and east of Broadway Ave. since this alternative appears to have the greatest likelihood for the City to meet its affordable housing goals and maximize development in and around these transit corridors.

Additionally, as a part of the MHA evaluation, CHH recommends a rezone for sites located within urban villages and near transit corridors to maximize both housing density and the supply of affordable housing. One example of this change would be sites located along and adjacent to E Madison St. The northerly portion of the block between E Union and E Spring St and between 13th and 14th Ave contains several affordable housing developments, the Helen V apartments and the Texada, an underutilized parking lot and market rate apartments. In advocating for increased housing density, blocks such as the one described above, would enable non-profits and affordable housing developers to maximize the supply of affordable housing while also ensuring the financial viability of such projects despite higher than normal land acquisition costs and local housing market conditions.

Background

Site and Vicinity

1. The subject block described above contains the following properties: thirty eight rent assisted apartments known as the Helen V apartments and an underutilized thirty two space parking lot owned by Capitol Hill Housing, twenty five rent assisted apartments known as the Texada owned by the First AME Church, and market rate development known as the Union Terrace Cooperative.

2. The block is zoned LR3.

3. Zoning to the north and west of the site is NC3-65. Development to the North includes a six-story multi-family apartment building, two commercial use buildings, and a six-story mixed-use apartment building. Development to the South and East include a mix of single-family and multi-family uses. The overall development pattern is more intense zoning and greater heights along and adjacent to E Madison St. and reduced zoning intensity and heights the more you travel southeast away from E Madison St.

4. E Union St is a two-lane, east-west, minor arterial. Both 13th and 14th Avenue are two-lane, north-south, local access streets. King County Metro Transit stops are located on E Union St and 14th Ave, and at the intersection between E Madison St and E Union St. Additionally, a Bus Rapid Transit (BRT) stop is planning to open on E Madison St and 12th Ave. Bicycle lanes and sharrows are available on E Union St.

Zoning History and Potential Zoning Changes

5. Potential zoning changes for the site are being discussed within the current draft Mandatory Housing Affordability (MHA) Environmental Impact Statement (EIS). Alternative 2 proposes that the site be rezoned from LR3 to Midrise while Alternative 3 proposes that the site receive the standard change from LR3 to LR3 (M).

Proposal

6. CHH recommends a rezone of the northerly portion of the block, from LR3 to NC3-75. A rezone of the block would enable affordable housing developers to rehabilitate existing affordable housing developments and/or to convert underutilized existing assets into new affordable housing units. As an example, the underutilized parking lot at 1321 E Union St would provide at least sixty-six units of low income apartments (an increase of twenty-two units) and the opportunity for unrestricted community serving commercial retail and programming space.

7. Currently zoned as LR3, the Helen V parking lot with its potential for forty-four units, is economically infeasible to accommodate both affordable housing and the commercial and common area space required to serve the target population. As such, it is likely that the lot will remain underutilized as a parking lot or be re-developed at a future date as market rate apartments or townhomes.

Urban Village Goals and Policies

8. Urban Village Goals and Policies were adopted as part of the 2015 Comprehensive Plan update. The Comprehensive Plan includes several policies that are relevant and supportive of opportunities to not only maximize housing density and increase the amount of affordable housing but also to ensure the compatibility of the surrounding buildings and neighborhood. UVG1 seeks to respect Seattle's human scale, history, aesthetics, natural environment, and sense of community identity as the city changes. UVG3 promotes density, mixed uses, and transportation improvements that support walking, use of public transportation, and other transportation demand management strategies, especially within urban centers and urban villages. UVG7 calls for the efficient use of limited land resources by encouraging infill development on vacant and underutilized sites, particularly within urban villages. UVG9 advocates for community collaboration in planning for the future. UV2.5 In areas surrounding major transit hubs, except in industrial zones, allow densities sufficient to take advantage of significant investment in public transportation

infrastructure. Use incentive zoning programs and other strategies to help ensure the provision of affordable housing.

Housing Element

9. The Comprehensive Plan on Housing includes several housing policies supportive of increased density. HG1 calls for 70,000 additional housing units, including Seattle's share of the county-wide need for affordable housing, consistent with the Countywide Planning Policies, over the 20 years covered by this Plan. HG2.5 seeks to reduce involuntary housing cost burdens for households by supporting the creation and preservation of affordable housing. HG6 encourages and supports accessible design and housing strategies that provide seniors the opportunity to remain in their own neighborhood as their housing needs change. The proposed new development at 1321 E Union St. would not only help to alleviate the need for additional affordable housing within Seattle but would also create the opportunity for LGBTQ seniors to remain in Capitol Hill, a neighborhood that the LGBTQ community has historically called home. HG12 similarly calls to reduce the number of low-income households in need of housing assistance.

Neighborhood Plan

10. The 12th Ave Neighborhood Plan goals and policies are also supportive of our recommendation. CA-G22 calls for a thriving mixed-use residential and commercial area with a "main street" including services and retail that is attractive and useful to neighborhood residents and students, and public spaces that foster a sense of community. CA-P73 encourages increased housing density.

Impact Evaluation

11. Function of the zone: Height limits are to be consistent with the type and scale of development intended for the zone classification, and the demand for permitted goods and services and potential for displacement of preferred uses are to be considered. NC3 zones are intended to "support or encourage a pedestrian-oriented shopping area that serves the surrounding neighborhood and a larger community, citywide or regional clientele." The proposed rezone to NC3 would increase the variety and scale of commercial uses allowed at this intersection and create the opportunity to serve a larger and broader audience.

12. Compatibility with the surrounding area: Height limits are to be compatible with actual and zoned heights in surrounding areas. In addition, a gradual transition in height and scale and level of activity between zones is to be provided unless major physical buffers are present. The requested height limit of 75 feet would match the height of the new mixed-use structures both directly to the North and to the West.

13. Neighborhood Plans: While the 12th Avenue Neighborhood Plan does not recommend specific height limits, as noted, it does include a policy that encourages increased housing density and a thriving mixed-use residential and commercial area including services and retail that is attractive and useful to neighborhood residents, and public spaces that foster a sense of community.

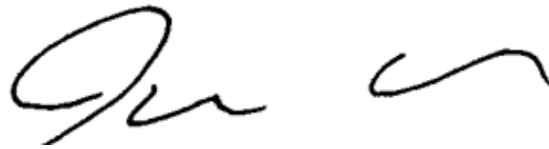
Conclusion

We ask the City to give careful consideration to the realities of affordable housing finance and housing market conditions when planning for future growth in the 12th Avenue and Madison St Corridors. LR3 zoning offers very little opportunity for the creation of affordable housing in this area. We encourage the

City to look at current LR3 zoning in this area as an opportunity for higher density zoning designations so that, as redevelopment occurs, affordable housing has a chance to be developed.

An example of where such a change in zoning can have an immediate effect is at 1321 E Union, at the southwest corner of 14th Ave. and E. Union, where a parking lot now exists. NC3-75 at this location will be most effective in spurring the development of quality affordable housing and accompanying community serving retail.

The Preferred Alternative in the Final EIS should incorporate as many land use strategies like this one as possible so that all members of our community, regardless of income, can have a chance to live in Seattle.

A handwritten signature in black ink, appearing to read 'Jeremy Wilkening', followed by a small, stylized flourish or mark.

Jeremy Wilkening
Vice President of Real Estate Development
Capitol Hill Housing Improvement Program

From: Steve Hall
To: [PCD_MHAEIS](#)
Subject: Comments on Mandatory Housing Affordability DEIS
Date: Monday, August 07, 2017 5:16:01 PM
Attachments: [FRIENDS OF HISTORIC BELLTOWN MHA DEIS COMMENTS submitted 080717.pdf](#)

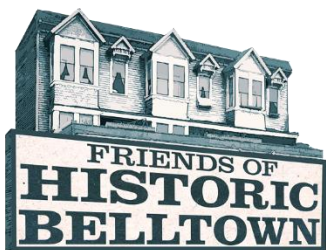
Hi. Please see the attached comments on the MHA DEIS. Thank you!

FRIENDS OF HISTORIC BELLTOWN, INC

**2324 1st AVE STE 404
SEATTLE, WA 98121-1698**

Steve Hall | DESIGNATED REPRESENTATIVE

p. 206.441.1882 | c. 206.450.1979



2324 1st Ave #404
Seattle, WA 98121-1698
August 7, 2017

Office of Planning and Community Development

Attn: MHA EIS

PO Box 34019

Seattle, WA 98124-4019

Sent as attachment via email to: MHA.EIS@seattle.gov

RE: Comments on Mandatory Housing Affordability Draft Environmental Impact Statement

Friends of Historic Belltown respectfully submits the following comments regarding the City of Seattle Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS).

Friends of Historic Belltown is a community-based, non-profit corporation that works with others throughout the greater Seattle community to increase the collective sense of place, identity, and community within one of Seattle's oldest neighborhoods: Belltown. While we understand that the City has already implemented MHA in Belltown, our interests include historic resources that are present in adjacent neighborhoods and as well as throughout all neighborhoods within the greater Seattle Community. Therefore, we have taken the time to review and comment on the current MHA DEIS.

We would like to stress that our objectives in submitting comments are not to block or interfere with MHA, but rather to improve the FEIS by recommending that OPCD (a) modify the discussion of significant adverse impacts related to historic properties and (b) develop additional mitigation measures or alternatives to address these impacts.

Ultimately, our desire is not merely for a better EIS, but for a better decision. Therefore, we sincerely hope that you find our comments helpful in improving the final decision that will create new affordable homes across the city, while at the same time preserve the significant historic character and values that historic buildings provide to the benefit of all Seattleites.

"It Starts on Second"

www.friendsofhistoricbelltown.org
info@friendsofhistoricbelltown.org

COMMENTS

1. THE DEIS DOES NOT APPEAR TO DISCLOSE PROBABLE SIGNIFICANT ADVERSE IMPACTS ON HISTORIC RESOURCES NOR DOES IT CONSIDER ALTERNATIVES TO ADDRESS THESE IMPACTS

The State Environmental Policy Act (SEPA) requires that all City of Seattle agencies consider the environmental impacts of their actions. Complying with SEPA is not optional. As stated in the City's SEPA policies (SMC 25.05.030 – Policy):

(City) agencies **shall to the fullest extent possible** interpret and administer the policies, regulations and laws of the state of Washington in accordance with the policies set forth in SEPA and these rules (i.e., SMC Chapter 25.05 - Environmental Policies and Procedures).

To comply with SEPA to the fullest extent possible, agencies must, at a minimum:

- identify specific adverse impacts of proposed actions and
- consider if any “reasonable alternatives” to the proposed action exist that may achieve the agency’s objectives, but at a lower environmental cost.

As described through evidence presented in more detail below, we believe that the DEIS as currently written is inadequate because it fails on both counts. Specifically, (a) it fails to identify specific and significant adverse impacts on historic properties that would not be adequately addressed through existing city regulations, policies or plans, and (b) it fails to consider alternatives or mitigation measures that could programmatically address these impacts.

2. LOSS OR DESTRUCTION OF HISTORIC RESOURCES IS A SIGNIFICANT ADVERSE IMPACT, AS DEFINED IN CITY POLICIES.

We believe that the destruction or loss of historic resources is clearly a significant adverse impact, as defined under Seattle Municipal Code (SMC, Section 25.05.330 - Threshold determination process). Specifically, the City's SEPA rules include historic resources as among the categories of impacts that the City considers significant:

*“A proposal may to a significant degree adversely affect environmentally critical or special areas, such as **loss or destruction of historic, scientific, and cultural resources**, parks, prime farmlands, wetlands, wild and scenic rivers, or wilderness.”*

Through this rule, the City acknowledges that historic resources are a significant resource on the same level as parks, prime farmlands, wild and scenic rivers, and wilderness. As such, the destruction of even a single historic resource is a significant adverse impact, as defined in the City's SEPA policies.

3. MANY HISTORIC RESOURCES ARE PRESENT WITHIN THE AFFECTED ENVIRONMENT

The EIS acknowledges that many historic properties are present within areas that would be affected by the Alternatives, as described in the following excerpt from Section 3.5.1 Affected Environment:

The study area contains individual historic properties that are designated Seattle Landmarks. These are located throughout the study area. However, not all properties within the study area have been systematically inventoried for their potential eligibility. Therefore, it is likely that the study area contains additional properties that could meet the criteria for designation as a Seattle Landmark.

The study area also contains historic properties that are listed in, and that have been determined eligible for listing in, the National Register of Historic Places (NRHP)... These properties are located throughout the study area. It is important to note that not all properties within the study area 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 eligible for listing in the NRHP, but which have not yet been inventoried.

(p 3.244)

4. THE DEIS ACKNOWLEDGES THAT ALTERNATIVES 2 AND 3 WOULD RESULT IN THE LOSS AND DESTRUCTION OF HISTORIC RESOURCES

The DEIS goes on to say that the MHA program may result in the loss or destruction of historic properties present within the affected environment, as described in the introduction to the Historic and Cultural Resources impact discussion (Section 3.5.2)

*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 historical properties** or construct new properties on land that may contain below ground cultural resources. ...**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, such as projects exempt from review under SEPA.***

We understand this section to mean that both Alternative 2 and 3 would result in an increased loss and destruction of historic properties that would occur under the No Action alternative.

5. THE DEIS FAILS TO FORMALLY IDENTIFY THE PROBABLE DESTRUCTION OF HISTORIC RESOURCES THAT WOULD RESULT FROM ALTERNATIVES 2 AND 3 AS SIGNIFICANT IMPACTS

When we looked at the discussions of specific adverse impacts for each alternative (page 3.253), not only did we not find full disclosure that Alternatives 2 and 3 would result in probable significant adverse impacts on historic properties, we found **no discussion of impacts at all**. The entire discussion presented in the sections titled “Impacts of No Action,” “Impacts of Alternative 2,” and “Impacts of Alternative 3,” seem to be general narratives leading to no conclusion regarding adverse impacts.

We must say here that if there is one thing that an environmental impact statement should include, it is a description of the environmental impacts of the proposed action and alternatives. Therefore, failing to disclose impacts in these discussions is a failure to implement SEPA to “the fullest extent possible.” Such a failure to identify impacts is likely to be considered “clearly erroneous” by a Hearing Examiner. This error is further described in the next comment.

6. THE DEIS SEEMS TO RELY ON FAULTY LOGIC IN DETERMINING NO SIGNIFICANT ADVERSE IMPACTS ON HISTORIC RESOURCES

Section 3.5.4 Significant Unavoidable Adverse Impacts, the DEIS concludes that:

Since no changes will occur to existing policies and regulations regarding review of historic and cultural resources under any alternative, projects subject to review under existing policies and regulations would still be reviewed at the project level, if and when redevelopment is proposed.

At the programmatic level of this analysis, no significant unavoidable impacts to historic and cultural resources are anticipated under any of the proposed alternatives.

This doesn’t make sense to us. Just because an action would not change existing policies and regulations on historic resources does not mean that OPCD can categorically conclude that the alternatives would not result in significant impacts. In fact, it is this very type of impact – **impacts that are not already adequately addressed by existing regulations** -- that SEPA is intended to identify and mitigate.

In fact, the DEIS does identify adverse impacts on historic resources. However, it is included under the heading “Impacts Common to All Alternatives.”

*Potential impacts to historic resources could occur from demolition, redevelopment that impacts the character of a historic property, or development adjacent to a designated landmark if the development alters the setting of the landmark and the setting is a contributing element of that landmark’s eligibility. **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, such as projects exempt from review under SEPA.

For example, projects with fewer than 20 residential units, or that have less than 12,000 square feet of commercial space, are exempt from SEPA review. Typical SEPA-exempt projects that could occur under the project would be redevelopment or replacement of single-family residences and small buildings with slightly larger residences and buildings.

*Alternatives 2 and 3 propose increased development capacity through standard increases; a standard increase is defined in Chapter 2 as increases to the maximum height limit, typically the addition of one story, and increases to the Floor Area Ratio (FAR). In some locations other standards such as maximum density or minimum lot size would be adjusted to allow for additional capacity. **These increases have the potential to result in changes to the historic scale of neighborhoods.***

We understand this excerpt to mean that under current city policy, significant historic buildings are already being destroyed through actions that are exempt from SEPA review and that **under Alternatives 2 and 3, even more significant historic buildings would be destroyed.**

We have difficulty reconciling this discussion with the conclusion that

At the programmatic level of this analysis, no significant unavoidable impacts to historic and cultural resources are anticipated under any of the proposed alternatives.

OPCD seems to be saying in the DEIS that because under current City policy, historic properties would be destroyed under the No Action alternative, destroying even more historic properties under Alternatives 2 and 3 is not an impact.

We find such reasoning to be contrary to both fact and law and, therefore, clearly erroneous. We also find this to be evidence that OCPD is not interpreting or administering SEPA policies to “the fullest extent possible.” To fully comply with SEPA, the additional destruction of historic properties must be disclosed as a significant adverse impact.

RECOMMENDATIONS

1. SUPPLEMENT, IMPROVE, AND MODIFY THE ANALYSIS OF THE EIS TO CLEARLY IDENTIFY THE SPECIFIC AND SIGNIFICANT ADVERSE IMPACT OF DESTRUCTION OF HISTORIC PROPERTIES

As described in Comments 4, 5 and 6 above, we believe that both Alternatives 2 and 3 would result in increased loss of historic properties that are currently exempt from SEPA review. As stated in comment 6, the DEIS seems to consider that because historic buildings currently exempt from SEPA review are already being lost, that destroying an even greater number of

these historic properties under Alternatives 2 and 3 would not be significant. We believe this to be a clearly erroneous conclusion. As such, to comply with SEPA to the fullest extent possible, these impacts should be clearly described and disclosed in the FEIS.

2. DEVELOP AND EVALUATE ALTERNATIVES THAT PROGRAMMATICALLY ADDRESS PROBABLE SIGNIFICANT ADVERSE IMPACTS OF INCREASED LOSS AND DESTRUCTION OF HISTORIC PROPERTIES

The City's SEPA rules (25.05.440 - EIS contents) require that an EIS include all "reasonable alternatives." The rules further require that "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."

As previously established, the City cannot use the inadequacy of existing regulations as an excuse to ignore significant adverse impacts. We believe that SEPA is intended to catch this very thing, and that OPCD has a tremendous opportunity – as well as a statutory obligation -- to programmatically address the current inadequacy of environmental regulation through a new alternative or additional mitigation measure in the FEIS.

In addition to being required by the City's own SEPA policies, we believe that these changes would greatly protect historic resources as well as the tremendous value they provide to our neighborhoods and our City as a whole.

Therefore, on behalf of all Seattleites that value our City's historic resources, we urge OPCD to improve the EIS by disclosing the true impacts of Alternatives 2 and 3 as presented in the DEIS, and by developing reasonable alternatives in the FEIS that can programmatically reduce or avoid these impacts.

Sincerely,

FRIENDS OF HISTORIC BELLTOWN, INC
2324 1st AVE STE 404
SEATTLE, WA 98121-1698
Steve Hall | DESIGNATED REPRESENTATIVE
p. 206.441.1882 | c. 206.450.1979
shall@pointconsulting.us

From: Jeannie Hammock
To: [PCD_MHAEIS](#)
Cc: [Caun](#)
Subject: MHA-EIS Comment Letter
Date: Monday, August 07, 2017 1:56:26 PM
Attachments: [MHA_Our_comment_re_WS_Pecos_proposed_zoning_8-7-17.pdf](#)

To the Office of Planning and Community Development,

Please find attached our MHA EIS comment letter on behalf of my Director Caun.

Thank you,
Jeannie Hammock

Jeannie Hammock
Coordinator, Investor Relations/Coordinator, Design & Construction
Pecos Pit Int'l Franchise, LLC
Jeannie@pecospit.com • 206-383-7578
When Pigs Fly ®

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August 7, 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 King Co. Parcel Nos. 9297301810 and 9297301805

To Whom It May Concern:

I am submitting this comment letter on behalf of Pecos Pit Bar-B-Que ("**Pecos**"). Pecos is popular barbecue restaurant located near the corner of Fauntleroy Way SW and 35th Avenue SW. Pecos operates its restaurant and adjacent parking lot on property Pecos leases from Seattle City Light ("**SCL**"). The restaurant is located on King County Tax Parcel No. 9297301815 ("**Restaurant Parcel**") and the parking lot is located on the southern portion of King Co. Parcel Nos. 9297301810, 9297301805 ("**Parking Parcels**") (collectively, referred to herein as the "**Property**"). The parking lot is south of an old, unused SCL substation located on the northern portion of the Parking Parcels. Attached as **Attachment A** is an aerial photo showing the Restaurant Parcel fronting on 35th Avenue SW and the Parking Parcels to the east.

Currently, the Restaurant Parcel and Parking Parcels have different zoning designations. The Restaurant Parcel is zoned NC3-65 just like the properties immediately south and west of the Restaurant Parcel. Despite the otherwise consistent NC3-65 zoning in the area, the Parking Parcels are currently zoned single-family 5000 (SF 5000). Attached as **Attachment B** is a current zoning map showing how the Parking Parcels have been omitted from the NC3-65 zone despite the consistent NC3-65 zoning on the adjacent parcels. This inconsistent zoning means that substantially different zoning requirements apply to the

Restaurant Parcel and the Parking Parcels, which make it difficult to operate a restaurant with sufficient parking on the Property.

The City's Draft Environmental Impact Statement ("DEIS") for implementation of Mandatory Housing Affordability ("MHA") evaluates two alternative zoning changes (Alternatives 2 and 3). Attached to this letter as **Attachment C** are excerpts from the proposed zoning maps for Alternatives 2 and 3 (Appendix H, Exhibits H-55 and H-56), which show the proposed zoning changes for the Property and surrounding areas. **Pecos requests that the City modify Alternatives 2 and 3 to extend the proposed NC3-75 zoning to include both the Restaurant Parcel and the Parking Parcels.**

By including the Parking Parcels in the proposed NC3-75 zone, the SCL Property will have a uniform zoning designation that matches its historical non-residential use as a substation. It also will have the effect of providing for consistent zoning in the area, which currently omits the Parking Parcels. The single-family parcels to the east will be buffered from commercial uses on the Parking Parcels as a result of the City's land use code (Title 23 SMC) requirements for setbacks and buffering between the commercial and residential zones. For example, SMC 23.47A.016(D)(1)(d) requires parking lots adjacent to residential zones to install 6-foot-high screening along the abutting lot line and a 5-foot-deep landscaped area inside the screening.

In SMC 23.34.078(B), the City provides four criteria for zoning property NC3. The Parking Parcels meet all of the City's criteria for being designated as part of the NC3 zone. The City's NC3 criteria and Pecos' comments regarding the criteria are provided below:

A Neighborhood Commercial 3 zone designation is most appropriate on land that is generally characterized by the following conditions:

1. The primary business district in an urban center or hub urban village;
 - Pecos Comment: The Parking Parcels are within the West Seattle Junction Hub Urban Village.
2. Served by principal arterial;
 - Pecos Comment: Fauntleroy Way SW and 35th Avenue SW are principal arterials.
3. Separated from low-density residential areas by physical edges, less-intense commercial areas or more-intense residential areas;
 - Pecos Comment: The Parking Parcels are adjacent to residential property that the City is proposing to rezone to LR1 or LR3, which are both more-intense residential uses.
4. Excellent transit service.
 - Pecos Comment: Fauntleroy Way SW is the primary arterial in the area and it is served by Metro's Rapid Ride C Line bus route, among others, which provide excellent and very frequent transit service to the Property.

For the reasons described above, **Pecos requests that the City modify Alternatives 2 and 3 to extend the proposed NC3-75 zoning to include both the Restaurant Parcel and the Parking Parcels.** Thank you for your time and attention to this important matter.

Very truly yours,

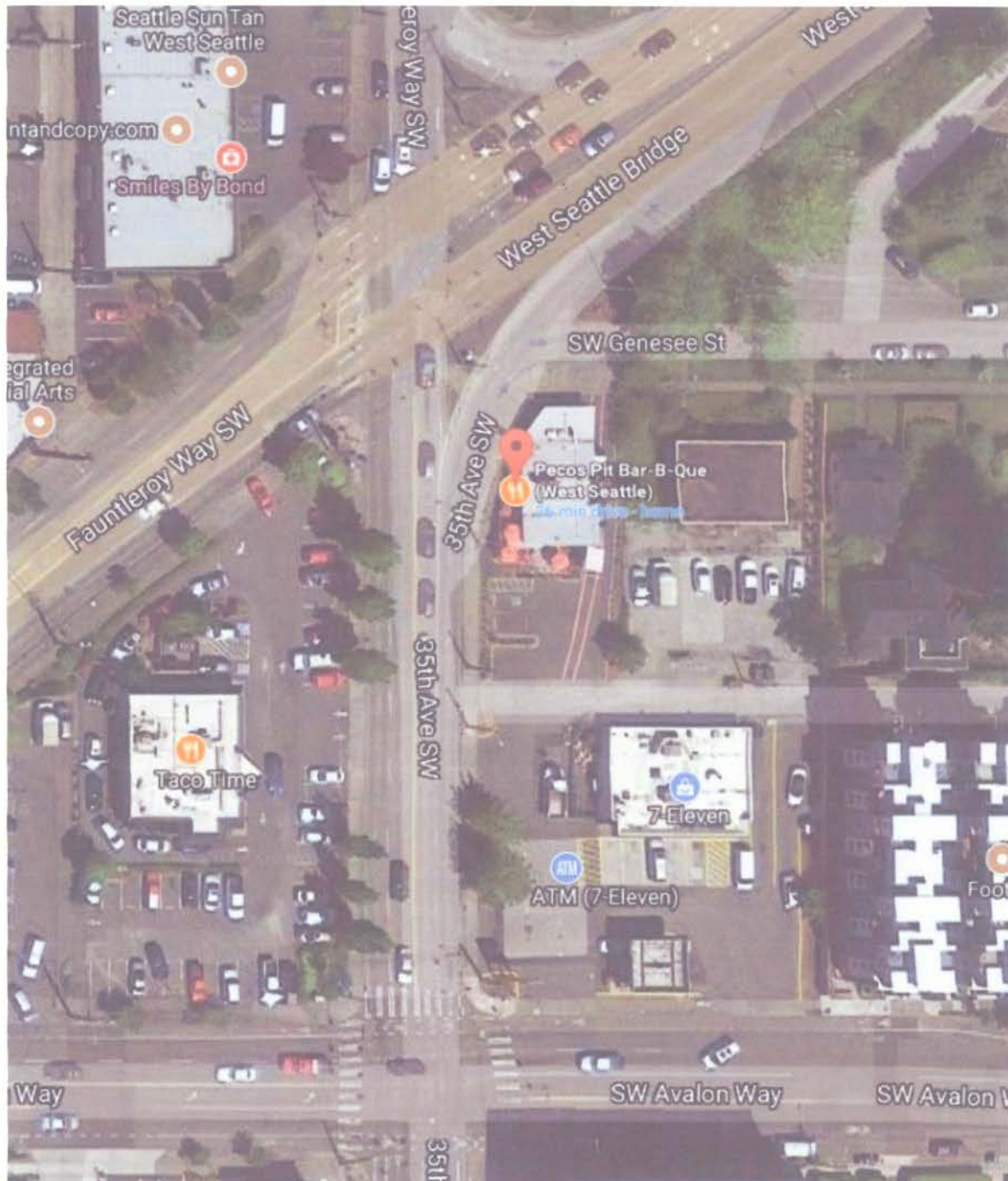


Caun Knapp
Director, Design & Construction
Director, Investor Relations

Attachment A

Pecos Pit Bar-B-Que

Aerial Photo



Attachment B

Pecos Pit Bar-B-Que

Current Zoning



Attachment C

Pecos Pit Bar-B-Que

MHA DEIS Alternatives 2 and 3



MHA Draft EIS
June 2017

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

Urban Village Boundaries

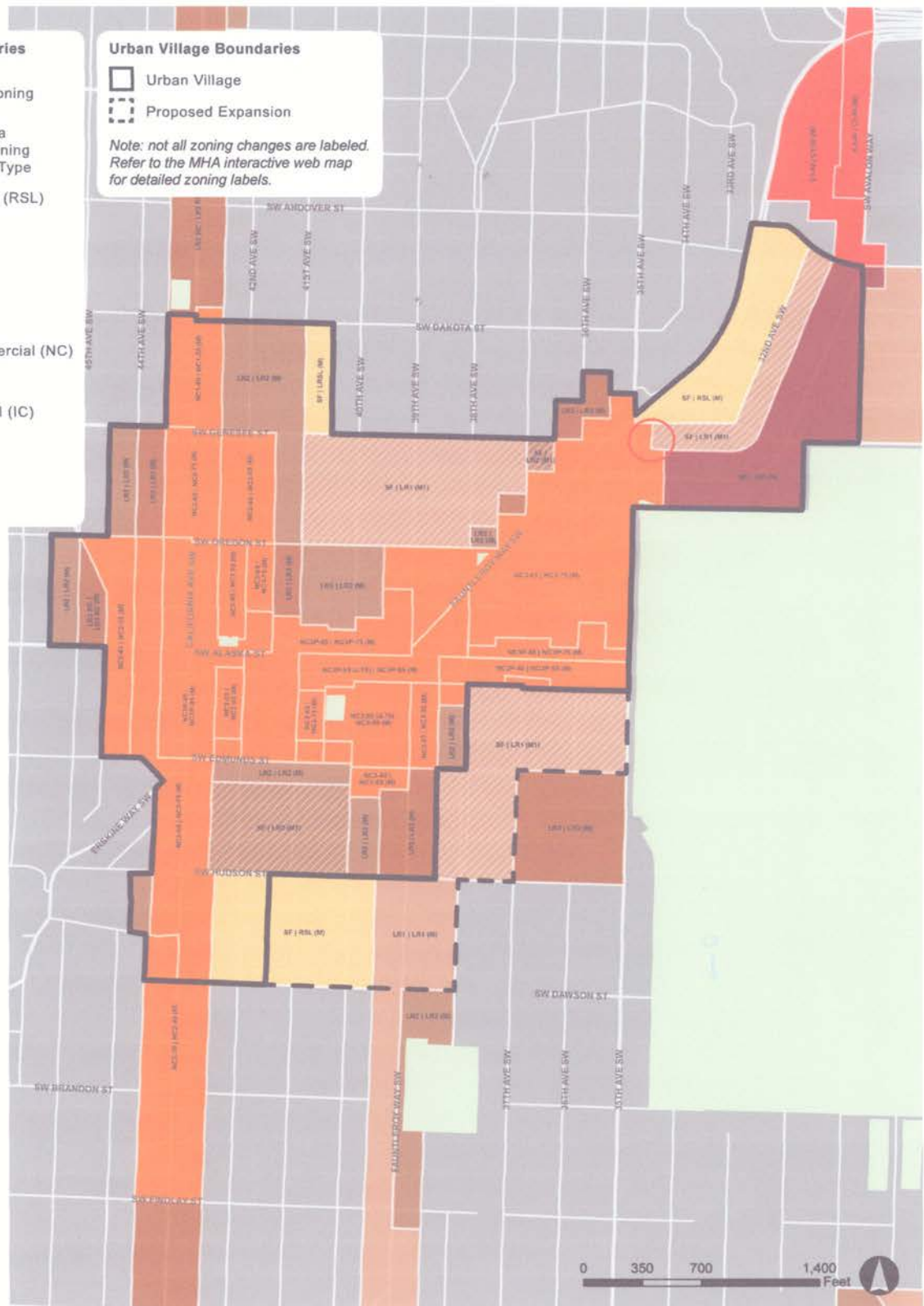
□ Urban Village

▤ Proposed Expansion

Note: not all zoning changes are labeled. Refer to the MHA interactive web map for detailed zoning labels.

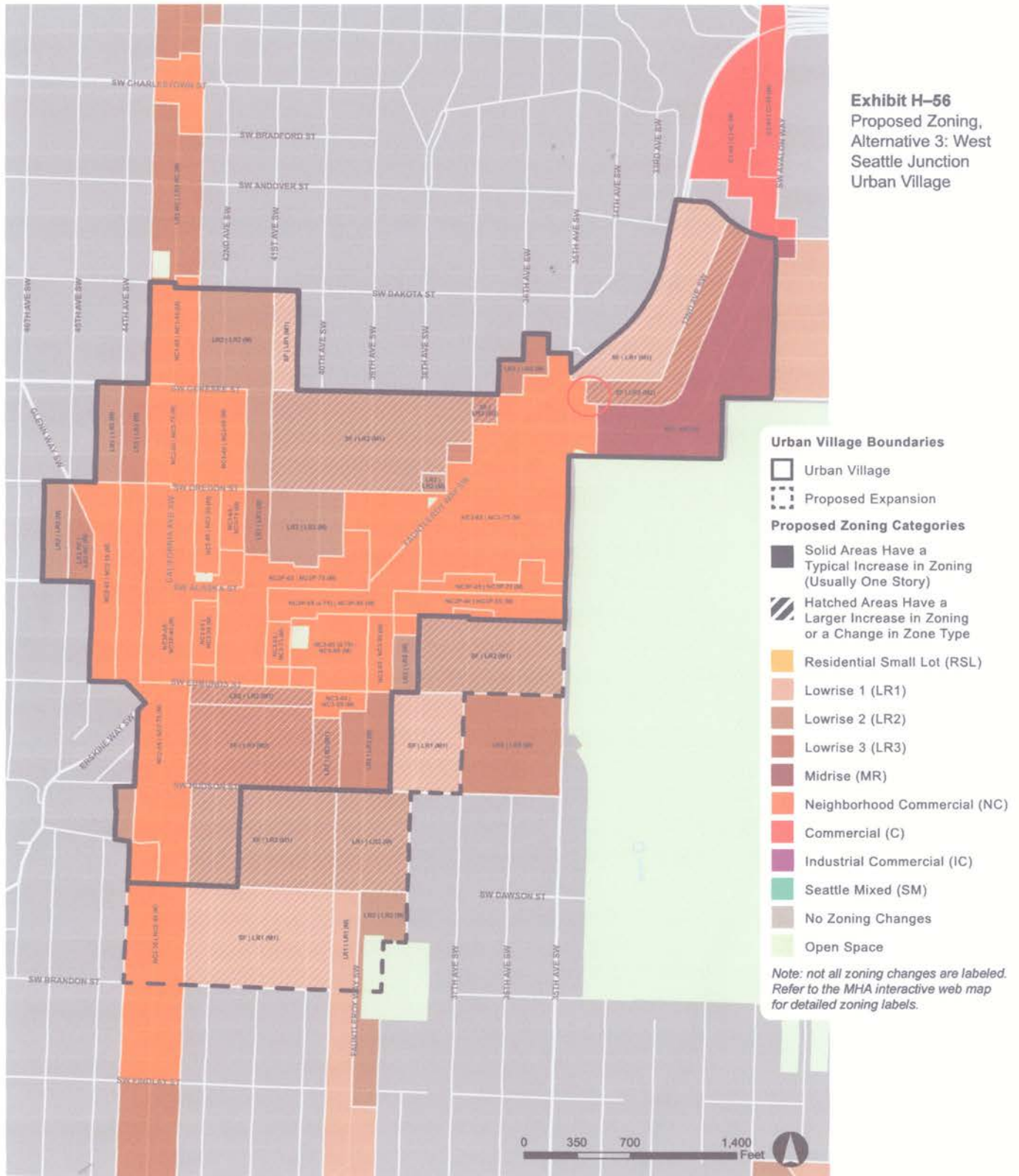
Exhibit H-55

Proposed Zoning,
Alternative 2: West
Seattle Junction
Urban Village



Source: City of Seattle, 2017.

Exhibit H-56
Proposed Zoning,
Alternative 3: West
Seattle Junction
Urban Village



Source: City of Seattle, 2017.

Name	Hannah
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.	I am a renter in North Seattle
Comment Form	
Description of the Proposed Action and Alternatives	1 please take one of the actions
Housing and Socioeconomics	2 Please make sure developers build homes for families not just single people.
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?	

8/7/2017 22:55:08
P. Mark Hannum

Description of the Proposed Action and Alternatives

1. I think no action should be implemented in the North Rainier Urban Village area. The neighborhood is in the process of acquiring a Landmarks designation for the unique homes in this area and an expansion of the area boundaries and change in zoning would impede these efforts.

Housing and Socioeconomics

2. There is plenty of unrealized opportunity for alternative housing in the north rainier urban village in the northern part of the area.

Land Use

3. Again there are plenty of opportunities for expansion of Multifamily and commercial buildings immediately adjacent to the Rainier Ave corridor without taking more areas from single family neighborhoods.

Aesthetics

4. The expansion would risk the fabric of one of the few intact turn of the century neighborhoods left in the city. As mentioned above the neighborhood is in the process of trying to preserve this quality as well as the Olmstead designed Park and boulevard system.

Transportation

5. The walking format used in the survey is very deceptive in the actual typography of the neighborhood. The walk limits feel very arbitrary and really do not apply to this area.

Historic Resources

6. As mentioned before, the boundary expansion would jeopardize the historic fabric of this neighborhood. The single family character defining elements of this cohesive neighborhood area is one of the reasons that many of the residents moved here to begin with in particular and Seattle in General, myself included. I do not wish to reside in an area when the aesthetics of a turn of the century neighborhood are transformed by scores of infill properties with no architectural relationships to their surroundings. If we let these changes occur in this neighborhood, we will have forever lost one of the character defining elements which make some people value living in Seattle.

Biological Resources

7. The area was first platted and designed as a park based development. One of the first mottos for the Mt. Baker neighborhood was beautification. This is why many of the features were Olmstead designed.

Open Space & Recreation

None

Public Services & Utilities

See above

Air Quality & Green House Gas Emissions

8. If the expansion occurs - there would be pressure to raze the older single family homes and replacement with multi units. There is no greater assault to the carbon footprint that to destroy an older home built with old growth timbers and materials and replace them with modern materials which often do not last nearly as long and need to be frequently replaced.

Name	Karen Hardy
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Please consider keeping the Roosevelt up zone west 15NE and No. of NE 65. the earlier map before the EIS was drawn up this way. Why the change after the Roosevelt, Bryant and Ravenna neighborhoods had worked with the city for this designation? I feel very frustrated to have to try and preserve Ravenna Park and it neighbors again.</p>
Housing and Socioeconomics	<p>2 Before the DEIS was published the Ravenna neighborhood was not in the upgrade of Roosevelt. Why now? We currently have small homes and accessory dwellings in this area on some properties which seem to suit our neighborhood.</p>
Land Use	<p>3 The DEIS does not address individual neighborhoods or include realistic conversations with the people impacted in the neighborhoods. We live here and in the city. I believe the land around NE 65 is good for low cost housing and yet I assume the developers of the Sisley Properties have not been required to address low cost housing.</p> <p>4 It makes no sense to move into the Ravenna neighborhood of well maintained homes, with historic buildings, a park saved by our founders.</p>
Aesthetics	<p>5 High rises that are not even for low income are currently being built at an amazing rate in the Roosevelt neighborhood. Why weren't some of those buildings designated for low income? We do have some mother-in-law/small living units already in the area which seem well suited to this neighborhood of Ravenna.</p>
Historic Resources	<p>6 Ravenna neighborhood has 100 year old homes that have been maintained. The Park is used by hundreds of residents daily. We need to preserve the character and natural areas in our city. Adding Ravenna to the Roosevelt upzone would be not in keeping with our founders as the area was originally set aside. This fragile area needs our continued care and stewardship and NOT development.</p>
Biological Resources	<p>7 Keep Ravenna Park and the neighborhood in Ravenna. Its shocking that any one would consider developing the surrounding area. Increasing density around this park takes away the chance of preserving the homes and the natural habitat</p>
Open Space & Recreation	<p>8 We need quality of life and saving Ravenna and the streets on it are worth the effort.</p> <p>9 Keep the Roosevelt Border on 15 NE and NE 65th. There is much construction in the Roosevelt area and I wonder if any of that has been designated for low income housing?</p>

From: Rob Harrison cPHc
To: [PCD_MHAEIS](#); [Sawant, Kshama](#); [Johnson, Rob](#); [Herbold, Lisa](#); [O'Brien, Mike](#); [Gonzalez, Lorena](#); [Burgess, Tim](#); [Juarez, Debora](#); [Bagshaw, Sally](#); [Harrell, Bruce](#); [Brand, Jesseca](#); [Maxana, Sara](#); [Wentlandt, Geoffrey](#)
Subject: MHA EIS Comment
Date: Tuesday, August 08, 2017 12:17:07 AM
Attachments: [ATT00001.htm](#)
[MHA_EIS_Harrison.pdf](#)

Please see the attached comment letter on the draft environmental impact statement for the citywide mandatory housing affordability zoning changes.

Thank you.

Rob Harrison cPHc

Rob Harrison cPHc
Certified Passive House Designer + Consultant

HARRISON architects

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<http://harrisonarchitects.com>

lyrical sustainable design :: passive house plus

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

To Whom It May Concern:

1

I urge the City to more fully investigate the impact of MHA fees on the feasibility of projects, particularly in the LR and RSL zones. In my own experience with smaller and DIY developers, even the current fees will stop projects. As far as I know (as a member of the Medium Density HALA Focus Group) the number of affordable housing units produced by each alternative is not based in any real data from or discussion with people who are going to be building this scale of project. That is, no one so far has answered the question of whether the amount of upzone granted (in terms of both FAR and height) actually balances the fee or performance requirement. If it doesn't, a percentage of projects won't go forward, and we won't get as much affordable *or* market rate housing out of the deal as we all want. Any fee at all will kill marginal projects. As MHA performance requirements increase, more projects will become marginal. I personally can't imagine any of my clients going ahead with projects within a High MHA area (\$20.75/SF) for a cottage project in an RSL zone, for example.

2

Related to the above, is there a point in here where we want to talk about changing single-family zoning? Can we not allow duplexes, triplexes, row houses, townhouses and small apartment buildings in SF zones? Is that not part of the deal at this time? It's the largest single thing we can do to increase access to high-opportunity areas in the city, and make it more possible to rent within communities that are now predominantly single-family houses.

3

Climate change is the greatest and most intractable social justice issue of our time. Buildings generate ~27% of carbon emissions in Seattle. An "environmental impact statement" for policy that will determine the type and scale of buildings built in Seattle over the next twenty years ought to consider how the way those buildings are built can help mitigate climate change. An incentive program that actually produced deep green buildings would be great. The amount of the typical MHA fees (~5-10%) is close to the current amount of extra construction cost required to go from conventional code-minimum construction to Passive House construction. Passive House buildings use 70% to 80% less heating and cooling energy than current code.

Seattle remains far behind Vancouver, BC, Portland, OR, New York, NY, and many other cities in the US in the adoption of Passive House or net-zero building. The current Green Building Incentive adds a very small increment of FAR and additional height that won't offset the increased costs. The Green Building Incentive ought to be considered at the same time as these upzones and MHA fees are considered. Going back in and fixing it later is going to be hard politically. As I have mentioned before, the current green building incentive program has not produced a single deep green building since 2014.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rob Harrison', with a long horizontal flourish extending to the right.

Rob Harrison cPHc

From: KLB Harwell
 To: [PCD_MHAEIS](#)
 Subject: Comments
 Date: Thursday, July 27, 2017 9:41:46 PM

The Following comments are submitted regarding MHA.EIS.

MHA should provide a more balanced approach to achieving growth and strike a balance to achieve *density without demolition*, and *affordability without sacrificing livability* in order to ensure that *how we grow* is sustainable and resilient - while retaining urban character and sense of place.

The Historic Resources section (3.5) is inadequate and 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 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. Added development pressure will result in increased demolition of potentially historic buildings and neighborhoods and adversely impact the character and scale of neighborhood blocks.

The analysis 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 DEIS does not connect MHA to URM

Unreinforced Masonry (URM) buildings are mentioned in both Affected Environment (3.5.1) and Mitigation Measures (3.5.3), however, the DEIS does not reference the Seattle Department of Construction and Inspection's (SDCI) list of over 1,100 URM properties in the city. The analysis should include the number of URMs in each of the study area neighborhoods in order to understand how MHA might impact these properties.

Additionally, complying with a possible City mandate to seismically retrofit URMs to the ["bolts plus" standard](#) will present a substantial financial burden on many property owners.

If preservation of existing affordable housing is truly a goal of HALA, it would then make sense to offer financial incentives to property owners who preserve and upgrade historic URMs and provide affordable housing.

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 has any import or will be seriously considered. 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.

From: KLB Harwell
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Comments
Date: Wednesday, August 02, 2017 2:01:23 PM

1. Confirmation emails from the MHA.EIS@seattle.gov are not sent, should there be an auto responder in place notifying a comment submitter that the comment was received?

2. As one of the oldest neighborhoods in the city, Madison-Miller Residential Urban Village has many significant trees. This is one of defining characteristic of this neighborhood. Under the current SF zoning code "Significant Tree Species" are identified and protected. Under the proposed MHA zoning changes and in Alternative 2 and 3 re-zones these significant trees are not protected. The DEIS does not address this loss of "Significant Tree Species" protections in SF zoning and does not offer mitigating measure for how to protect this aspect of the R.U.V. character.

Request the DEIS should propose significant tree species protection in all MHA zoning changes of SF for the MMRUV, and all Residential Urban Villages.

Thank you,
Kirk L. B. Harwell

Comment: The City of Seattle’s use of the **Displacement Risk / Access to Opportunity Index** to determine a generalized approach for rezoning Urban Villages is flawed.

*Two urban villages may coincide on the typology diagram but for different reasons. For example, because this analysis integrates several inputs into a single result, an urban village with marginalized populations and fewer amenities could occupy a very similar position on the displacement risk axis of the typology as an urban village with inverse characteristics. In this case, a similar result for displacement risk in two urban villages masks their dissimilar socioeconomic conditions that investments and policy decisions must consider.*¹

Summary

- The City of Seattle unfairly applies the **Displacement Risk/Access Opportunity Typology** developed in the Growth and Equity Analysis of the 2035 Seattle Comprehensive plan as a method for determining levels of zoning changes in Alternate 3 for Urban Villages.
- MHA DEIS use of this typology is flawed when categories are applied to Urban Villages that are situated in ambiguous locations (i.e. neither high nor low) along Either the Displacement Risk or Opportunity Access axis.
- The City of Seattle Fails to describe an Urban Village as having Moderate Displacement risk when it is neither “high” not “low” on the spectrum in the Growth and Equity study as part of the 2035 Comprehensive plan; and
- The Displacement Risk inaccurately labels urban villages displacement risk category as “Low Displacement Risk” when review of the Displacement Risk Index map Exhibit 2-2 clearly shows that with few exceptions all of the Urban Villages in the Study Area have a “moderate” to “high” displacement risk.
- The applicant fails to highlight the identification under the Seattle Comprehensive Plan 2035 Growth and Equity Analysis of most urban villages having been identified as moderate to high vulnerability in a study of the Composite Vulnerability Indicators in the Growth and Equity Study p.17. (Vulnerability is defined: Populations less able to withstand housing cost increases and more likely to experience discrimination or other structural barriers to finding new housing. Growth and Equity Study p.16)
- The applicant could generate the “MHA” funds through applying a “Housing Impact Fee” city wide and/or on a specific types or sizes of projects. This method has been implemented in cities throughout the country.

Detail:

These comments are raised specifically to address the changes proposed for the Madison Miller Residential Urban Village in Alternates 2 and 3; however, they are equally applicable to other Urban Villages including among others: 23rd & Union-Jackson, Aurora-Licton Springs, Crown Hill and others.

A specific concern exists regarding the displacement of people of color and low income from the Madison Miller along with the fairness of the equitable implementation of the cities MHA program.

¹ City of Seattle May 2016 Growth and Equity; p 21-22

Between the years 1990 – 2010 Madison Miller RUV has experienced some of the greatest levels of displacement of Black and African American people while concurrently experiencing among the greatest levels of growth as a percentage of population.² As is noted in the DEIS this displacement is the direct result of densification and development that have occurred primarily in the Urban Villages and in proximity to the Transit Centers. There is significant concern that the implementation of the HALA proposal will further exacerbate and accelerate the displacement of remaining at risk groups from the Madison Miller and all Urban Villages, particularly considering the large levels of displacement previously observed.

The City of Seattle has adopted a flawed approach of focusing development in and around transit centers. These neighborhoods are clearly shown on the attached maps to have the most vulnerable populations at risk for displacement. The City of Seattle should adopt policy which distributes the impacts of development throughout the city and enhances the transit system to better serve the entire city rather than offer developers greater incentives to redevelop the areas with the most vulnerable populations.

The **MHA Draft EIS Study Area** (as shown in Exhibit 2-1) compared with the **Displacement Risk Index Map** (Exhibit 2-2) is revealing of two important facts about the HALA Proposal.³

1. **INSIDE** the MHA Draft EIS Study Area most property has **Moderate to High** Levels of Displacement Risk; while, **Outside** the Study Area most property has Low Levels of Displacement Risk.
2. **HALA MHA** is being proposed to be applied across the city disproportionately to the neighborhoods and areas that have been determined to have the **HIGHEST LEVELS OF DISPLACEMENT RISK**.

A large portion of the DEIS analysis of the impact of Alternative 2 & 3 zoning has been studied through a model which incorrectly characterizes RUV such as Madison-Miller as “Low Displacement Risk.” Madison Miller has been historically a location of high displacement risk and (based on the attached maps from the 2035 Comprehensive Plan) is more accurately characterized as moderate to high displacement risk.⁴

While the Displacement Risk/Access to Opportunity Typology Index is a useful tool for categorizing the RUV a specific warning is written in the Growth and Equity Analysis regarding it's use:⁵

Because many factors contribute to a neighborhood's position on this diagram, it is critical to examine carefully the underlying data layers before adopting investment or programs to mitigate displacement or increase access to opportunity.

23rd and Union-Jackson and Madison-Miller fall in almost the exact same location on Figure 7, however the DEIS treats them as opposites when considering Displacement Risk. Review of Alternate 2 and 3 proposals shows this more precisely. In Alternate 2 for Madison Miller all SF (Single Family) is changed to RSL(residential Small Lot) while 23rd & Union-Jackson has “SF” increased by the significant amounts originally proposed in the HALA draft zoning change maps. Conversely, in Alternate 3, it is Madison

² City of Seattle May 2016 Growth and Equity; pp 33-34

³ MHA Draft EIS Exhibits 2-1 & 2-2

⁴ City of Seattle May 2016 Growth and Equity; p 22 Figure 7.

⁵ City of Seattle May 2016 Growth and Equity; p 21-22

Miller that sees the dramatic rezoning of “SF” originally proposed by HALA and 23rd & Union see the much lower impact rezoning of “SF”.

Specific Mitigation Action Request: The undersign requests:

- Delay the applicants stated proposal “to make city-wide zoning map changes” for further study;
- that the applicants be requested to provide a more specific methodology for categorizing and proposed zoning change alternates for each Urban Village to account for the displacement risk unique to each RUV.
- that the applicant address the specific vulnerability indicators unique to each Urban Village in developing the proposed alternates.

Respectfully submitted,

K. L. B. Harwell, AIA LEED AP

May 2016

factors contribute to a neighborhood's position on this diagram, it is critical to examine carefully the underlying data layers before adopting investments or programs to mitigate displacement or increase access to opportunity. Two urban villages may coincide on the typology diagram but for different reasons. For example, because this analysis integrates several inputs into a single result, an urban village with marginalized populations and fewer amenities could occupy a very similar position on the displacement risk axis of the typology as an urban village with inverse characteristics. In this case, a similar result for displacement risk in two urban villages masks their dissimilar socioeconomic conditions that investments and policy decisions must consider.

We can see this phenomenon at work in Seattle's urban centers — six large, populous areas with a varied social and economic landscape. To address this, the typology not only classifies urban centers but also their component urban center villages according to the average

Figure 7 Displacement Risk / Access to Opportunity Typology

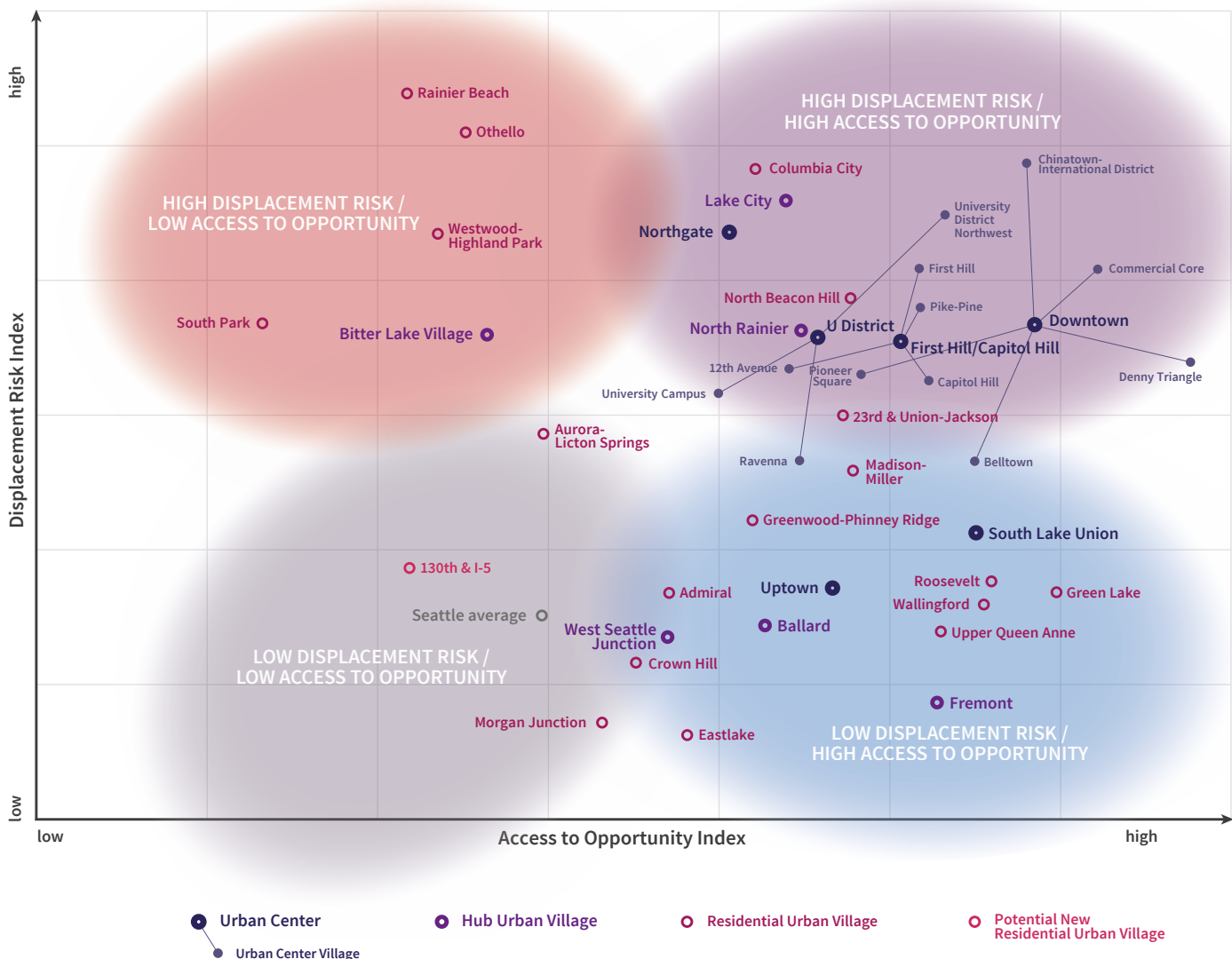
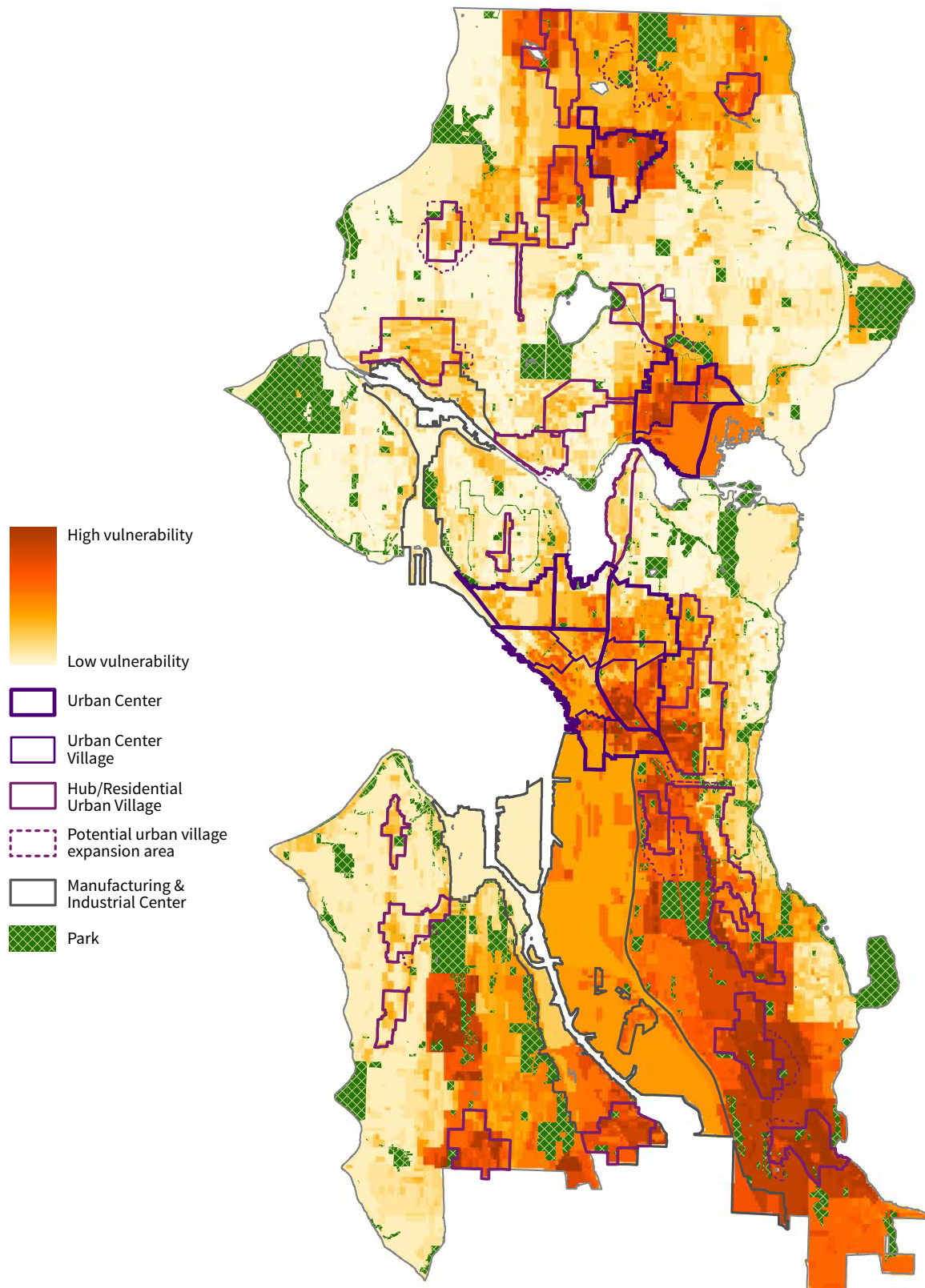


Figure 4 Composite vulnerability indicators



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Figure 5 Displacement Risk Index

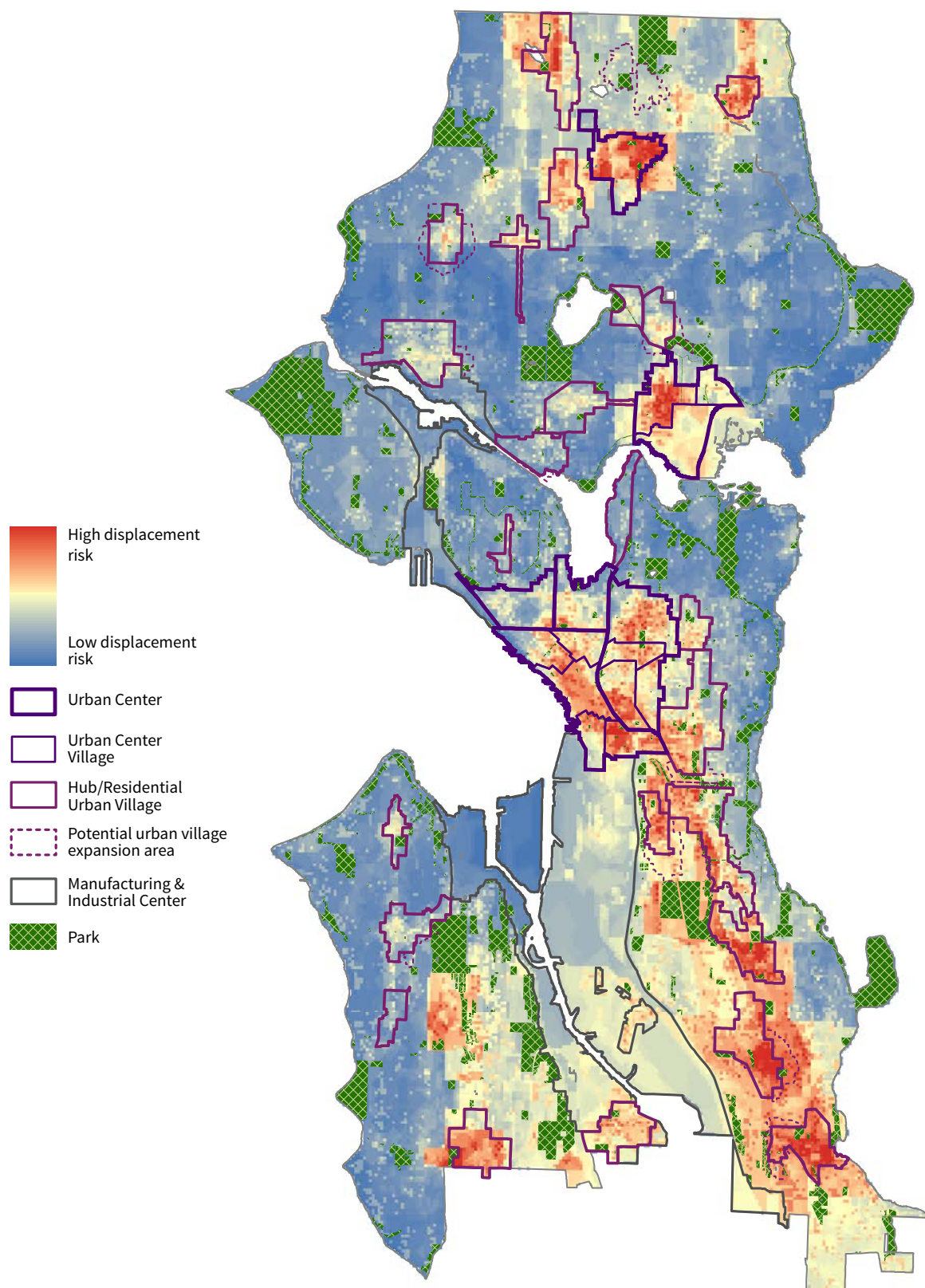


Table 3 and Table 4 describe the data used in this analytical model. The maps that follow illustrate the variation in displacement risk and access to opportunity across the city.

Table 3 Displacement Risk Index indicators

Indicator	Description	Source
1 People of color	Percentage of the population that is a race other than non-Hispanic White	2010 Census
2 Linguistic isolation	Percentage of households in which no one 14 and over speaks English only or no one 14 and over speaks both a language other than English and English "very well"	2008–2012 American Community Survey
3 Educational attainment	Percentage of the population 25 years or older who lack a Bachelor's degree	2008–2012 American Community Survey
4 Housing tenancy	Percentage of households that are renters	2010 Census
5 Housing cost-burdened households	Percentage of households with income below 80% of area median income (AMI) that are cost burdened (paying > 30% of income on housing)	Consolidated Housing Affordability Strategy (CHAS) (based on 2007–2011 American Community Survey)
Severely housing cost-burdened households	Percentage of households with income below 80% of area median income (AMI) that are or severely cost burdened (> 50% of income on housing)	
6 Household income	Percentage of the population whose income is below 200% of poverty level	2008–2012 American Community Survey
7 Proximity to transit	Number of unique transit trips within a quarter-mile walking distance	King County Metro General Transit Feed Specification (GTFS)
8 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
9 Proximity to core businesses	Location within a certain distance of supermarket/grocery (0.5 mi), pharmacy (0.25 mi), and restaurant/café/diner (0.25 mi)	City of Seattle
10 Proximity to civic infrastructure	Location within a certain distance of a public or private school (0.25 mi), community center (0.25 mi) or park of at least 0.25 acre (distance varies based on park size), or library (0.5 mi)	ReferenceUSA
11 Proximity to high-income neighborhood	Census tracts that (a) have a median household income < 80% of AMI and (b) about a tract where median household income is > 120% of AMI	King County GIS
12 Proximity to job center	Travel time to designated King County Urban Centers and Manufacturing/Industrial Centers	City of Seattle
13 Development capacity	Parcels that allow residential uses identified as likely to redevelop in City development capacity model	2008–2012 American Community Survey
14 Median rent	Ratio of rent per net rentable square foot by tract to the Seattle average for rent per net rentable square foot	Dupre + Scott (Spring 2016)

May 2016

Table 4 Access to Opportunity Index indicators

Indicator	Description	Source
1	Elementary school math and reading proficiency scores by attendance area	Washington Office of Superintendent of Public Instruction (OSPI)
School performance		
2	Middle school math and reading proficiency scores by attendance area	
3	Graduation rate	High school graduation rate by attendance area
4	Access to college or university	Location within 30 minutes of a college or university by transit (bus and/or light rail)
		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 Washington State Farmers Market Association

Comment: The City of Seattle should be required to provide an Alternate 4 reviewing the impacts of the MHA implementation separately from the impacts of “Area-wide Zoning Map Changes”. i.e. The impacts of changing LR1 – to LR1(M) should be studied in a separate Alternate from the “city-wide zoning map changes” in Alternate 2 & 3.

Seattle Municipal Code (SMC) Chapters 23.58.B and 23.58.C contain an adopted framework for the proposed MHA affordable housing requirements. These codes establish many basic program parameters and regulations, such as the income qualifications and duration of affordable housing term. As currently adopted, MHA does not apply anywhere unless and until the City Council adopts legislation for zoning changes to increase development capacity. Both action alternatives assume and reflect the program elements of MHA already established by code. MHA DEIS p. 2.17

It is the applicant’s intent to implement MHA by adopting legislation for zoning changes to increase development capacity. As per the MHA DEIS and the Seattle Comprehensive Plan 2035 there exists significant capacity within the current zoning designations to accommodate the Seattle’s projected growth.

The City of Seattle has not included an Alternate to study the possibility of implementing the MHA within the existing land use designations of parcels as currently supported by the 2035 Comprehensive Plan. However, in some case it appears The City of Seattle has pursued this method for implementing MHA programs. According to the 7/18/2017 OPCD Newsletter “Council’s **PLUZ Committee** passed legislation to implement a community vision for 23rd Avenue in the Central Area, including new **Mandatory Housing Affordability** (MHA) requirements at key intersections with Union, Cherry and Jackson streets.”

The applicant should provide and study an Alternative that changes the existing land use designations to new (M) zoning types (i.e. LR2 to become LR2(M)) without the changing of the land use type (i.e. SF to become LR3(M2)). The DEIS only looks at a no change Alternative or two similarly significant change Alternatives. Given that the 2035 Comprehensive Plan acknowledges ample capacity within the existing zoning to accommodate the Comprehensive Plan’s projected growth

Much of the community input received by HALA during community outreach program relates to preserving the neighborhood character and limiting multiple zone increases, i.e. when parcel use is changed from SF to LR3. Under these conditions much of the neighborhood character as relates to setbacks, open space, light, and trees are significantly impacted, particularly when multiple zoning levels increases are proposed in existing SF neighborhoods. Further, the applicant is concurrently attempting to undermine the proposed adverse impact mitigating measure of Design Review by submitting a proposal to OPCD to increase the threshold whereby a project would be required to undergo Design Review, and thereby reducing the ability of the design review process to mitigate the adverse impacts.

Specific Significant Impact Mitigation Request:

- The applicant should be required to present a study of implementing MHA without the more controversial proposal of changing existing land use designations with citywide zoning map revisions, which reviews the impacts of implementing MHA without changing existing land use zoning type for each parcel. i.e. **LR1** can only be rezoned **LR1(M), LR1(M1) or LR1(M2).**

Respectfully Submitted,
K. L. B Harwell, AIA LEED AP

Comment:

The New York Times reports that in the United States' biggest metropolitan areas, low-income housing developments that use federal tax credits are disproportionately built in majority nonwhite communities. *What this means, fair-housing advocates say, is that the government is essentially helping to maintain entrenched racial divides.*

Detail:

When the City of Seattle creates a program that knowingly and significantly impact populations at greatest risk for displacement, the City of Seattle must provide mitigation measures to offset this impact. As shown in the attached map, the current city policies for the concentration of density in and around transit centers have served to disproportionately displace Black Seattleites from the Urban Center. The HALA MHA program will further accelerate this trend.

As well documented in the Attached Article, both high land prices and the political connections of the affluent communities combine to contribute to the relocation of the affordable housing to areas that are majority nonwhite communities.

The MHA program is designed to specifically take advantage of the federal programs mentioned in the attached article but provides no measure to offset the now well studied and documented consequence of increasing segregation in cities where these programs are implemented.

Specific Request:

The applicant provides:

- detailed information documenting the segregating impacts that have resulted from the implementation of the Urban Village designation and resulting development in Seattle.
- mitigation measures which will address the undesirable and adverse impacts of policy which will serve to further segregate Seattle.
- Specific measures to ensure affordable housing will be built in the Single Family Zones of Residential Urban Villages where additional multifamily zoning capacity is being proposed.

Respectfully submitted,
K. L. B. Harwell, AIA, LEED AP

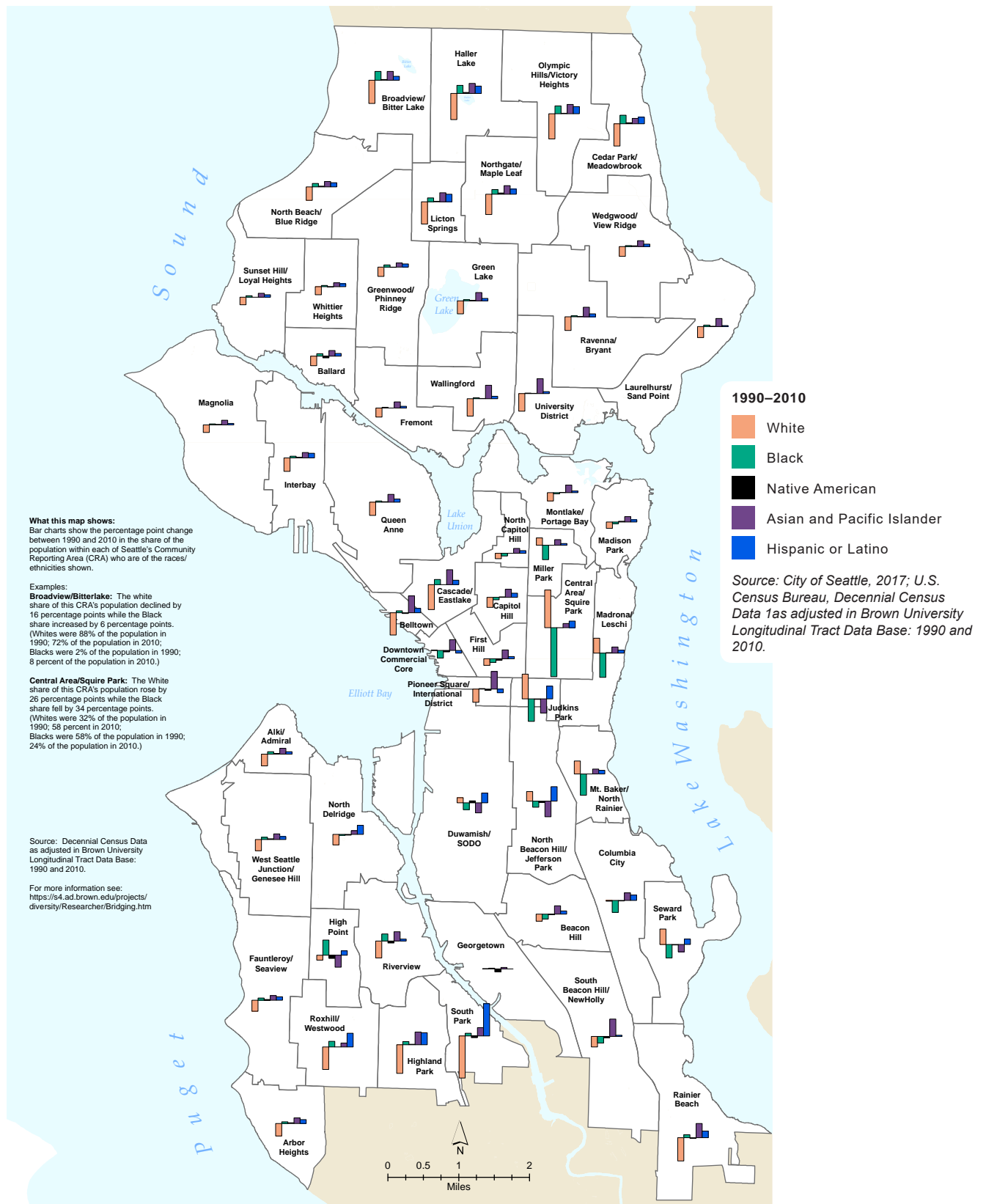


Exhibit 3.1–2 Change in Shares of Population by Race, 1990–2010

The New York Times | <https://nyti.ms/2tBBfAL>

U.S.

Program to Spur Low-Income Housing Is Keeping Cities Segregated

By JOHN ELIGON, YAMICHE ALCINDOR and AGUSTIN ARMENDARIZ JULY 2, 2017

HOUSTON — A mural on the wall of an elementary school here proclaimed, “All the world is all of us,” but the hundreds of people packing the auditorium one night were determined to stop a low-income housing project from coming to their upscale neighborhood.

The proposed 233-unit building, which was to be funded with federal tax credits, would burden their already overcrowded elementary school with new children, many people argued during a lively meeting last year. Some urged the Houston Housing Authority to pursue cheaper sites elsewhere.

As cheers rang out over nearly three hours for every objection raised, Chrishelle Palay, a fair-housing advocate, confronted the mostly white crowd.

“It’s time to face your fears,” Ms. Palay said as boos rang out. “Stop succumbing to misleading rhetoric, and begin practicing the inclusive lifestyles that many of you claim to lead.”

The outcome was familiar. Elected officials sided with the opposition. And an effort to bring affordable housing to an affluent, majority white neighborhood failed in Houston, where low-income housing is overwhelmingly confined to poor, predominantly black and Latino communities.

A review of federal data by The New York Times found that in the United States’ biggest metropolitan areas, low-income housing projects that use federal tax credits — the nation’s biggest source of funding for affordable housing — are disproportionately built in majority nonwhite communities.

What this means, fair-housing advocates say, is that the government is essentially helping to maintain entrenched racial divides, even though federal law requires government agencies to promote integration.

The nearly \$8-billion-a-year tax credit program allows private developers to apply for credits they can use to help finance new housing or the rehabilitation of existing units.

The program offers developers larger credits for building in poorer communities, which tend to need affordable housing the most but also have large minority populations. That has meant that even in a place like Houston, one of the country’s most diverse cities, racial divides can run deep.

When she got a federal housing voucher many years ago, Tonya McKinney said, she searched far and wide for an apartment but ended up in Houston’s Fifth Ward, a neighborhood she was not happy with. Founded by former slaves, the community, just east of downtown, has a long history of blight but has undergone significant redevelopment in recent years.

Her three children want change, she said.

“They talk about this all the time, about us moving into a better area,” said Ms. McKinney, 46, who used to work in retail but is now disabled. “They’re actually tired of living in what they call the ghetto.”

The proposed Houston housing, known as the Fountain View Drive project, would be built in the Galleria district, which sits a few miles west of downtown and features shiny office towers and stores. And at 87 percent white, it is an unlikely site for low-income tax-credit housing.

While only about a third of census tracts in the nation’s hundred largest metropolitan areas have a majority nonwhite population, 54 percent of new tax-credit projects have been built in those tracts since 2000, according to a Times analysis. And that pattern of placing tax-credit projects in communities with disproportionately high black and Latino populations has been consistent over time, the data shows.

The Treasury Department, which administers the program, includes no provisions in its regulations that address segregation. That, fair-housing advocates argue, runs afoul of the Fair Housing Act, which requires government agencies that administer housing programs to do so in a way that reduces racial segregation.

“It’s been clear for a long time that the tax-credit program is perpetuating racial segregation,” said Michael Daniel, a fair-housing lawyer.

While nearly 58 percent of the people living in all tax-credit properties in Houston are black, the area proposed for the housing development is just 3 percent black.

At the meeting last year, Galleria residents complained mostly of school overcrowding, the effect on their property values and the cost of the project. Yet some people hinted at deeper social discomforts.

One man, Richard Caldwell, stepped to the microphone and described a low-income area in Oxnard, Calif., where he had lived previously. The families there, he said, jammed a lot of people into the apartments by subletting rooms.

“They’re going to sublet it out, and you won’t have any control over it,” he said.

In a letter to the federal Department of Housing and Urban Development, one Galleria resident warned that the development would introduce an “unwelcome resident who, due to poverty and lack of education, will bring the threat of crime, drugs and prostitution to the neighborhood.”

She had made it to the neighborhood, she wrote, through the hard work and sacrifice of her family.

“I will fight very hard,” she continued, “before I give up that privilege and dignity to those who, either from lack of initiative or misfortune, don’t deserve to be there.”

Mayor Sylvester Turner, who is black and in his first term, vehemently opposed the project and decided not to put it before the City Council for a vote. His opposition was mostly due to the cost, he said, but he acknowledged that race may have motivated other critics.

“I know for a fact that there were some who did not want it because they did not want, quote-unquote, those people coming over there,” he said. “I got that. But that is their right to exercise their freedom of speech, even though I fundamentally disagree.”

Greg Travis, the city councilman representing the area, said race was not a concern in the community, where about 29 percent of the elementary students are Latino and 7 percent are black. Rather, for some residents it was about how low-income neighbors might fit in, he said.

“People of different socioeconomic status sometimes have different values based on their socioeconomic status,” he said. “Some people can afford things that other people can’t.

“You go to certain places, their houses would be painted,” he continued. “Others, they can’t afford that as much, so you don’t see it as often. It’s not a bad thing, it’s just a socioeconomic thing.”

Several United States senators reintroduced a bipartisan bill this year that would greatly increase funding for the tax-credit program and prohibit community members from vetoing projects.

“One of the biggest obstacles that has always existed and that remains in building affordable housing in higher-income, higher-opportunity neighborhoods is local opposition,” said Diane Yentel, the president and chief executive of the National Low Income Housing Coalition.

Although the Treasury Department administers low-income housing tax credits, each state is left to decide which projects are funded. Ever since Texas made changes to its selection process four years ago, projects have increasingly gone into neighborhoods that are whiter and more affluent, according to a study by the Texas Low Income Housing Information Service, the fair-housing group that Ms. Palay works for.

Whether that is what’s best for low-income families is at the center of a dispute between Houston and the Department of Housing and Urban Development, which is the government’s chief enforcer of fair-housing laws.

In January, in the waning days of the Obama presidency, the department sent a scathing letter to Houston, saying that the opposition to the Fountain View project was partly motivated by race. The department had found that 81 percent of tax-credit developments in Houston were in census tracts where eight in 10 people are minorities. HUD threatened to take the city to court if it did not approve the development.

Mr. Turner took exception to the department’s demands.

“I don’t think the right message to be sending to kids in low-income families is that the only way they can succeed is that they have to move into affluent communities to do that,” he said.

Instead, Mr. Turner has strongly advocated investing in black and Latino communities that lack resources, saying new housing could be one tool to help improve them.

“But this is the same thing we have been hearing for years, if not decades,” said Gustavo Velasquez, a former assistant HUD secretary who worked on the Houston investigation.

Mr. Velasquez described telling Mr. Turner in a meeting that Fountain View represented a balanced approach to developing affordable housing in both poor and affluent areas.

“This was the opportunity for the city to take that bold step and start reversing Houston’s legacy of segregation,” he said.

Research suggests that when children from low-income households grow up in affluent communities, they tend to get a better education and earn more money as adults. But a study published last year by two Stanford professors made a case for building tax-credit housing in high-poverty areas, finding that home values around the developments rose by about 6.5 percent and that segregation decreased modestly.

Ben Carson, the secretary of housing and urban development, declined to comment on the Houston project, but he has publicly stressed the importance of investing in low-income communities and questioned government-driven efforts to promote integration.

“The secretary strongly believes that all cities should provide the opportunity for their residents to have a diverse range of housing options,” Raphael Williams, a HUD spokesman, said in a statement.

He added that the department was still contemplating what to do about the Fountain View project. The city has asked HUD to withdraw its complaint, and the fate of the project hinges on whether the department complies or tries to force Houston to allow it to be built.

One Houston resident, Katrina Rhodes, wants the development to be built. As she sat in her second-floor apartment one afternoon, holding her 21-month-old daughter, Chassity, Ms. Rhodes had fresh worries about her 9-year-old daughter, Leeah.

Just a day earlier, Leeah, who walks more than a mile to and from school every day because school buses do not come out that way, was chased home by fourth graders in a dispute over someone being sprayed with Silly String, Ms. Rhodes said. Without any extracurricular activities at the school, Ms. Rhodes, 31, worries about what will keep her children busy.

She wants a neighborhood like the Galleria, where, she believes, the schools are better and they will have the best chance to succeed.

“If there was an opportunity for me to move over there, guess what: I would go,” she said.

Not everyone thinks it would be a good idea to move.

“No,” Erica Ashton, 38, said of whether she would move to the Galleria from her spartan, low-income apartment complex in a predominantly black part of northwest Houston. She was worried about the discrimination she might face.

Her brother-in-law, James Smith, wondered if integration could even work as he bounced his 15-month-old daughter, Jamie, on his lap. If black people moved into the Galleria, white people would flee, he said, adding that it would be more instinctive than intentional.

“Out there,” said Mr. Smith, 46, “they were taught: ‘This is us. If anything from the outside tries to come in, we shall stop it.’”

Doris Burke contributed research.

Follow John Eligon on Twitter @jeligon and Yamiche Alcindor @Yamiche.

A version of this article appears in print on July 3, 2017, on Page A1 of the New York edition with the headline: Tax Credits to House Poor Reinforce Racial Divisions.

From: Ramona Hattendorf
 To: [PCD_MHAEIS](#)
 Cc: [Harrell, Bruce](#); [Bagshaw, Sally](#); [Burgess, Tim](#); [Gonzalez, Lorena](#); [Herbold, Lisa](#); [Johnson, Rob](#); [Juarez, Debora](#); [O'Brien, Mike](#); [Sawant, Kshama](#); [Murray, Edward](#)
 Subject: HALA/MHA plans MUST include schools Date: Sunday, July 23, 2017 5:05:17 PM

Re: Schools in MHA Draft Environmental Impact Statement

Dear Office of Planning and Community Development,

I am writing as both an education and affordable housing advocate. I serve on the public policy committee of the WA Low Income Housing Alliance and I am a past president of the Seattle Council Parent Teacher Student Association, a position that gave me insight into the schools and communities across the city. In a professional capacity, I promote the rights of people with developmental disabilities and work to build inclusive communities. I support increased density and I appreciate the city's attempt to ascertain equitable access to services.

I am alarmed, however, by the city's continued disregard for the impact density has on education. Your capacity analysis dismisses the impact on access to education, and your equity analysis relies on test scores – not access to programs, support and enrichment opportunities. Seattle Public Schools has been in a crisis of overcrowding for years, with a poor track record of predicting growth and capacity to meet need. Not only are buildings at capacity in targeted parts of the city, use of portables are at capacity at these facilities. The SPS analysis you relied on is already dated and fails to factor in new, lower class sizes that are part of basic education. And the proposed solution of simply shifting boundaries may not be viable for some sections of the city, or for all school types (high schools, for instance). School boundary changes in and of themselves can cause major transit and other environmental disruption. Which isn't to say density should not happen.

The city, however, does a great disservice by underestimating the impact and by failing to consider

how to partner to support educational capacity. In my neighborhood, it has taken 9 years (and

counting) to reopen a much-needed closed school. Bonds and levies need to be passed, and they don't necessarily happen when the kids come.

Adding density without addressing school capacity will squeeze families out of the city and contribute to sprawl. Please, as you consider density proposals factor in the following:

- **IMPACT FEES:** These are the norm for our region and across the nation to help offset costs of schools, parks and community services needed to build healthy communities that work for residents of ALL ages. The city council should adopt developer impact fees to help pay for school capacity. It is mind-boggling that this city – which depends on a highly educated workforce – continues to import talent while at the same time short-changing the children of Seattle in infrastructure planning. We need space for preschools and childcare, for K-12 schools, for access to college slots. These are necessary costs associated with development and should be shared by the developers.

- **SCHOOL CAPACITY PLANNING:** First, do not upzone any area where schools are already overcrowded unless the city will ALSO commit to mitigating and increasing school capacity as part of its HALA plan. Second, the city council

should pass an ordinance that commits the city to addressing early learning and school capacity in ALL planning decisions.

· **DO NOT CONFLATE TEST SCORES TO ACCESS TO LEARNING OR EQUITY.**

Assessment is important to track the learning growth of each student and to help schools gauge whether they are capable of meeting the learning needs of the students in their community. Ideally, they are a tool for educators to improve instruction and for families to understand where their child may need more support. And that's it. As for equity, they do not reflect access to inclusive programs for children with complex learning requirements – ie, special education, bilingual education, or trauma-informed education. A school with high scores may just indicate a school that lacks diversity, or does not have a highly mobile population, or does not serve many children affected by poverty or homelessness, or who

Hattendorf, Ramona

require specialized instruction.

Please, take a moment to consider what can happen if you squeeze a community out of its schools. You create a system where people create private choices; you actually make cities LESS equitable and much more expensive. **You force families of more modest means to relocate and you create churn and sprawl.** As Seattle and King County grows more dense, government needs to plan for the needs of children and families, and that includes partnering on school capacity.

This practice of assuming schools can keep up has got to end.

Sincerely,
Ramona Hattendorf
2619 W. Lynn St., Seattle, WA 98199

Cc: Seattle City Council, Mayor Ed Murray

From: Paul Haury
To: [PCD_MHAEIS](#)
Subject: Public Comment for HALA DEIS MHA
Date: Monday, August 07, 2017 7:56:40 PM
Attachments: [Bublic COMMENTS ON DRAFT EIS RE MHA.pdf](#)

Sent from [Mail](#) for Windows 10

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:

Lack of parking has created blocked crosswalks and hydrants. This creates a daily fire and pedestrian safety issue in our single family 5000 neighborhood. Proposed upzone will only make things worse.

Paul Haury



Hayward,Lisa

From: Lisa Hayward To:

[PCD_MHAEIS](#)

Subject: Extreme concern about draft EIS relating to rezoning of Wallingford Ave N Date:

Friday, August 04, 2017 11:35:09 PM

Dear Seattle city planners,

When I moved to Seattle in 1998 I bought a "fixer upper" at 10315 Wallingford Ave N from a man who had been renting it to heroine addicts. Over the years since then I have invested a massive amount on projects ranging from cleaning up needles, condoms and excrement to insulating, rewiring, asbestos abatement, and re-roofing. While making my 1932 house a home fit for the two children that I have had since moving here, I have also worked to create a community on this block, starting a block party potluck in 2011 that we have held annually every year since.

People on our block come from many different countries- Japan, India, Germany, Singapore, to name a few. Many are retirement age. Some have young families. Some are just out of college. We loan each other trucks, share produce and flowers from our gardens, babysit and petsit for each other, have each other to dinner, make each other birthday cakes, bring each other treats on holidays, cooperate to solve problems such as mail theft, play music together. We pitch in when our neighbors experience tragedy. We help each other move large furniture. We know each other. Most of us have lived here many decades and have invested heavily in our homes and local community. My neighbor, Irene Price, who lives directly across the street from my family, has owned her home for more than 60 years!

1

The proposed changes to zoning will destroy the sense of community on our block and will also severely impact our quality of life by replacing yards that provide tree canopy and gardens with impermeable surfaces. Right now we enjoy a diversity of pollinators, butterflies, dragonflies, birds, and bats in our yard. Building dense housing on the other half of our block will harm this vibrant part of our organic urban garden ecosystem as well as our local microclimate, while also increasing storm run-off. Parking, traffic and noise will also increase on our block. Yet plans do not appear to take this into account.

2

I sympathize with the need for affordable housing in our city, but also feel strongly that our block already provides affordable housing to many renters who will likely not be able to afford the new units that will be created when their single family homes are destroyed. Even if they could, their quality of life would suffer without the yards that they now enjoy.

Rezoning one half of our SFH block is an unusual measure that will leave the remaining half of our block bereft of the community that we all have worked hard to build here. There are other options for developers to pursue that do not destroy the integrity of the diverse and thriving community on our small block. For example, it will be possible to provide affordable housing half a block away, where the North Seattle Police Station currently is, once they have moved their operations to another facility.

I beseech you to spare the community on our block the devastation that will result from rezoning. Surely affordable housing goals can be better met within nearby blocks that are already zoned for higher density development.

Thank you for your consideration.

Sincerely,

Lisa Hayward

(also on behalf of my husband, Sean, our son, Henry, age 8, and daughter, Rowan, age 2)

Name	Anne Heavey
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 DO NOT move forward with Alternative 3... we live in Morgan Junction and it would cause high rise development in a lovely residential area. It would ruin the charm and livability of a great neighborhood.
Land Use	2 DO NOT move forward with Alternative 3... we live in Morgan Junction and it would cause high rise development in a lovely residential area. It would ruin the charm and livability of a great neighborhood.
Aesthetics	3 Alternative 3 proposes that high and mid rise development would be allowed in a lovely, charming residential neighborhood of Morgan Junction in West Seattle. These developments would ruin the aesthetics of the area and the height, bulk and scale of the buildings would impact the charm or the area and the livability.
Transportation	4 All the new places would impact traffic on a busy street (Fauntleroy) already. With ferry traffic and residents, this street is already very busy. And there is no parking for these developments!
Biological Resources	5 There is a lovely ravine in this area with eagles and other wildlife - these developments threaten this natural area.
Open Space & Recreation	6 There are no parks in consideration at all!
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: Geoffrey Heller
To: [PCD MHAELS](#)
Subject: For Lawton site
Date: Thursday, August 03, 2017 12:57:33 PM

Hello,

1 I would like to voice my support for building a school at the Fort Lawton site.

I understand that the school district has not been included in any of the city's HALA planning meetings. This is unacceptable. Solutions are needed to provide adequate classroom space for a growing Seattle population!

I hope that the City and School District can work together to plan for a school at the Fort Lawton site.

Best Regards,
Geoffrey Heller



SEATTLE CITY COUNCIL | DISTRICT 1

COUNCILMEMBER LISA HERBOLD

July 7, 2017

Sam Assefa, Director
Office of Planning and Community Development
P.O. Box 94788
Seattle, WA
98124-7088

Re. Comment Letter on the DEIS for Citywide MHA Implementation

Dear Sam:

I write to comment on the Draft Environmental Impact Statement (DEIS) for Citywide Implementation of the Mandatory Housing Affordability (MHA) Program. This comment letter requests an additional extension of the comment period and provides initial comments on the analyses in the *Housing and Socioeconomics* chapter.

First, thank you for extending the comment period to August 7. I agree that the length and complexity of the analyses warrants giving the Council and public further time for review. However, I don't think 15 more days is sufficient. Many in the community have commented that additional time would allow them to be more thorough in their review and comment with a better understanding of the alternatives and potential impacts on their communities. The DEIS is complicated, and for people to read through the over 400-page document, excluding the appendices, and have time to respond adequately between time at work and with family, they will need even more time. Moreover, the DEIS was released on the same day as the Determination of Non-significance (DNS) for the proposed changes to the City's Design Review Program. For people following both processes, this meant choosing between reviewing and preparing comments on the DNS versus the DEIS during the first 14 days of the DEIS comment period. Consequently, I request an extension of the comment period for an additional 21 days to Monday, August 28.

With respect to the analysis in the *Housing and Socioeconomic* chapter, information in the DEIS is not sufficient for me, as a decision-maker, to assess the neighborhood-level impacts on protected classes of MHA implementation under each alternative. Specifically, the displacement analysis fails to consider the racial and ethnic dimensions of displacement. Using low-income households as a proxy for race impedes a more nuanced discussion of the risk of displacement from a race and culture lens.

Moreover, the analysis did not include the last 5 years of record growth in our city. The high-risk displacement areas may be at a point where just a very small increment of increased growth displaces larger numbers of people than is typical in a less active construction climate. It also does not measure increased speculative activity in high growth areas, i.e. rapid turnover and increases of sales and resales of existing older affordable apartments and how that activity might accelerate as a result of granting increased zoning capacity. Additional neighborhood-level analysis should be completed to disclose the degree to which the proposal will affect people differently depending upon their race or ethnicity.

The analysis should address the following questions:

- Could people from different races or ethnic groups be impacted differently by the three alternatives?
- The findings from the *Population and Household Characteristics* section of the *Housing and Socioeconomic* chapter in the DEIS, states that areas with historically the highest shares of non-whites are losing people of color. Will the alternatives either introduce a trend or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the same extent that the socioeconomic character of the neighborhood would change?
- Is there a pattern or potential for different racial or ethnic groups to be displaced at different rates and/or do they resist displacement with different degrees of success?
- Could the proposal have disparate effects on distinct populations that would otherwise be masked or overlooked within the larger study area? This will require analyzing distinct sub-areas that should be based on recognizable neighborhoods or communities.

Analyses in the recently adopted *2017 City of Seattle and Seattle Housing Authority Joint Assessment of Fair Housing* (Fair Housing Assessment) is instructive here, and I am pleased to see it referenced in the DEIS. As a point of departure for answering the above questions, the DEIS should seek to provide a neighborhood-level analysis of impacts under each alternative on different racial and ethnic groups, for those neighborhoods identified in the Fair Housing Assessment, where people of color are a higher share of the population.¹ Many of those neighborhoods are in my district. To the extent information is available, the DEIS should also address impacts to the other protected classes, including, but not limited to, persons with disabilities, limited English proficiency, and familial status.

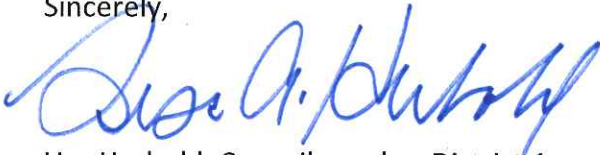
Finally, I am concerned about the conclusion, based on a weak correlation, that increasing development capacity and encouraging market rate development in high displacement risk areas in itself an anti-displacement strategy. The analysis relied heavily on Tenant Relocation Assistance Ordinance (TRAO) - eligible households which does not provide a complete picture of the number and types of households at risk of displacement. TRAO-eligible households represent only those households with incomes at or below 50% of Area Median Income (AMI). Lower income households in Seattle extend to 80% of AMI. Moreover, TRAO-eligibility is based

¹ See the table on p.108 of the Fair Housing Assessment.

on household income and underrepresents non-family, low-income households. In those households, the combined incomes of two or more unrelated low-income householders may exceed the TRAO-income threshold although separately each householder may be very low income. Further, while the number of households receiving HUD assistance was quantified and accounted for in the analysis, the number of households living in units subsidized through other programs, such as projects developed with funding from the Office of Housing, are not accounted for and likely skewed the analysis of the changes in the number of low-income households in areas with more housing production. This conclusion and the methodology used in the analysis requires further consideration.

Thank you for your efforts to make equity a key principle in our planning efforts. Analyses in an FEIS that addresses the issues and questions highlighted in this letter would be more consistent with the letter and spirit of the displacement analysis requested through Resolution 31733, in which the Mayor concurred. I look forward to working with you and my colleagues to ensure that future MHA implementation addresses impacts on our residents vulnerable to displacement.

Sincerely,



Lisa Herbold, Councilmember District 1

Cc: Councilmember Rob Johnson, Chair of Planning, Land Use and Zoning Committee
Councilmember Mike O'Brien, Vice-Chair of Planning, Land Use and Zoning Committee

Name	Brandon Herman
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 .The biggest flaw in the DEIS is that it analyzes rezoning on a citywide level. In other words, it proposes to upzone the Junction without making a street-level assessment of things such as traffic, parking, and infrastructure. It begs the question: why propose zoning changes when you don't know what they'll look like?</p>
Housing and Socioeconomics	<p>2 The DEIS projects the Junction to gain only 20 to 36 new units of affordable housing over the next 20 years – in exchange for upzoning more than 20 blocks. All other units will be priced at market rates. The result will be a further erosion of the neighborhood's economic diversity.</p>
Land Use	<p>3 On Page 152 of the DEIS is an admission that some upzoning efforts will conflict with existing neighborhood plans – and says the City should simply change those plans to remove such conflicts. We expect the City will try to unilaterally remove the longstanding protection for the character and integrity of single family homes inside the Junction Urban Village from our neighborhood plan.</p>
Aesthetics	<p>4 The DEIS presumes multifamily buildings in newly upzoned single-family areas will have a modern and geometrical design. It also states those designs will not have a significant impact on the aesthetics – or look and feel – of upzoned areas. In fact, a large percentage of the homes in these areas are more than 90 years old; new construction is rare, with only a small percentage built in a modern, geometrical design; and it is more common for new homes to emulate the Craftsman style of existing homes. There will be a profound shift in aesthetics on these blocks. In perhaps its most head-scratching statement, the DEIS says neighborhood planning and design review should be used to mitigate aesthetic shifts. We agree. However, the City has told JUNO there is no funding available for such planning – and, under a separate initiative, the City proposing that design review be eliminated for most developments. Thus the City has simultaneously minimized the impact of its upzoning and eliminated access to its proposed solution.</p>
Transportation	<p>5 The DEIS states the RapidRide C Line operates at 67% capacity at peak hours, when local riders know the C Line is overcrowded and skips stops at the Junction when full during peak AM trips.³ Further, the DEIS calculates travel time in and out of West Seattle using Google Maps data for a single evening in March, when local drivers know the worst commute times are in the mornings and more variable than a single Spring evening would suggest.</p> <p>6 The DEIS does not offer any mitigation for the impact of upzoning on traffic on either West Seattle or the Junction: it</p>

	simply says it needs further study.
Historic Resources	<p>7 The DEIS fails to acknowledge the Junction's historic Hamm and Campbell buildings or the results of a 2016 survey of historic properties along California Ave SW and the streets immediately east and west of it. These buildings are the physical embodiment of the Junction's small-town feel and connected deeply to neighborhood events ranging from the Farmers Market to the West Seattle Grand Parade. The City proposes to allow building heights up to 95 feet along California Ave SW with no regard for historic buildings or neighborhood uses that contribute to the livability in the area.</p>
Biological Resources	<p>8 With bus line ridership maxed-out, increased auto commuters will continue to decrease air quality. Increased building massing decreases permeable surfaces and leads to increased urban heat island effect. Decreases in permeable surfaces also has a profound negative effect on local watersheds and waterways.</p>
Open Space & Recreation	<p>9 .According to the DEIS, Parks accessibility at the Junction is worse than the City's open-space standard, and the Junction has among the lowest amounts of nearby park space per resident in the City. While the City acknowledges more growth will create a greater strain on parks and recreation resources, it proposes no specific mitigation.</p>
Public Services & Utilities	<p>10 Despite not having its own hospital, and despite a projected growing population, the DEIS fails to examine access to emergency services for Junction residents during a disaster. It also fails to study or acknowledge and mitigate the impact on police requirements for the SW precinct, the need for those officers to meet a 7-minute response time standard, or the impacts of rezoning on property crime and auto theft. The DEIS fails to acknowledge that most sewer lines in the Junction are less than 12 inches wide and must be upgraded to meet the demands of either 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.</p> <p>11 The DEIS fails to flag the lack of school capacity for Junction residents. It proposes no material mitigation for this capacity issue. What's more, it fails to acknowledge that the School District's BEX Phase IV plan will still leave the Junction 1,100 seats shy of student demand.</p>
Air Quality & Green House Gas Emissions	<p>12 With bus line ridership maxed-out, increased auto commuters will continue to decrease air quality. Increased building massing decreases permeable surfaces and leads to increased urban heat island effect.</p>
Demographic Survey (optional)	
Have you been or are you at risk of being	

8/8/2017 11:46:46	Laura Herzog	
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Representing myself and many other neighbors

1. The Ravenna neighborhood cannot handle low rises or high rises. Expansion should be limited to and very near Roosevelt Square! Going west of 15th is too much for the Ravenna neighborhood and Roosevelt HS to support. We are opposed to anything other than residential and small business in the Ravenna neighborhood.

From: Gregory Hill
To: [PCD_MHAEIS](#)
Subject: MHA DEIS
Date: Thursday, July 27, 2017 4:46:54 PM

Geoff,

The MHA DEIS is a much more robust document than previous land use documents from previous zoning changes.

It is easy to see why this document took nearly a year to produce and appeared months after it was originally scheduled. Given that level of effort, it seems odd to require the citizens to review it in a very tight window of time, and during the summer. Of course, skeptics would note that the most troubling land use legislation is always produced in August.

I would appreciate having the schedule for comments on the MHA DEIS extended until the end of August.

Thanks,

Gregory Hill ARCHITECT, AIA

From: Gregory Hill
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Monday, August 07, 2017 4:24:41 PM

1. The deis is fatally flawed be virtue of the absence of a true alternative. A variation in implementation between neighborhoods is not an alternative to solving affordable housing.
2. A true alternative could include not requiring the developer proposed change to the physical character and demographic profile of dozens of neighborhoods.
3. The proposal would make significant demographic changes to neighborhoods. Single family homes are present in SF and LR1 and LR2 zones. The proposed rezones, combined with loss of density limits and higher FARs will significantly reduce housing for families with children and extended families. The magnitude of these changes has not been described nor has adequate mitigation been required.
4. The proposed changes will exacerbate the loss of vegetation which was not disclosed by the 2010 multi family zoning changes. The loss of mature trees will be accelerated by the proposed changes.
5. The proposal will accelerate the loss of existing affordable housing. The mayor and his staff have denied this is even a possibility.
6. City staff have repeatedly stated they are looking for past examples of how the MHA program works. Studies of previous similar legislation have found little or no examples of successful implementation. We need a clear set of researched examples for comparison.

Please conduct addition studies of the issues identified in numbers 2 through 6 so that the impacts of the MHA proposal are more clearly understood.

Include at least one true alternative using a distinctly different technique to develop funding for affordable housing.

Gregory Hill
1215 N 47th St
Seattle 98103

Sent from my iPhone

From: william h holderman
To: [PCD_MHAEIS](#)
Subject: EIS plan Capitol Hill Neighborhood William H Holderman Date: Monday,
August 07, 2017 7:38:55 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.

1

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,

William Holderman

wmholdmd@aol.com

From: Guy & Cathy Holliday
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: DEIS comment by Madison-Miller Urban Village Resident
Date: Friday, August 04, 2017 5:48:59 AM
Attachments: [MadisonMillerDEISResponse_Rev_2017_08_02.docx](#)

Dear Seattle City Council Representatives & To Whom It May Concern,

After review of the recently released Environmental Impact Statement I support the Madison-Miller Park Community in endorsing Alternative 1 with specific modifications suggested in their combined statement. Please refer to the attached August 2 MHA Draft EIS Comments from the Madison-Miller Park Community Group. I will include some salient points in a minute.

First: I have two personal observations. Recently, on my bus ride home from work I twice sat beside an older woman of color wearing her work I.D. We talked about her hope to retire in the coming year, as well as her fears about the ongoing development in her neighborhood. It became apparent from our conversation that she is a renter; her apartment complex has been raising rents in an attempt to come close to the prices of the new apartment complex under construction. She despaired as she considered where she might be able to move to, speculating this would not be within Seattle city limits. Soon she will be on a fixed income faced with finding adequate medical care outside of Seattle.

The last personal observation is the direct impact (figuratively and literally) that development has had on us via our car. Due to a narrow 1922 driveway and garage we generally park on the street. For more than a year a dumpster has been parked across the street from our home as our neighbor's house underwent a significant remodeling. Though our street is one-way it is not wide; three times in the past year some other vehicle has damaged our car to the point that our insurance company had to pay for repairs. In zero of these three cases did anyone leave a note claiming responsibility. Once our mirror was torn off and twice our bumper was partially torn off.

These two observations inform my view about the HALA proposals for our neighborhood. During the community feedback process I felt my concerns were being ignored by city representatives; they simply wished to push their agenda without resistance. The theory seemed to be, "who could deny the concept of affordable housing?" However, this is a complex issue--just as complex as the individuals who reside in any one of the many neighborhoods of Seattle. We are a city of individuals--mavericks before that term was negatively co-opted. I was born in Seattle, raised on the Eastside, went away for 30 years and came back 12 years ago. We felt incredibly lucky to buy a single family house in the Madison-Miller Community; we had truly earned it but knew we were not entitled. We bought our home believing our new neighborhood had existed this way for decades before, and would continue to be so. We can walk to church, three restaurants, several stores, and easily catch two different bus lines. Just as we are lucky enough to live in this area, we also want others with lesser resources to be able to live in the area, but we expect the community to retain its character with affordable housing incorporated as it has been before HALA.

Here is the essential question:

Why are ***developers the main priority*** in HALA, as shown by unnecessary concessions such as no mandatory parking spaces for new construction, no consideration for impact on infrastructure, lower setbacks and higher allowed heights, unreasonably low impact fees taken only in Urban Villages, and no restriction to use those fees in the impacted area?

- **HALA is in effect a discrimination and segregation program, forcing displaced low-income residents to unspecified outskirt areas.**
 - Though the title of HALA includes the words 'Housing' and 'Affordability,' there is no mandate to developers to build affordable housing or contribute impact fees to be used in the specific community in which they are building.
- Zoning and development should be addressed as separate issues; addressing both in HALA creates distraction resulting in flawed typology (see attached community response).

- Zoning: because Madison-Miller Park Community has already met density guidelines set forth in the 2035 Comprehensive Plan, there is no need to upzone at all.
 - if upzoning is still required despite the will of the community, Alternative 1 (with modifications specified in the attached document) is the community choice.
- Development: though more units are needed to accommodate growth, developers need fewer, not more concessions. Developers will continue to build even with higher impact fees to offset
- **On site parking must be required for all Madison-Miller Park Community single family and multifamily housing development.**
 - Additional development in the Madison-Miller Park Community will exacerbate already terrible parking and traffic problems.
- Just as **developers increase depreciation of infrastructure** they **must** be required to contribute in a meaningful way to maintain and improve existing infrastructure.

Sincerely,

Catherine Holliday
2003 E Aloha St.
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 Elegen, Yamich Alcindor and Agustin Armendariz.

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

- 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).
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- 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 _____

From: Guy Holliday
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: Proposed Re-zone of the Madison-Miller Park Urban Village
Date: Saturday, August 05, 2017 10:21:29 AM
Attachments: [MadisonMillerDEISResponse_Rev_2017_08_02.docx](#)
[MMRUV-MAP-073117.pdf](#)

Dear City Council and HALA Team Members-

In recent months I have participated in the development of the MHA Draft EIS input recently completed by the Madison-Miller Park Community Group. I support it fully. Specifically, I strongly support Alternative 1, with modifications as outlined in the attachments below.

I respect the hard work that has gone into the complex and difficult MHA process, and I am glad for the opportunity to assist in getting it right to best achieve the city's goals while preserving the character of our neighborhood. My greatest concern is that we must avoid a path that leads to further racial and economic segregation when we have a chance to avoid it, or at least minimize it. Seattle is smart enough to avoid such unintended consequences when they are clearly perceived in advance, as we demonstrated in our response. Affordable housing should be built here, fully integrated into our neighborhood, rather than wherever the buy-out money goes.

Sincerely-

Guy Holliday
guy.holliday@gmail.com
206-290-8052

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

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- 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

Holliday, Guy

ALTERNATE PROPOSAL

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

DEVELOPED BY MADISON-MILLER PARK COMMUNITY

SPECIFIC CONCERNS

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

PROPOSED CHANGES

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.

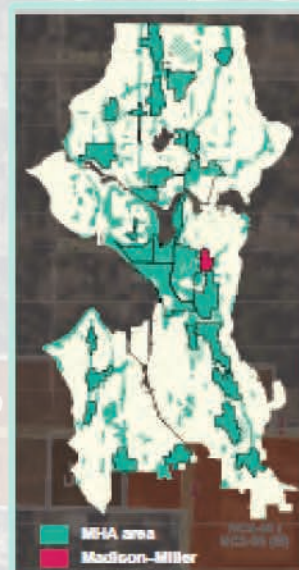
7 **LR1(M)** - Address scale transition and adjacency to Greenspace.

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





Mr. Geoff Wentlandt
City of Seattle Office of Planning and Community Development
600 4th Avenue, Floor 5
PO Box 94788
Seattle, WA 98124-7088
Email: MHA.EIS@Seattle.gov
August 7, 2017

Re. Draft Environmental Impact Statement for Mandatory Housing Affordability-Citywide

Dear Mr. Wentlandt:

Seattle for Everyone would like to thank the City of Seattle for giving us the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for the citywide implementation of Mandatory Housing Affordability (MHA). 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, all united to build an equitable, prosperous, thriving, and inclusive Seattle by ensuring that the benefits of the city's growth are shared by all current and future residents—from those struggling with homelessness to wage-earners and families.

We commend the City of Seattle for its work on preparing the DEIS for implementation of MHA citywide. Seattle needs more housing choices across the full income spectrum—including both market-rate and subsidized homes—in order to meet the needs of current residents who are finding themselves stretched by rising rents and home prices, as well as the unprecedented number of new residents moving to the city every day. The citywide implementation of MHA is expected to contribute at least half of the more than 6,000 rent- and income-restricted homes created through the MHA program over the next ten years, while also producing additional market-rate homes across the city—and thus stands to have a big impact on affordability and housing choices in Seattle.

To achieve this aim, Seattle for Everyone requests that the Final Environmental Impact Statement (FEIS) for implementation of the citywide MHA program maximizes additional capacity for affordable and market-rate homes to the greatest extent allowable. The City of Seattle needs to ensure this cornerstone policy enables substantial progress towards achieving the goal set out in the Housing Affordability and Livability Agenda (HALA) of creating 50,000 new homes across the city—20,000 of which are income restricted—by fully utilizing the development capacity increases available through the DEIS.

Seattle for Everyone appreciates the City's ongoing use of the *Growth and Equity Analysis* framework in its work on *Seattle 2035* Comprehensive Plan updates. We request that the City continue to use the *Growth and Equity Analysis* lens to assist in shaping the FEIS and would urge the City ongoing refinement of the application of the analysis to the FEIS as new data becomes available and information evolves that might better shape outcomes.



Thank you for the opportunity to provide this feedback. We urge the City of Seattle to keep the goals of HALA and the growing housing needs of our city and residents at the center of policy decisions and implementation.

We're happy to provide any additional information or answer questions as needed. Please contact Erin House at erin@seattleforeveryone.org.

Sincerely,

The Seattle for Everyone Coalition

Hudson, Ron

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... please! don't consider our neighborhood
using the same methods and approaches that are being
used in other areas of the city. Some of our unique
challenges: geographic isolation - rural, freeway, industrial
area, superfund cleanup area, high levels of
air pollution and legacy industrial pollution...
lack of amenities and low walkability.

Ron Hudson
chrony@earthlink.net
736 Skene St.

From: Steve Caroline
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 11:36:33 AM

- 1 The City of Seattle faces a housing supply shortage and acute housing affordability crisis, due to increased housing demand, driven primarily by a tech boom bringing in high paying jobs at a rate faster than the City can scale up housing. In the face of this housing crisis the City of Seattle is pursuing multiple affordable housing strategies under HALA. One of these strategies, mandatory housing affordability, offers additional scale and height in exchange for creating affordable housing units on site or through payments to a city fund. The MHA plan also includes limited expansions to the urban village boundaries in some communities.

As **residents of Wallingford** we have reviewed the proposed rezone, the boundary changes and affordable housing requirements proposed for our neighborhood. Although any development will have impacts, **the Draft EIS sufficiently addresses** these **impacts**. Much of the growth potential already exists within the current zoning. Growth is already occurring and will continue, with or without the affordability requirements.

Given the affordable housing and overall housing supply needs of our growing city, the rezone, the boundary changes and affordable housing requirements seem like the least that we can do. In our neighborhood we would have liked to have seen an alternative that included an expanded rezone to more blocks to allow more housing options for families.

Alternative 3, which considers displacement risk potential, is a worthy approach, bringing an equity lens to zoning while achieving affordable unit counts similar to the Alternative 2.

Stephen Hurd & Caroline Shelton

From: Lyn Jacobs
To: [PCD_MHAEIS](#)
Subject: Please don't expand Mt Baker Urban Village further
Date: Sunday, August 06, 2017 8:48:59 PM

1

Hello,

Please maintain our urban village boundaries as currently delineated.

There is no need when there is so much undeveloped space in the North Rainier urban hub village now.

Thank you.

Lyn

Name	Jules James
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I support Alternative #1 - No Action. The HALA "Grand Bargain" was compromised at the outset when Single Family neighborhoods were opted out -- dumping responsibility for the density increase inappropriately on Multi-Family and Neighborhood-Commercial.</p> <p>2 Empowering an ad hoc committee of developers while simultaneously dismantling the political infrastructure of traditional neighborhood advocacy groups is institutional gerrymandering -- politics expected in Venezuela, but destined to unravel in Seattle. Seattle needs to grow, but HALA is not healthy path to growth.</p>
Housing and Socioeconomics	<p>3 Bumping every neighborhood zone up 10 or 15 feet in height ignores the capitalistic changes this brings. For example: NC-1 should be -- and is -- typically 40 feet, good for 25+/- residential units and ground floor commercial. At the commonly proposed 55', unit count exceeds 50. At the capital level, this changes NC from local ownership to institutional ownership. This will send the profits from Seattle's NC structures out of the region and depriving local landlords from providing local entrepreneurs leased commercial space based more on faith of success than national statistical leasing metrics.</p>
Land Use	<p>4 HALA's upzone of LR-2 by 10 feet does not recognize the environmental impact of changing the fundamental nature of this type of housing. LR-2 now intends to encourage townhomes and row houses -- presumably long-term owner-occupied child-compatible ground-related individual entrance units -- the modern replacement to the single family house on the 5,000 sq ft lot. Adding 10 feet of height encourages this housing type from vertical to horizontal -- apartment flats. LR-3 is for apartment flats. HALA fails to realize it is eliminating a high-percentage owner-occupied housing type for a high-percentage renter housing type. Multi-Family neighborhoods should be a mix of each.</p>
Transportation	<p>5 Although the mass transit/no parking required ordinance pre-dates HALA, it is a core portion of the HALA thinking and it is flat-out wrong! Variances may be allowed for under-parked residential construction, but the basic Code needs to be one parking space for each unit in the neighborhoods. Landlords can rent the parking separately from the units, but we need the infrastructure in place for storing personal transportation devices. Municipal buses are obsolete 20th Century technology. Autonomous vehicles delivering us picking us up from the rail station is an obvious future. But that vehicle needs off-street, on-site parking. One per unit.</p>

Name	Janet
Comment Form	
Description of the Proposed Action and Alternatives	1 Choose Alternative 2 for Morgan Junction and West Seattle Junction which results in a lower percentage of M3 and M2 compared to Alternative 3. The infrastructure is not ready for the more dramatic changes in Alternative 3.
Transportation	2 Higher density planning must trigger immediate higher capacity of the public transportation system and improved traffic (synchronizing signals, etc). The transportation infrastructure must be improved before the density is increased in order to avoid degradation of quality of life/environmental impact.
Open Space & Recreation	3 Morgan Junction and West Seattle Junction growth will move them below the green space standard of 1/3 acre per 100 residents. Therefore alternative 1 is advised (no change in zoning in these urban villages).
Demographic Survey (optional)	
Have you been or are you at risk of being displaced from your neighborhood?	
Have you been or are you at risk of being displaced from Seattle entirely?	
Are you now or have you ever experienced homelessness?	
Do you live in rent- and income-restricted affordable housing?	
How many people are in your household?	
Are there children under the age of 18 in your household?	
Do you own or rent your residence?	
How long have you resided in the city of Seattle? (total number	

From: Justin Jarrett
To: [PCD_MHAEIS](#)
Cc: [Herbold, Lisa](#)
Subject: Draft EIS comment period extension
Date: Wednesday, July 12, 2017 7:27:19 PM

1

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

Thank you!
Justin Jarrett
4738 37th AVE SW
Seattle, WA 98126

From: Artistic One
To: [PCD_MHAEIS](#)
Subject: Geoff Wentlandt Office of Planning and Community Development, who is in charge of the DEIS
Date: Friday, July 28, 2017 2:41:37 PM

I am requesting an extension until August 28 for comments on Draft Environmental Impact Statement. The DEIS is very long and we need more time to make comments.

Thank you,

Jasmine

From: chad jeffers
To: [PCD_MHAEIS](#)
Subject: Environmental Impact study options for Roosevelt Date:
Tuesday, July 25, 2017 9:23:53 AM

1

The area located north of Roosevelt High School to the reservoir, between 12th and 15th avenue is currently zoned as Single Family. In support of housing affordability, the residents of the neighborhood are in support of up-zoning to RSL only. LR1 and LR2 is unacceptable as it will change the neighborhood from affordable family homes to unaffordable studio and 1 bedroom homes. This has been the pattern for the 2500 apartments currently being built along the transit corridor. These small units are unsuitable for families with children or extended families. This neighborhood is the last section of Roosevelt that offers the choice of housing types which is a principle of HALA. By changing the zoning to Low Rise, it will discriminate against large families which is against HALA principles as well. RSL gives homeowners the ability to build units on the property to house extended family members and low-cost options for renters in Roosevelt.

The EIS offers the RSL as an option and this has the majority of support for homeowners in this neighborhood. It would be even more attractive if certain restrictions for development of ADU and DADU's were lifted for lot size, parking and other barriers for remodels.

Thank you,

Chad Jeffers

Name	Jenn
Comment Form	
Description of the Proposed Action and Alternatives	1 Upzoning property isn't going to create significant affordable housing. The HALA plan is basically a giveaway to big developers. The amount of affordable housing it will create is too little for what we get in return. The displacement risk of the current affordable housing is too great. We can create more housing in other ways, so I don't believe we should make any changes to zoning.
Housing and Socioeconomics	2 I'm against implementing MHA/HALA because the displacement of people already in the affordable housing here is too great. The MHA HALA plan won't do anything to assist with our current homeless crisis.
Land Use	3 HALA will eliminate setbacks on property lines. They use phrases like "encourage greenery" which is just words. There is no green space requirement. There are no setbacks from property lines. This would be fine downtown, but in neighborhood that has been recognized for air quality issues, it just makes no sense. We need more trees. I support growth but it has to be smartly planned. And should benefit people not big developers. The existing zoning already allows for growth.
Transportation	4 No parking requirement is ridiculous - especially since you need a car to get anywhere. There is no nearby shopping, no amenities. The buses aren't always an option.
Public Services & Utilities	5 We have flooding, a lack of parking, air quality issues, lack of amenities. These plans were written as if these issues don't exist. We have room for growth within our existing zoning. We should not implement the upzoning as mentioned. I support no change to existing zoning.
Air Quality & Green House Gas Emissions	6 Our air quality is already horrible! Removing our trees is going to make it worse! These plans were created without specifically reviewing 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 displaced from Seattle entirely?	
Are you now or have	

Name	Mark JoHahnson
Email address	
Comment Form	<p>Comments on HALA Draft Environmental Impact Statement (DEIS) Section 3.2 Land Use July 15, 2017</p> <ol style="list-style-type: none"> 1) No alternative analysis was done on re-purposing (granting) and re-zoning surplus governmental lands for use in building affordable housing. <ol style="list-style-type: none"> 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. 2) 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. <ol style="list-style-type: none"> 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. <ol style="list-style-type: none"> 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. <ol style="list-style-type: none"> 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. <ol style="list-style-type: none"> a. Current citywide zoning has capacity for 3 times the projected growth in residents

Land Use

- 7 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.
- 8 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.
- 9 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.
- 10 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.
- 11 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:

- 12 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.
- 13 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.
- 14 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: Iskra Johnson
To: [PCD_MHAEIS](#)
Subject: comments on MHA EIS
Date: Friday, August 04, 2017 5:54:36 PM
Attachments: [MHA-HALA-Comments.pdf](#)

Comments from Iskra Johnson Re: MHA EIS Also included as a copy as Pdf attachment

The “Livability” quotient in the MHA/HALA plan is not addressed adequately in this environmental impact statement.

Biological:

Loss of tree canopy has been substantial in the last 10 years, and there is no adequate structure mandated in HALA for a) measuring current tree canopy and b) monitoring continued loss through development and c) limiting loss of tree canopy through requiring permits as per the Seattle Urban Forestry Commission’s 2014 recommendations as well as previous plans approved by the Seattle City Council but not followed through on.

Increased density and expansion of the urban village growth boundary is already leading to more and more zero lot line development and subsequent loss of gardens and trees. The residential green space of the city is its “lungs.” It is also the highway on which the city’s population of birds and other wild life transports itself. The result of the proposed increase in density will create an increase in “dead zones” in which fewer birds, insects and other wild life can thrive. I see no adequate mitigation of this in the HALA plan.

Aesthetic and community concerns:

An important component of urban livability is setbacks and pedestrian and resident access to light, views and the sense of open space that comes from walking down streets that are not wall to wall walls. I see no convincing design review built in to ensure that dense development does not erase light and space from the urban experience. View corridor protection is nonexistent.

An intangible but important component of urban street life is the felt sense of connectivity that comes from small scale development and yards in which families and neighbors use outdoor space to connect and build community. In areas of the city such as substantial portions of Ballard that have been up zoned for townhouses and high-rises there are no yards and virtually no sidewalk

pedestrian interaction, as the new developments are structured so as to wall off or in other ways make private the car/pedestrian entry to the homes. These are “social dead zones,” of which HALA promises many more.

Historical concerns:

Seattle leadership needs to strike a balance to achieve density without demolition of useful existing structures, and affordability without sacrificing livability in order to ensure that how we grow is sustainable and resilient – while retaining urban character and sense of place. The up-zone proposals are a blunt tool that does not customize development to respect the ethnic or historic character of neighborhoods.

The section on Affected Environment (3.5.1) does not provide a researched or thorough 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. A result of development pressure is the increased demolition of potentially historic buildings and neighborhoods. This has a negative effect on the scale and character of the city’s distinct neighborhoods.

Affordability:

The EIS assessment of the effects of increased density on affordability is superficial and highly unrealistic. It does not take into account the way higher rents in new construction raise the rents in nearby older and formerly affordable units. For instance: when an apartment is built and sets the baseline rent for 150 square feet with no kitchen or bathroom at \$700 per month (the current going rate) it immediately makes it logical and possible for the apartment house next door to raise the rent on its formerly \$700 per month 400 square foot studio *including bathroom and kitchen* (now defined as “luxury”) to (at least) \$1,200, based on square foot calculations and “what the market will bear.” Virtually every new apartment building built in Seattle, unless specifically subsidized, has higher rents than older apartment stock. Add in the increase property tax assessment on the older building when the new one goes in next door, and the apartment owner may have no choice but to raise rents, or to sell, if they want to remain viable.

When an older apartment is sold it is immediately “improved” and the rents are raised significantly. Where are the calculations of this effect? And where are the mitigations?

We have had an enormous degree of added housing capacity and development in Seattle in the last 5 years. If the model of “increased capacity=lower rents” were viable would we not have seen a drop in rents? Nothing in the EIS shows a working model in which higher density has resulted in lower rent or home ownership costs.

Race and class:

Allowing developers to buy their way out of building affordable units onsite and instead pay money to a fund results in pushing the organically formed previous population out. Rationalization is that more affordable housing can be built in the less desirable parts of the city. But this policy effectively moves all the low income and marginalized populations literally to the “margin” of the city. In what way does this fulfill the city’s proclamations of “equity?” There should be no way to buy out of supplying affordable units on site. The percentage of mandated units considered “affordable” in new development under the HALA bargain should be at least doubled and preferably tripled.

Legal issues:

Numerous lawsuits are pending on behalf of developers to challenge the legality of the HALA agreement. There is no contingency in the plan to take this into account. What is to prevent the lawsuits from prevailing, stripping the affordability mandate out and leaving the city with massive increases in density and zero affordable units?

Traffic management:

There are no convincing calculations of the increase in street traffic due to increased populations. There is mention that increased residential populations will be accompanied by more job growth and yet this is not accounted for in the estimates of growth in traffic.

The assumption that traffic will not be an issue because more and more people will ride bikes and take busses relies on the assumption that the new population will be entirely young, athletic and child free, with transportation needs limited

to going directly to and from a place of employment rather than picking up children from school, grocery shopping, doing errands and all the other normal kinds of daily transit of family life and small businesses. Built into the traffic assumptions is the normalization of the idea of Seattle as a city primarily serving a corporate campus environment rather than as a city diverse in age and stage of life.

Assumptions of inevitability:

Any EIS purported to be about a plan for growth should take into consideration the cause and effect of growth. Baked into the EIS and into HALA is the assumption that unlimited growth is both necessary and inevitable. If this EIS was regarding the use of clamshell packaging in consumer goods it would not be limited entirely to how the packaging could be recycled. It would instead look at limiting the packaging at the source, and assessing the effect of manufacturers creating *less* packaging. We cannot realistically continue to invite unlimited job campuses into Seattle without degrading quality of life and the overall health of the environment. There is no reason for Seattle to take every job. We should be encouraging other cities to take some of the growth, and recognize that the price of growth to urban character, affordability, equity, sense of place and environmental health is substantial and measureable. We should recognize the value of these elements and take all reasonable steps to protect them. MHA/HALA does not do this.

Comments from Iskra Johnson Re: MHA EIS

The “Livability” quotient in the MHA/HALA plan is not addressed adequately in this environmental impact statement.

Biological:

Loss of tree canopy has been substantial in the last 10 years, and there is no adequate structure mandated in HALA for a) measuring current tree canopy and b) monitoring continued loss through development and c) limiting loss of tree canopy through requiring permits as per the Seattle Urban Forestry Commission’s 2014 recommendations as well as previous plans approved by the Seattle City Council but not followed through on.

Increased density and expansion of the urban village growth boundary is already leading to more and more zero lot line development and subsequent loss of gardens and trees. The residential green space of the city is its “lungs.” It is also the highway on which the city’s population of birds and other wild life transports itself. The result of the proposed increase in density will create an increase in “dead zones” in which fewer birds, insects and other wild life can thrive. I see no adequate mitigation of this in the HALA plan.

Aesthetic and community concerns:

An important component of urban livability is setbacks and pedestrian and resident access to light, views and the sense of open space that comes from walking down streets that are not wall to wall walls. I see no convincing design review built in to ensure that dense development does not erase light and space from the urban experience. View corridor protection is nonexistent.

An intangible but important component of urban street life is the felt sense of connectivity that comes from small scale development and yards in which families and neighbors use outdoor space to connect and build community. In areas of the city such as substantial portions of Ballard that have been up zoned for townhouses and high-rises there are no yards and virtually no sidewalk pedestrian interaction, as the new developments are structured so as to wall off or in other ways make private the car/pedestrian entry to the homes. These are “social dead zones,” of which HALA promises many more.

Historical concerns:

Seattle leadership needs to strike a balance to achieve density without demolition of useful existing structures, and affordability without sacrificing livability in order to ensure that how we grow is sustainable and resilient – while retaining urban character and sense of place. The up-zone proposals are a blunt tool that does not customize development to respect the ethnic or historic character of neighborhoods.

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From: Johnson, Jeff
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 3:59:50 PM

1

I am writing to express my position that the Draft Environmental Impact Statement (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.

2

Additionally, the DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined. Seattle residents live in both their own neighborhoods and in the City at large, yet this DEIS has failed to analyze the impacts to both thoroughly and accurately.

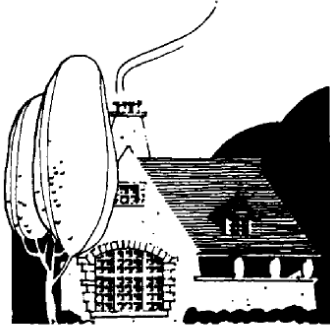
Sincerely,

Jeff Johnson

1719 N. 41st Street
Seattle, WA 98103
Wallingford



August 7, 2017



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RE: Comments regarding MHA
Draft Environmental Impact Statement

These comments address the Mandatory Housing Affordability Draft Environmental Impact Statement (MHA DEIS) issued by the City of Seattle on June 8, 2017. Comments below focus on broader implications, impacts, and mitigation policies related to the MHA proposals.

Before providing DEIS-specific comments, we strongly emphasize our concern regarding housing affordability and equity issues in our neighborhood and throughout Seattle, as well as in other US cities. We agree that developing ways to reduce these issues is critical. That being said, our comments will state some of our concerns about the proposed MHA alternatives described in the DEIS and will suggest some additional strategies for City consideration.

Also, please note that many of our comments are general to the proposal and alternatives proposed while some are focused specifically on the Roosevelt/Ravenna* neighborhood areas (*See notes below regarding use of term Ravenna.) We own and operate a small business that employs seven people in the Roosevelt Urban Village, and we live in the Ravenna* neighborhood. Walking is our primary form of transportation.

A. General comments on the MHA DEIS

1

1. Cumbersome review. While we appreciate the effort of producing the MHA DEIS, the documentation is simply too lengthy and too cumbersome for anyone but an experienced SEPA professional with a vast amount of time. The MHA EIS is over 400 pages long, includes further appendices, and incorporates by reference the EIS for Seattle 2035 Comprehensive plan. Furthermore, due to length, most review must be done using the electronic version, which can make direct comparisons of various sections, figures, or tables unwieldy unless reviewers have a large screen, good internet connection, and a lot of patience. Print copies are unfeasible to make, and very difficult to find (for example, no copies were found at the Northeast Branch Library when we checked). The unwieldy documentation, combined with the complexity of the proposal, simply makes review of this EIS extremely difficult, if not impossible, to fully review by most Seattle citizens, especially considering that our citizenry have families and jobs requiring attention first. We question that this EIS truly meets SEPA goals for readability.

2

2. Clarification of "No Action" maps and confusion with other recent rezone processes. While the EIS for the Seattle 2035 Plan is incorporated by reference and identified as the basis for the No-Action Alternative, the MHA DEIS does not specifically represent the No-Action Alternative for comparison with Alternative 2 and Alternative 3 figures. This might seem clear enough; however, when talking with others reading the MHA DEIS, we were struck by how many people did not seem to understand what No Action really meant or how it compared on a map with the alternatives. Many people also did not seem to realize the magnitude of change between No-Action versus the action alternatives. Additionally, we observe that area citizens are

confused by the number of rezones related to transit, 2035 Comprehensive Plan, etc., over a short time; do not always see notices; may not be aware of meetings & websites (information may be more accessible to certain groups than overall population); and simply may not have time/energy/ability to participate effectively at each iteration.

3 **3. Confusion regarding MHA “Draft Zoning Changes” Map published by the City.** See <http://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=6aafae86b1f4392965531c376489676> These draft zoning changes may be construed as being somewhere between the range of MHA DEIS Alternatives 2 and 3. However, if this represents the preferred proposal the City is indeed planning to implement, public SEPA comments on the MHA DEIS will not be commenting directly on specifics of this rezone map. Also, the processes leading to this map of “draft zoning changes” vs. the MHA DEIS have confused many people. Many are not sure what is really being proposed or how much their comments would actually be considered seriously.

4 **4. Alternatives and Objectives.** There appears to be disconnect between the “Objectives of the Proposal” listed in Section 1.2 of the MHA DEIS and the SEPA action alternatives described throughout the DEIS in that the need to upzone a significant amount of land is presumed to be an essential component of the stated objectives. The proposed upzoning may be a way to meet the “Grand Bargain” and what is now termed “MHA-R,” but may not be the only way to meet the stated “Objectives of the Proposal,” especially in a non-project DEIS analysis. Also, the proposed alternatives do not seem to fully achieve intended objectives. Alternatives that can meet objectives of the MHA proposal at lower environmental cost should be considered. Further alternative strategies for achieving greater equity and affordability in housing should continue to be developed, and should also consider the entirety of Seattle and its public resources.

5 **5. Adequacy concern due to combined review of many different Urban Village areas.** The MHA DEIS attempts to combine SEPA evaluations of all Urban Villages, as well as for potential expansion areas, outside of the separately-reviewed Downtown/South Lake Union and University communities. For many Elements of the Environment, this leads to superficial analyses that in theory might be analyzed in greater detail at a project level. However, this also means that the depth of analyses is not sufficient to justify many specific conclusions. SEPA review needs to focus on the specifics of each Urban Village and surrounding area. Each Urban Village and surrounding area has a unique history, different community patterns, different housing characteristics, strengths, and deficiencies. By lumping these Urban Villages, the DEIS fails to adequately address SEPA issues and impacts for each community.

6 **6. Gap between Non-Project and Project review regarding proposed mitigation measures.** A general concern for many Non-Project SEPA reviews is that a policy-level EIS assumes impacts on various elements of the environment will be reduced or mitigated through project-level SEPA reviews. *However, this is only appropriate when the project-level proposals are large enough to trigger SEPA review. Likewise, the same gap occurs when Design Review is cited—this is only appropriate when those thresholds are met.* It may sound like mitigation, but realistically will not apply, especially when the proposal leads to many upzones for many projects all over the City, many of which will fall below SEPA and /or Design Review thresholds. The overall effect of these numerous smaller projects scattered all over the City, many of which will occur in or near existing single-family and lower-density neighborhoods, will lead to *significant cumulative effects* that are not addressed in the MHA EIS. At the policy level, this mitigation deficiency could, and should, be reduced by *lowering* SEPA and Design Review thresholds. The MHA proposals focus instead on raising such thresholds to allow greater expediency for project developers, but this in turn reduces the ability of citizens and neighborhoods to participate and reduces the potential for mitigation measures to be considered. Mitigation policies need to address this gap.

7 **7. Cumulative Effects.** Cumulative effects are not sufficiently acknowledged in the EIS. Cumulative effects could adversely affect many elements of the environment and could be observed at a neighborhood level and/or at a City-wide level. For example, loss of tree cover and vegetation may cumulatively be more significant in neighborhoods where proposed upzones are concentrated. Likewise, cumulative effects on integrity of historic resources may occur in neighborhoods with distinctive historic character.

8

8. Use of the term “Ravenna” throughout EIS. The MHA DEIS uses the term “Ravenna” in a manner that is confusing, if not deceptive, and also makes it difficult for people in the general area of Ravenna to comment clearly on the EIS or to expect that their comments may be clearly understood by the city. The DEIS calls “Ravenna” an area that is lumped into the University community and includes the area directly north of the University of Washington that includes many fraternal “Greek” organizations and other housing, the University Village area, and a very small area south of Ravenna Park that is historically related to the area that should properly be called “Ravenna” today. Background: Ravenna was incorporated as a town in 1906 with boundaries along 15th Avenue NE on the west, NE 55th Street on the south, and otherwise generally similar to its 1907 annexation area. (Current street names are used in these descriptions. Also, NE 55th Street is neither exactly straight nor contiguous.) Ravenna was annexed to the City of Seattle in 1907 with boundaries located along 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. Ravenna is currently described somewhat similarly on the Seattle City Clerk’s map, except the University Village area east of 25th Avenue NE is shown as included. Ravenna is represented as part of the Ravenna Bryant Community Association (RBCA). Note that the attached RBCA map does not include “DEIS Ravenna” and does not include the University Village area.

For purposes of clarity, we will use the term “DEIS Ravenna” to mean the area the MHA EIS confusingly uses to describe a portion of the University Community area, and use the term “**Ravenna***” to describe the neighborhood area that should properly be called “Ravenna” *that is part of and entirely included within the RBCA boundaries*. We will also use the term **Ravenna-Cowen** to describe the neighborhood areas north of the Ravenna Blvd/Cowen & Ravenna parks, an area which overlaps the Roosevelt and Ravenna* neighborhoods. Please note these distinctions carefully and that we request that the City provide greater clarity and accuracy in all further documentation related to the MHA EIS.

9

9. Sensitivity to Neighborhoods. In past years, Seattle was often positively described as a “city of neighborhoods.” Neighborhood communities and context were strongly valued. “Grassroots” community efforts seem to have been supplanted by a “top-down” policy approach. MHA provided separate reviews processes for the Downtown/South Lake Union and University areas and then lumped the rest of Seattle for consideration in the MHA EIS in a manner that, while intended to be “equitable,” overrides many local neighborhood community concerns and even seems to pit neighborhoods against each other in some ways. Part of this may be built into the “Payment” vs. Performance” options for implementing MHA. Developers in faster-growing, more upscale, higher “opportunity” neighborhoods will likely tend prefer the “Payment” option instead of actually providing affordable housing in these communities, even when increasing affordable housing and increasing diversity in these neighborhoods are strongly-desired community values, as they are in the Roosevelt/Ravenna* neighborhoods. Market values and development would increase with upzoning in these communities, but not necessarily affordability. This may even accentuate disparities. Mitigation should include requirements for physically locating affordable housing within our neighborhoods too. Additionally, neighborhoods often have local values that should be considered much more respectfully in implementing mandatory upzoning. At a neighborhood level, most neighborhoods are willing to participate finding ways to “do their share” and to accommodate needs and related transitions within their neighborhood context; this needs to be more strongly built into MHA planning and mitigation. Local control is an essential component for successfully improving housing options and increasing affordable housing in our communities. Let’s also allow neighborhood character to continue to be celebrated as a civic value.

10

10. Livability. The concept of livability—the situation where *all citizens* can thrive—seems to be lost in the DEIS analyses. Part of this seems to be related to the lack of detailed connection to the Seattle’s many different Urban Village areas, as noted above. Some of this may also be related to emphasis on transportation-oriented design rather than people-oriented design. Viable neighborhoods in areas may be adversely impacted or destroyed through the proposed upzones while some less viable neighborhoods in other areas are left behind. Also, the discussion is more narrowly focused on a particular opportunity/displacement construct that seems more concerned with upzoning options in certain neighborhoods rather than creating opportunities for communities. Sustainable, viable neighborhood communities for all are an essential aspect of livability, and the MHA proposals and the DEIS analyses do

not demonstrate that livability and affordability challenges in Seattle's neighborhoods will be successfully achieved. Perhaps we should consider what Jane Jacobs, author of "The Death and Life of Great American Cities," might have said about our communities.

B. Comments on specific MHA DEIS sections

1. Housing & Socioeconomics

a. Socioeconomic analysis. While the socioeconomic analysis might have been well intentioned, it seems flimsy, which also means it might be dangerous. The analysis does not conclude that the massive zoning changes proposed will resolve MHA objectives, nor does convincingly support the action proposals or mitigation strategies. Specific weaknesses include:

- Too much reliance on data from the 2009 to 2013 period, which was a five-year period representing a portion of a significant recession and initial phase of recovery. This likely includes skewed results.
- Lack of more recent data—we are in the second half of 2017! If this analysis is the basis for upzoning that significantly modifies existing communities, data should at least be current.
- Specifically regarding Roosevelt, data regarding housing units and production are out of date. Numbers should be revised to include a very significant number of housing units developed in the past two years, as well as include the number of housing units under construction, permitted although not constructed, and in the process of obtaining permits. Similarly, when looking at upzoning, the amount of recently rezoned land in Roosevelt should be fully factored in before additional upzoning and expansion of the urban village is considered.
- Statistical correlations illustrated in Exhibit 3.1-31 are weak.
- Displacement is defined very narrowly by the DEIS and transitions are not sufficiently considered. Discussion of displacement does not fully encompass that all people, regardless of category, displaced by development have to relocate somewhere else. Also, there is a gap period of time between when people are displaced by redevelopment activities that result due to upzoning and when new housing is available in the redeveloped area. Once people are displaced, they may not come back; they may be replaced.
- Discussion does not address that just because someone can afford a certain rental rate does not mean that they would pay that amount. For example, young single tech or professional workers with very good salaries may choose to rent a much cheaper small housing unit, perhaps because they expect to move somewhere else in the relative near-term, are not connected with their residential community, or for a whole number of other reasons. This adds further pressure to competition for non-controlled "affordable" or less expensive work-force units.
- Need for more thoughtful consideration of Seattle's history of economic cycles—a longer look back shows how our City has been through a number of "boom" phases, but there are pauses in between. Planning how to flexibly address economic trends should be better built into the MHA proposals. Could alternatives that include some phasing of upzoning be considered?

b. Consolidation of Land Ownership. The MHA DEIS fails to highlight that upzoning as proposed will exacerbate the trend toward consolidating land ownership. This trend will occur as developers and lessors acquire and redevelop property. This will also lead to a situation where an increasing proportion of Seattle residents are renters, subject to trends in rental markets and regulations. Ownership trends will favor larger developers, portfolio-ownership, corporate apartment owners, non-resident investors, etc. Increasing consolidation of land ownership belies progressive values and may increase economic disparities. In many cases in the current single-family areas, working families who have owned a home will be replaced as landowners by larger-scale lessors.

13 **c. Housing viability.** The analysis of housing did not seem to consider viability of existing housing. For example, a 100-year-old single-family residence that has been well maintained and extensively upgraded to bring it to modern code, seismic, energy and technical standards may provide excellent housing through 2035 and years well beyond, may be a better resource to retain than a residence that is in disrepair. Forcing replacement of such residences through neighborhood upzoning and the consequential changes resulting from incremental redevelopment is not necessarily a “green” solution, especially if less viable residences are “protected.” MHA, at a policy level should also give serious consideration to structural viability in reviewing areas for intended redevelopment. Policies should also consider the resources and energy that are already part of viable structures. See also comments on Historic Resources below.

14 **d. Speculation and nonproductive land vs. supply.** The MHA analysis does not seem to adequately consider the amount of housing or potential housing that has been removed from housing supply and held for speculation in our rising real estate market and in light of recent multiple upzoning activities. While this situation may exist in other neighborhoods as well, properties in the Roosevelt neighborhood (and some adjoining areas in Ravenna*) have been held in non-productive or vacant status for many years. There has been no incentive for developers to create new housing when they can wait for the next upzone. Meanwhile, houses are boarded up, unmaintained/dilapidated, or demolished, and no new housing is created, thus skewing the supply/demand curve. Disincentives for this situation need to be added at a policy level. Length of time that such properties being held for future residential development can be retained in these unproductive states should be limited, or unproductive properties held in this manner for long-term for speculation could be taxed for affordable housing use, as part of policies intended to further the objectives of housing affordability and equity. Long-term holding of such unproductive properties for speculation also contributes to higher prices for available usable land, as well as impetus to demand for upzoning/extending zoning boundaries yet further.

15 **e. Hidden housing in SF zones.** While single-family areas are being implicitly downsized/discouraged in focus areas of the MHA DEIS, hidden density also exists in many older residential areas, such as Roosevelt/Ravenna* and the north University community. Many older homes in these areas are undivided group homes, have legal attached or detached accessory units, have “mother-in-law” apartments, house extended families, house elderly people or others with special needs and also include a caretaker family or accommodation for others within the home, etc. Such hidden density is not necessarily factored into consideration and does contribute to housing needs and affordability within single-family zones.

16 **f. Housing for families & elderly.** The MHA DEIS did not appear to adequately address the needs of either new/young families or the elderly. A large number of new/young families cannot find suitable affordable housing and have been leaving Seattle for suburban areas. (This contributes to longer commutes and growth of suburban areas, as related effects.) Also, elderly people who are able to remain in their homes frequently prefer to remain in their existing homes, but effects of upzoning on their neighborhoods and related increases property values/taxes/rents can cause their relocation. Not all elderly persons need to or want to live in retirement communities and care facilities. However, Seattle will still also need increased amounts of retirement communities and care facilities too. Diversity of housing types is important for all groups.

2. Land Use

17 **a. Abrupt intrusions and transitions.** The action alternatives create many abrupt land use transitions, especially around expansion areas and some single-family/lower density residential areas, especially those with established architectural contexts. While these show up in many other neighborhoods as well, the proposed upzoning in the Roosevelt expansion area into Ravenna* and in the Ravenna*/Cowen areas will have significantly more than “minor” land use impacts, as described in the MHA DEIS. Alternative 3 and the MHA Draft Zoning Changes map especially would have significant adverse effects in these areas.

18 **b. Topography.** Seattle’s regional topography was largely shaped by retreating glaciers that created more elongated wide troughs running generally north-south. Neighborhoods, such as Roosevelt, follow this elongated north-south pattern. Simply applying walk-distance radii to such neighborhoods can miss the

effect of ridges when going east-west, versus flatter paths when going north-south—or whatever topographic (or many other) conditions exist in each of the neighborhood areas. More careful consideration at neighborhood levels is necessary. Also, concepts for appropriate walk-paths and distances should consider other specific factors for each Urban village area, not simply estimated walk times.

3. Aesthetics

a. Design Review threshold. Abrupt changes, transitions, neighborhood architectural character, shade/shadows, glare, etc., are important concerns at neighborhood levels in the affected study areas. However, mitigation will not occur in many areas, especially expansion areas into existing single-family residential zones, unless the Design Review thresholds are in fact lowered and regulations are indeed modified as suggested on page 3-165. Otherwise, this will also fall into the “gap” between non-project SEPA and project-level reviews. Thus, stating that “impacts would be reduced to less than significant levels” (page 3-166) would not be accurate. Cumulative effects should also be factored into this discussion.

b. Impact on Urban Village Expansion Areas. On page 3-161, the DEIS states that “Alternative 3 would extend the aesthetic impacts to a smaller area than Alternative 2.” However, if Alternative 3 creates larger expansion areas than Alternative 2, then this statement cannot be correct. For example, for the Roosevelt Urban Village, the Alternative 3 expansion area is approximately 17 acres as compared with approximately four acres for Alternative 2, then the area of aesthetic impacts would be greater, not smaller, since the estimated 10-minute-walk expansion area is greater than the estimated five-minute-walk expansion area.

c. Neighborhood Character. Analyses do not seem to address neighborhood character. This can differ widely between Seattle’s many Urban Villages and their surrounding areas, and needs to be addressed at local neighborhood levels. Planning should accentuate the positive attributes that neighborhoods want to reflect and enhance, while increasing affordable and equitable housing supply.

4. Transportation.

a. Parking, Loading, and Transportation trends. Needs for and impacts on parking may be understated, and the DEIS also may not adequately reflect trends expected within the next 20 years, such as toward electric vehicles, self-driving vehicles, and car shares. Likewise, change of emphasis from retail space vs. distribution services for many types of goods will likely lead to additional needs for loading and service aspects. Also, access/parking/loading for handicapped/mobility-impaired populations need careful consideration to help ensure safe and viable access for all citizens. It is especially important that affordable housing developments provide for universal access.

b. Transportation vs. Housing types. Implicit in the MHA model seems to be correlation between use of cars and housing type. However, what seems to be missing is the notion that many single-family residents in our city do not necessarily rely on cars for their transportation needs (or may not even own cars), and that many people who live in small apartments may own cars and/or rely on cars for their transportation needs.

c. Roosevelt High School. Specifically in the Roosevelt neighborhood and western edge of the Ravenna* neighborhood, effects on transportation, parking, and pedestrian safety related to Roosevelt High School must be factored into consideration for the action alternatives that would simultaneously upzone land and reduce parking availability in areas near the school. Similar situations would occur in other neighborhoods as well.

5. 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 (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 that 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 (page 3-256) states that “no changes will occur to existing policies and regulations regarding review historic and cultural resources under any alternative.” Therefore, 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; 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 will also adversely 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 “DEIS 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 such historic resources should be considered *before* upzoning for redevelopment irreversibly and irretrievably alters architectural integrity and historic fabric. There are numerous buildings in this area that would meet National Historic Register eligibility. (While this comment is specific to Ravenna*, similar concerns apply in other study areas as well.)

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.

6. Biological Resources

a. Tree canopy and related effects. Chapter 3.6 provides useful background and estimates magnitude of impacts. The estimated loss of 5-11 acres of tree canopy in Alternative 2 and 8-16 acres of tree canopy in Alternative 3, may seem insignificant on an overall percentage basis, but may be very significant to the affected neighborhoods. It will also adversely affect birdlife in such areas. As a city, we should be looking for ways to *enhance*, rather than reduce, our urban forest. Proposed mitigation measures listed on pages 3-278 and 3-279 include some promising items; however, these are merely identified as options the City is exploring. Since this is a policy-level SEPA review, it should be emphasized that these measures could only have positive or mitigating effects if policies requiring them are enacted. We encourage enacting such

policies *before* upzoning for redevelopment occurs. Also, we suggest more careful identification of exceptional trees for protection of these resources and the birdlife they support.

- 31 | **b. Effects of shading on vegetation.** While the analysis considered areas of reduced vegetation in reviewing potential impacts of the action alternatives on biological resources, did it also consider effects of shading from taller structures (as is addressed in section 3.3 on Aesthetics) on areas available for planting in redeveloped areas?

7. Open Space & Recreation

- 32 | **a. Update Park and Open Space analysis.** MHA planning should closely follow the 2017 Parks and Open Space plan that is currently in process, and analyses should be updated in the Final EIS.

- 33 | **b. Increase opportunities.** For all areas where housing is provided, opportunities for recreation and open space should be provided. Increase these opportunities and facilities as part of housing development, especially in conjunction with developing affordable housing in communities that are currently underserved. Likewise, tree canopies could be increased as part of such development. Such measures would contribute to increases in benefits for neighborhoods the MHA DEIS describes as “low opportunity.” MHA objectives would be well-served by finding more ways to raise levels of opportunities; this would help lead to achieving greater equity.

8. Public Services & Utilities.

- 34 | **a. Construction impacts.** More detailed analyses of strategies to reduce adverse effects of construction on communities should be provided. Also, sidewalks and streets are often blocked for long periods of time, and sometimes utilities are affected too. This situation will increase as Urban Villages redevelop.

C. Mitigation Strategies

- 35 | **1. Accountability in Proposed Mitigation.** Mitigation measures listed in the MHA DEIS include a number of items that are highly speculative; e.g., items that might be enacted, might be considered, etc., but may never happen. If the City intends to mitigate adverse effects of a proposal or to state that due to mitigation, adverse impacts will be avoided, then mitigation policies must be more rigorously developed and implemented. Since this is a non-project EIS analysis, it is imperative that *clear mitigation policies are integrally included in the proposed courses of action to mitigate adverse effects*. Mere suggestions and items that realistically will not effectively be enacted or completed at a policy level are simply not appropriate. Further work on developing accountable, substantive, and effective mitigation strategies is needed.

- 36 | **2. Mitigation strategies should include:**

- Increase community control within neighborhoods as part of developing affordable housing strategies and addressing transitions. This will be a critical element in helping to resolve Seattle’s affordable housing crisis. Involvement of local neighborhoods should also be included in shaping mitigation strategies for their respective communities, each reflective of their distinct needs, resources, and growth patterns. One size does not necessarily fit all.
- Phasing upzoning incrementally to allow better evaluation of what works and what doesn’t. Allow opportunities to refine policies in face of outcomes. This would allow refinement in ways to increase public benefit and to decrease adverse effects based on observed results. Also, this allows sensitivity to and retooling for economic cycles, which can be expected during the roughly 20-year EIS timeframe.

- Focus upzoning in vacant, underdeveloped, and more transitional areas before considering upzoning is stable, viable areas.
- Complete historic resource surveys before irrevocably committing to upzoning, especially in areas where significant intact historic fabric or potentially eligible historic resources are located.
- Close review gaps in SEPA and Design Review that will allow significant adverse effects. Address cumulative effects in these matters and use reduction in these gaps to help mitigate adverse effects.
- Allow greater diversity of housing types within Urban Villages and provide better approaches for developing successful design transitions than a simple 10-minute “step-down” approach, as well as ways for helping to maintain viable established community businesses and services.
- Consider more ways to increase opportunities in neighborhoods as a way to help achieve greater equity. Development incentives could be considered for providing significant contributions to community needs for parks, open spaces, trees, community service centers, community services, and other specific neighborhood needs.
- Address parking and loading impacts more convincingly. Also, consider that parking and loading are related to public safety because when these are in short supply, many people (including elderly and mobility-impaired citizens) may have no alternatives to walking longer distances, sometimes at night or in low visibility situations.

D. Additional Specific Roosevelt/Ravenna* Comments.

37 **1. Work with the Ravenna Bryant Community Association (RBCA).** Local neighborhood associations should be considered carefully for all communities; we are highlighting the RBCA because this neighborhood is concerned about the effects of potential Roosevelt expansion and the development of appropriate transitions, and the Ravenna* neighborhood wants to be involved in planning.

2. Roosevelt/Ravenna* modified alternative. Alternative 3 rezoning, as well as the MHA Draft Zoning Changes map, is too harsh and abrupt as proposed, especially along the east side of Roosevelt and in the Ravenna*-Cowen areas. Alternative 2 is less harsh, but should be improved. The western side of Roosevelt has a strong relationship to Green Lake as well as the Roosevelt Station/Commercial area, and many recent development projects have been capitalizing on this relationship. Specifically for the Roosevelt/Ravenna* neighborhood, we propose the following modifications to the action alternatives:

- 38
- Recognize the shared boundary between the Roosevelt and Green Lake Urban Villages. Intensity should be skewed toward the western side of the Roosevelt Urban Village and coordinated closely with the Green Lake Community. These adjoining communities can also coordinate regarding development of shared opportunities while still maintaining the distinct community identities.
 - Continue to recognize the strengths of the west Roosevelt housing developments, as well as focus on potential uses for vacant, underdeveloped and transitional areas.
 - Focus the most intense development on the immediate Roosevelt Station area and include meaningful development of affordable and low-income housing located in this prime central area.
- 39
- Consider the future of the Roosevelt reservoir site north of the future Roosevelt Station and how that might be utilized for in the future to create new opportunities, which may include park and/or open space, community center and/or services. This may also affect future planning for the surrounding areas, and *needs be coordinated closely with the Roosevelt Neighborhood Association and surrounding communities.*
- 40
- Retain 15th Avenue NE as the eastern boundary of the Roosevelt Urban Village, with the possible exception of the existing Sisley/RDG properties located between 15th and 16th Avenues NE, especially north of NE 65th Street. While it has been painful for our neighborhoods to have seen this land held in dilapidated or unproductive use for decades, it is time to move forward and the

Sisley / RDG properties realistically could have the lowest impact to redevelop. Focus should be on maximizing what can be accomplished using these properties to provide affordable housing, while minimizing transitions. However, also recognize that 15th Avenue NE has been a long-standing logical boundary for historic and topographic reasons, and any further discussion of this Urban Village boundary needs be coordinated directly with the RBCA and Ravenna* neighborhood prior to any further upzoning. Suitable transitions, design review, and sensitivity to Roosevelt High School also would need to be resolved.

- Recognize that the north and south slopes of Ravenna Park are environmentally sensitive areas that cannot sustainably handle intensive development along adjacent areas. The single-family residential neighborhood in these areas and the stable community here helps maintain these sensitive areas.
- Defer upzoning of the Ravenna*-Cowen areas until after historic resources survey has been completed. This neighborhood contains intact areas of historic resources that may be eligible for designation. This would help avoid potential irreversible and irretrievable loss of historic resources in this neighborhood area.
- *After historic resources survey has been completed and design guidelines reflect historic fabric in the Roosevelt blocks near Cowen Park, south of NE 64th Street have been adopted*, consider including some RSL infill development (bungalow courts, appropriate low-rise rowhouses) in non-contributing properties west of 15th Avenue NE.
- Consider RSL zoning in the current single-family area along portions of 12th Avenue NE and Brooklyn, in sections as far south as NE 55th Street *after historic resources survey is completed, with careful Design Review and respect for the extant historic resources along these streets*. These areas south of Ravenna Blvd. are more topographically related to Roosevelt than the areas east of 16th Avenue NE, are adjacent to the recently upzoned NC areas across from Cowen Park and also appear to include a significant number of rental properties and less viable structures. Walk time along 12th Avenue NE from NE 55th Street to the future Roosevelt Station is less than nine minutes, relatively flat, and generally pleasant. *If owners in these areas and appropriate neighborhood associations agree*, possibly southward expansion of the Roosevelt Urban Village might be considered?
- Work with the RBCA and Ravenna* neighbors to plan for additional density and affordable housing in the Ravenna* neighborhood and on how to mitigate transition issues. Similarly, coordinate with the Roosevelt Neighborhood Association and Green Lake community.
- Work with the RBCA and affected property owners to consider whether there might be some suitable areas along NE 65th Street that could be considered in the future to help provide additional density and affordable housing, along with better linkage of the Roosevelt and Ravenna neighborhood commercial areas.
- Include performance-option affordable and low-income housing located within the Roosevelt/Ravenna* neighborhoods. Much of what has been built recently and is being constructed now is targeted above these levels.

Thank you for your careful consideration of these EIS comments.

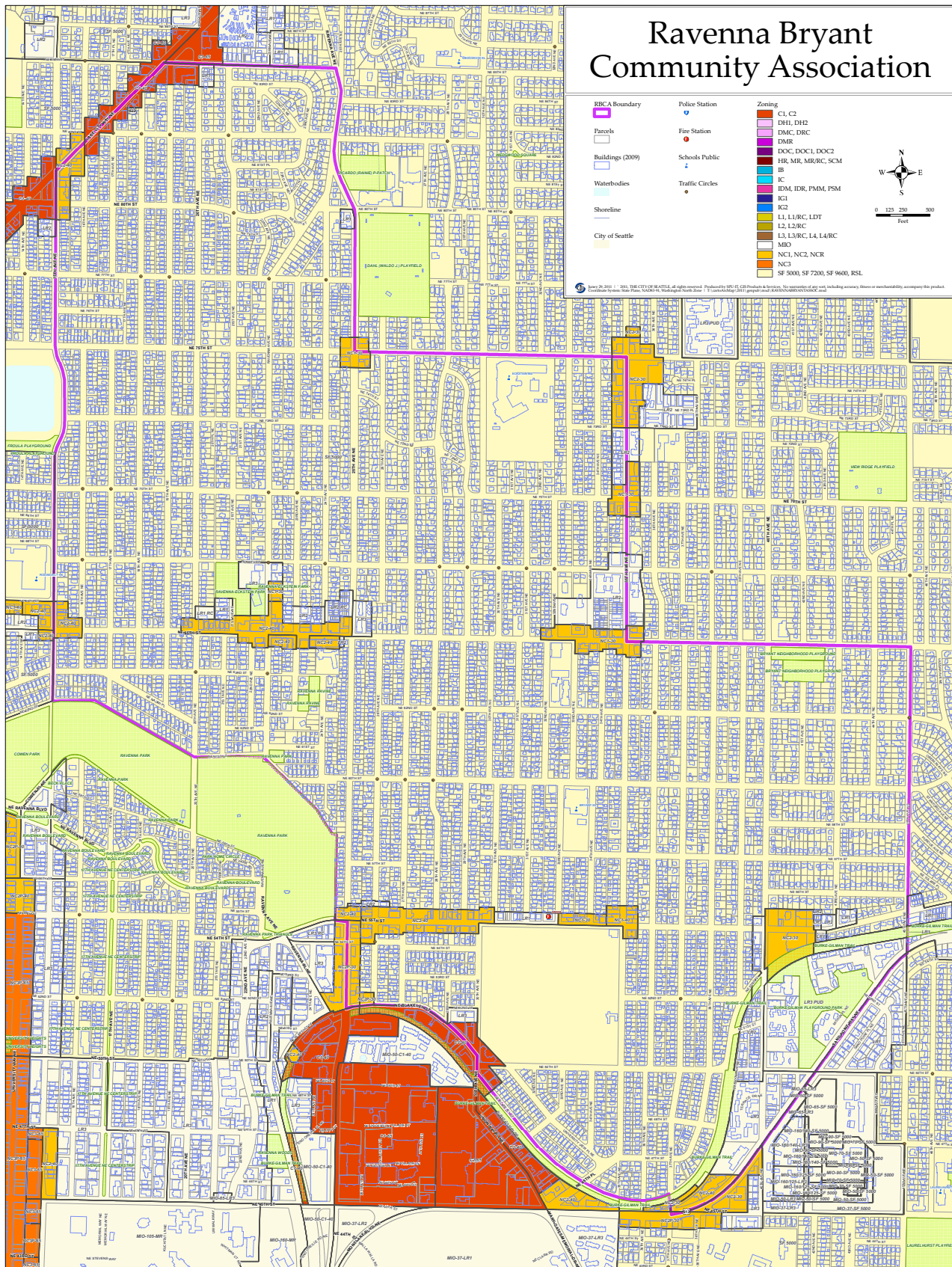
Sincerely



Lani v.d.L. Johnson



Larry E. Johnson, AIA



Source: RBCA

August 7, 2017
Office of Planning and Community Development
ATTN: MHA EIS
PO Box 34019
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RE: Comments regarding MHA
Draft Environmental Impact Statement

These comments address the Mandatory Housing Affordability Draft Environmental Impact Statement (MHA DEIS) issued by the City of Seattle on June 8, 2017. I greatly appreciate the opportunity to comment on this proposal, and consider housing affordability, equity, and sustainable growth to be critical issues. My comments on the DEIS address primarily issues of procedure, scope, scale, and level of local control in decision-making.

I am a resident of the University District and long-time Seattleite, presently living in a one-bedroom condominium within walking distance of my job as a chemistry researcher. As an early-career professional, I have also spent several years in the greater Los Angeles area and in the Tri-Cities in Eastern Washington. I have been a homeowner, renter (both in a private condo and in a managed apartment complex), and landlord (renting my condo while out of state) within the last decade. I have also had a long-standing interest in housing sustainability and affordability, including work on the 2002 housing levy campaign, as well as interest in parks and preservation/restoration of urban green spaces.

During these past few years, Seattle has undergone dramatic growth and changes, driven in particular by a booming technology sector. While this boom has brought many amazing opportunities to the city, it has also posed challenges to the city's housing and transportation resources. HALA/MHA is intended to mitigate some of these challenges. However, the impacts of a proposed large-scale program must be comprehensively considered through review processes such as those prescribed by SEPA in order to balance and mitigate costs, analyze potential benefits, and provide alternatives. While the program is well-intentioned, based on review and discussion of the DEIS, I am not convinced that the program is likely to provide its advertised benefits, that sufficient alternatives have been considered, nor that costs from land use changes have been adequately addressed.

While the DEIS addresses a wide range of issues, my comments will focus on three areas of concern, (1) city-wide effects of MHA up-zoning, (2) socioeconomic analysis and trends, and (3) neighborhood-specific factors for the Ravenna/Roosevelt/University District area.

Three alternatives are presented in the MHA DEIS: Alternative 1 (no-action), and two alternatives involving primarily expansions to specific Urban Villages (Alternatives 2 and 3). The implication, to a casual reader, would be that "no

action” would mean no changes from current land use. However, the program interacts with the 2015 rezone and a pending proposal to increase allowable heights in Neighborhood Commercial (NC), Lowrise (LR), and Midrise (MR) zones (a *de facto* up-zone), such that substantial cumulative impacts could occur from the interactions of these programs, leading to very rapid increases in density in many areas, both within and outside of the MHA-selected regions, regardless of which alternative is selected. Furthermore, Alternative 1 (no action) is not mapped, even though it does include substantial zoning changes. No preferred alternative is specified, and furthermore, none of the alternatives are consistent with the City’s current proposed zoning map (<http://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=6aafeae86b1f4392965531c376489676>), which combines elements of Alternatives 2 and 3 from the DEIS and was published in advance of the closing date on the comment period for the DEIS. While up-zoning will be necessary to accommodate anticipated growth in Seattle, the DEIS is misleading about the combined impact of recent and pending proposals.

Furthermore, no alternatives other than large-scale up-zoning are considered, and the DEIS discusses a limited study area (Urban Villages) in isolation. Potential alternatives could include public or private development on city-owned lands, incentives for construction of ADUs/DADUs, taxation of vacant properties and of non-resident speculators, long-term bulk leases by the city to provide rent-stabilized properties to low-income residents, and targeted development incentives coupled with provision of open spaces, community resources, and co-located low income housing substantially in excess of proposed MHA targets.

The heavy emphasis of MHA on up-zoning, combined with other recent or proposed up-zones, also presents three other major challenges that are not given significant weight in the DEIS.

The first of these issues is zoning-driven speculation. Frequent up-zoning or potential for up-zoning creates a perverse incentive for investors to hold idle or poorly-maintained property instead of developing under existing regulations, which leads to a reduction in amount of housing produced, limiting supply and further inflating prices, leading to additional up-zoning pressure. Such speculation and neglect of properties/holding of vacant properties has been rampant in Roosevelt and portions of the University District. Alternatives should be examined that focus on increased capacity utilization in existing multi-family zones and on providing regulatory certainty that encourages development now instead of further speculation.

The second issue involves the intent of zoning and design review. Most multi-family development is conducted by for-profit businesses, seeking to maximize their return on investment. In a stable/slow-growing market, demand for a diverse variety of housing can limit the scale of construction and encourage preservation of open space. However, in an overheated market such as Seattle at present, large potential returns encourage developments that maximize building envelopes and number of units, while minimizing unit size and setbacks/open

space in order to obtain the largest monetary value per square foot. While low-rise and mid-rise multi-family buildings can be designed at a scale and with layouts and styling that fits into existing neighborhoods—I feel that the unit that I chose to purchase is in such a development—many are not. Many are soulless, anonymous complexes that are designed with little or no effort towards promoting community within the development or engagement with the surrounding community. Taste may not be a regulatory matter, but the externalities (displacement, loss of biological resources, traffic, etc.) created by density-maximizing development are. These externalities are what regulatory requirements such as zoning and design review are intended to address, providing a constraint that keeps communities within the scale of their resources. While the DEIS implies that concerns can be addressed via design review, many smaller multi-family projects are presently exempt from design review; zones that are intended to be adjacent to lower-density areas should have smaller design review thresholds to better reflect their relative scale within neighborhoods.

The third issue involves irretrievable and irreversible loss of resources in the city, including historic structures, mature trees, and environmentally sensitive areas. These resources can be adversely affected by increases in the intensity of land use. If these resources are not properly surveyed before up-zoning and impacts to them avoided or mitigated, including sufficient transitions between high-intensity uses and sensitive resources, those resources cannot be replaced.

My second area of concern involves the socioeconomic analysis (Section 3.1) that the proposed zoning changes are based on. This section focuses on changes in demographics in Seattle, population and distribution of low-income households, and extent of housing displacement by region in the city. While containing a large amount of useful data, this section raises a number of questions that are not adequately addressed, and in some cases, draws conclusions that are in contrast with the putative intent of MHA, such as “data show that additional housing supply will not fully solve the fundamental problem of insufficient affordable housing to meet the need for such housing among low-income households.” (DEIS 3.21)

The first issue that, while mentioned in several footnotes, is not adequately addressed is how representative of long-term trends the study period for displacement is (2009-13) is. This period represents a recovery from a major recession coupled with a boom in the technology sector, and omits the most recent four years, in which substantial up-zoning and new construction has occurred. Furthermore, while the study period for vacancy rates and average monthly rent is longer and incorporates more recent data (1997-2016), the time periods showing high vacancy rates and low costs both correspond with recessions/recoveries, potentially confounding the ability to decouple trends from the business cycle.

Another issue that is not adequately addressed involves the changes in populations within specific percentiles of average median income (AMI). Changes in the number of low-income households can be related to in-migration,

intra-city migration, or changes in labor markets, but can also be due to an increase in median income occurring primarily within more affluent populations. While use of a median-based metric is more robust than a mean-based metric, a sufficient increase in higher-income houses can still raise the median such that households that were previously not considered low-income now are, such that shifts in the median could mask displacement of households previously in the 60-80% AMI range. Furthermore, correlations between gains/losses of low income households and net housing production are very weak, with the breakdown in Exhibit 3.1-31 indicating statistical significance only for the “Low Displacement Risk – High Access to Opportunity” study areas.

Another issue that is not substantially discussed involves consolidation of land ownership. Many lots that were previously owner-occupied are now being purchased as portfolio properties or by large commercial real estate ventures, and development of condominiums as opposed to rental properties has slowed dramatically. In contrast to rental-heavy societies in which cost stabilization is more often attempted through regulation, property ownership provides one of the main housing cost stabilization mechanisms available in the United States. While ownership is far from a panacea, as seen from the Great Recession, consolidation of ownership reduces residents’ level of influence over their housing costs.

Yet another issue involves longer-term demographic trends within the city. Seattle has recently had significant in-migration of often young and single residents, for whom small apartments may be adequate. However, should these new residents remain in the city, they may choose to form larger families with different housing needs. I am on the younger edge of my peer group, and many of my peers have been searching for single-family houses or 2-3 bedroom condominiums and have found themselves priced out of the Seattle market as the number of starter homes has dwindled, instead purchasing homes farther and farther out in the suburbs and commuting to their jobs in Seattle, even if they had wanted to stay in the city.

Relatedly, discussion of single-family versus multi-family living misses many potential other living arrangements, including shared houses and apartments and multi-generational households. Shared housing arrangements, whether within the same building or accessory units, are often less expensively than independently-leased or owned housing. Furthermore, housing arrangements based around nuclear families is less common in many cultures that may instead have several generations living together or in close proximity, and development guidelines should reflect this.

Another matter that is not discussed in the context of displacement involves transient versus long-term populations, where transient populations include students and workers on short-term contracts or in highly mobile industries. For example, the University District, where I live is, has high turnover of residents. Displacement due to new development has much lower effects on transient populations due to their high mobility, than on long-term residents (whether

owners or renters). The boundaries of the study regions and displacement projections should reflect the average residence time in neighborhoods.

A final matter involving the socio-economic analysis involves compliance with MHA via payment versus performance. Developers within the study areas may comply with MHA by either constructing affordable units or paying into the city's affordable housing fund. Some recent estimates, see for example (<https://news.theregistryps.com/seattle-expects-few-affordable-housing-units-with-downtown-and-south-lake-union-upzone/>), project that most developers will choose the payment option, paying relatively low rates per square foot. This provides no guarantee that low-income housing will be built in "high-opportunity" areas and given planning lags and changing market conditions, may result in targeted areas consisting almost entirely of market-rate housing and lower-than-desired numbers of low-income units constructed. Requiring a specific fraction of performance housing would help improve housing and income heterogeneity.

Furthermore, MHA is focused heavily on construction within "high opportunity" areas, and while more low-income housing (e.g. from MHA performance) is needed in these areas, little emphasis is placed on improving opportunity in "low opportunity" regions of the city. Essentially, the MHA framework ends up penalizing "high opportunity" areas via increased environmental impacts, property taxes, and displacement, while likely generating mostly market-rate housing in those areas. Should the city not also focus on increasing resources and opportunities for residents of "low-opportunity" areas, whether using public resources or public-private partnerships?

The final section of my comments specifically concerns the Ravenna, Roosevelt, and University District neighborhoods. Both the proposed Alternatives 2 and 3 move the boundary of the Roosevelt Urban Village east of 15th. I strongly urge that the Urban Village boundary is maintained at the historical boundary between the Ravenna and Roosevelt neighborhood, although some low-impact multi-family (e.g. RSL) zoning may be practical along the arterials *without Eastward expansion of the Urban Village*, and placed to avoid environmental impacts to Ravenna Park. Planning processes should recognize that neighborhoods are unique, seek to preserve and expand the positive attributes of a neighborhood, while improving deficiencies. Many neighborhoods, including those in the Ravenna-Roosevelt-University communities, are open to increased density and development, but request input in local planning, including placement of increased density, with involuntary rezoning only as a last resort if sufficient equity cannot be achieved through collaborative planning with neighborhood residents.

Another matter specific to the neighborhood that is not addressed by the MHA DEIS is the region between the University District Urban Center and the Roosevelt Urban Village. This region, located just West of my property, is close to not only one, but two light rail stations, has good access to busses and bicycle lanes, and is served by multiple major arterials. Areas along Brooklyn and 12th

south of Ravenna Boulevard are well-situated for increased density via low-intensity rezoning to RSL or similar.

In summary, while well-intentioned, the proposed alternatives described in the MHA DEIS broadly apply a single solution (up-zoning near Urban Villages) that may or may not sufficiently address the intended challenges related to housing affordability in a rapid manner that may have cumulative impacts with land use changes from the past four years, is misleading about the meaning of “no action,” makes assumptions that may be linked to shorter-term trends in the business cycle, may have substantially larger benefits for large landholders and developers than for residents, and is poorly consistent with both progressive values and concepts of local control and community involvement. Further study of cumulative impacts, irreversible impacts, demographic changes, and the potential for perverse incentives is necessary to structure alternatives to achieve our common goal of affordable housing in Seattle while avoiding and mitigating adverse effects.

Sincerely,

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SEATTLE CITY COUNCIL | DISTRICT 4

COUNCILMEMBER ROB JOHNSON

August 7, 2017

Sam Assefa, Director
Office of Planning and Community Development
P.O. Box 94788
Seattle, WA
98124-7088

Re. Comment Letter from the Planning Land Use and Zoning Committee on the DEIS for Citywide MHA Implementation

Dear Sam:

We write to comment on the Draft Environmental Impact Statement (DEIS) for *Citywide Implementation of Mandatory Housing Affordability (MHA)*. This letter is informed by the comments, question, and issues identified by participants in the sixteen Urban Village Community Design Workshops convened by Councilmember Johnson's office between last October and this March and consultation with the members of the Planning, Land Use and Zoning Committee. Comments in this letter are intended to both address the analysis in the DEIS and to set out, at a high-level, planning and urban design principles that we think should inform identification of a preferred alternative. We note in this letter that MHA implementation is already underway and the program has been implemented in three of the City's six Urban Centers. We also recognize that EIS alternatives contemplate additional growth above and beyond growth allocated to the City and planned for in the Comprehensive Plan, *Seattle 2035*.

Mitigating the Interim Condition

As MHA is implemented and the public and the development community see the resulting changes to urban form there is the potential for both adverse reactions to perceived height, bulk and scale impacts and underutilization of new development capacity.

The *Urban Design and Neighborhood Character Appendix* to the DEIS provides a useful visual guide and source of common understanding of how height, bulk and scale impacts may be mitigated. We encourage you to include in the preferred alternative zone designations and development standards that provide appropriate transitions at sensitive areas, such as the edges of urban centers and villages and in transitions from arterials and other corridors with more intensive land uses.

After implementation, there will be a period during which the development community must adjust to the changed economics under MHA. This may be challenging for owners, developers, and investors who have already established investment-backed expectations based on current zoning. We encourage you to consider measures that optimize market-rate and affordable housing production in this interim period. This could include changes to business practices to encourage pipelined-projects to take advantage of existing development capacity, such as allowing developers with active applications or permits to opt-in to the requirements to contribute to affordable housing; where appropriate, minimum

densities to ensure that sites in key areas are not under-developed; and establishing regulations authorizing new development types, such as small scale flats in Lowrise and RSL zones.

Making the Most of Station Areas

To make the most of the City's and the region's investment in transit, we encourage you to consider a preferred alternative that locates residential and employment density around station areas and transit corridors. Specifically, we request that the Final Environmental Impact Statement (FEIS) analyze higher densities and more intensive zoning at the following locations:

- Areas immediately around the Capitol Hill and Judkins Park light rail stations;
- Areas proximate to the Mount Baker and Northgate station areas, including Lowrise areas south of the intersection of Rainier Avenue South and Martin Luther King Junior Way South and in the Northgate Urban Center;
- Future light rail station areas in neighborhoods where planning by SoundTransit is sufficiently advanced to identify future station locations; and
- Areas along existing rapid ride lines and planned Bus Rapid Transit Corridors.

Consistent with our comments above, we encourage you to consider gradual transitions from these station areas and corridors, even if that means analyzing the potential for rezones to low and moderate intensity multifamily zones in areas not currently contemplated for such changes. The FEIS should include a range of alternatives sufficient to allow neighborhoods, the Council, and other decision-makers to make height and density tradeoffs within stations areas to balance MHA implementation with other urban design and livability objectives.

Coordinating Development Around Infrastructure and Livability Amenities

Successful MHA implementation will require intentional and thoughtful investments in basic infrastructure and livability amenities in areas that will experience sustained growth. This includes planning and investing in traditional public goods and services, such as parks, community centers, and stormwater and wastewater facilities. It also includes coordination and partnership with the Seattle School District to ensure that capacity does not lag growth.

It also includes planning for and investing in livability amenities that are non-traditional and lend themselves to multiple uses. This can include changing the Street Improvement Manual for high growth areas, such as portions of Aurora Avenue, California Avenue, Stone Way, and 45th Street, to require family-friendly amenities, like street furniture, curb bulbs, and landscaping that amplify the open space amenity value of rights-of-way. It can also include requiring or allowing development of green stormwater infrastructure in rights-of-way to increase infiltration and reduce run-off from new development.

We encourage you to consider these potential livability amenities as mitigation measures in the FEIS. Additionally, with respect to schools, we request that you identify implementation of impact fees for schools as a potential mitigation measure. While impact fees can produce revenue for new capital facilities; because they are tied to development, they are not a steady source. We recognize that they are but one strategy the City could pursue to address school capacity issues.

We look forward to the forthcoming *Growth and Livability Report*, which will help characterize how livability investments will accompany ongoing MHA implementation. To the extent possible, we request that recommendations in the livability report are reflected in the proposed *2018 – 2023 Capital Improvement Program*.

Finally, capacity issues related to King County's West Point treatment plant have been in the news lately. Please supplement the Public Services and Utilities analysis to include a discussion of whether and how those capacity issues are addressed through King County's capital facilities planning.

Flexibility Throughout the City

We continue to have an ongoing interest in exploring the flexibility for development of "missing-middle" housing in areas throughout the City that are rich in amenities, close to schools or transit facilities, or adjacent to urban villages. If any of these areas are within transit walksheds or potential urban village expansion areas that were not analyzed in alternatives two or three, we encourage you to include them in the FEIS to preserve the option for Council consideration at some point in the future.

Similarly, where neighborhoods have identified areas for change outside of urban village, such as in areas along 35th Avenue Northeast where community members have indicated a desire to fill in gaps in their neighborhood business district, we encourage you to analyze alternatives that will allow the Council to consider including those areas in MHA implementation.

Commercial Affordability

A consistent theme the Council has heard throughout MHA implementation efforts to date has been a concern over the loss of existing commercial spaces that are affordable to current and future small business owners. Affordable commercial spaces provide opportunities for local business incubation, neighborhood-level goods and services, and a neighborhood character distinguishable from that provided by the national "credit tenants" sought for new development. As an ongoing livability concern we encourage you to consider parallel efforts that will establish a strategy for ensuring that affordable commercial spaces are part of MHA implementation in neighborhood business districts

Using a Race and Social Justice Lens

Thank you for your response to Councilmember Herbold's comment letter dated July 8, 2017. The additional analyses you propose could go a long way towards helping the Council understand whether and to what extent MHA implementation could result in disparate impacts to protected classes.

In addition to those analyses and to the extent that data are available, please quantify what effects MHA implementation may have on the housing market under alternatives two, three and the preferred alternative. This would include anticipated geographic dispersion of market rate and affordable units, type of residential tenure, and diversity of housing type and unit mix. This information will help the Council understand where and how to balance the benefits and burdens of MHA implementation such that current and future Seattle residents, regardless of race, ethnicity, age, or income-level, benefit from future growth.

**

Thank you in advance for consideration of these comments. In the interest of completeness, I ask that you append summaries compiled by my office during the Community Design Workshops to supplement the Summary of Community Inputs in Appendix B to the EIS. Those materials are available [here](#). Additionally, we excerpt and highlight a few District 1-specific comments attached to this letter and commend to you for your consideration other District-specific comments submitted online and through MHA.EIS@seattle.gov. Finally, we request that you provide the Council with a courtesy copy of the draft FEIS at least two weeks prior to its publication.

Sincerely,

Rob Johnson, Chair
Mike O'Brien, Vice Chair
Lisa Herbold, Member

District 1 – Specific Comments

Transportation

- Please confirm peak period capacity of the Rapid Ride C line and re-analyze transportation impacts as appropriate. Sixty-seven percent capacity used in the DEIS does not conform to overcrowded condition experienced during the AM peak.
- Please confirm the travel times to and from West Seattle in the AM peak period. The DEIS appears to base travel times off a single PM peak in March.
- Please identify specific mitigation for degraded levels-of-service at key intersection in the West Seattle Junction, Morgan Junction, Admiral District, South Park, and Westwood-Highland Park neighborhoods.

Aesthetics

- Please identify any proposed development standards changes or proposed modifications to transition along California Avenue, and other similarly situated arterials. to mitigate the appearance of height, bulk, and scale.
- Please identify where proposed changes to Design Review thresholds would eliminate the program as a source of potential mitigation for height, bulk and scale impacts.

Historic Resources

- Please include, as a mitigation measure, inventorying potentially eligible landmark structure in neighborhoods for which a systematic inventory has not been conducted.

Open Space and Recreation

- For areas of the District where parks accessibility under the Draft 2017 Parks and Open Space Plan, please identify specific mitigation measures.

Public Services and Utilities

- Please quantify increased demand for elementary, middle-school, and high-school classrooms under all alternatives.
- Please quantify additional police officers who would be needed to maintain recommended staffing under the Police Department's staffing model and to meet response times under all alternatives.
- Please analyze the capacity of the storm water system during peak flow periods and estimate the number of potential new Combined Sewer Overflow discharge events under all alternatives.

Johnson, Trish

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.

Trish Johnson

johnson.trish@gmail.com

From: Anita Jones
To: [PCD_MHAEIS](#)
Date: Monday, July 03, 2017 9:00:58 PM

1

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.

Anita Jones

Name	Michael Jones
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 I believe a fourth option of more limited grow and limited increased zoning is needed to keep this city livable.
Land Use	2 I believe a fourth option of more limited grow and limited increased zoning is needed to keep this city livable.
Transportation	3 After reviewing this section in detail, I believe this statement from the document clarifies the City's hope: "From a policy perspective, the City has prioritized reducing vehicular demand rather than increasing operating capacity." While this is a nice wish, the increasing number of people coming to the area coupled with the limited space for transportation due to waterways, and the limited options for appropriate transportation growth will not allow the City to accomplish this. I believe the City needs to limit growth to a level that reasonably fits with what transportation capacity now and in the future can sustain. I don't believe any of the three options address this. I believe a fourth option of more limited grow is needed to keep this city livable.
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	Michael Jones
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	Moot point. See my comments regarding transportation.
Housing and Socioeconomics	Moot point. See my comments regarding transportation.
Land Use	Moot point. See my comments regarding transportation.
Transportation	<p>1 The thrust of this transportation proposal is a ***hope*** that people will move away from SOV transportation to some greater or lesser degree. Given the study's statement "Much of Seattle's transportation network is constrained by the waterways within and around the city" and that population is going to continue to increase, I don't believe the "hope" expressed by this plan will be a reality. People are going to continue to drive because public transit can't possibly meet everyone's travel needs. Further, I think adding affordable housing is going to make transportation issues worse.</p> <p>In the end, the City Counsel and the Mayor are going to have to decide if the City is supposed to be here for the residents of the City or for the benefit of the developers who are building their buildings here.</p> <p>2 Affordable housing and rapid growth are nice ideas, but we just don't have the available space to support all of what the City seems to think it wants. Until the issue of appropriate transit is solved at a City and regional level, all these other questions being asked are moot points. If we go forward with this plan without solving the transportation questions, we're going to end up with a city that's not livable for anyone.</p>
Historic Resources	Moot point. See my comments regarding transportation.
Biological Resources	Moot point. See my comments regarding transportation.
Open Space & Recreation	Moot point. See my comments regarding transportation.
Public Services & Utilities	Moot point. See my comments regarding transportation.
Air Quality & Green House Gas Emissions	Moot point. See my comments regarding transportation.
Demographic Survey (optional)	

Jones, Scott

From: Scott Jones
To: [PCD_MHAEIS](#)
Subject: Raising height restrictions in neighborhoods Date: Sunday,
August 06, 2017 9:13:49 PM

To the Planners of the Mandatory Housing Affordability:

1

We are residents for the past 18 years at 4036 44th Ave SW, Seattle 98116. We have just received notice that there is a proposal to raise the current height limits for property zoning in our area to 50 feet; primarily on California Ave. Our home is separated by an alley to California Avenue here in West Seattle, and currently our neighbor's across the alley live in a 2 story apartment complex. To think that the new zoning being considered would raise the allowed height of the building to 50 feet would negatively affect our quality of life at home and the integrity of our neighborhood.

A building of that size would be "out of synch" with the traditional neighborhood we currently live in; and to have a 50 foot structure towering over our home, and all the other homes on our side of the alley, would be an extremely negative addition to our neighborhood.

Please keep the building of such large structures to areas that are already zoned for such large buildings, and help those of us who live in single family neighborhoods maintain the integrity of our homes that we currently enjoy.

Thanks for your time, and I hope you will reconsider your proposal. Please contact us if you have any questions regarding this matter.

Sincerely,
Scott Jones and Darci Kurzawa
206-933-9099

Sent from my iPad

Name	JR
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 Limit growth, save Seattle's character.
Housing and Socioeconomics	2 Do not invite unlimited poor to our area who need endless subsidization or who feed off of government handouts. We know that these populations are known to vote Democrat in elections, but the Middle class is further disrespected and destroyed by having to endlessly support these populations.
Land Use	3 What about the other species of animals that live in or around Seattle? Once all concrete and towers, what then for these creatures?
Aesthetics	4 Towers and concrete? Joy. Runoff and no other animals in the once beautiful emerald city? Great. Can't wait.
Public Services & Utilities	5 Constant increases to those in the middle to pay for those that require the government teat? Joy.
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	

Name	Katie Kaku
Email address	
Comment Form	
Public Services & Utilities	<div>1</div> <p>I am shocked to find that you only consider the quality of the schools and not the space available at the schools in your analysis of local education opportunities. While access to good schools are desirable for all new families, if the schools are overcrowded beyond capacity and beyond what adding a few portables can solve (we have already reached that point), then the quality of the education will suffer. Adding family housing units to an already overcrowded school zone without providing any analysis of mitigation will have detrimental impacts on the City of Seattle as a whole. This must be better addressed before the proposal should be accepted.</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	

Name	Jeff Kapsner
Comment Form	
Description of the Proposed Action and Alternatives	1 We need more housing, the no action is a bad option that keeps prices rising quickly and turns us into San Fran sooner.
Aesthetics	2 Bigger building in urban villages are appropriate.
Transportation	3 Driverless cars will soon make this whole chapter a joke to read in 10 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	

Name	Marcia Kato
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 The MHA Draft does not sufficiently address the specific neighborhoods that will be affected by the MHA implementation.</p> <p>2 Community input was not actively solicited as the draft was formulated; rather the meetings (which were not adequate in number or venue size) were more a presentation of plans to upzone and support development in the name of affordable housing.</p>
Housing and Socioeconomics	<p>3 The proposed upzoning and current affordable housing incentives to developers do not seem to yield that many affordable housing units. It would be interesting to look at the specifics of displaced low- and middle-income households vs. the added affordable units.</p> <p>4 The report does not address household configurations and development. Many low-income households may include extended family members and require larger units than new development offers.</p>
Aesthetics	<p>5 The current design review process does not adequately address aesthetics, and the city has proposed that design approval be streamlined, eliminating public meetings where community members can express concerns that about buildings that will</p>
Transportation	<p>6 This chapter does not adequately address the specific of the West Seattle neighborhood and the traffic analysis is very inaccurate. Local input and collaboration would have made the flaws obvious. The information in this chapter is misleading for our community.</p>
Historic Resources	<p>7 Preservation of specific historic resources in the WS Junction are not addressed, nor is the value of the maintaining the liveability and historic character of the area with more compatible development (see aesthetics and</p>
Biological Resources	<p>8 The chapter does not address the development standards that allow nearly 100% of land beneath new develop to be covered by building/pavement.</p> <p>9 in addition, large trees are consistently replaced by saplings that are planted in the medians in small plots that will never allow the trees to develop much beyond the</p>

	sapling stage.
Open Space & Recreation	<p>10 The analysis does not propose how the increased demand for parks and open space will be addressed. The analysis also does not look at specific neighborhoods proposed for upzone, how their geography impacts accessibility of proposed or existing open space.</p>
Public Services & Utilities	<p>11 Again, this chapter does not address specifics of West Seattle. The SPS capacity issue does not address where in the city schools will be added. The WS projects listed do not seem to significantly increase capacity but only upgrade facilities on existing sites, and there are no middle or high school projects listed.</p> <p>12 The Most sewer lines in West Seattle are less than 12" in diameter and would not meet demands. This is not addressed, and the study does not look at peak flows.</p>
Air Quality & Green House Gas Emissions	<p>13 Avalon Way, part of the WS Junction urban village abuts the West Seattle/Fauntleroy Way corridor, the primary traffic route to and from West Seattle, and also the Nucor Steel plant. There is no mention of this urban village being within 200m of a major a major highway. Certainly, this area experiences more traffic/pollution than 23rd/Jackson or Green Lake. Intense development will eliminate current green spaces and plantings and trees that mitigate the health risks associated with exposure to air pollutin</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?	

From: martinkato
To: [PCD_MHAEIS](#)
Cc: [LEG_CouncilMembers](#); [Murray, Edward](#)
Subject: Draft EIS - MHA
Date: Monday, August 07, 2017 8:27:26 AM

Thank you for extending the comment period; I wish that there were more time so that more community members could comment on this important issue.

While like all Seattle residents, I am concerned about the housing issues in Seattle. I am not convinced that upzoning and mega-development is the solution. I do not see new development sufficiently addressing the housing crisis that low-income and middle-income residents face. Rather, one side effect not sufficiently addressed is the collateral damage that this kind of development brings to existing residents who are just scraping by. The relocation funds are insufficient for relocation in our city. And new privately owned development does not adequately address their needs and also negatively impacts remaining residents by reducing quality of life (including restriction of light from highrises, inadequate green space and infrastructure for the influx of new residents, and loss of neighborhood community "feel").

Perhaps the biggest flaw of the Draft EIS is the inadequate community input --at least in West Seattle. Residents tried to participate in community meetings which were few, overcrowded and not amenable to participation at the meetings. Without the West Seattle Blog and neighborhood-run listserv, I would be unaware that the meetings took place or of much of the details of the plan. The Junction Neighborhood Organization (JuNO) concisely identifies the concerns about the EIS.

I live in a strongly connected neighborhood community. With a plan created without the voices of residents like my neighbors who are passionately invested in Seattle and West Seattle and the few blocks that we call home, the important considerations that need to be a part of planning that so intimately affects residents are missing.

Sincerely,
Marcia Kato
4130 32nd Ave SW
Seattle, WA 98126

Name	Katy
<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>1 why aren't the definitions provided on the map? Or a handy link? Thank you</p>
Demographic Survey (optional)	
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: Andy Katz
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Monday, August 07, 2017 12:01:15 PM

To Whom It May Concern:

I'm a nine-year Seattle resident who has rented in the 23rd & Union-Jackson RUV and currently the First Hill-Capitol Hill Urban Center. I've seen massive rent increases over the past several years typical of many Seattle residents, large enough to put me at risk of displacement from the neighborhood if not the City altogether. I'm a white male, living alone, in my 40s, who left a job last year with extensive international travel and am now looking for work locally in Seattle.

I'm a member and leader of the Capitol Hill Renter Initiative, and I'd like to include the content of our DEIS comment letter to OPCD, dated August 7, 2017, by reference.

I'd like to supplement those remarks briefly.

I would like to see more and larger Urban Village boundary expansions to fill in missing jigsaw-puzzle-pieces such as the area circumscribed by 12th Ave E to the west, E Aloha (or even E Highland) to the north, and 19th or 23rd Ave E to the east. These areas are or will be well-served by Metro Routes 10, 12, and 48 as well as Madison BRT. Notwithstanding HALA's other recommendations, the City should seize this generational opportunity provided by the implementation of MHA to maximize the areas of opportunity for maximum density.

I'd also respectfully suggest that the City consider one modification to Alternative 3 for First Hill-Capitol Hill: Upzoning the Melrose Promenade area to NC3P-145 instead of NC3P-95, as it's bounded by highrise to the south and I-5 freeway to the east. With the shrinking economies of wood-frame construction in the "donut hole" between approximately 80-120 feet, an incentive height of 95 feet is virtually meaningless. A 145' max height would permit project to pencil out that would result in move overall housing units, as well as more affordable units, in a dense walkable area with little incremental adverse impact at street level compared to 95' structures.

Thank you for your time and attention.

Sincerely,
Andrew Katz
katzaj@gmail.com

Name	Mitch Katz
Email address	
Comment Form	
Housing and Socioeconomics	<p>1 Over the past few years, Crown Hill has undergone a density increase even before implementation of any of these proposed actions. Tearing down 700 square foot Craftsman bungalows to build a pair of three-story, 3000 square foot milk carton homes may increase density but it does not increase affordability.</p>
Land Use	<p>2 Over the past few years, Crown Hill has undergone a density increase even before implementation of any of these proposed actions. This has led to extensive tree loss and loss of open space along streets. New buildings stretch to within 5 feet of lot lines on all four sides.</p>
Aesthetics	<p>3 Over the past few years, Crown Hill has undergone a density increase even before implementation of any of these proposed actions. Big box home construction has removed trees, blocked light, filled lots, destroyed character, and created a sameness of milk carton homes packed tight on lots. There is an increasing ugliness and homogeneity of construction, even before the zoning has changed. Neighborhood character is lost, or transformed into something much less desirable. We are already becoming an overflowing warehouse of side-by-side stacked boxes containing people.</p>
Transportation	<p>4 Over the past few years, Crown Hill has undergone a density increase even before implementation of any of these proposed actions. 15th and 8th Avenues and 80th and 85th Streets and Holman Road have been getting more and more crowded, with an increase in accidents and back-ups. Buses have been getting more crowded.</p>
Public Services & Utilities	<p>5 Over the past few years, Crown Hill has undergone a density increase even before implementation of any of these proposed actions. Sewer repairs have become frequent. Electricity demands must be extraordinary. Police already acknowledge that they are woefully understaffed in the North Precinct.</p>
Demographic Survey (optional)	
<p>Have you been or are you at risk of being displaced from your neighborhood?</p>	
<p>Have you been or are you at risk of being displaced from Seattle entirely?</p>	

From: Courtney Kaylor
To: [PCD_MHAEIS](#)
Subject: Comments on DEIS for MHA
Date: Monday, August 07, 2017 2:46:22 PM

On behalf of 70th & Greenwood LLC, we are writing to provide comments on the City of Seattle Office of Planning and Community Development's Draft Environmental Impact Statement ("DEIS") for the Citywide Implementation of Mandatory Housing Affordability. 70th & Greenwood LLC is the applicant for a contract rezone at 7009 Greenwood Avenue North (SDCI Project No. 3023260). The property is currently zoned NC2-40. The proposal is to rezone the property to NC2-65; however, the proposal voluntarily limits the height of the project to 55 feet. This is consistent with proposed height limits for the property under both Alternative 2 and Alternative 3 in the DEIS. 70th & Greenwood supports the adoption of this height limit for the property.

Courtney Kaylor
Partner

[McCULLOUGH HILL LEARY, PS](#)

701 FIFTH AVENUE, SUITE 6600
SEATTLE, WA 98104
TEL: 206.812.3388
DIRECT: 206.812.3379
FAX: 206.812.3389

COURTNEY@MHSEATTLE.COM

WWW.MHSEATTLE.COM

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From: Courtney Kaylor
To: [PCD_MHAEIS](#)
Subject: Comment on MHA DEIS
Date: Monday, August 07, 2017 3:00:49 PM

On behalf of Brook V LLC, we are writing to provide our comments on City of Seattle ("City") Office of Planning and Community Development's ("OPCD's") Draft Environmental Impact Statement ("DEIS") for the Citywide Implementation of Mandatory Housing Affordability ("MHA"). Brook V LLC is the applicant for a contract rezone 1600-1612 Dexter Avenue North (Parcels 8807900200 and 8807900210) (SDCI Project No. 3021980). The property is currently zoned NC3P-40. The proposed zoning is NC3P-65.

The DEIS identifies the proposed future zoning of this property as NC3P-55(M) for both Alternatives 2 and 3. However, the property to the south is proposed for C2-75(M) zoning and the property to the east is proposed for NC3-75(M) zoning.

The Final Environmental Impact Statement ("FEIS") should take into account the pending contract rezone proposal. See SMC 25.05.670. The FEIS should consider the NC3-75(M) zoning for this property to accommodate the 65-foot project proposed with the contract rezone. This height is consistent with the existing C2-65 zone to the south and NC3-65 zone to the east. It is also consistent with the proposed NC3-75(M) zoning to the east and the proposed C2-75(M) zoning to the south. The additional height allows the proposed building to closely relate to the scale of adjacent existing structures, provide more affordable dwelling units, increase residential density in the area, and respond more appropriately to the site's topography. This height would better contribute to the City's affordable housing supply and would replace an underutilized office building with a pedestrian-oriented, well designed building.

We appreciate the opportunity to comment on the DEIS.

Courtney Kaylor
Partner

McCULLOUGH HILL LEARY, PS

701 FIFTH AVENUE, SUITE 6600

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WWW.MHSEATTLE.COM

NOTICE: This communication may contain privileged or confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

From: Eve Keller
To: [PCD_MHAEIS](#)
Subject: North Rainier expansion, no please
Date: Monday, August 07, 2017 12:28:03 PM

Hello,

- 1 Please do not expand the North Rainier urban village boundaries. This historic and beautiful neighborhood, currently pursuing preservation of the Historic Mt. Baker tract under federal designation, should not be encroached upon at this time. Perhaps in the future, when the development along Rainier Ave has been completed and the spaces there have been maximally pursued and developed, we should consider expanding the boundary. But not before.

This city is straining to hold its visual identity, and on the neighborhood level it is largely losing, as a result of the development that has been implemented of such bland, lackluster appeal. One person I know who has been a long term resident of Eastlake refers to the visual look of the new developments in Seattle as stacked porta potties.

I have met returning Seattleites, after absences of 5 years only, whose leading comments are what has happened to Seattle, they hardly recognized Capitol Hill, and Ballard, well, I won't even go there about those comments. Please do not erode the integrity of Mt.Baker's charm and beauty easily. Once it is gone, it will never be replaced by the same quality. It is not yet time for this drastic a move.

Sincerely,

Eve Keller
12 resident of Mt. Baker
Vice-President Mt. Baker Hub Business Association

From: Kathryn Keller
To: [PCD_MHAEIS](#)
Subject: Draft Comments on MHA DEIS
Date: Monday, August 07, 2017 1:15:49 AM

I have one comment regarding the MHA DEIS [http://www.seattle.gov/hala/about/mandatory-housing-affordability-\(mha\)/mha-citywide-eis](http://www.seattle.gov/hala/about/mandatory-housing-affordability-(mha)/mha-citywide-eis)

The DEIS is a huge miss regarding the lands and neighborhoods that are zoned multifamily and neighborhood commercial, and subject to up zone under the MHA proposal, but which are categorized 'outside' of Urban Villages. It is a healthy percentage of the total, but it is scattered in different neighborhoods with different conditions in each.

Every property to be up zoned for MHA should have a level of local planning and measures of concurrency maintained. Up zones should be a function of neighborhood or community planning, not the precondition for crisis management. But, Seattle, unlike many other cities who plan in whole districts, chose to address that level of planning attention only to Urban Villages and Urban Centers. Well, now I see a fairly large percentage of the expected growth outside of all of those planned areas.

The DEIS addresses primarily the impacts of displacement, and relies on existing neighborhood planning assessments (some out of date) in order determine other impacts on each Urban Village. Sadly, there is no equivalent basis for areas outside of Urban Villages.

By and large these commercial and residential areas each function very differently within their networks of economic and residential activity, demographics, transit capabilities, historic character, near term development interest or lack thereof, tree canopy, parks, schools, utility infrastructure, community assets — all of the matter that must be taken up as part of what the Comprehensive Plan now terms community planning.

Those areas are obviated and disappeared in this DEIS, just as they were obviated and disappeared from public feedback in the HALA MHA and outreach process.

Mitigation cannot even be determined unless and until these areas are specifically addressed, either as proposed additions to existing Urban Villages, with concomitant required planning and community outreach, or they may require to be their own UV, but they all require a level of attention that identifies the community assets, enhances the ability to provide MHA level housing, and addresses the resources required to support greater population in those areas. Whether Seattle decides to create new Urban Villages or not, all places experiencing planned growth deserve a level of planning and community engagement to support it.

Madison Park down the road from me, for example, has a lot of existing moderately priced apartments, a near-historic 'downtown,' legacy businesses, and not a lot of public transit. There is no existing neighborhood plan to even rely upon. Development pressures could result in an apartment complex like the Edgewater all being redeveloped into luxury units, which is undeniable. Thus my support for inclusionary requirements. But, up zoning will incite development in a hot market. If there is no respect given to factors on the ground, no Urban Design Framework established, no plan, and no pre-commitment to supporting greater transit needs, with a community that has practiced neighborhood planning activities never, the city is doing a huge disservice to both old and new residents. I am positive other commercial and residential areas have their own challenges that need to be tackled in order to manage growth that is being proposed. Many have legacy zoning that is largely out of whack with the current community, given some of Seattle's historic zoning practices, and never improved through any neighborhood planning process.

The planning must be accomplished before up zones are imposed. That is the only way to establish appropriate mitigation to even hope to meet concurrency requirements. I ask you to look at the model provided by the 23rd Ave and CID processes to understand the quality of engagement that is required. Certainly, any contract rezone of PUD proposal is already covered under the MHA Framework in the meantime.

To sum up, I believe the MHA DEIS is wholly inadequate to address the impacts on land proposed to be up zoned outside of Urban Villages or the Urban Centers.

Thank you,
Kathryn Keller
1821 27th Ave

Kelly, Kathleen

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.

Kathleen Kelly

812 So Sullivan St.

I have serious concerns regarding the lack of
specifics for our unique neighborhood. I am a
longtime resident & homeowner. This zoning will directly
impact my property and quality of life with no real
benefits to me.

~~This~~ This is a neighborhood with a long history and
character that needs to be preserved. The planning
for our neighborhood needs to be in the hands of our
neighborhood residents.
Missing from your draft - tree canopy impact (in
a neighborhood with air quality issues). Lack of
parking for apartments, neighborhood. Traffic increase
on residential streets. Drainage issues ect.

8/7/2017 23:27:01

Mariska Kemna

Description of the Proposed Action and Alternatives

None

Housing and Socioeconomics

None

Land Use

None

Aesthetics

1. The city currently doesn't pay close attention to bulk of buildings, which will become an issue in 10-20 years, when houses have been torn down and replaced by back to back town homes and apartment buildings. Many of them maximize space to the extreme, encroaching on neighbours, but also on sidewalks by having second stories hang over the site walk, which will prevent Seattlelites from walking in the sunshine, and add a certain, unnecessary, amount of gloom. It can be made much brighter, greener and lighter, which will help everyone enjoy the neighborhoods more: newcomers and oldtimers alike. FOr example, Portland requires large buildings to have a common green space that is accessible to the neighbors.

Transportation

2. Please consider the infrastructure! Not everyone will be able to take light rail. For example, merging South onto I5 from 65th is taking a long time these days and it will only get worse- Roosevelt still has a lot of buildings to add; it wont be long before the merging lane will start blocking 65th street by sheer size

Historic Resources

3. Please dont destroy historic Seattle neighborhoods; Seattle is defined by them, and they are what makes the city great. Adding out-of-scale townhomes amidst historic homes will have a chain reaction- the neighboring plot will eventually also convert because 100 yo homes lose their appeal when there is a large modern complex next door that has been built disproportionately large: up until the fence line and the curb. For example, occasionally you will encounter a single family plot that has 6 townhomes crowded on them. Ironically, none of these will be affordable, starting at 800,000 USD.
4. Please stick with natural arterial borders for urban villages, rather than a walking radius that doesn't incorporate the uniqueness of each neighborhood into the decision making process. For example, the Roosevelt urban village border should stay at the 15th Ave NE arterial, and not extend to 17th Ave NE. Especially the area between 15th-17th AVE, south of 65th, is a historic neighborhood, drawing walkers from all over the NE Seattle to enjoy the scenery of old characteristic Craftsmen homes. The Seattle historic society even organizes walks in the neighborhood.
5. These type of decisions should get real neighborhood input, since the residents of neighborhoods know the minutia and dynamics of each neighborhood and can help decide where adding more density makes sense, and where it may not.

Biological Resources

None

Open Space & Recreation

6. Please don't forget about green space between buildings; a little bit of green goes a long way to avoid the impression of block after block of large scale housing, that may not look as bright and shiny in 20 years.

Public Services & Utilities

None

Air Quality & Green House Gas Emissions

None

Name	Kendahl
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I don't feel you are considering displacement when you talk about mandatory housing. For one, our street, 16th ave NW is targeted for upzone; a street full of homeowners who couldn't afford to buy a home somewhere else before the prices skyrocketed. How is it progress to target our street and make us feel we are impeding progress by wanting to keep the homes we worked so hard to buy?</p> <p>2 For the other, and I think much more importantly given the number of people it affects, there are so many low income citizens renting in CHUV, including on our street, many of them here for years, all of them contributing to this city. I don't see this plan being effective if those folks are displaced. There needs to be more security for current renters in the neighborhood. At the moment it feels like they are being bulldozed out to clear space for the affluent and a sprinkling of low/mid income people.</p>
Housing and Socioeconomics	<p>3 Again, I don't think the current plan addresses the needs of our current low and lower-middle class income renters and home owners. I have no feeling that we are secure in this scenario.</p>
Aesthetics	<p>4 I have seen the transitional heights for proposed upzone neighborhoods and I find this a fair compromise. If there can be some increased density and the people who wish to keep their homes can stay because adjoining buildings don't ruin their right to enjoy their own homes, it seems fair.</p>
Transportation	<p>5 However, I don't see the infrastructure keeping up with these changes. It's all well and good to address height, but drainage, sidewalks and other pedestrian safety measures must be managed first. This process feels too rushed. Some major steps are being missed.</p> <p>6 I think option 3 is incredibly dangerous given how poorly public transportation is already serving our area. Buses are packed during rush hour. Growth of 150% would be ridiculous. If this area is not getting light rail, then please stick to 50% and be realistic about how many new units are being built when considering improving public transportation improvements for CHUV.</p>
Have you been or are you at risk of being displaced from your neighborhood?	
Have you been or are	

McCULLOUGH HILL LEARY, PS

August 7, 2017

VIA Electronic Mail

Office of Planning & Community Development
c/o Geoff Wentlandt
PO Box 34019
Seattle, WA 98124-4019
Email: MHA.EIS@seattle.gov

Re: Mandatory Housing Affordability
Draft Environmental Impact Statement Comment

Dear Mr. Wentlandt:

On behalf of Phoenix Property Company (Phoenix), we are writing to provide our comments on the City of Seattle ("City") Office of Planning and Community Development's ("OPCD") Draft Environmental Impact Statement ("DEIS") for the Citywide Implementation of Mandatory Housing Affordability ("MHA"). Overall, we are pleased with the direction of the MHA citywide legislation, and believe the proposed code changes outlined in Alternative 2 is the best option of those studied in the DEIS to achieve the MHA Implementation Principles to increase densities in areas well served by transit and neighborhood assets and to encourage a wide variety of multi-unit housing throughout the City.

Phoenix intends to submit a contract rezone application for a development at 4801 24th Avenue NE, directly west of University Village and north of the University of Washington. Phoenix's proposed development, Trailside, is a student targeted housing project that sits directly adjacent to the Burke Gilman trail. The goal of the project is to provide much needed student housing within close proximity to the campus, and will provide direct, safe public pedestrian and bicycle connections from the Burke Gilman Trail to the amenities directly east of the site and beyond.

The contract rezone seeks to rezone the site from LR3 to NC2-85, conditioned to 75' in height. This rezone aligns with Alternative 2 in the DEIS, which studies rezoning this site to NC2-75. We strongly encourage OPCD to implement the density analyzed in Alternative 2 for this site. The change from low rise residential to Neighborhood Commercial-75 is critical to allow this project to move forward so that the significant public benefits of safe trail connections can be achieved. The existing site and surrounding streets are not active or pedestrian friendly, and this project will greatly improve the pedestrian experience and enhance the public realm around entire site. The project, and

consequently the public benefit, cannot be achieved under LR3 zoning, even with the additional density studied under Alternative 3. Due to its location next to University Village and surrounded by NC uses, it makes sense to rezone the current LR3 zone to NC2-75 to align with the surrounding parcels and existing development.

While LR3 zones typically serve as a transition to lower density housing, this is not the case for this site. The site abuts the Burke Gilman Trail, and to the west of the trail is a steep slope with large, significant trees. The residential uses at the top of the hill are shielded from view of the project by the large trees, and are at a similar elevation as the height of the project at 75'. The graphic attached as Attachment A to this letter illustrates the unique topography of the area and demonstrates why the additional height and density are appropriate on sites such as the project site.

In addition, the City's adoption of the NC2-75(M1) zone studied in Alternative 2 will provide a significant contribution to the City's affordable housing supply, and in this instance, allow students to be walking or biking distance to school. The change from M to M1 alone would be significant, as the fee per square foot would increase from \$13.25/s.f. to \$20.00/s.f and the performance requirement would increase from 6% to 9% of the total units. The additional density afforded the project would amplify this change. For example, a change to LR3, as described in Alternative 3, would result in approximately only 9 units of affordable housing or \$2.8 million for affordable housing. If the NC2-75(M1) zoning is implemented, the project as currently structured would provide 24 units of affordable housing or \$7.6 million for affordable housing. The additional affordable housing provided as a result of the upzone fulfills the purpose of MHA, and we encourage the City to adopt the higher density option for this site as described in Alternative 2.

In addition, in our review of the DEIS Appendix F, we understand that OPCD is contemplating adding upper-level setback requirements to NC2-75 zones regardless of its proximity to a residential zone. The DEIS does not provide proposed Code language or an analysis of the proposed setbacks. While Phoenix understands the need for upper level setbacks for certain sites within NC-75 zones, this code change should not be a one size fits all solution. Phoenix's property is unique in its location in that it is not located on a designated street and is not located near a residential zone. We suggest that any additional setbacks contemplated under MHA apply only to those sites located along streets with a traffic classification of Class I, Class II, Pedestrian Street, or a Green Street.

We appreciate the opportunity to comment on the DEIS. Thank you for your consideration. Please feel free to contact me with any questions.

Sincerely,

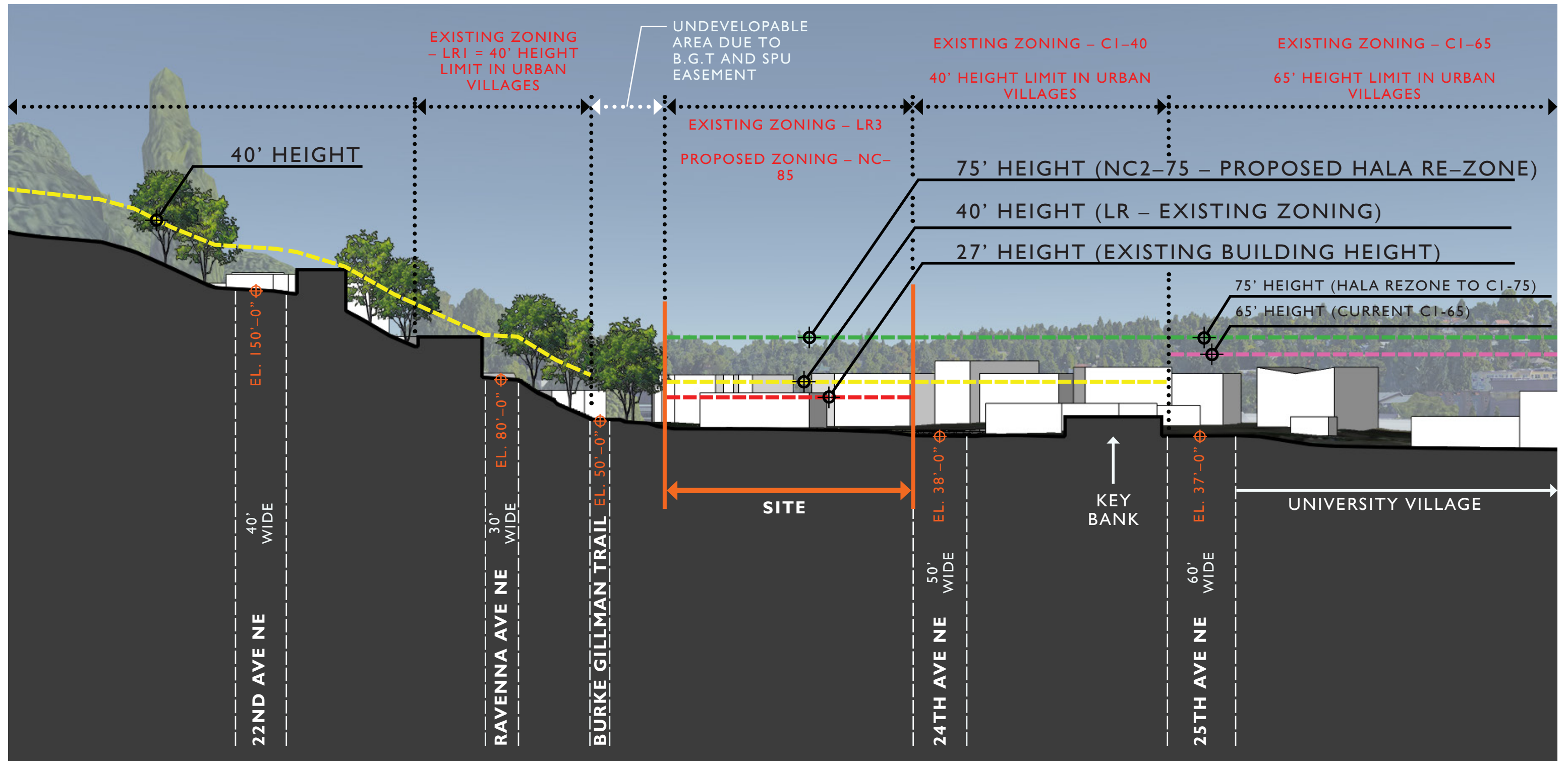


Katie Kendall

SECTION THROUGH SITE LOOKING NORTH

ATTACHMENT A

Kendall, Katie-1



PHOENIX
PROPERTY COMPANY

TRAILSIDE EDG | 08.07.2017 | PAGE 11

SiteWorkshop
LANDSCAPE ARCHITECTURE

WEBER THOMPSON



McCULLOUGH HILL LEARY, PS

August 7, 2017

VIA Electronic Mail

Office of Planning & Community Development
c/o Geoff Wentlandt
PO Box 34019
Seattle, WA 98124-4019
Email: MHA.EIS@seattle.gov

Re: Mandatory Housing Affordability
Draft Environmental Impact Statement Comment

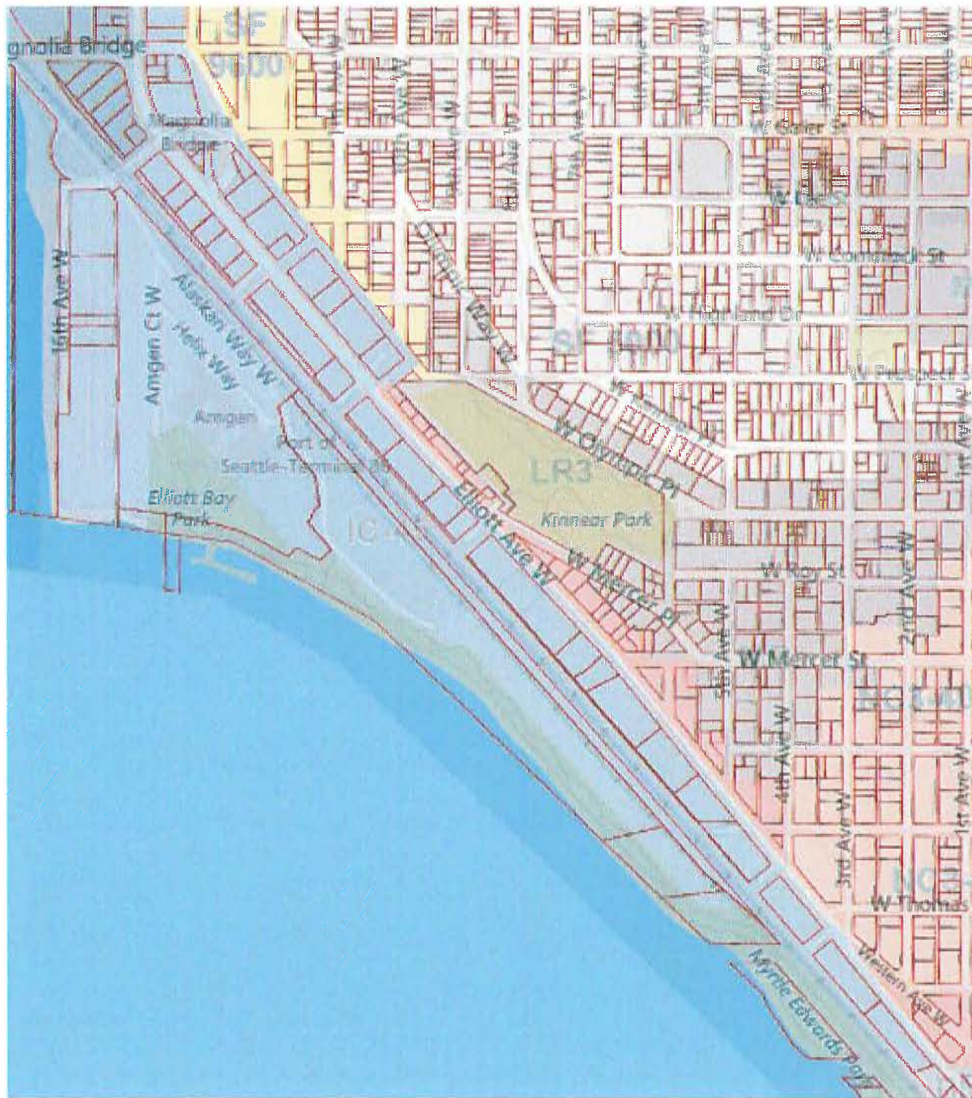
Dear Mr. Wentlandt:

On behalf of Elliott Way Partners, LLC (“Elliott Way”), we are writing to provide our comments on the City of Seattle (“City”) Office of Planning and Community Development’s (“OPCD”) Draft Environmental Impact Statement (“DEIS”) for the Citywide Implementation of Mandatory Housing Affordability (“MHA”). Overall, we are pleased with the direction of the MHA citywide legislation, and believe that increasing density in areas well served by transit will best achieve MHA’s ultimate goal of housing affordability.

However, Elliott Way has concerns regarding the inadequacies of the DEIS, particularly the lack of consideration for additional density for Industrial Commercial (“IC”) zones in significant transit corridors, such as the Elliott Avenue corridor.

Elliott Way Partners owns property located at 1405 Elliott Avenue W, in the Elliott Avenue corridor in the Interbay neighborhood of Seattle. The corridor is primarily zoned IC-45, with certain parcels currently able to obtain a 65-ft height limit through a special exception. SMC 23.50.026.C.2. Alternatives 2 and 3 in the DEIS both propose to increase the height in the IC-45 zone to 55 ft. and increase the FAR in all IC zones, regardless of the height limit, from 2.5 to 2.75. While these blanket increases may work for some areas of the city zoned IC-45, the alternatives studied in the DEIS fail to properly plan for density in this corridor and ignores the physical limitations in the corridor. Much of the IC-45 corridor is located in a liquefaction zone near the water and many of the parcels are small. Typically, this means that constructing below grade is difficult and expensive due to the high water table. In order to have a feasible commercial development along the corridor,

the height and FAR need to be increased. We accordingly request that the City study an increased density alternative in this corridor to rezone to IC-75 zone with an FAR of 4.



This transit corridor is also currently undergoing significant changes. Sound Transit has selected the corridor as appropriate for light rail to Ballard in its ST3 plans. The light rail is anticipated to travel to Ballard as soon as 2035.

The corridor is ripe for redevelopment with the coming of light rail. However, the DEIS ignores the need for density in this transit corridor and misses an opportunity to provide much-needed funds for affordable housing under MHA. The corridor itself is currently primarily in commercial use, and is unlikely to be developed with 55-ft height limits and an FAR of 2.75, especially when considering the small sites, high water table, and the fact that commercial development will be subject to the fees under MHA without gaining sufficient density.

Instead of providing a standard 10-ft increase in all IC zones with a standard increase in all IC zones, regardless of height, of 0.25 FAR, we recommend that the City study an increase to height and density in this IC corridor in the FEIS: rezone to IC-75 with an FAR of 4. A brief analysis of the entire IC corridor demonstrates that an increase in density has the potential to double the fees that would go to the City for affordable housing without doubling the allowed density. To illustrate, if all sites (excluding those recently constructed, recently permitted, or owned by the city or county) on the IC corridor redevelop with commercial development at 2.75 FAR, the proposed FAR under MHA, the City could receive approximately \$11.55 million in fees for affordable housing. If the City increases the allowable FAR from 2.75 to 4 in an IC-75(M1) zone, the density would increase by approximately 750,000 s.f. over the entire corridor (from 1.65 million s.f. allowed under the current MHA scheme to 2.4 million s.f. allowed under the proposed MHA scheme), but the fee would increase to \$27 million for affordable housing. The additional density allows for marked increase in affordable housing production in Seattle.

The density allowed in a rezone to IC-75 with an FAR of 4 would allow for development that is compatible in scale to existing development and would not have the potential to affect neighboring residential areas, as the residential neighborhoods are significantly elevated above the corridor itself—all key goals of MHA. Moreover, MHA seeks to place density along significant transit corridors and neighborhood assets and to encourage a wide variety of multi-unit housing throughout the City. We accordingly ask that OPCD study in its FEIS an increase in density in this IC corridor along Elliott Avenue to IC-75 with an FAR of 4 so that these goals of the MHA can be met.

We appreciate the opportunity to comment on the DEIS. Thank you for your consideration. We look forward to continued work with the City to help ensure the final EIS is a complete evaluation of the MHA Proposal and its goals. Please feel free to contact me with any questions.

Sincerely,



Katie Kendall

McCULLOUGH HILL LEARY, PS

August 7, 2017

VIA Electronic Mail

Office of Planning & Community Development
c/o Geoff Wentlandt
PO Box 34019
Seattle, WA 98124-4019
Email: MHA.EIS@seattle.gov

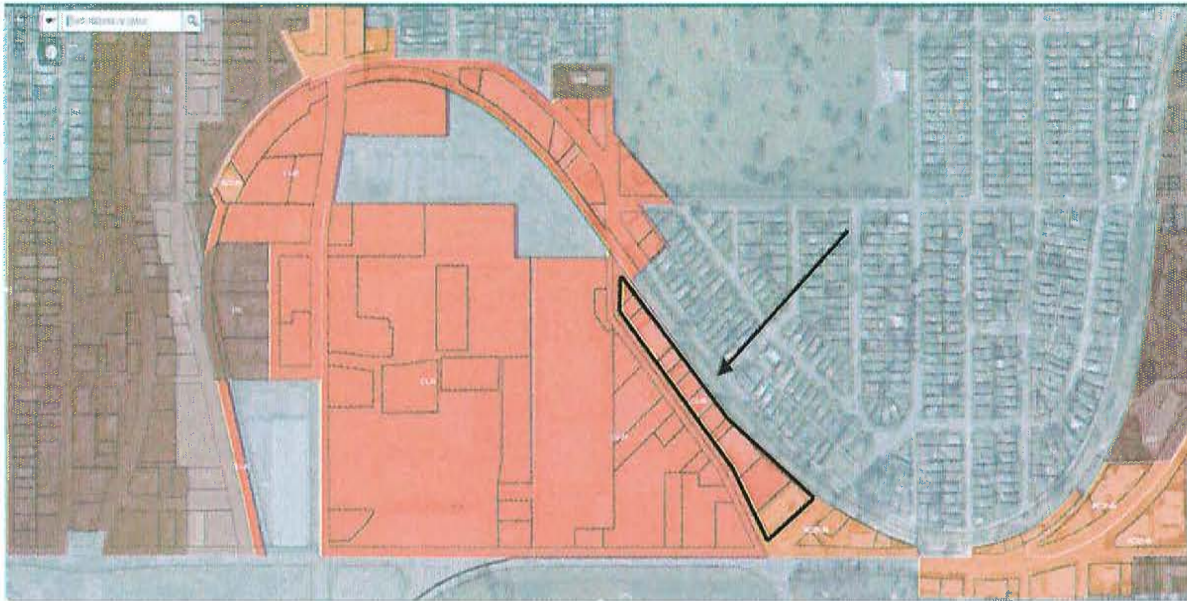
Re: Mandatory Housing Affordability
Draft Environmental Impact Statement Comment

Dear Mr. Wentlandt:

On behalf of ICP Capital LLC (“ICP”), we are writing to provide our comments on City of Seattle (“City”) Office of Planning and Community Development’s (“OPCD”) Draft Environmental Impact Statement (“DEIS”) for the Citywide Implementation of Mandatory Housing Affordability (“MHA”). Overall, we are pleased with the direction of the MHA citywide legislation, and believe that increasing density in areas well served by transit will best achieve MHA’s ultimate goal of housing affordability.

However, ICP has concerns regarding the inadequacies of the DEIS, particularly the lack of consideration for expanding the boundary of the Ravenna Urban Center Village to include the properties across the street from Union Bay Place NE, the current boundary of the Ravenna Urban Center Village, and the lack of consideration for additional density on these commercially zoned properties.

Several parcels located on Union Bay Place NE between NE 45th Street and NE 49th Street are currently zoned C2-40, and were reviewed in the DEIS to be upzoned to C2-55 and NC2P-55 (“Properties”). These properties are currently located between University Village directly to the west, located in a C2-65 zone and in the Ravenna Urban Center Village, and the elevated Burke Gilman Trail to the east.



The alternatives studied in the DEIS miss an opportunity to properly plan for density in this existing commercial area. We accordingly request that the City study a revised or new alternative to rezone these properties to C2-75 to align them with the zoning across Union Bay Place NE and throughout University Village. ICP also requests that OPCD review as a revised or new alternative in its FEIS the potential expansion of the Ravenna Urban Center Village to include the properties.

C2-75 Zone

The DEIS fails to analyze the appropriate density for the Properties. The existing C2-40 zone, and the MHA proposed upzone to C2-55, is insufficient to support development in this commercial area well served by transit. Moreover, because of the unique elevation change in this area, rezoning the Properties to C2-75 provides the necessary density for redevelopment without jeopardizing an appropriate transition to the single family homes to the east.

The Properties are located on the east side of Union Bay Place NE. The west side of Union Bay Place NE and throughout University Village is slated to be rezoned to C2-75.

In this location, the Burke Gilman Trail serves as a natural barrier that is nearly 30' – 40' in elevation higher than Union Bay Place NE, as you can see in the graphic attached to this letter. Based on the distance between the Properties and the elevation changes, the 55' height limit proposed by the MHA rezone accordingly serves no transitional purpose. The Burke Gillman trail and the steep slope behind the Properties is the natural & appropriate buffer to the residential uses to the east, and not the commercially-zoned properties.

The height increase will also help to mitigate the significant soils and groundwater conditions in this area by providing additional above grade parking options. The groundwater in this area is extremely shallow which makes very challenging and prohibitively expensive to build below grade parking. In other words, it is impossible to provide the required parking in a 55' height limit without significantly raising the rents on any new development under the proposed rezone described in

Alternatives 2 and 3. With a 75' height limit, it is possible to provide the necessary density needed for this area.

The density increase addresses both physical limitations of the Properties and the need for affordable housing in areas well served by transit and neighborhood assets. We ask that OPCD study in its FEIS a revised or new alternative that addresses the need for increased density in this area.

Urban Center Village

For the same reasons set forth above, including the Properties in the Urban Center Village aligns with the MHA Implementation Principles.

The MHA Implementation Principles also recommend that OPCD consider topography, natural boundaries, and other elements when determining whether to expand an urban village. Here, the C2-zoned properties are sandwiched between University Village and the Burke Gilman Trail, which is approximately 30-40' feet in elevation higher than the existing grade of the Properties. The steep slope and the trail create the natural barrier that makes it appropriate to extend the Urban Village to these properties. In conformance with the MHA Implementation Principles, the increase in density, coupled with inclusion in the Urban Village, would allow the Properties to achieve appropriate density that is compatible in scale to existing development and provide much needed affordable housing in the area.

In conclusion, the increase in density and the expansion of the Urban Village meets the MHA goals to increase densities in areas well served by transit and neighborhood assets and to encourage a wide variety of multi-unit housing throughout the City. We ask that OPCD study in its FEIS the inclusion of the Properties in the Ravenna Urban Center Village and an increase in density and height to C2-75 for the Properties.

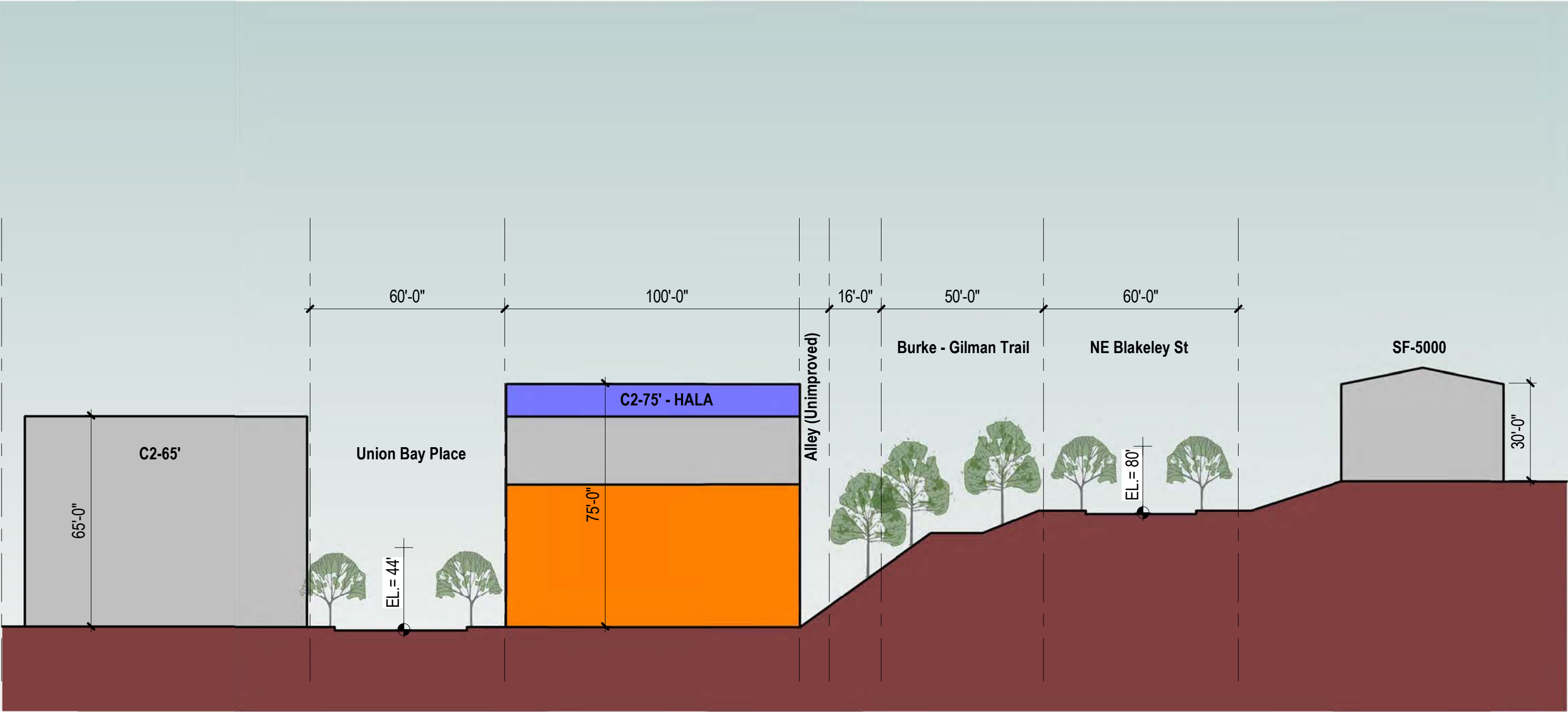
We appreciate the opportunity to comment on the DEIS. Thank you for your consideration. We look forward to continued work with the City to help ensure the final EIS is a complete evaluation of the MHA Proposal. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Katie Kendall", with a stylized, flowing script.

Katie Kendall

ATTACHMENT A



McCULLOUGH HILL LEARY, PS

August 7, 2017

VIA Electronic Mail

Office of Planning & Community Development
c/o Geoff Wentlandt
PO Box 34019
Seattle, WA 98124-4019
Email: MHA.EIS@seattle.gov

Re: Mandatory Housing Affordability
Draft Environmental Impact Statement Comment

Dear Mr. Wentlandt:

On behalf of Ballard 15th Ave, LLC (“Ballard 15th Ave”) we are writing to provide our comments on City of Seattle (“City”) Office of Planning and Community Development’s (“OPCD”) Draft Environmental Impact Statement (“DEIS”) for the Citywide Implementation of Mandatory Housing Affordability (“MHA”). Overall, we are pleased with the direction of the MHA citywide legislation, and believe that increasing density in areas well served by transit will best achieve MHA’s ultimate goal of housing affordability.

However, we have concerns regarding the inadequacies of the DEIS, particularly the lack of consideration in either alternative to consider pipeline projects such as pending contract rezone applications.

Ballard 15th Ave has submitted a contract rezone application for the property located at 6416 15th Avenue NW, Project Number 3024352, in the Ballard neighborhood. The proposed project is a six-story mixed use apartment building with 2,904 s.f. of street-level commercial uses, 72 residential uses, 2 live-work units, and parking for 33-34 vehicles. The site is currently zoned NC3P-40. Ballard 15th Ave has applied to rezone the property to NC3P-65. Ignoring the rezone application, the MHA DEIS only analyzes a rezone at this property to NC3P-55. We ask that OPCD study in its FEIS all pipeline projects, including this the contract rezone application on file with the City to rezone the property from NC3P-40 to NC3P-65. Alternatively, the OPCD can study as an alternative a rezone to NC3P-75 to align with the new zoning designations.

The DEIS alternatives analyze a rezone to NC3P-55. Increasing the height by only ten feet misses an opportunity to plan for density in an area well served by transit and ignores the reality that a project at this site built to NC3P-55 is likely infeasible due to existing site conditions and configurations. If infeasible, the gains that could be achieved under MHA, combined with the likely additional affordable units provided through the Multi-Family Tax Exemption, would be lost. The

rezone to NC3P-65 better implements the community's desire to increase density in this neighborhood to provide more affordable housing, while remaining is consistent with the character of the existing area within the Ballard Hub Urban Village. These additional affordable units integrated into an economic social fabric of a single building at the cost of only 8 to 9 more market units (compared to what would have been a 100% market rate building) accomplishes the goals of MHA. The FEIS should accordingly incorporate an analysis of the additional apartment units provided at 60% affordability that could be provided by the contract rezone project or the rezone to NC3P-75.

The rezone to NC3P-65 better contributes to the City's affordable housing supply than what is currently being analyzed in the DEIS and would replace a small restaurant and surface parking lot with a pedestrian-oriented, well-designed building. The height increase is only 10 feet taller than the MHA alternatives analyzed for this area, and would allow appropriate density on such a busy corner of the City. MHA desires to increase density in areas well served by transit and neighborhood assets and to encourage a wide variety of multi-unit housing throughout the City. This proposed rezone meets the goals of MHA and should be analyzed in the FEIS.

We accordingly ask that OPCD study in its FEIS all pipeline projects, including the pending rezone application to rezone the property from NC3P-40 to NC3P-65. Alternatively, we ask that the City study as a revised alternative a rezone on this site and neighboring sites to NC3P-75.

We appreciate the opportunity to comment on the DEIS. Thank you for your consideration. We look forward to continued work with the City to help ensure the final EIS is a complete evaluation of the MHA Proposal and its goals. Please feel free to contact me with any questions.

Sincerely,



Katie Kendall

From: Rebecca Kenison
To: [PCD_MHAEIS](#)
Subject: Changes to Madison-Miller Residential Area
Date: Friday, July 07, 2017 5:13:49 PM
Attachments: [LtrCapitalHillDevelopment 7-7-2017.doc](#)

Rebecca and Tim Kenison
 753 – 18th Avenue East
 Seattle, WA 98112
 (206) 325-5021
 July 7, 2017

We attempted to complete the survey for the Madison- Miller Residential Urban Village HALA and proposed up-zoning. Since we did not answer all the questions, we were unable to submit the survey! We did not answer all the questions because, as noted below, they were poorly worded, unclear and confusing. Now, finding out that the survey cannot be submitted unless one answers all the questions, means the survey is flawed and risks generating inaccurate and un-useable responses. If one doesn't have an opinion on a particular question or if one didn't understand the question, one just has to guess so he can submit the survey.

First question:

- (a) Asking a question about having a balance of studio, one bedroom and two and three bedrooms units is a different concept from having Residential Small Lot zoning.
- (b) More accurate questions would have been: (1) do you agree or disagree that lots with no more than 3' to 5' of side yard (i.e., RSL zoning) should be allowed? (2) Should lots with no more than 3' of side yards be allowed to have no limit on how much of the lot is covered? (3) Should 3 and 4 story units be allowed on streets with bus routes? (4) Should studio and one-bedroom units be mixed with two and three-bedroom units?
- (c) We do NOT agree with the RSL zoning. There are not anywhere near enough adequate-sized neighborhood parks and green spaces to justify RSL zoning.

Second question:

- (a) The concepts presented are not related in a meaningful way:
 - optimizing affordability;
 - optimizing livability;
 - keeping affordable housing dollars generated by development within our community;
 - subsidizing locally owned small businesses; and
 - retaining front and backyard setback and trees.
- (b) Are you trying to ask: "Should the money generated by development subsidize small businesses and retain setbacks and trees?" We thought money generated by development was supposed to be used for development of affordable housing. How would "affordable housing money generated by development" keep small businesses in the community? How would "money generated by development" subsidize small business? How would "money generated by development" retain setbacks and trees?
- (c) Do we want to retain our locally owned small businesses? Absolutely. We recall, however, what happened on 24th Avenue in the Central District when they re-

designed 24th. The supposed subsidies were a bureaucratic mess and woefully inadequate. What money came was too late and not adequate to maintain the businesses. Several had to close because they couldn't wait out the year plus project.

- (d) The current model in Seattle is to require developers to set aside the first floor of residential buildings for retail. Many, many retail spaces in new construction sit empty or turn into pretty non-descript businesses. Also, one of the draws of local, small businesses is that they are in funky little store fronts.
- (e) Do we want trees and front and back yard setbacks? Absolutely. We hate the claustrophobic feeling now of Seattle where everything is jammed together and has no character.

Third question:

- (a) Upgrade sewer lines: I assume with increased density there will have to be new sewer lines.
- (b) Upgrade and bury utility lines: It would be nice but at what cost? If the City would be paying for it, those dollars should be going to affordable housing.
- (c) Accessible public green spaces – ABSOLUTELY.
- (d) Public transportation – yes!
- (e) Designated parking – is this zone parking? Yes, but realize that if developers are not required to provide parking for the retail spaces, then those retailers will not have as many customers. We realize that we are all supposed to walk and ride bicycles or take the bus to do all our shopping but that is not convenient for doing a week's worth of shopping or if one has a couple of little kids in tow or if one is helping one's non-terribly-mobile elderly neighbor do her shopping.

Fourth question:

- (a) Define "costs." Are you referring to monetary costs or emotional costs?
- (b) Are you asking: Should my Capital Hill taxes be used to provide housing in another part of the City? (I don't think we have the option.) OR are you asking: Should affordable housing be congregated in certain areas as opposed to being distributed throughout the city? That depends in part on where transportation routes will be located.

Questions regarding transit and infrastructure projects:

- (a) Upgrade main sewer lines - very important;
- (b) Upgrade and bury utility lines – somewhat important;
- (c) Resurface roads – very important in downtown Seattle BUT the developers should be required to fully pay for the costs. In the Madison-Miller area, it is not as important.
- (d) Provide accessible public green spaces – extremely important.
- (e) Upgrade rain and storm water management – not sure.

- (f) Establish pedestrian and cyclist greenways – extremely important for pedestrians and not at all important for cyclist greenways.
- (g) Improve public transportation – extremely important.

Seattle used to be a livable city. Now it is turning into an amorphous, non-descript big city with no character.

Seattle has not answered the questions:

- (a) How does the City provide/encourage truly affordable housing for those making \$15/hour, \$20/hour/\$25/hour? Is it even possible?
It appears that the “answer” is to allow developers to build higher buildings and then only set aside 6% for “affordable housing.” San Francisco requires 25% to be set aside for affordable housing. The Seattle developers aren’t really sacrificing anything. They’re able to make as much money as they always have since 6% is nothing to them for being allowed to build higher buildings.
- (b) How does the current Seattle plan dovetail with the State-wide urban growth plan enacted several years ago?
- (c) Can we be assured that urban sprawl won’t occur if we allow cramped growth in Seattle?

Rebecca and Tim Kenison
753 – 18th Avenue E
Seattle, WA 98112
August 7, 2017

City of Seattle Office of Planning and Community Development
Attn: MHA DEIS
P.O. Box 34019
Seattle, WA 98124-4019

Re: Madison – Miller Park urban village proposal

1 To whom it may concern:

Enclosed is the August 6, 2017 Seattle Times' Pacific NW section article on backyards which is timely in light of decisions being made regarding the Madison – Miller Park urban village.

The article confirms that our backyards significantly enhance our quality of life. Please take this into consideration when making decisions about our lives, i.e., about zoning changes to our neighborhoods.

Thank you.

Very truly yours,



Rebecca Kenison

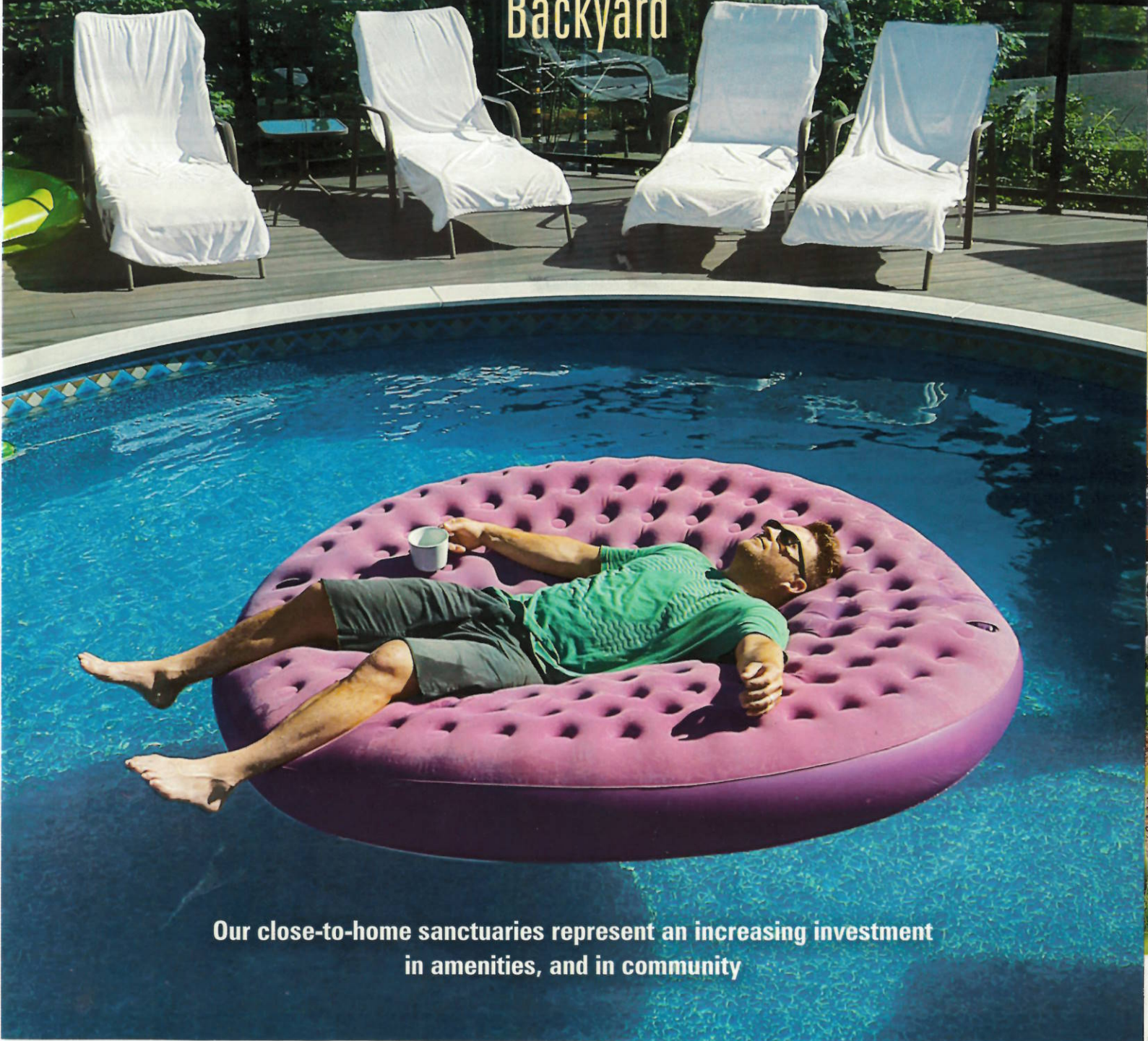
■ NW LIVING: A garden remodel ■ TASTE: Rolled ice cream ■ IN THE GARDEN: Wasps 101

PACIFIC NW

The Seattle Times

AUGUST 6, 2017

Right in Your Own Backyard



Our close-to-home sanctuaries represent an increasing investment
in amenities, and in community



12 COVER STORY:

Our backyards provide a chance to get away — right at home.

BY TYRONE BEASON
PHOTOS BY
KEN LAMBERT

ON THE COVER

Sam Allard relaxes in his Columbia City backyard pool. Allard has tricked out this space with an L-shaped seating area, a Ping-Pong table, a wall-mounted TV and a whirlpool.

6 The Grapevine

BY ANDY PERDUE

26 Now & Then

BY PAUL DORPAT

4 Fit for Life:

Lean Bazuka pushes your limits with an intense, varied workout.

BY NICOLE TSONG
PHOTOS BY MIKE SIEGEL

8 In the Garden:

How to tell the good wasps from the bad wasps.

BY CISCOE MORRIS

10 Taste:

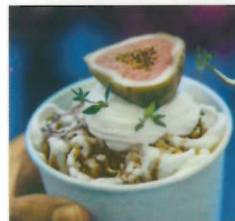
Roll with it: Another way to eat ice cream.

BY BETHANY JEAN CLEMENT
PHOTOS BY STEVE RINGMAN

20 Northwest Living:

What's new, what's next in Lorene Edwards Forkner's garden.

BY VALERIE EASTON
PHOTOS BY MIKE SIEGEL



NEXT WEEK

"Off Speed," a new book by Terry McDermott, gives K. Felix — and his masterful changeup — the royal treatment.

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Backyards serve as our inner sanctums,
our close-to-home getaways
— and even shelter for our neighbors

JUST INSIDE THE GATE that leads to Heather and Sam Allard's backyard in Seattle's Columbia City neighborhood, Southern California awaits.

A wide ash-gray deck extends deep into the yard, creating a huge platform for all the goodies Sam has tricked it out with, including an L-shaped seating area, a wall-mounted TV and a whirlpool tucked in a corner.

The centerpiece is a round swimming pool, lined in shades of blue and recessed into the deck, creating the illusion that it was built into the grounds. Lounge chairs surround the pool, perfect for supreme beings of leisure to take in the yard and, in the distance, a peekaboo view of Lake Washington and the Cascades.

Just to the west of the deck, a cobalt-blue Ping-Pong table sits on bright-green artificial turf.

The easy-breezy vibe is very David Hockney, an effect greatly accentuated by the intense summer sunlight on this particular 85-degree day, which gives these blues and greens a dreamlike intensity.

"It was a nasty yard, with a dead pine tree in the middle — nothing was really level back here," Sam, 38, says of his yard of four years ago, when he started its dramatic face-lift.

Its reincarnation represents just the sort of life Heather would live, if every day were a pool party.

What's Going On Back There?

As owners of the nearby sports bar Rookies and the adjoining bar behind it, aptly called Backyard, the Allards spend most of their time catering to others. It comes with the business. Here, they can kick back and treat themselves.

"It's nice to host people here but also, for me, to kind of escape," says Heather, 42.

Backyards are more than extensions of living spaces. Set far from the street, usually closed to the outside world, they serve as inner sanctums for relaxation, scenes of fellowship among family and friends, settings for gardens and picnics, a place to get away without actually going anywhere.

The backyards of my own youth in

Kentucky play through my head as I stare into the Allards' brilliant pool — scenes of me playing hide-and-seek and Wiffle ball with my brothers, cousins and neighborhood kids; mostly failing to dunk the ball in a hoop nailed to a tree trunk; peeling limber switches from branches for butt-whippings; fixing cars with my dad; eavesdropping on my mother and her sisters as they chatted in vinyl lawn chairs; mowing Big Mama's lawn; watching my grandfather brush homemade hot sauce on whole cows, pigs and goats in an open barbecue pit on holiday weekends.

Front porches present you to the outside world. Backyards let you retreat into your own. ►

BY TYRONE BEASON • PHOTOS BY KEN LAMBERT





Carmen Stark enjoys the Georgetown backyard of her friend Sean Eaton. Stark, who previously had lived nearby, says she has no backyard of her own and likes visiting old friends here.



Custom deck contractor Jason Russell, of Tacoma, known as Dr. Decks, at right, works on the upper level of a deck he calls his “masterpiece” for a Lake Tapps client. At left is Russell’s “wing man” on this major project and others, Phil deLeon.



Russell is known for his specialized technique in heating and bending PVC decking boards. He created this for a Milton client’s backyard.

BACKYARDS

IN A CITY FILLING with renters and town-house dwellers, and with a controversial movement to address rising housing costs by making it easier to build backyard cottages, the backyard as we know it—or *knew* it—seems like an ever-more precious commodity here.

Maybe that’s why the Allards’ backyard feels so special.

The couple bought their three-bedroom bungalow in 2004, but in 2010, a tree fell on it, causing significant damage. Sam, who has a background in construction, took advantage of the

City of Seattle’s Community Power Works program, which offers rebates and low-interest loans to homeowners who improve the energy-efficiency of their homes, to remodel their house.

The backyard is Sam’s showpiece, and the stuff of Heather’s daydreams.

“I basically live in Palm Springs during the winters,” Heather tells me. Even when she’s not physically in her mind.

One of her favorite ways to unwind used to be to rent a room in a local hotel with a pool terrace and invite friends to join her for good wine and conversation. It wasn’t exactly a jaunt

to the desert, but it did the job.

“Maybe we’re just going to build a pool in the backyard so you can stop spending money on hotels in the city that we live in,” Heather recalls Sam joking.

Now they have a SoCal retreat literally at their back doorstep.

“It looks like a Palm Springs house,” Heather says.

The Allards recently moved into another home nearby. They now rent the house on Airbnb, except for holiday weekends, when they use it for R&R or socializing.

The Allards are not alone in re-imagining their living spaces with striking remodels and add-ons.





HOME-IMPROVEMENT spending nationwide hit a record \$340 billion in 2015, as the lingering effects of the 2008 recession finally wore off, according to a recent report by the Remodeling Futures Program of the Joint Center for Housing Studies at Harvard. Growth in the market is expected to average 2 percent a year through 2025 as home values and incomes rise.

"It blows my mind how much people will spend," says custom deck contractor Jason Russell of Tacoma, aka Dr. Decks. "They want to have a resort at their house."

With customers mainly in South Puget Sound, the gregarious Russell

has built a reputation for designing and creating mind-blowing decks and patios featuring artistic patterns; booming car-audio sound systems "that'll kill any wake boat that comes by your house"; and hidden grills, TVs and seats that rise from boards with the push of a button.

"I've been doing some stuff in decks that you'd see in 007 movies," Russell says.

Russell, 48, has been in the deck business for 26 years. He might be most famous locally for the "Alien on Vacation" garden display he made for the 2013 Northwest Flower & Garden Show in Seattle.

Using terms like "tiki torch"

and "silver teak" to rope people in, deck-supply companies have gotten clever about marketing the idea of backyards as canvases for the imagination, he says.

Russell says 80 percent of his sales happen because of the women in the household, especially those in the 35-to-55 age range with disposable income.

"She has to see texture and color; she has to see design," Russell says.

A Dr. Decks extreme backyard makeover won't come cheap: Most of his decks run from \$60,000 to \$120,000.

"It's fun, but it's also an investment," Russell says. "Besides that, ►

Misilla dela Llena records a video tutorial about kale in her Bothell backyard's edible garden.



Dela Llana, second from left, and her husband, Nick Suryan, right, enjoy time in their Bothell backyard with two of their children, Bella, 11, and Sophia, 1.

BACKYARDS

it's just the cool factor. You're basically getting a one-off custom deck that you're not gonna see anywhere else on your street."

Business is booming right now, he says.

He builds one deck at a time to ensure quality. And he's constantly pushing the envelope.

Lately, the "doctor" has been experimenting with circular decks made of straight PVC boards that he bends using silicone heating blankets produced by an aerospace firm in Tukwila.

The pliable PVC has opened up loads of possibilities.

"That's when things get interesting," Russell says. "I've destroyed \$100,000 in deck materials to



Dela Llana brings a baby chick over to Sophia, in their backyard in Bothell.



perfect my craft.”

His current project, a curvaceous multi-tier deck at a home in the Lake Tapps area of Pierce County, employs his most impressive engineering and creative work.

Russell says he has a deck at his home in Tacoma that he uses mostly for cookouts, though not as much as he ought to.

It's a modest deck compared to what he makes for clients.

He lets out a laugh.

“I can't afford the decks I build.”

ANYONE WHO HAS seen Misilla dela Llana's “Learn to Grow” YouTube tutorials for vegetable gardening knows that the setting is the backyard of the home she shares with her husband and three of their kids north of Seattle in Bothell.



From their spacious deck, this suburban backyard feels like a farm, with soaring evergreens; a big, grassy lawn that merges with the property of a neighbor; a small garden; and chickens in a coop and run area.

When I visit, dela Llana's greens, herbs, beans, garlic and rhubarb looked vibrant in the blazing sun and record-breaking heat.

She used to run a summer horticulture and science camp for local kids in the backyard, and even today her own children will help out in the garden. The family has started donating fresh, homegrown produce to a local food bank.

Dela Llana says gardening is in her blood. Born in the Philippines, she remembers that her family's backyard boasted mango, guava, coconut palm and banana trees. The family moved to the United States when dela Llana was 10, first to Missouri and then to Snohomish County. Her mom and aunts were gardeners. They served as early role models.

When dela Llana and her husband, Nick Suryan, found this house in 2011, with its spacious backyard, she was pretty much set on buying it, Suryan says.

Since then, the yard and elevated deck have been put to good use. Suryan built the garden's planter

boxes and trellises. He's also working on a firepit.

The yard is big enough for camping, volleyball games and playing in the snow in winter.

For dela Llana, working in the backyard isn't just a supplemental source of income (by way of advertising for her free gardening videos); it's therapeutic.

“I find peace when I'm in the garden,” she says. Plus, “It gives me joy to be able to show the kids where food comes from — and to enjoy that space with them.”

THE CONCEPT OF the backyard as a space to restore oneself and forge community lies at the heart of the nonprofit BLOCK project in Seattle.

The brainchild of father/daughter architects Rex Hohlbein and Jennifer LaFreniere, the project aims to fight homelessness by transforming backyards from private spaces into incubators for social change.

BLOCK's goal is to work with enough volunteer homeowners to install a solar-powered tiny house for a homeless resident on every block in the city, offering people without shelter a chance to reboot their lives and build tighter bonds with established neighborhoods. ►

Lianne and Claude Burfett take in their new backyard deck's view in King County's Bryn Mawr-Skyway neighborhood. Lianne, pointing to Mount Rainier, says after she and Claude retired, the plan was to downsize. But when she saw the views from this backyard, they upsized, instead. “It just stopped me,” Lianne says of the view.



Kim Sherman, left, and Dan Tenenbaum, right, with Robert Desjarlais, 75. Desjarlais has been homeless and will be moving into a cottage being built in Sherman and Tenenbaum's Beacon Hill backyard.

BACKYARDS

I meet with Hohlbein at BLOCK's offices in the University District, where his team also runs the "Just Say Hello" campaign to foster compassion for people living in the streets, and where they hand out tarps, socks and other essentials to the homeless through their "Window of Kindness."

He talks about the need to shift our ideas about homelessness as a civic issue to a personal concern that anyone can address.

"Everyone has to have their place in it," Hohlbein says.

The program, which was launched this summer, allows people without shelter to screen participating homeowners to ensure a good fit, using matchmaking technology (not unlike a dating app) produced with help from University of Washington students. When paired, participants get to move in and pay a third of their monthly income in rent, or nothing if they have no income.

Hohlbein says the biggest obstacle to getting people to help the homeless isn't finding compassionate volunteers; there are plenty of those in Seattle. It's showing people how they can turn their caring into action in a safe, easy way. Homeowners don't have to worry about collecting rent or maintenance of the tiny houses; that's handled by BLOCK and its partners.

"The closer you bring a person to the issue of homelessness, the more you feel and the more you act," Hohlbein says.

"We're taking this proximity issue to its logical end. We're going to bring homelessness to you," he says.

BLOCK has received an outpouring of support in the form of pro bono legal services and design and construction skills and labor, as well as donated materials, Hohlbein says.

BLOCK is still in its pilot stage.

KIM SHERMAN and Dan Tenenbaum, a couple on Beacon Hill, will be the first homeowners to host a tiny-house

resident, Robert Desjarlais, 75, a man they met through one of the homeless-services organizations partnering on the project, the Chief Seattle Club.

The couple has long been concerned about homelessness in the city, and has given to homeless charities in the past. But Sherman says it doesn't seem as if the problem is getting better.

They wanted to do more.

"It's just not the kind of world we want to live in," Sherman says of homeless encampments and the increase in people in need.

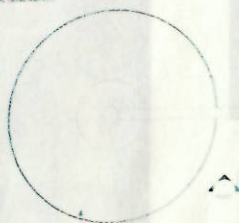
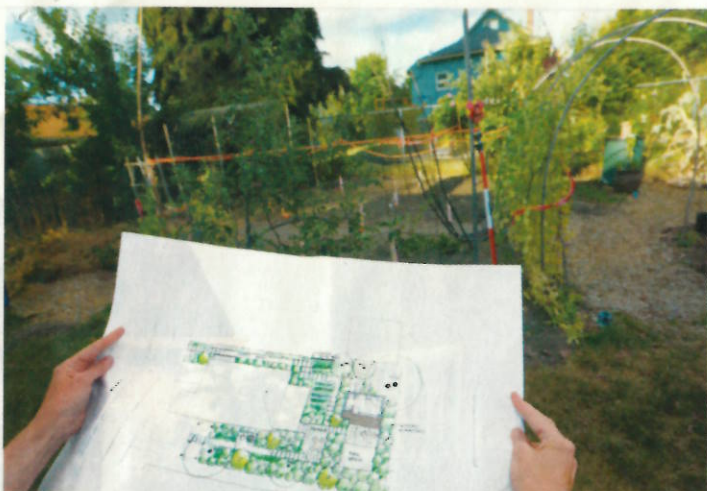
Sherman works in marketing at FSI consulting engineers, the firm that's handling ventilation, heating and water systems for BLOCK's tiny houses. She was immediately intrigued.

"I thought, 'I want to do that,'" she says.

It didn't take long for the couple to agree to volunteer their backyard.

"We didn't overthink or over-worry about it," Sherman says.

Since then, they've done more research into homelessness, and



they've spoken to neighbors on their street to make them aware of their plans. So far, they've received nothing but encouragement.


The couple is aware of the negative stereotypes attached to homeless people, but they are excited to dispel those by helping to show the human side of this complicated issue.

"We know it's not THE solution," Tenenbaum says, "but it's A solution." He hopes the success of their example will make it easier for others to follow suit.

The house for their backyard is expected to be completed by this month.

Sure, Sherman and Tenenbaum will have to sacrifice some space for gardening and entertaining in order to accommodate their backyard neighbor.

That's a loss, "But there's going to be somebody who's not going to be living in a tent anymore," Sherman says. "There's an obvious choice there."

By sharing a piece of their private world, someone else will get to remake his own. 

Tyrone Beason is a Pacific NW magazine staff writer. Reach him at tbeason@seattletimes.com or 206-464-2251. Ken Lambert is a Seattle Times staff photographer.

Top:

Sherman holds plans in her backyard for construction of a tiny house that will shelter a homeless man.

Bottom:

A tiny-house design shows the home that is being built in Sherman and Tenenbaum's backyard.



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CLARKE & CLARKE
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From: Rebecca Kenison
To: [PCD_MHAEIS](#)
Subject: Madison - Miller Park urban village proposal
Date: Saturday, August 05, 2017 5:49:44 PM
Attachments: [LtrCitySeattle 8-2-2017004.pdf](#)

Rebecca and Tim Kenison
753 – 18th Avenue E
Seattle, WA 98112
August 3, 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

Re: Madison – Miller Park urban village proposal

To whom it may concern:

The Madison/Miller Park area is a unique area of Seattle with classic older buildings and homes mixed in with some newer buildings, large homes with multiple tenants, senior centers, half-way houses, low-income, middle-income and those with more wealth. In addition, and significantly, there are many small, non-chain shops and restaurants, a retail mix which has a much greater chance of being owned by families, by women and by minorities.

There is a liveliness to our neighborhoods. We appreciate that our neighborhoods do not have a cookie-cutter/one-size-fits-all look to them. *What is being proposed by MHA* appears to be a one-size-fits-all for the Madison - Miller Park area as well as the other neighborhoods of Seattle and *does not take into consideration the significant adverse impact on the livability and quality of our unique neighborhoods throughout the City*. The uniqueness and character of our neighborhoods built over the last century needs to be maintained.

Why is the City changing the recently enacted 2035 Comprehensive Zoning Plan? We support following the 2035 Comprehensive Zoning Plan recently enacted by the City Counsel. The Comprehensive Zoning Plan will meet the HALA density goals and, actually, exceed MHA goals! The MHA affordability requirements can be implemented into the existing zoning with the requirement of higher developer impact fees.

As to the three alternatives proposed, *we prefer Alternative One with the modification that the Mandatory Housing Affordability requirements for developer impact fees be collected throughout the city and not just from urban villages AND that the housing built (or p.s.f payment made) by developers be increased significantly in order to generate significantly more affordable housing. We agree with the August 2, 2017 MHA EIS Comments from the Madison-Miller Park Community.*

We strongly encourage the City to *require developers to provide more in Housing Impact Fees*. The current rate of requiring developers to provide only 6% of their buildings for affordable housing is NOT enough. (San Francisco requires their developers to provide 25% in affordable housing.) If the concern is that the developers will not build, then so be it.

Alternatives 2 and 3 will result in high displacement of many who have lived here for decades and raised their families here, for many who have found a niche here of a small, somewhat affordable apartment in an older building and for those who have put their heart and souls – and life savings – into their small businesses. Quality of life will suffer significantly.

What is not apparent from a map is the significant density and the variety of people the Madison - Miller Park urban village already has in its existing buildings. Notably, in a recent walk through the area of East Thomas to East Madison Street and 17th to 23rd Avenues East and knocking on doors, one of our residents found *many, many low-income, disabled and seniors citizens living in affordable housing in buildings that were once single family dwellings but have been multi-occupancy for many years*. Many are renters and probably don't feel they have a say. The City very likely has not received (much) input from them. *We do NOT want to lose the diversity of our area. Please explore more affordable options within our existing buildings.*

As noted in the July 2, 2017 New York Times article, "Program to Spur Low-Income Housing is Keeping Cities Segregated", it was found that the *increase in units for each unit demolished greatly increases displacement and segregates the displaced population*.

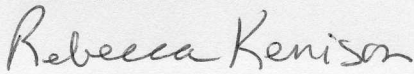
A more balanced approach to achieving growth needs to be found. Just as we do not want to lose the variety of people who have lived here for years, we also do NOT want our historic homes and small businesses, now in classic, old, funky buildings, to be demolished just so something tall that covers all but a few feet of the lot can be built. Realize, also, that once a small business is required to move from its existing building, that business is lost. Where do they move in the neighborhood? How do they survive away from their long-time customers?

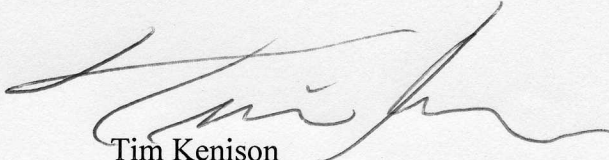
Buildings built tall and to the maximum lot size do not allow children to have backyards in which to play; do not allow sufficient light to come into our homes in the dark of winter; and do not allow for anything other than a pot or two of flowers for some color, if one lives on the ground floor. Where will be the beautiful, big trees we now have in our parking strips, trees that provide beauty and shade and help purify our air? *We do not begin to have enough parks to make up for the lack of a back yard*. Miller Park is already used close to capacity: local and City-wide schools and City-wide sports teams take advantage of the Park leaving little room for a couple of neighborhood kids who just want to kick around their football.

Where will parking be? The idea that all the (new) residents will ride the bus to the grocery store or to take a sick child to the doctor's office or to the Seattle Center to see a play at night in the rain in the dark of winter is unrealistic.

Please do not ruin this unique area by up zoning it.

Very truly yours,


Rebecca Kenison


Tim Kenison

cc by e-mail to:

jesseca.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.O'Brien@seattle.gov; Sally.Bagshaw@seattle.gov; Tim.Burgess@seattle.gov; Lorena.Gonzalez@seattle.gov

From: Rebecca Kenison
To: [PCD_MHAEIS](#)
Subject: Madison - Miller Park urban village proposal
Date: Saturday, August 05, 2017 6:00:40 PM
Attachments: [LtrCitySeattleMadisonUrbanVillage.pdf](#)

From: Rebecca Kenison
Sent: Saturday, August 05, 2017 5:50 PM
To: 'MHA.EIS@seattle.gov'
Subject: Madison - Miller Park urban village proposal

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:

jesseca.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; Debora.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

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 Estey 717- 17th Ave E Sea 98112
John Estey 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 Seattle WA 98112
Susan Morgensztern 731 18th Ave E Seattle WA 98112

From: Marilyn Kennell
To: [PCD_MHAEIS](#)
Cc: [lisa.zerkowitz](#)
Subject: DEIS
Date: Saturday, August 05, 2017 9:40:41 AM

From Marilyn Kennell and Alan McMurray:

We attended the January 26 2017 HALA meeting at West Seattle Junction along with many, many concerned neighbors. The city representatives seemed surprised by the turnout. Our impression that this meeting was simply a pro forma exercise.

We filled out the extension HALA survey after that and felt that it, too, was just set up as a way for people to be able to vent their frustrations but that no one in the city ever took the questionnaire seriously. We received no feedback as to the results; in fact, we never had it affirmed that our opinions were recorded.

On May 6 2017 we also attended another “workshop” to help the community comment on the proposed rezoning for the Mandatory Housing Affordability component of HALA. Though the city representatives politely listened to our concerns and even allowed us to write them down we felt that this, too, was all a sham; in reality a done deal.

**WE FEEL THAT OUR INDIVIDUAL AND JUNCTION NEIGHBORHOOD
FEEDBACK HAS NOT BEEN TAKEN INTO ACCOUNT**

We live at 4022 32nd Avenue SW and have many concerns about the proposed rezoning.

**OUR BIGGEST COMPLAINT IS THAT OUR AREA 32ND AND GENESSEE SOUTH
AND EAST MAY BE JUMPED TWO LEVELS -
FROM SINGLE FAMILY ZONE TO LR3 50Ft APARTMENTS. THIS IS
BLATANTLY UNFAIR!**

(1) **Parking** is not taken into consideration. We have a shortage of parking already. And because to live near the transit stop we have people leaving their cars here on a daily basis. When parking spaces (the only parking for many homes here) on both sides of the street are full it is at times impossible to get to one's home.

(2) **Traffic** Pulling over for neighbor's oncoming car is part of city life. So is waiting for the garbage collectors to do their job. But delivery vans, construction trucks, cement mixers, porta-potty flatbeds often hold up traffic for a long time - emergency vehicles included. We do not see a plan that considers traffic.

(3) **Green Space** Our green space is diminishing daily with all the new construction. More people in apartments mean more need for parks. When we have voiced this concern we have been told (three times) that the City counts West Seattle Golf Course as green space. It is existing greenspace; we will need more. (And when you read that the City wants to make Jackson Municipal Golf Course into public housing who knows how long it will be until the City starts eying West Seattle GC).

(4) **Public Safety** We have no hospital here in West Seattle and are dependent on bridges to

get emergency treatment and aid.

This existing problem will increase with increased population but we see no plan addressing it.

These are just our major concerns. Our neighborhood has developed a plan to maintain its character and livability as West Seattle grows but the DEIS has failed to honor our plan.

Marilyn Kennell
4022 32nd Avenue SW
Seattle, Washington 98126

mkennell@gmail.com
(425-280-3538)

From: Rob Ketcherside
To: [PCD_MHAEIS](#)
Cc: [Capitol Hill Historical Society](#); [Tom Heuser](#); [Tamara Bunnell](#); [Zach Works](#)
Subject: Capitol Hill Historical Society Feedback on MHA DEIS
Date: Friday, August 04, 2017 10:13:53 PM

Capitol Hill Historical Society Feedback on MHA DEIS

The Capitol Hill Historical Society (CHHS) is new, having formed in January 2017. This is our first policy feedback on the Housing Affordability and Livability Agenda (HALA). Like other neighborhood historical societies, we advocate for historic preservation.

While many comments you receive may focus on the alternatives themselves, we are instead focused on the content of the Historic Resources section, 3.5.

Impacts

There are two impacts to historic structures that CHHS is concerned about in HALA's Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS) section 3.5.2. These should be improved in the final EIS.

The Pike/Pine Conservation Overlay District (PPCOD) is directly threatened by HALA. Developers currently can make taller buildings if they preserve some or all of a building constructed before 1940. With HALA they can take the same benefit if they destroy the building but provide affordable housing. HALA presents the same perk via an alternate route that may be more palatable to developers but less desirable to the community and city.

On page 3.251 and again on 3.252, HALA's impacts appear to include a proposal to limit the impact of Seattle Municipal Code 25.675.H.2.d. Currently the Historic Preservation Officer must review all projects adjacent to or across the street from a landmark. The DEIS suggests limiting this to projects near landmarks that will demolish or modify "buildings over 50 years in age." If this is an error, it should be corrected in the final statement. If it is purposeful, we strongly object -- all projects near landmarks should continue to require review by the Historic Preservation Officer to avoid degrading the landmarks. Capitol Hill has 37 landmarks and none of them should be diminished.

Mitigations

There are many mitigations outlined in the DEIS section 3.5.3 that we strongly agree are necessary. Especially important are the following mitigations which the city should immediately fund and staff.

As stated in the DEIS, the city should fund "continuation of the comprehensive survey and

inventory". The Department of Neighborhood's historical resource survey has been stalled for a decade. This puts Capitol Hill and other neighborhoods' sites at risk because surveyed structures are more likely to trigger the landmark review process of the Washington State Environmental Policy Act (SEPA). Because perspectives on architectural history and understanding of community history change over time, the Department of Neighborhoods needs to repeat these surveys on a regular interval.

The City should support and encourage new historic districts. Our neighborhood historic districts are all relics of the early days of preservation in Seattle during the 1970s. Areas not recognized or cherished at that time have eroded over the last forty years. Capitol Hill has several areas that seem to meet the criteria, but without city help the process and challenges are insurmountable. One benefit of historic districts to developers is that it removes questions and risk. All buildings in the district are assessed in advance as contributing or not contributing.

Broadly reviewing buildings for landmark status before approving demolition permits is another useful mitigation considered in the DEIS. Currently the reactive landmark eligibility review process is only activated when the subject building is larger than a specific number of square feet or dwelling units. Many buildings that are important to our neighborhood history fall under those thresholds, such as the historic mansions on Millionaire's Row. Proposal to demolish one of them should cause pause, but the current process does not allow for that. It seems necessary to update city policy or landmark review systems prior to implementing MHA.

One other concern with the demolition review mitigation is that outright demolition may be too high of a threshold. If developers are allowed to significantly modify structures and then later apply for a demolition permit, there may not be enough building left to meet the integrity requirements of landmark designation.

The DEIS describes mitigations for the Pike/Pine Conservation Overlay District in Appendix F in the middle of section F.4. These should be at least mentioned in section 3.5.3 with a reference to Appendix F to describe how other neighborhoods can use PPCOD as a model for mitigation.

Conclusion

As the availability of parking lots and background buildings for new project sites dwindles on Capitol Hill, development has already started replacing our character-defining structures. New policies like MHA that increase redevelopment need to mitigate new impacts. Assessment of our buildings, encouragement of historic districts, and safeguards for demolition are all tools that should be put to use. With these in place, Seattle can enjoy the benefits of MHA while avoiding unintended impacts on our historic urban fabric.

Sincerely,

Tom Heuser, President, Capitol Hill Historical Society

Rob Ketcherside, Vice President, Capitol Hill Historical Society

From: Gretchen
To: [PCD_MHAEIS](#)
Subject: EIS draft
Date: Sunday, July 02, 2017 10:19:53 AM

Hello,

Please extend the draft EIS period to 90 days. This is a large document and the city took months to prepare it. I want more time to review and comment on the content.

Expecting residents to review this in 45 days is bananas and feels like you are not allowing enough time for residents to collaborate and contribute.

Thanks,
Gretchen King

From: Stephanie King
To: [PCD_MHAEIS](#)
Subject: Fort Lawton
Date: Thursday, August 03, 2017 1:27:56 PM

1

Hello,

I am writing to express my support for the Ft. Lawton land grant to be allocated to SPS for capacity expansion of public education.

Use of the land for purposes of low income housing or to solve the crisis facing many homeless individuals in SPS is not a sustainable solution. Magnolia lacks many of the basic requirements necessary to support individuals facing poverty and homelessness - transportation, access to medical care, access to jobs or job training, access to affordable goods, and access to support services. Lacking basic infrastructure will pose a hardship on individual occupying the proposed housing complex.

Thank you for your consideration - Stephanie King

Name	Bryan Kirschner
Email address	
Comment Form	<p>1 I am writing to comment on Mandatory Housing Affordability Draft Environmental Impact Statement (“EIS”). I applaud the city’s diligence in conducting a study of alternatives and commitment to robust public engagement. I would like to comment specifically on the issue of equity and equitable development.</p> <p>2 The EIS assess a proposal to “implement MHA requirements for multifamily residential and commercial development in certain areas of Seattle.” To do this, the City would take actions including (but not limited to) modifying “development standards in the Land Use Code,” expanding “the boundaries of certain urban villages” and making “area-wide zoning map changes.” The City’s choice of what among the range of options should be guided by both its own policy commitments and its broader obligations. The EIS defines “equitable development” in part as “...policies in neighborhoods taking into account past history and current conditions to meet the needs of marginalized populations and to reduce disparities so that quality of life outcomes such as access to quality education, living wage employment, healthy environment, affordable housing and transportation, are equitably distributed for the people currently living and working here, as well as for new people moving in.” The City is also obligated to Affirmatively Further Fair Housing (AFFH) under the federal Fair Housing Act of 1968. At the city, region, and national level, African-American households have lower mean and median income and wealth than White households. This should be dispositive for deeming Alternative 1 (“no action” unacceptable versus Alternatives 2 and</p> <p>3 3. Choosing to forgo the creation of more than 5,000 units of income-restricted housing units under the latter two options would have a racially invidious disparate impact inconsistent with equitable development and AFFH.</p> <p>4 The city has identified 13 urban villages as offering both “low risk of displacement” and “high access to opportunity.” Alternative 3 would generate a greater absolute number of income-restricted affordable units in these areas compared to option 2 (2,903 versus 2,337). Current income and wealth disparities by race, in part due to a documented history of restricting African-Americans’ access to homes in high-opportunity areas through both formal means (e.g., redlining) and social pressure, argue for seeking to create the most opportunities for affordable housing in high opportunity areas. Concomitant with lower levels of income and wealth, at the city, region, and national level, African-American households are also more likely to live in attached and multi-family housing than White households, and less likely to live in single-family detached homes.</p>

**Description of the
Proposed Action and
Alternatives**

- 5 In this context, I urge the city to adopt (a) maximizing the number of new, market-rate multi-family housing units overall and (b) maximizing the number of income-restricted affordable housing units in low risk of displacement, high access to opportunity areas as a guiding principle for its preferred option.
- 6 The EIS states that air quality “[r]isks and hazards drop dramatically in areas more than 200 meters (656 feet)” from “a major highway, rail line, or port terminal.” The EIS states that 14 urban villages are at least partially within this zone.
Under Seattle’s current zoning and land use policies, multi-family housing is heavily concentrated in urban villages (according to the city’s records, 54% of the city’s land excluding parks and rights of way is single-family zoned). According to the EIS, persons of color are disproportionately represented in urban villages (34% of the city’s population but 41% of urban village residents; for African-Americans the figures are 8% of the city’s population and 11% of urban village residents). The reverse is true for White households (69% of the city’s population and 63% of urban village residents).
By plain reading, Seattle’s current zoning maps often string multi-family zoning along arterials and transit corridors rather than manifesting as approximately circular representations of n-minute walksheds.
In this context, I urge the city to adopt (a) maximizing the number of new, market-rate multi-family housing units overall and (b) maximizing the number of income-restricted affordable housing units more than 200 meters from these pollution sources as a guiding principle for its preferred option.
- 7 In view of these general principles I urge the city to consider the following specific changes to its “Alternative 3” approach (Exhibit 1-5 in the “Summary”):
 - In all cases, expand urban village boundaries to a full 10-minute walkshed. In low risk of displacement, high access to opportunity areas, expand urban village boundaries to a 15 minute walkshed. In all cases, urban village boundaries and transit-oriented development (TOD) zoning schemes should reflect the full walkshed—approximately a circle—and not be truncated to limit multi-family housing to tight proximity to arterials.
 - In low risk of displacement, high access to opportunity areas substantially overweight M2 and M1 rather than “M” designations.
- 8 • In low risk of displacement, high access to opportunity areas, aggressively reduce (or simply eliminate) mandatory parking minimums to increase the availability of affordable housing. (If street parking is difficult, people with more rather than less money will have the means to build or buy parking to meet their needs, while people with less rather than more will benefit from less expensive rent or purchase costs).
- 9 • In any high access to opportunity area, expedite and accelerate permitting and minimize (or eliminate) design review for projects that include income-restricted affordable housing units on-site.
- 10 • In every area, designate residential small lot (RSL) as the most restrictive form of residential zoning (in place of Single Family 5,000 or greater). Allow lots to be subdivided as right. Assess the equity benefits to minority and lower-income homeowners of

being able to sell a portion of their lot in order to remain in place, including the knock-on effects of neighbors potentially downsizing into a small lot, small home.
Thank you for your hard work and the opportunity to provide comment.

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: Andrew Kirsh
To: [PCD_MHAEIS](#)
Subject: Comments on DEIS
Date: Monday, August 07, 2017 2:52:55 PM
Attachments: [2017 HALA DEIS comments.docx](#)

Hello,

Attached please find my comments on the Draft EIS.

Thank you.

Andrew Kirsh

8/7/17

Comments on the HALA/MHA Draft DEIS

A. Kirsh

Biological resources

3.260 "Tree cover for a given zone was assumed to remain constant over time if the zoning designation stayed the same."

This is a flawed assumption, given, for example, the trend toward the demolition of small SF houses and their replacement with larger houses that leave little or no room for replacement tree canopy. DEIS Exhibit 3-3-3 is an example of such a house. See:

3.32 "Some demolitions occur in zones where the developer can replace an existing single-family home with a multi-unit structure such as townhomes or an apartment building. However, many demolitions involve the replacement of one older single-family home with a new single-family home. According to City permit data, between 2010 and 2016 29 percent of all units demolished were in Single Family zones. When excluding downtown zones, 32 percent of all units demolished were in Single Family zones, or 139 demolitions per year on average. This indicates that demand for new single-family homes accounts for nearly one-third demolitions outside downtown."

Existing trees are being lost in this redevelopment.

"The one exception was the percent cover for RSL. There is currently only one area zoned RSL in the study area. This did not provide a large enough sample size to accurately estimate the percent coverage for all current and future RSL zones. Given this, the tree cover was calculated as the average of SF tree cover and LR tree cover, weighted by lot coverage. This calculation assumed that lot coverage translates to canopy coverage proportionally.

Is "lot coverage" coverage by structure? Lot coverage might translate to canopy coverage inverse proportionally, but not proportionally. As shown below, LR *zone* tree cover is likely mostly due to SF houses within LR zones, so LR *development* tree cover has to be calculated on a lot-by-lot basis to be accurate.

Tree canopy typical of future LR development is very likely overestimated because of the presence of many SF houses with trees in LR zones (and possibly also older LR structures with setbacks or courtyards with trees). See photo A below. The canopy calculations in the DEIS were made according to the zoning map. This leads to underestimation of the difference in canopy between SF and built-out LR, and of potential canopy loss in upzoning LR to MR. On Capitol Hill, much of the latter would be an upzone from SF development in terms of canopy. Likewise for SF to LR upzoning: new LR construction (townhouses, row houses) with minimal setbacks is less tree-friendly than old LR construction (see photos B and C below); canopy measurements for older LR zones in neighborhoods like Capitol Hill are likely to be overestimates of what new LR provides, and should not be used to predict future canopy in developing LR zones.

Using the City's GIS and Google street view, I calculated the percentage of tree canopy contributed by parcels occupied by single family structures in five square blocks of the LR zone on Capitol Hill. A few small townhouses in the second block built in 2005 were not included, as the canopy data are from 2007 and any trees would not have grown much. Note, however, that the canopy on parcels with other than single family houses will be overestimated if a house was present in 2007 when the canopy was measured, but the lot has since been redeveloped with loss of trees not reflected in the canopy data. (For unknown reasons, the 2016 LIDAR canopy coverage data is not in the public GIS).

Block (All Aves E and E Streets)	Average canopy cover on SF parcels (%)	Average canopy cover on other parcels (%)	%age of block's total canopy contributed by SF parcels	%age of block's total canopy contributed by others
11 th /12 th /Roy/Mercer	33.8	10.8	82	18
11 th /12 th /Mercer/Republican	27.2	4	90	10
11 th /12 th /Republican/Harrison	26.3	9.9	65	35
Federal/11 th /Mercer/Republican	28	13.4	72	28
10 th /Federal/Roy/Mercer	29.2	22.6	56	44

These data strongly suggest that parcels occupied by SF houses contribute most (73% on these five blocks) of the tree canopy in the LR zone, and that the DEIS' estimates of future canopy loss resulting from upzoning are likely inaccurate. Remaining single-family houses are also boosting the canopy coverage in Capitol Hill's MR zone. The EIS should use the city's data to link canopy cover with

structure types, etc., to produce a fine-grained description of potential impacts in each area, block by block, considered for upzoning. The acute impacts of tree loss are local. A 5% loss across the city is not a 5% impact on a block that loses 25 or 50% of its tree canopy. The analysis should include street trees. The Capitol Neighborhood Design Guidelines strongly discourage design departures that threaten the health of mature street trees. Row houses grant these "departures" without actual departures, as the front setback requirements are minimal. The City has an inventory of its street trees: how many would likely be impacted by the replacement of existing structures by row houses that would remove much of the trees' root zones?

Reduced setbacks in proposed RSL zones will further eliminate canopy and/or the potential for canopy. Most of the vulnerable trees in the study areas are not exceptional and would not be protected during development, nor would they be replaced if street trees were already present. The DEIS discusses the proposed changes to design review but fails to mention that the public involvement in design review would be lessened in many cases, as more projects would fall under administrative design review. Generally it is the public, not DCIS planners, who argue for tree protection in design review.

Loss of tree canopy intensifies the urban heat island effect. The Land Use section should address this in the context of the new tree canopy loss analyses described above. New buildings in Seattle are starting to provide air conditioning, which puts more heat into the local environment, and canopy loss will accelerate the trend.

Loss of tree canopy has a negative impact on air quality, and the EIS should address this.

Environmentally critical areas: continued protection of steep-slope ECAs is thrown into question by the exception granted by DCIS to project 3020338, to stabilize a steep-slope ECA with many mature trees by removing the entire slope and all trees and replacing it with a building. The project is still in design review but the assumption that ECAs will be protected when under pressure from developers and DCIS is questionable.

Land Use

P 8 Land Use

"But each of Seattle's urban centers has its own unique character and mix of uses. For example, both Downtown and First Hill-Capitol Hill share the density, development intensity, and mixed-use character that typify urban centers, but Downtown is more heavily commercial."

Unlike downtown and First Hill, Capitol Hill has significant numbers of existing SF houses in the urban center and the analysis of Land Use impacts should reflect this fact.

P 8 Land Use

- "Most land use changes would be minor or moderate in level of impact, with significant impacts in particular locations.
- Significant land use impacts would usually occur near frequent transit stations, at transitions between existing commercial areas and existing single-family zones, and in areas changing from existing single-family zoning in urban villages and urban village expansion areas. "

The above ignores changes from existing SF scale development to Midrise (in Alternative 2 for Capitol Hill) in Lowrise zones. Placing 85' buildings next to existing SF houses in LR zones upzoned to MR will have significant impacts.

P12 LU

- **Intensification of use:** Land use impacts may occur when zoning changes would allow different activities and functions to take place. For example, this could occur in an area with residential zoning that is rezoned to allow commercial activities such as retail or offices. Changing the uses allowed in an area can have a land use impact since certain new activities can conflict with established functions. Impacts related to intensification of use can include noise, increased pedestrian and vehicle traffic, parking constraints, longer hours of activity, industrial and other urban noises, air quality, and increased light from buildings. This analysis considers the following broad land use categories that pertain to the study area: Single Family, Multifamily, and Commercial/Mixed-Use. Alternatives 2 and 3 change the distribution of land use among these categories, which may create an impact in certain circumstances.

Canopy loss and heat island effect should be included.

P 18 Land Use

3-94

- "As noted in the tables above, regardless of MHA tier, the greatest potential for significant adverse land use impact occurs in Single Family areas rezoned to higher intensities. These zoning changes would occur where single family zoning is present in existing or expanded urban villages. Urban villages with greater quantities of existing single family zones could experience more local land use impacts than urban villages with little single family zoning."

The impact will be just as great or greater in current LR zones such as Capitol Hill's that contain a significant percentage of single-family structures, especially if the LR zones are upzoned to MR per Alternative 2. The EIS should be based on the facts on the ground, not simply the current zoning map.

Where is the comparative analysis of the alternatives' impacts on urban centers such as First Hill/Capitol Hill?

The EIS should discuss the impacts of increased property taxes due to upzoning on displacement. For example, under Alternative 2, owners of SF houses in the LR zone on Capitol Hill would find their parcels upzoned to MR. What effect on the assessed value of their parcels would this have, and how would it affect their property taxes and ability to remain in their homes? How would such greatly increased land values accelerate new development? The assumption that new development will be gradual and incremental over 20 years should be backed up with data.

P 28 Land Use

"First Hill-Capitol Hill. A swath of land in north Capitol Hill currently characterized by multifamily housing and zoned LR3, would be changed to Midrise, introducing potential scale impacts, resulting in moderate landuse impact. The area is generally bounded by E. Aloha St. and E. Roy St. at the north, and the midblock north of E. Pine St. at the south. Scale impacts would also occur in the First Hill area on the southwest side of the village, but would be minor in nature due to the already tall zoning envelopes in this area.

It is misleading to state that the area is "characterized by multifamily housing" without also mentioning the many single-family houses. Around them, the proposed rezone would effectively be a rezone from SF to MR in terms of land use and tree canopy impact, yet the DEIS ignores the existence of those houses and thus the real nature of current land use in the LR zone. **The EIS must start from an accurate report of existing conditions in each area at a finer scale than the Urban Center or Village if its assessment of impacts is to be accurate.**

Land Use 3-2-4

"...adopted regulations and procedures would mitigate the impact of changes."

This is an assumption, not an argument. Regarding tree canopy, newly planted trees are not adequate mitigation for the loss of many large trees, as canopy volume is important. Trees planted at new row house and townhouse developments are often narrow, columnar, and/or small varieties that provide little canopy.

3-3 Aesthetics

Seattle's Comprehensive Plan calls for "the care and retention of trees that enhance Seattle's historical, cultural, recreational, environmental, and aesthetic character" (Comp Plan EN 1.7). Trees, especially trees of significant size, are one of the most

important contributors to the aesthetics of Seattle's neighborhoods. Yet, in the entire Aesthetics section of the DEIS, there is no mention of trees. This is an extraordinary omission and should be corrected. Some of the upzoning would certainly result in a loss of trees and loss of potential for new trees. As the DEIS' assumptions regarding canopy loss and conclusion that canopy loss will be insignificant are likely faulty, as explained above, the impact of tree loss should be considered in the Aesthetics section as well as in the Biological Resource section, especially in light of the proposed switch to more administrative design review.

3-9 Air Quality

The effect of loss of tree canopy on air quality should be addressed.



A. Single-family house and associated tree canopy in the LR3 zone, Capitol Hill. Another SF house is behind it, on the next street.



B. New LR row houses, rear, Capitol Hill.



C. New row houses, front.



I am writing to urge that the HALA EIS be withdrawn until it can fully account for the short and long-term impact on capacity in Seattle Public Schools, preschools and before- and after-care. My perspective has been shaped as Principal of Genesee Hill/Schmitz Park since 2008, but I am writing as a private citizen and a parent of Seattle Public School students. My comments should in no way be construed to represent the position of the Seattle School District.

If HALA does not consider school capacity up front, this oversight will cripple public education in Seattle just as our district is recovering from a two-generation decline and just as our nation is confronting the importance of public schools as a cornerstone of our democracy. If we do not have enough high-quality classrooms to meet new capacity demands, the immediate result is that families who can will look to private schools to solve their need, and this push toward privatization could be a death knell to Seattle Public Schools and the “livability” of our city. We have seen this process before, and we must ensure it does not happen again.

I offer my comments first as a native Seattleite who grew up during the great decline of Seattle Public Schools in the Seventies and Eighties. When considering the potential capacity needs in Seattle, it’s important to remember that Seattle Public Schools enrolled 105,000 students in 1960 (and Archdiocese schools were also very full). By 1982, it had plummeted to 43,000 students. SPS flatlined and stayed right around 43,000 for a full generation until the economic crisis of 2008. In less than a decade, SPS has rebounded significantly and now stands at 54,000. We are in the “Boomer echo” with students who are the grandchildren of Boomers, but still have a lot of ground to make up. We should be planning on significant enrollment growth continuing.

The professional perspective I am able to offer is as the principal of an elementary school that has been ground zero for the enrollment surge since 2008. My own school, Schmitz Park Elementary, enrolled 315 students when I started in 2008. By 2016, we had added 20 portables and had grown to 650 students (still with one set of bathrooms). In the fall of 2016, we moved into a new build at Genesee Hill and have continued to grow even though our boundaries have remained essentially the same. We are projected to open this fall with 750 students, the largest neighborhood elementary school in Seattle, and a hundred students over the capacity promised by the BEX IV levy.

Over the course of this growth, we have struggled to maintain a cohesive learning community that meets the needs of all students. The impact of school growth on the learning environment in a school is significant and must be considered:

- 1) Growing and changing teacher teams challenge curriculum alignment and make it difficult for consistency of expectations.

2) Logistics around multiple lunch times, travel times moving around the building, multiple uses for rooms, etc. cause a busy-ness that becomes very stressful for students and staff. We have seen a marked increase in anxiety among students.

3) Changing relationships: in elementary school, we cherish the fact that we can support a child and her family over six years. If staffing at a school ebbs and flows unpredictably due to enrollment changes, the ability schools have to invest in relationships that make a difference for kids becomes severely limited. We know that strong social-emotional learning is a critical component to closing all the achievement and opportunity gaps our students face.

4) Predictable pathways: a major part of the revitalization of Seattle Public Schools has been the neighborhood assignment plan which has provided predictable K-12 pathways; when we must play catch-up on shifting and growing enrollment, we see tremendous pressure on families and our enrollment system to keep siblings together and meet the expectations of families who have made significant financial and career decisions based on these assurances.

My experience teaching on three continents is that where a strong public school system does not exist, middle class families will spend their last dollar on mediocre private schools. What I know as a principal is that families are keenly aware of the fact that their kids are only in school once. If I have great plans for a Kindergarten three years down the line, those plans mean nothing for the child who is ready for Kindergarten today.

There is a huge public cost to planning up front for capacity demands, but there is an even greater cost to society when we fail to do so. Planning for a public school system with capacity to meet a rise in population should be considered to be as critical to the environment of our city as basic utilities, safety and transportation.

Gerrit Kischner

6326 – 19th Ave. NE, Seattle 98115

August 7, 2017

Name	Ellen Kissman
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.	Yesler Community Collaborative
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Yesler Community Collaborative continues to encourage the City to apply an equity lens in the implementation of MHA citywide based on its 2016 Growth and Equity analysis. Using contrasting Alternatives in the DEIS to investigate displacement risk under different zoning scenarios is an appropriate approach. We recognize that modeling growth and displacement risk is inherently very difficult and that the results of any such analysis should be considered illustrative rather than definitive. Yet, Councilmember Herbold raises many points that might further characterize the displacement risk (Councilmember Herbold blog). Where good data can be found and a sound analytical method applied, we encourage the City to dig deeper into the questions she raises, particularly concerning the potential impact on neighborhoods such as the Central District and the Chinatown-International District that are trying to preserve their cultural character in the face of overwhelming change, as well as the impacts on various racial and cultural groups throughout the city.</p>
Housing and Socioeconomics	<p>2 While MHA is a crucial tool to generate more affordable housing, it cannot be expected to solve the affordable housing crisis by itself. We appreciate the City's commitment to additional measures, such as those included in the companion resolutions to MHA implementation in the Central District and the C-ID. Active and careful monitoring of the effects of MHA on affordable housing production, neighborhood character and displacement will also be necessary. We look forward to working with the City to develop mitigation measures and other tools that will keep Seattle a city for the many well into the future.</p>
Land Use	<p>3 The zoning scenarios tested in EIS alternatives 2 and 3 were primarily intended to illustrate issues of equity and displacement. The final zoning changes adopted in a preferred alternative must take into account local conditions with a goal of creating livable, attractive, sustainable urban neighborhoods. This requires a detailed, neighborhood-by-neighborhood examination of urban form -- existing uses, adjacent zones, access to transit and other amenities, etc. We urge the City to pay close and careful attention to input on specific places from neighborhood-based</p>

groups, such as our partners, Capitol Hill Housing, First Hill Improvement Association, Central Area Collaborative and SCIDpda, and others.

Aesthetics

- 4 The zoning scenarios tested in EIS alternatives 2 and 3 were primarily intended to illustrate issues of equity and displacement. The final zoning changes adopted in a preferred alternative must take into account local conditions with a goal of creating livable, attractive, sustainable urban neighborhoods. This requires a detailed, neighborhood-by-neighborhood examination of urban form -- existing uses, adjacent zones, access to transit and other amenities, etc. We urge the City to pay close and careful attention to input on specific places from neighborhood-based groups, such as our partners, Capitol Hill Housing, First Hill Improvement Association, Central Area Collaborative and SCIDpda, and others.

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?

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?

From: Philip K
To: [PCD_MHAEIS](#); [Klatte, Philip](#)
Subject: HALA Draft EIS comment period too short!!!
Date: Monday, June 26, 2017 9:43:13 AM

I am trying to read through the draft EIS, but the document is HUGE and the appendices are just as large. The staff creating it were employees, able to work on it all day, but those of us trying to read and comment can't devote full time to it. Furthermore, it was released right at the beginning of the Summer.

Please extend the comment period by 2-3 months, to allow citizens (like me) to be able to properly read it, talk to others, and formulate reasonable comments.

Thank you,

Philip Klatte
(206)466-6968

From: Philip K
To: [PCD_MHAEIS](#); [Klatte, Philip](#)
Subject: Re: HALA Draft EIS comment period too short!!!
Date: Monday, June 26, 2017 10:50:01 AM

Sorry, I meant the MHA Draft EIS period is too short. See, I need to even get up to speed on the basic terminology more!

On Mon, Jun 26, 2017 at 9:43 AM, Philip K <klatte@gmail.com> wrote:

I am trying to read through the draft EIS, but the document is HUGE and the appendices are just as large. The staff creating it were employees, able to work on it all day, but those of us trying to read and comment can't devote full time to it. Furthermore, it was released right at the beginning of the Summer.

Please extend the comment period by 2-3 months, to allow citizens (like me) to be able to properly read it, talk to others, and formulate reasonable comments.

Thank you,

Philip Klatte
[\(206\)466-6968](tel:(206)466-6968)

From: Philip K
To: [PCD_MHAEIS](#)
Subject: Request for extension: comments on the draft MHA EIS
Date: Monday, July 31, 2017 8:20:22 AM

We need an extension for the comment period, until at least August 28, 2017. It is taking a long time to read, research, draft, and edit comments. Many reviewers are gathering additional information from the city, which is taking extra time. This EIS is simply too large and complex to adequately comment in the time provided.

Thanks,

PK

From: Philip K
To: [PCD_MHAEIS](#); [Klatte, Philip](#)
Subject: Comments on draft MHA EIS
Date: Sunday, August 06, 2017 5:52:38 PM
Attachments: [MHA_draft_EIS_comments_Klatte.pdf](#)

Attached are my comments on the draft EIS. Please let me know if it's helpful to get them in some other format.

Thank you,

PK

The review period is too short for the draft EIS

Even with a (short) extension, this EIS is too large, too complex, and affects the city in too many ways, for citizens (who have other jobs) to be able to fully understand it and meaningfully comment. My comments are a great example – I was only able to comment on Section 3.1, and even then those comments are thrown together and incomplete.

My family came to Seattle shortly after the Seattle Fire, in the late 19th century. My sister recently found a letter addressed to “Seattle, Washington Territory” (though that letter is post-marked after statehood, the news apparently didn’t get back East). When my grandfather was young, they were still logging the now-considered-old neighborhood that I grew up in, much of the city still had dirt streets, and Alki was still pronounced “alkee”.

My grandfather was a commercial property manager downtown and was involved in determining how downtown would develop (I like to believe he’s the reason Pioneer Square is still there, while we also have a beautiful, tall skyline of new buildings). You cannot grow up in my family without knowing that Seattle is ever-changing, but that you need to make sure to preserve what’s good about it, while welcoming progress. The time allowed for comments did not allow me to intelligently respond to this huge, sweeping change, which is very painful.

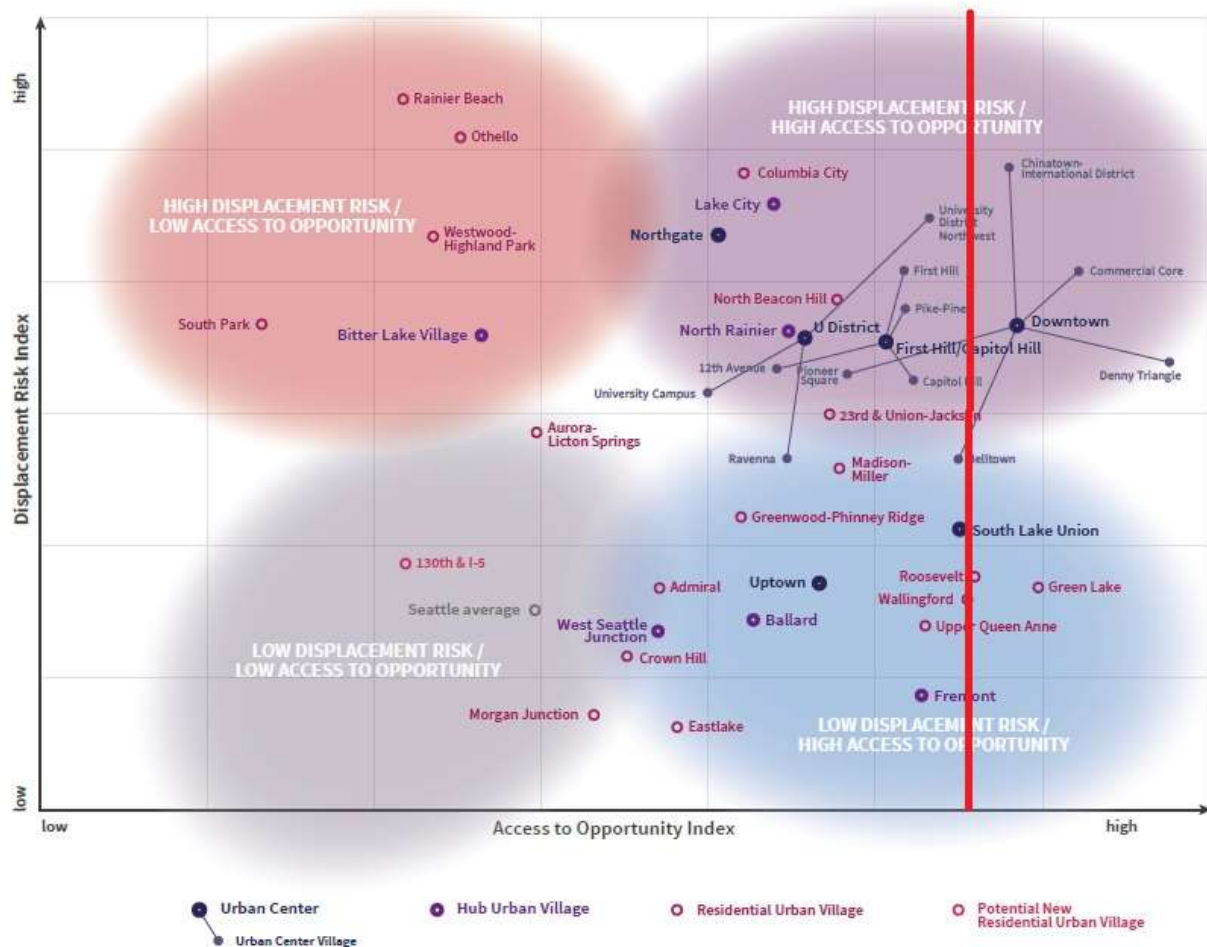
“Access to Opportunity” analysis from background study fatally flawed – multiple sub-comments

The Draft MHA EIS depends entirely on Appendix A (CITY OF SEATTLE GROWTH AND EQUITY ANALYSIS) for analysis of “access to opportunity” and “risk of displacement”. This analysis is central to the entire classification system for MHA and central to the supposed differences and rationale for Options 2 and 3. However, the “access to opportunity” analysis is fatally flawed in several respects:

1. The results are ridiculous on their face. For example, Wallingford is listed at the very top of the access-to-opportunity scale, with Roosevelt in almost a dead heat and only Greenlake and (part of) downtown showing a greater access to opportunity; the entire rest of the city pales in comparison. Anyone who has spent any time in Seattle knows, without further analysis that this is absurd.

For example, the University District has less “access to opportunity” than Wallingford in the city’s analysis. The primary “opportunity” Wallingford has “access” to is the University District (for jobs, transport, businesses, education, etc.). Results like that just don’t pass the red-face test. This anomaly opens up questions about the whole analysis – the exact methodology used is never explained, so all you can do is look at the results and ask if they are reasonable. If the same methodology was used to analyze the other parts of the city as Wallingford, the whole analysis flawed.

Figure 7 Displacement Risk / Access to Opportunity Typology



- The factors going into the analysis of access to opportunity were clearly not weighed reasonably to create the final scoring.

Again, using the example of Wallingford...

Attachment B of the study includes a heat-map style graphic for each and every individual factor analyzed. The actual weights and values assigned to the different factors were not properly spelled out, so the best analysis is just looking at heat maps and guessing how it could even be possible to achieve the final results.

Wallingford shows very few categories where it particularly excels, primarily access to employment, access to a university/college, and how well middle-school students do in math.

It is hard to read the elementary school chart – it has a North-South dividing line that is not labelled, but since Wallingford has no neighborhood elementary schools (see later point on lack of community schools), it doesn't seem likely that Wallingford scored high in that department.

If the elementary-served-area line for Greenlake Elementary on that component map does go down into the study area for Wallingford, it clearly does not include the entire urban village.

It is possible that simply being anywhere near Greenlake Elementary School is enough to put an area into the stratosphere, based on the maps and the fact that Greenlake and Roosevelt are the only areas to exceed Wallingford in "access to opportunity", but a single school should not have that effect, particularly that very-normal school.

This limited number of high-scoring categories doesn't justify being the antepenultimate rating, with the entire city lagging so far behind.

3. The actual measure of the component factors in access to opportunity were not gathered properly or are over-/under-emphasized, at a per-category level.

Again, using Wallingford as the example...

Schools: Wallingford has no neighborhood schools. There are two *option* elementary schools, which the residents of Wallingford do not get to automatically attend. Even those two elementary school are both language immersion schools in Spanish and Japanese, so they aren't ideal for all students, even if they can get in. John Stanford Elementary admitted fewer than half the applicants last year, including wait listing multiple siblings of existing students. The local middle school takes students from a variety of neighborhoods, and the high school for the area is in Roosevelt.

Access to College or University: Wallingford residents can access the University of Washington easily by bus, however, with the introduction of light rail (not present in Wallingford, see later point on light rail impacts), every light rail stop in the city of Seattle has great access to The University of Washington, and with the introduction of the North extension, there will be much more frequent access than the busses from Wallingford provide.

Access to employment: since there are very few jobs directly within Wallingford, this seems most likely to be because one can get easily by bus to downtown and other areas with jobs. With the introduction of light rail (not present in Wallingford, see later point), every light rail stop in the city of Seattle has better access to downtown, the U-District and many other places where there are jobs. Even the places that *have* those jobs are listed as having less "access to opportunity" than Wallingford.

Proximity to Transit/Light Rail: Wallingford has similar proximity to buses as other parts of the city, but no light rail, or plans for future light rail. The Introduction of the Link Light Rail system is the biggest game-changer in Seattle transportation since Interstate-5 was built. Given the massive importance of light rail, the weighing of access to light rail is clearly wrong. Wallingford should not be almost the highest "access to opportunity" area, even though there is no light rail and no plans to ever have light rail, as well as distance and significant barriers (e.g. I-5) between Wallingford and the closest *planned* light rail station. Every single area in Seattle (other than downtown) with light rail scores lower on "access to opportunity" in the City's analysis than Wallingford; this dramatically under-weighs the importance of light rail. The areas with planned

light rail expansion areas are also all scored below Wallingford for “access to Opportunity”, except for Roosevelt.

Community Center: Wallingford has no community center.

Library: Wallingford shows the exact same green circle around the Wallingford “branch” of the Seattle Public Library (SPL) as all other SPL branches. The Wallingford location, however, is a small store-front, with limited hours and limited services. There is no differentiation between locations – literally, the main downtown SPL has the exact same mark on the map as the tiny storefront with limited hours and services in Wallingford.

No “alternatives” actually reviewed (plans 2 & 3 essentially the same) – multiple sub-comments

WAC 197-11-440(4) mandates including alternatives in an EIS:

(b) 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.

The inclusion of “alternatives” 2 and 3 do not satisfy that requirement.

Alternatives 2 and 3 use the exact same approach, up-zoning within the study area and mandating either building of affordable housing or payment into a fund for the Seattle Office of Housing, the only difference is modest map changes for where the up-zones are applied.

1. The effects of up-zoning are entirely speculative – changing zoning does not actually result in buildings being replaced directly. As outlined in other EIS comments, below, the calculus for analyzing those effects is flawed and can't be relied on. Since map outlines of up-zoned areas are the only difference between the two “options”, they don't really qualify as options. If the best areas for developers to make money are included in both maps, there is essentially no difference.

I grew up in Roosevelt and my mother (and myself to a lesser extent) was involved in the early urban village up-zoning in Roosevelt in the early 1990s. Almost none of that up-zoning resulted in actual new building, until the North extension for light rail was planned. As we get closer to Roosevelt having a light rail station, the development there is exploding. Simply changing the zoning did not result in significant new buildings for decades, until an outside events happened (light rail, a particular property owner selling, etc.), then there was finally a change in Roosevelt.

Again, the introduction of the Link Light Rail system is the biggest game-changer in Seattle transportation since Interstate-5 was built. That will have a significantly larger impact on where development actually occurs than simply drawing slightly different maps for what amounts to the same plan (“alternatives” 2 and 3).

2. There are plenty of other options that have been included in prior Seattle planning and that would have significantly lower environmental costs. An excellent example is increasing density

and affordability in existing buildings and the creation of ADU/DADU housing. Up-zoning results in tearing down existing buildings and building from scratch, and most of the impacts from the EIS are because of that – concentrating new units, building in waves, increasing scale/height, etc. Increasing density within existing housing areas eliminates those impacts.

3. There are plenty of other options that would achieve the proposals objectives much more directly and through less market-skewing methods.

Inherent to a market approach to tear down old buildings and build new ones from scratch (up-zoning) is the fact that the developers must make a significant profit (significant because of the risk and carrying costs involved). The very fact of that significant profit implies that the new housing is more expensive than the old housing (except in very rare circumstances).

Further, the new development does not necessarily end up being affordable, in fact there is plenty of evidence that developers are maximizing their profits by building more luxury-oriented units, or units that are small but very expensive per square foot. The only method(s) for achieving affordable housing in either “alternative” is to create rent controlled units (either through units in the new development or from the SOH). These are incredibly market-skewing and not truly affordable (artificially offered below market rates), unless so many are built that the market rate for renting them is the same rent that is set.

If a person below 60% of the AMI can rent a unit for significantly below market rate, then by the law of supply and demand, there are more people who would want that unit at that rate than can get it. This means that whoever wins the lottery to get one, is actually no longer the same as any other person at their income level. If an employer gave out a below-market-rate unit, the IRS would want to tax the difference as income. All this does is make a few lottery winners and cut everyone else out. A great example is the waiting list for Section 8 vouchers, where the wait list in Seattle has only been open twice since 2012 – I know people who were homeless and had no opportunity to even sign up for the wait list for Section 8. Additionally, since the below-market rent is a golden ticket, it decreases important societal flexibility in terms of housing and causes people to do perverse things to keep from losing the unit (like not taking a job for more money, not moving closer to work, etc.) – none of these impacts were evaluated in the EIS.

Additionally, artificial programs to create “affordable housing” (e.g. income-based rent control) by their nature create significant additional hurdles for the lower income person, in terms of bureaucracy, paperwork, proof of income, limits on roommates/occupants, etc. As an example, a parent should be able to take in an adult child who is in transition, without having to fill in paperwork or worry that their combined income exceeds some threshold – this flexibility is totally lacking in the artificial constraints of this rent-control system. These impacts were not evaluated in the EIS.

On the other hand, increasing the capacity of existing housing creates a true market of affordable housing. On my block alone, there are two older ladies who rent either a room or an ADU, there is a rental house fit for a family, and there is a house where people rent rooms.

There are two daycare workers in the aforementioned house who are paying \$400-500/month – there will never be housing like that created using this plan, but buildings where that is feasible will likely be torn down under the studied “alternatives”. The impacts to existing market-affordable housing were not evaluated.

The proposal and “alternatives” miss a fundamental truth about Seattle – our “single-family” neighborhoods are not necessarily full of single families. In the late 1960’s, Seattle approached 600,000 residents, prior to the “Boeing Bust” downturn. We only recently reached those same levels again – this shows the incredible flexibility in existing neighborhoods. I grew up in a “boarding house” in Roosevelt, where the renters often outnumbered the family members, and we were not alone in that arrangement in our circle of friends, and we knew plenty of people who built ADUs. There is tremendous flexibility in existing neighborhoods to create a wide range of affordable housing options, but no options were reviewed.

4. There is plenty of evidence that there are very strong political and monetary incentives to avoid having real options explored. Everyone involved acknowledges that this approach, the Grand Bargain, is actually specifically designed to achieve special profits for developers, in exchange for their backing the plan. This casts a special shadow over analyzing whether proper alternatives were reviewed, since the all incentives are to avoid looking at any options outside the specific parameters of the bargain. In particular, it creates strong incentives to avoid looking at alternatives that would spread profits outside of the developer community, even if those alternatives are part of the comprehensive plan and have been extensively studied by the city.

Failure to identify displacement and cultural loss of non-marginalized groups

While it is socially responsible to analyze the effects of major housing changes on vulnerable groups, the analysis on displacement should not stop there.

I grew up spending a lot of time in the Central District. I spent my socially formative years as a minority white kid in a predominantly-black Washington Middle School; I consider my time there to be a tremendous success for the goals of desegregation. I went to high school in the CD and I had friends in the neighborhood. The city needs to understand, in its decision making, that what’s happened in the CD is terrible in itself, but it’s also a canary-in-a-coal mine. Because race is tracked in censuses, it is easy to see when communities of color are displaced, but those people are also long-term Seattleites, who helped create things about this city that everyone loves, and it’s happening all over.

When people find out that I’m from Seattle, they are surprised to meet “one of the rare natives”. At my neighborhood block party, the “natives” are a few older people who have lived in the same house for 40+ years and me. The kids I grew up with are only in the city still if they came from rich families, they inherited their parent’s house, they hit it big in tech (stock options etc.), or else they are living a tenuous existence. One close friend from high school, who grew up largely in the Central District, is living in an apartment in South Lake Union; she has been in the same building for over a decade, she works in a lower-income field (child-care), and is being priced out of her home now. I know many people who have left the city either because of unaffordability or because the city has lost its soul.

Many people moved to this city because they liked the vibe, but the kind of people who made the Fremont Troll and the dance steps on Broadway, who experimented with brewing beer and roasting coffee, and who made this a place with a mixture of whimsy and order (think artists who won't cross a street against a light) are all being replaced.

We have essentially one industry that is growing very rapidly, the technology industry, and that is skewing everything in Seattle. That industry has high enough wages that they can easily push people out – if you made a nice place to live, that's great, but there's someone who can pay more for it than you can. That industry also has specialized skills and a history of not caring at all where people come from, so that locals can't necessarily participate in great numbers – even the tech guy who grew up down the street from Google has a worse shot at a job there than someone who went to Stanford or has a history working in the Bay Area and has never even visited Seattle. The proposal is really geared toward simple housing for those people who are coming in for tech jobs.

In Ballard, they used to have bumper stickers that say “I, for one, welcome our new condo overlords”. Ballard is essentially unrecognizable from the down-to-Earth, maritime, Scandinavian neighborhood with terrible drivers that I remember. The entire city is becoming unrecognizable, in character more than physically. Change is always going to happen, but we should notice (and the council should see it in this EIS) when the changes will be great enough that the only thing left of “Seattle” is the geography.

I am not against people moving to Seattle from the outside, particularly if they are going to stay and vest in the city. Even my family moved here in waves: one set of great-grandparents in the 19th century, another in the 1910s, my father in 1972, my brother-in-law in the 1990s, and my wife in 2013 (from Tacoma). Seattle has always, and will always, have people moving in, who will love it and stay. However, when the rate of displacement of Seattleites gets too high, there is no continuity and no Seattle.

A stated central tenet of MHA is to “maintain Seattle as an inclusive city by providing housing for everyone: people of all ages, races, ethnicities, and cultural backgrounds and households of all sizes, types, and incomes”. The current analysis fails to look at this aside from the very narrow focus on census-tracked factors (e.g. race) in different neighborhoods.

Appendix A (Growth and Equity Analysis) describes building strong communities to limit economic and cultural displacement. The EIS should not stop at only looking at marginalized groups.

Impacts not separated by urban village

While the increases in housing stock are analyzed per urban village in the study area, the impacts are not broken down by urban village. This means that the true scope of the impacts cannot be intelligently reviewed, as they may seem acceptable in aggregate, but in a given area they may be far worse.

Impact differences not adequately delineated between options 2 and 3

The differences in the impacts between options 2 and 3 are not fully delineated, particularly outside of Section 3.1. Without that, decision makers cannot properly weigh the alternatives.

Impacts not reviewed outside urban villages

WAC 197-11-440(6) mandates including alternatives in an EIS:

(a) This section of the EIS shall describe the existing environment that will be affected by the proposal, analyze significant impacts of alternatives including the proposed action, and discuss reasonable mitigation measures that would significantly mitigate these impacts. . . .

The draft EIS focuses on impacts within the study area, but that is not the proper “existing environment that will be affected.” The larger neighborhoods, and the city as a whole, will be affected by a project this large, with changes spread out across so many parts of the city.

Ignores central tenet of Seattle 2035 (Growth and Equity) appendix, “achieving equitable growth will require: . . . economic mobility for current residents”

There is no analysis of the impacts on economic mobility. As pointed out earlier, MHA is geared toward giving developers greater profits, and all indicators are that they are building expensive housing which is mostly geared toward housing high-paid incoming tech workers. Again, those tech firms have a history of actively ignoring where someone currently lives, so connections like prior work in the Bay Area or attending the right college (Stanford) are the real key to many of those jobs. There is no analysis for economic mobility for current residents.

Example: The city is in a war with cars – this is no secret. There are no longer rules for supplying parking with development, and yet many of the “gig economy” jobs, which give some flexibility to people who are not high earners require cars.

Economic mobility requires flexibility in some of the factors of life – if you are locked in on everything, your life is fragile and it can shatter. The primary factors include housing cost, housing location, transportation, employment, education, and children. If you lock someone in so that they are in a rent-controlled, income limited apartment, they must use public transportation, etc. then you start to limit important things like where they can get a job and the kind of job, or whether they can attend school while working. The more life factors that are rigidly locked in, the harder it is to flex with circumstances and do well.

No analysis on marginalized groups moving INTO urban villages (CD is decreasing, but North Seattle areas increasing)

In Appendix A, there is clear analysis of marginalized groups moving out of particular areas, but it is also noted that they are increasing as a share in other areas (see Figure 2, “Urban centers and villages in Seattle with a decrease in population by race, 1990-2010”). There is no analysis on impacts to those newly arrived residents.

Failure to properly analyze “affordable” and AMI trends – several sub-comments

1. The data used to evaluate impacts to people at/below 60% of AMI do not actually have cutoffs at 60%. Multiple data sets used (e.g. Exhibit 3.1-7, Exhibit 3.1-19, etc.) clearly have ranges for 30-50% and 50-80% of AMI, which is not precise enough for analyzing “affordable” to someone at less than 60%.
2. The EIS does not properly take into account the projections or trajectory of AMI for Seattle. According data from the federal government:

Historical Inflation Adjusted Median Household Income for Seattle

Date	US	Washington	Seattle
2015	\$55,775	\$64,129	\$75,331
2014	\$53,719	\$61,437	\$71,355
2013	\$53,166	\$59,429	\$68,663
2012	\$53,031	\$59,434	\$67,800
2011	\$53,223	\$59,897	\$67,538
2010	\$54,405	\$60,477	\$68,583
2009	\$55,478	\$62,468	\$70,731
2008	\$57,276	\$63,935	\$73,168
2007	\$58,003	\$63,548	\$73,040
2006	\$56,957	\$61,814	\$71,313
2005	\$56,122	\$59,787	\$66,705

These data show that Seattle is moving further and further away from the national average. This could affect many impacts, such as the causing even greater perverse behaviors due to rent control (see earlier comments on affordability through market forces versus artificial programs).

Improper calculations for provision of affordable housing through MHA funds through Seattle Office of Housing (SOH)

The calculations used to predict how MHA funds will provide affordable units are flawed:

1. They predict too much extra money from other sources, based on history with current programs. The addition of MHA funds is a big change, and SOH may not be able to match that much new money up as they can in existing programs.
2. There is no analysis of the impact of timing on the use of MHA funds. If there is a delay between the payment and construction of new housing, the costs are likely to escalate, particularly if property needs to be purchased.

Failure to properly analyze differences between developer payments and developer production of fixed-rate housing (especially by area)

MHA purports to supply affordable housing (rent controlled) through two possible means: MHA payments or developer-production of affordable units (Incentive Zoning – IZ); the choice is entirely up to developers. The EIS fails to analyze what happens if one or the other of those is used drastically more than the other, particularly as applies to each urban village in the study area.

Additionally, there is no analysis on the impact of timing for when units are available, based on whether they are provided by developers or through MHA funds.

Failure to analyze options for “guiding” principal to “encourage or incentivize a wide variety of housing sizes”

The “wide variety” of housing in the alternatives is very limited. There is no analysis of options like expanding housing in single-family areas, like through ADUs and DADUs. The basis of the “Grand Bargain” essentially forbids it, since that would not be aimed at funneling more profits to developers.

Failure to account for commercial zoning, beyond zoning in mixed-use new zoning

Commercial areas and jobs are key factors in where people want to live and where developers can maximize their profits by building. Without analyzing where things are going on the commercial side, you cannot predict important things like when up-zoning will actually result in building.

Predicted growth analysis fatally flawed (based on historical growth 2010-2016)

The effects of up-zoning are entirely speculative – changing zoning does not actually result in buildings being replaced directly.

I grew up in Roosevelt and my mother (and myself to a lesser extent) was involved in the early urban village up-zoning in Roosevelt in the early 1990s. Almost none of that up-zoning resulted in actual new building, until the North extension for light rail was planned. As we get closer to Roosevelt having a light rail station, the development there is exploding. Simply changing the zoning did not result in significant new buildings for decades, until an outside events happened (light rail, a particular property owner selling, etc.), then there was finally a change in Roosevelt.

The EIS uses historical number on growth in the study area (2010-2016) to predict where growth will occur. The introduction of the Link Light Rail system is the biggest game-changer in Seattle transportation since Interstate-5 was built. Any analysis that is based on historical numbers to predict where growth will occur are fatally flawed.

From: Dave Knight
To: [PCD_MHAEIS](#); [O'Brien, Mike](#)
Subject: Rezone Market Street 3200 Block
Date: Wednesday, July 26, 2017 7:31:26 AM

Dear Councilman O'Brien & MHA Staff,

I am writing in support of rezoning the last 10 remaining single family homes at the west end of Market Street in Ballard from SF 5000 to a proposed minimum zoning of LR-1 as shown in the current MHA plan.

I live in the first of these 10 single-family homes at 3214 NW Market Street which is immediately next door to existing LR-2 apartments and across the street from existing NC-1, LR-2 and LR-1 developments. The City zoning map currently (and very oddly) jogs around my property to capture my side of the street as SF 5000. This jog in zoning designation is inconsistent with city planning and housing goals. Through discussions with long-term resident neighbors and some research, I came to learn that this odd zoning jog is apparently the result of a former City employee who lived behind us to the north in the early 1990s and used their connections to rezone our portion of the block to preserve their own view. Given the housing inventory crisis in our city, and the on-going densification of our street, it seems time to revert our properties back to denser zoning to better meet the needs of the City.

When we bought our home just 3.5 years ago, the disparity in zoning on our block was not nearly as noticeable as it is today. While I love our large lot (including in-ground swimming pool), my neighbors and I began questioning the fairness of property rights on our block as the modest two-story duplexes across the street have been torn down and replaced with taller "4-Pack" developments. Since I moved in there have been 17 new homes added on our block with another 5 slated to begin any day. While we have taken on much of the burden of new density including lost views, increased traffic and property taxes, we have not been able to act in any manner to evolve with these changes.

With the densification we are experiencing on our block and the ongoing city-wide advocacy far reaching upzones, we are burdened with uncertainty over the long-term future of our single-family properties. We see rezoning our properties as obvious 'low-hanging fruit' in the effort to address City goals. If not today, it will inevitably happen in the future. To alleviate our uncertainty and avoid wasted or deferred maintenance or investments in our psingle-family homes, we ask that the City not delay in correcting our current zoning from SF 5000 to LR-1 any longer. We ask for the opportunity to act as we see fit to remodel with basement apartments, subdivide like our immediate neighbors, or maintain and improve as-is.

Thank you for your attention to the request to upzone the last remaining single-family homes on the 3200 block of Market Street in Ballard. We appreciate your time and support.

Dave Knight & Family

3214 NW Market St.

Seattle, WA 98107

[206-214-8224](tel:206-214-8224)

From: Constance Knudsen
To: [PCD_MHAEIS](#)
Subject: CROWN HILL URBAN VILLAGE -- BACK TO THE DRAWING BOARD
Date: Monday, August 07, 2017 11:00:50 AM

1 WE NEED TO GO BACK TO THE DRAWING BOARD ON THIS, FOLKS.

Alternative 2 is very likely to overtax an infrastructure and transit that's already under strain.

Alternative 3 if implemented in CHUV would exceed the ability of the city or private partners to mitigate the significant impacts of increased density. It would displace neighbors by aggressively rezoning smaller, single family rental homes, particularly vulnerable neighbors living north of 85th street and seniors and those on fixed incomes or with mobility challenges.

We are already seeing these neighbors displaced with nowhere to go. Small businesses are being forced out under existing regulations, and unable to afford the much higher rents in new developments.

Both alternatives project that CHUV will absorb some of the heaviest growth of all the urban villages and be subject to many of the largest environmental impacts in the City due to rezoning and MHA implementation.

BACK TO THE DRAWING BOARD, WITH
PARAMOUNT CONSIDERATION FOR MIDDLE

CLASS TAXPAYERS.

Constance Knudsen

From: Chris Koehler
To: [PCD_MHAEIS](#)
Cc: [Steve Koehler](#)
Subject: RE: Public Comment on Seattle's EIS MHA
Date: Monday, August 07, 2017 4:25:06 PM
Attachments: [Public Comment on Seattle's EIS MHA_08.07.17.pdf](#)

The previous email sent a few minutes ago contained an attached letter that had the wrong date listed on its second page. Please use the corrected letter attached to this email.

From: Chris Koehler
Sent: Monday, August 07, 2017 4:10 PM
To: 'MHA.EIS@seattle.gov' <MHA.EIS@seattle.gov>
Cc: Steve Koehler <steve@koehlerandcompany.com>
Subject: Public Comment on Seattle's EIS MHA
Importance: High

Sent on Behalf of Steve Koehler and Koehler & Company, please see the attached .pdf that contains our letter of public comment. Contents of which are as follows:

To Whom it May Concern:

Thank you for allowing comments on the City of Seattle's proposed zoning and land use revisions.

We represent Northgate Associates Limited Partnership, owners of the Northgate Office Building located at 9750 Third Avenue NE, Seattle, WA 98115, as its Managing General Partner and Property Manager. We have been owners of the property since it was originally developed in 1980 – 37 years ago. We hope that our long term investment in the Northgate community over this long period of time carries some weight in the planning process.

The rezoning of the Northgate Overlay District is an important process for our City and how close-in, self-sustaining neighborhoods will grow and be responsive to our citizen's needs. Regarding the new zoning recommendations we have the following comments:

1. Up-zoning to provide greater density around mass transit (Sound Transit Link Light Rail) will provide greater ridership for the system and reduce traffic congestion as those within walking distance to Light Rail will make use of the facility.
2. Northgate Executive Park was designed and has operated as a commercial office and professional services center for 40 years! The current zoning does not require

low income housing or the payment for low income housing. It would be inherently unfair for a redevelopment of the property under slightly more advantaged new zoning to require all newly developed and redeveloped commercial space to pay toward the low income housing subsidy. Thus, we assume that any Mandatory Housing Affordability (MHA) policy adopted would only apply to additional FAR allowed for commercial use over and above the current zoning.

3. The buildings developed 30 to 40 years ago in Executive Park were done in an era of surface parking with a resulting low actual FAR. The justified rezone to higher FAR and height will dramatically change Executive Park over the next few decades. We welcome this change but want to ensure that the new development will be architecturally pleasing. We believe that more design flexibility, providing more light & air, articulation and other pleasing design parameters could be achieved with the 145' height outlined in Alternative 2 of the draft MHA EIS. We would even favor no marginal increase in FAR under Alternative 2 in favor of an increased height if that compromise was needed. The increased height limits will allow more efficient floor plate configurations, better view corridors, less bulk, etc.
4. The high density demographics in North Seattle surrounding Northgate provide a terrific employment base for high density, low margin businesses. Many of these employees do not want to venture downtown but are still too far to walk to work and are too close to be Light Rail prospects. The businesses at Executive Park have traditionally located in this region to avoid parking charges and gain a lower rent profile. We need to keep a home for these types of businesses in Seattle so reducing the maximum parking allowed even with a nearby light rail system is counterproductive to many of these businesses. The current zoning provides for maximum parking that is already reduced below that under which all the buildings in Executive Park were developed. We strongly recommend that the current parking ratios be maintained in any new zoning ordinance.
5. We fully embrace the concept of mixed-use development as the Overlay District is truly well suited for a "Live, Work, Shop" environment.

Thank you for considering these recommendations and comments. We look forward to engaging in the planning process as it moves forward.

Sincerely,

Steve

Stephen K. Koehler, President
Koehler Northgate Inc., Managing General Partner

Northgate Associates Limited Partnership, Owner of Northgate Office Building
Koehler & Company

2

<< File: Public Comment on Seattle's EIS MHA_08.07.17.pdf >>

From: Rich Koehler
To: [PCD_MHAEIS](#)
Subject: Extension needed
Date: Thursday, June 15, 2017 9:10:13 PM

Hello,

I am writing to ask for an extension to the DEIS comment period. There is too much material to look at for the given amount of time.

Rich
5212 49th Ave SW
Seattle

Sent from my other iPad

From: Andri Kofmehl
To: [PCD_MHAEIS](#)
Subject: DEIS Comments from a Concerned West Seattle Resident
Date: Monday, August 07, 2017 11:33:14 PM
Attachments: [DEIS Comments - Andri Kofmehl - Aug 2017.pdf](#)

Hi,

1

As a West Seattle resident who's in the process of building one of Seattle's most sustainable homes for our family, I've been following the developments around HALA with great interest. While I generally agree with the need to increase density (our own new home will have 7 people living in it instead of the prior 3), it is very troubling to see when such important decisions as neighborhood zoning are being made without adequate ownership of the people affected and with insufficient analysis of impact.

Most recently, we learned of the serious flaws in the DEIS which you can see listed in the attached document. The West Seattle community has been struggling with several problems of urban development, such as poor infrastructure, yet this issue is not being given adequate attention. Critical aspects, e.g. impact on commuting time or need for green spaces, are not properly projected in light of the large increase in population.

I urge the City to revisit the points in the attached document in a revised EIS and to genuinely work with the community to develop a better plan than the current HALA maps. I sense there is strong interest in West Seattle in being part of the constructive process, but so far the City's outreach and incorporation of feedback have been disappointing.

Best,
Andri Kofmehl

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:

- Some people have invested \$20,000 or more into solar photovoltaic systems. If the new zoning goes into effect, the taller buildings will cause shading and will make these investments (and the environmental benefits!) obsolete.

Name: __Andri Kofmehl__

Address: _____

Name	Todd Kombol
Email address	
Comment Form	
Land Use	<ol style="list-style-type: none"> 1 As I home owner in the Junction, I am not in agreement to ruin an existing single family zoned neighborhood by a zoning change. 2 If more areas are needed for affordable housing it should be in existing commercially zoned areas. I also want to point out that WS isn't all that affordable. Many cannot afford to live here. 3 This type of housing should be built in cheaper areas needing the gentrification.
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	Sam Kraft
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I support MHA rezone 2, without a “displacement analysis”, but with a caveat. I live in the Othello neighborhood and many of my neighbors are low income or on fixed income and are threatened by displacement in the face of economic development. Whether they own or rent, this is a truly profound concern.</p> <p>2 I think that we should upzone as aggressively as is possible, but offer robust assistance and extensive outreach to those folks who are most socioeconomically vulnerable. Upzone aggressively in the high risk of displacement/ low access to opportunity areas to increase the land value in some of these communities that have been historically discriminated against. To not do so would be to continue to perpetuate the out of balance distribution of wealth across the city. At the same time, the City of Seattle should be going door to door, letting people know that if they face economic eviction or rising costs, they have access to a suite of programs and relief to allow them to stick around if they would like. But, because of the upzoning, when they or their families are ready to sell, they will have accumulated wealth in the land.</p>
Housing and Socioeconomics	<p>3 My comment on housing and socioeconomics was included in the previous comment. However, to add, the impacts on affordability and equity far eclipse the impacts on current residents in single family zones to their parking and traffic. Unfortunately, the issues of parking and traffic will just have to continue to be problems we must learn to adapt to as we grow and densify as a city.</p>
Land Use	<p>4 I strongly support abolishing single family zoning city wide in an effort to increase density and affordability. I understand that the MHA zoning is nowhere near proposing that policy, and that this policy is politically toxic, as 60% of city residents still live in SF zones. However, I support zoning policy that encourages the "missing middle" housing typologies of rowhouses, townhomes, and small apartments to fill in our current SF zones along with the MHA TOD based upzones as a larger plan.</p> <p>5 I currently own a home in a SF zone. I enjoy my yard and my rapidly increasing home value, both products of the SF zoning laws. But I am willing to give these up in the name of affordability, density, equity, and climate change. I believe that my family and all of Seattle will be happier and wealthier if we allow a denser city to fill in the voids. To the planners and reviewers reading this feedback, listen to your advanced educational training! And listen to your hearts! This city needs visionary change to create equity, and to conserve regional and global resources!</p>
	<p>6 As an architect, scale is a very important consideration. But it is</p>

Aesthetics	also deeply contextual. As we scale up as a city, and we upzone, more buildings will increase in size. The character of many streets will change. And that is okay. We need to be bold and imagine major commercial strips and neighborhood commercial nodes with more bulk than they have today.
Biological Resources	7 Think of the region, and think of the entire planet. If we do not create more building capacity in our city zoning, people will spread out farther into the region, creating sprawl. Sprawl puts dramatically more strain on natural resources than density does. It is true that increased density will eliminate urban green space and create more traffic in the city, however, studies show this has a significantly lower impact on regional and global biological 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?	
How long have you resided in the city of Seattle? (total number of years)	
Do you work in	

From: Georgi Krom
To: [PCD_MHAEIS](#)
Subject: HALA plans
Date: Tuesday, July 25, 2017 10:53:02 AM

Attention Seattle Office of Planning and Community Development,

I am a long time homeowner in Seattle, in the same house since 1982. I recognize that growth is happening in my city but I feel strongly that not enough attention is being made to keep older, affordable buildings in place. Instead, the upzoning plans for DEIS expanding urban villages do not allow for neighborhood character or preservation.

My single family neighborhood of north Queen Anne has seen ugly homes and apartments go up next to smaller homes. These towering structures are neither attractive nor affordable. They are replacing smaller homes that could have been usable for growing families.

Some years ago the church on 8th West was almost demolished for a couple of tall housing towers. Thankfully, this beautiful historic structure was saved and now serves as a church for many families who come from all over the area. Housing is not the only thing that makes for lively neighborhoods.

In Queen Anne we have many areas of lower, human scale buildings that are sought out by residents for shopping and eating. The lovely older block that the Macrina Bakery is in is a perfect example of this. Another street is Galer, where modern buildings live alongside older places with unique businesses that are not chain stores. The HALA plans do not allow for this attractive type of diversity.

Section 3.5 of the DEIS shows no understanding of the area's history. What will really be affordable and will design standards be used for these changes? Do we want every neighborhood in Seattle to be a cookie cutter of every other neighborhood?

The unreinforced masonry section will limit the preservation of existing housing. Financial incentives for property owners should be encouraged to keep historic homes in Seattle. These places give neighborhoods their distinctive qualities and would be more affordable than newer construction. The HALA plans to not take this into consideration.

I am appalled by the absence of design criteria and the lack of sensitivity for the preservation of older buildings in Seattle. We are tearing places down in a willy-nilly fashion to make unaffordable towers that only the most wealthy new residents can afford.

Someday Amazon will slow its growth and we will be looking at cheap, overbuilt and empty apartment buildings. Slow it down and do it right.

Sincerely,

Georgi Krom
3267 Conkling Pl W.
Seattle, WA 98119

Name	Jon Krombein
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 The fatal flaw in the current planning is that "multifamily" doesn't mean what is implied by the name and it has no teeth. Currently, in the city of Seattle "multifamily" in actuality means "multi-tenant." I am an electrical engineer who has worked on design teams for over 2000 of the new apartments that have been built in Seattle in the last few years. Approximately 90% of those units were 1-bedroom or studio units. The remainder were 2-bedroom units. I have never seen an apartment with 3 or more bedrooms in Seattle.</p> <p>All of the new construction is aimed at multiple tenants and maximizing the number of "doors" per development, but they aren't actually functional for "families." Until there are a large number of affordable condos and apartments large enough for families with 2 or more children, families will continue to "age" out of the City and flee to the suburbs--taken their income, spending, and tax-base with them.</p> <p>Within reason, I am in favor of some form of Mandatory Housing Affordability, but only as long as there is also a mandate for "family-sized" units, and the zoning isn't adjusted to encroach further on existing single-family neighborhoods that have a right to not be disturbed.</p>
Housing and Socioeconomics	<p>2 Currently the vast majority of the housing need in the Seattle core is driven by incoming employees at companies like Amazon, F5 Networks, Google, Apple, Facebook, etc. Many are single. As is typical in the tech industry, many will likely "turn-over" in the next 2-4 years, and be replace with new employees. Others will begin to settle down and start families. If you wish to keep their salaries and spending within Seattle, you need to provide a housing infrastructure that will accommodate their needs as they age-up and have children. If you don't they will leave.</p>
Open Space & Recreation	<p>3 Along with the need for "family-sized" units (true multiFAMILY housing) there is a need for safe open spaces (playground, parks, and ballfields) in the City. This could be ground-level space or it could be a requirement for developers to include such spaces in their construction--at a minimum for their tenants, or ideally as benefit to the public. Any parent of small children will tell you that kids need outdoor spaces to run, scream, play, dig, build, etc. If you are serious about keeping Seattle affordable for families you also need to make it appealing to families. If they feel like they need to life</p>

downtown to find the space they need to live, then that is just a further incentive to move to the suburbs.

Public Services & Utilities

4 The city desperately needs a K-12 public schooling facility in the downtown core.

Demographic Survey (optional)

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

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

Are you now or have you ever experienced homelessness?

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

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)

From: Andrew Krueger
To: [PCD_MHAEIS](#)
Subject: comments regarding the Mandatory Housing Affordability Draft Environmental Impact Statement
Date: Monday, August 07, 2017 5:45:59 PM

To Whom It May Concern,

My name is Andrew Krueger. Together with my wife, Ingrid, we own a home at 7744 16th Ave NW which is in an area being considered for upzoning as part of the Crown Hill Urban Village.

I write to express concern regarding the recent MHA DEIS and the myriad problems it brings to light.

In brief, I support the comments outlined by the Crown Hill Urban Village Committee for Smart Growth (<http://crownhillurbanvillage.org/wp-content/uploads/2017/08/CHUV-MHA-EIS-Summary-final-073117.pdf>) which clearly call into the question the basis for the proposals.

Here are some specifics I would like to address:

The existing Crown Hill Urban Village already has significant capacity for development. I'm in the area every day. It is not an area of urban density. It looks far more suburban than urban. Spend 10 minutes driving through the area and do the same in Belltown, Pioneer Square, Capitol Hill, Upper Green Lake, Ravenna... it is not at all similar. **Build up in the area already zoned for it before expanding and negatively impacting people's lives.**

Every day in front of my house, people use our street as an unofficial park & ride to catch the D line or 15. Combine that with the people who currently live on 15th Ave in buildings that didn't provide enough parking and you'll understand why my wife and I often find ourselves walking a couple of blocks with our 5 year old to get in our front door. If this serves the city's intent to get people out of cars, let me end that argument now.

Mass transit can't accommodate the growth. I work in the University District. To get there from my house using mass transit, I take the 48 which leaves from the SE corner of 15th Ave NW and 85th Ave. It's a stop generally littered with trash and the occasional scattering of

needles. A recent trip to work on that route got me to work in one hour. When I drive, it takes me 20 minutes. When I take the bus during the school year, it often takes longer; sometimes I find myself waiting for a second or third bus on the way home because they are packed. For my wife, the options and speed are better, but they land her squarely in the midst of an aggressive youth and homeless population. Great company for our 5 year old (yes, sarcasm). And please don't forget that innocent bystanders have been shot at that bus stop. Light rail is not an answer given it is not expected to reach our "urban village" and the stop planned for 20 blocks away won't be online for more than 20 years. Arguing that the growth will provide revenues needed to increase transit is also unfounded.

What's already being built around us is an architectural embarrassment and certainly not befitting of an "urban village." The growth to the south of us on 15th is not conducive to any walkability. Developers are simply dropping party walls to the street level. What does that afford for our neighborhood? More nail salons and insurance agents, as the spaces don't accommodate a variety of business types. There is a "P" suffix attached to this zoning – intended to designate pedestrian friendly destinations – that is hardly worthy of what's being built. You'll also find a number of those units being occupied by residents rather than businesses (a guess since the blinds are always closed and no sign hangs outside).

If you've read to this point, thank you. Really; thank you, because I write with a heavy heart. The decisions made regarding upzoning of Crown Hill will lead to our family staying in Seattle or leaving the city I've called home since 1989.

I'll end there. Thank you in advance for your consideration.

Best,

Andrew Krueger

From: Ingrid Krueger
To: [PCD_MHAEIS](#)
Cc: [Deborah Jaquith](#); [Leigh Pate](#)
Subject: CHUV MHA DEIS Comments
Date: Wednesday, August 02, 2017 10:19:36 AM
Attachments: [CHUV-MHA-DEIS-Full Comments 20170731.pdf](#)
[CHUV-MHA-DEIS-Summary 20170731.pdf](#)

To Whom It May Concern:

Please find attached Comments on the MHA Draft Environmental Impact Statement, as well as a Summary of those comments, prepared by the Crown Hill Urban Village Committee for Smart Growth.

Please feel free to contact me with questions or comments.

Ingrid Krueger

Crown Hill Urban Village

Committee for Smart Growth

206-245-8560



City of Seattle Mandatory Housing Affordability Draft Environmental Impact Statement (DEIS) Response

1. Summary:

See comments to individual chapters below.

2. Description of the Proposed Action and Alternatives [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.

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

- Seattle 2035 Comp Plan Assumptions that are applied to Alt 1 conclude that CHUV will grow by 700 new housing units by 2035. In June of 2017 the City of Seattle Permitting process identified 21 development projects already under permit that include over 600 new housing units. Planning estimates improperly omit projects under permit now and produce inaccurate growth estimates.

Comment 2-2: DEIS Growth Projections in Alt 2 and Alt 3 in CHUV, and potentially other Urban Villages, are unrealistically low; planning assumptions that they are based on exclude current development in the pipeline, and therefore are unrealistically low.

- Alt 1, Alt 2 and Alt 3 scenarios should be re-assessed with growth projections that are in line with the development occurring now and readjusted throughout the DEIS for their impact.

Comment 2-3: The DEIS Underestimates the mobility challenges and the limitation of Urban Villages that will get light rail investments and those that will not.

- Urban Village Expansion Areas are defined as a 10-minute walkshed from high frequency transit, yet there is no delineation between Urban Villages that will get light rail compared to those that will not. Urban Villages without light rail should not be expanded beyond the capacity of current or funded infrastructure to keep residents mobile.
- MHA zoning within urban villages with no light rail should reflect the limits of future mobility due to lack of multi-modal transit.

Comment 2-4: All maps in Appendix A should show boundaries of urban villages and expansion areas to properly assess data and Displacement/ Opportunity designations.

Comment 2-5: The final EIS should include data to explain where the "line was drawn" between High and Low Displacement Risk and High and Low Access to Opportunity. The final EIS should better classify "borderline" Urban villages in the Displacement Risk analysis to reflect realities and better protect residents. The current analysis is a broad oversimplification.

Comment 2-6: Crown Hill Urban Village is deemed High Opportunity in the DEIS, but Appendix A Figure 7 shows Crown Hill almost exactly at the mid-point of the Access to Opportunity axis, and as only slightly higher than Morgan Junction, which is categorized as low opportunity.

Comment 2-7: The DEIS relies on the Growth and Equity Analysis as its primary parameter to group and apply broad re-zoning principles and evaluate MHA, yet the topology maps in Appendix A do not show specific, numerical figures or the weighting of each category. This makes it impossible to truly weight each Urban village and the impacts within the Urban Village.

- No data is provided as to how each “score” affects the overall designation.
- As noted under Limitations "The indices and maps in the Growth & Equity Analysis should be used with caution. This is a first attempt to understand equity effects of broad City policies, and results of the analysis depend on the selection and weighting of indicators." and "Greater historical and qualitative context is needed to avoid **simplistic conclusions**." By designating urban villages only high/low, the analysis is drawing “simplistic conclusions,” and thus being improperly applied throughout the DEIS.

Comment 2-8: Conclusions drawn in the context of the Growth and Equity Analysis simplistically characterize Crown Hill Urban Village. Applying broad, simplistic assumptions over a large, diverse area with several demographic and economic areas yields inaccurate assumptions and assessments of impacts applied throughout the DEIS.

- CHUV is assigned as a High Opportunity/Low Displacement urban village; however, the composition of CHUV varies greatly; CHUV includes low-income areas with a high proportion of housing costs mixed in with single-family areas. Areas lacking in basic infrastructure like sidewalks and drainage are intermingled with established areas with typical amenities.
- CHUV is borderline in all the classifications used to define High Opportunity and Low Displacement, making this definition unsuitable and undercutting meaningful displacement analysis, impacts and potential future infrastructure mitigations and investments.

Comment 2-9: Displacement Risk Analysis Indicator People of Color: Per Attachment A, POC in Crown Hill Urban Village increased from 12% to 26% of the population from 1990 to 2010, or growth of 14%. CHUV is colored on the heat map [Figure 5] the same as neighborhoods with as low as 5% growth. CHUV growth of POC is closest to Aurora/Licton Springs with a 17% increase, which was heat-mapped with the hottest colors. Per Figure 2, the cut-off was set at 15%. CHUV is "borderline."

Comment 2-10: Displacement Risk Analysis Indicator Educational Attainment: Crown Hill shows multiple degrees of "heat," depending on the quadrant within the UV. In some areas of CHUV, up to 60% of residents do not have a Bachelor's degree. It is unclear how this data affects the overall evaluation of displacement risk for CHUV.

Comment 2-11: Displacement Risk Analysis Indicator Housing Tenancy: Crown Hill shows multiple degrees of "heat," depending on the quadrant. In some areas of CHUV, up to 70% of the population are renters. It is unclear how this data affects the overall evaluation of displacement risk for CHUV.

Comment 2-12: Displacement Risk Analysis Indicator Severely Housing Cost-Burdened Households: Crown Hill shows multiple degrees of "heat," depending on the quadrant. In some areas of CHUV, up to 15% of households are severely cost-burdened. It is unclear how this data affects the overall evaluation of displacement risk for CHUV.

Comment 2-13: Displacement Risk Analysis Indicator Household Income: Crown Hill shows multiple degrees of "heat," depending on the quadrant. In some areas of CHUV, up to 35% of the population has income below 200% of the Federal poverty level. It is unclear how this data affects the overall evaluation of displacement risk for CHUV.

Comment 2-14: Displacement Risk Analysis Indicator Proximity to Light Rail: It is unclear in the rendering of the map whether *lack of access to light rail* is included in the evaluation of Displacement Risk.

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.

Comment 2-16: Displacement Risk Analysis Indicator Development Capacity: The heat map appears to show only current zoning in analysis of parcels that allow residential uses as likely to develop. Most of the area of CHUV is *not* colored as likely to develop, which is not an accurate representation of displacement risk under rezone Alternatives 2 or 3. The final EIS should re-analyze development of parcels that are currently omitted.

Comment 2-17: Displacement Risk Analysis Indicator Median Rent and Housing Tenancy: The DEIS only considers rental properties with apartment complexes of 20+ units when analyzing rentals at risk of displacement. Smaller buildings and single-family housing rentals (housing multiple individuals in a family or sharing a house) are more typical in Urban Villages like Crown Hill UV. The threshold of 20 or more units ignores this common type of housing and minimizes displacement impacts. The Final EIS should consider smaller buildings and single family rental homes in analysis.

Comment 2-18: The Displacement Risk Index, Exhibit 2.2 illustrates that CHUV has a varying degree of risk, including hot spots of substantial risk, which clearly compromises the validity of categorizing CHUV as "low displacement risk."

- Note that based on this map, CHUV looks to have a higher displacement risk than Queen Anne, West Seattle Junction and Ballard, yet Appendix A, Figure 7 places CHUV at lower risk of displacement.

Comment 2-19: The Access to Opportunity Index, Exhibit 2.3 illustrates that CHUV has a varying degree of access to opportunity and substantial differences North or South of 85th Street; it appears that much of the area in CHUV is colored mid- to low-access. From this graphic, it is clear that CHUV should be designated with "medium" Access to Opportunity, not high. The final EIS should consider "medium" in its assessments of displacement risk and environmental impacts.

Comment 2-20: Access to Opportunity Analysis Indicator Proximity to Transit: It is unclear in the rendering of the map whether *lack of access to light rail* is included in the evaluation of Access to Opportunity. For the four urban villages without light rail, dependence on bus-only transit creates clear differences. The City should evaluate the difference in transit quality and capacity in the final EIS.

Comment 2-21: Access to Opportunity Analysis Indicator Sidewalk Completeness: Completeness in this index is defined as "percentage of block faces within a quarter mile of sidewalk," which is an inaccurate definition of completeness, and does not take into account the ability of the disabled, children, or the elderly to travel safely and without obstacles to their mobility within their neighborhoods. The City

should evaluate pedestrian mobility criteria for communities with and without sidewalks in the final EIS. Analysis should include expectations of additional residents moving to the neighborhood without cars who will be dependent on safe pedestrian mobility and proximity on foot to services.

Comment 2-22: Access to Opportunity Analysis Indicator Proximity to Healthcare Facility: The map indicates that much of CHUV is within a mile of a healthcare facility; this is not accurate. The Ballard Swedish Hospital is approximately 2 miles from the center of CHUV, and Northwest Hospital is 3 miles from the center of CHUV; there are no other major health care institutions in the area.

Comment 2-23: Access to Opportunity Analysis Indicator Proximity to a Library: Crown Hill is one of only a few urban villages without proximity to a library. It is unclear how this data affects the overall evaluation of access to opportunity for CHUV.

Comment 2-24: Access to Opportunity Analysis Indicator Property Appreciation: Crown Hill shows multiple degrees of "heat," depending on the quadrant. The NE quadrant of Crown Hill shows substantial area substantial below city average home value. It is unclear how this data affects the overall evaluation of displacement risk for CHUV and other urban villages where income, housing value, and other economic indicators vary greatly within urban village boundaries

Comment 2-25: Access to Opportunity Analysis Indicator Proximity to a Community Center: The majority of Crown Hill is not proximal to a Community Center, particularly north of NW 85th Street. It is unclear how this data affects the overall evaluation of access to opportunity for CHUV and similar urban villages that have no planned urban center.

Comment 2-26: Seattle 2035 Comp Plan (page 30 of Growth Strategy) estimates a 50% growth in CHUV, which is lower than the projected growth in Alternative 2 of 61%. Given the Growth Strategy, Alternative 2 meets the criteria of an "over-estimated" option. Alternative 3 vastly exceeds the Comp Plan estimated growth with 155% growth in Crown Hill, and should not be considered a viable alternative.

Comment 2-27: Appendix G: Technical Memorandum. DEIS Growth Estimates. This memorandum describes how growth estimates were calculated, the modeling method and the assumptions, but does not provide specific data for each urban village. The number of homes estimated to be demolished was based on historical demolition trends, averaged across the city, and all UV's appear to be estimated using the same, averaged trends. The final EIS should establish growth estimates specific to each urban village.

Comment 2-28: The Growth and Equity Analysis was conducted based on existing status of each Urban Village (UV) within the study area per the four typologies. This model is used to inform how and where to distribute additional housing growth to bring about more equity across the city. The limitation of this model is that it does not track the *progress* toward equity. For example, the proposed upzone or expansion of a given UV may result in the UV transitioning from the Low Displacement Risk/High Opportunity quadrant to High Displacement Risk/Medium-Low Opportunity quadrant after full implementation. The final EIS should include analysis of the impact upzoning on Equity categories.

Comment 2-29: MHA dis-incentivizes preservation of existing affordable housing and incentivizes tear-down to build new rental housing units. The result of this strategy would be displacement of households currently living in existing housing units to make way for new multi-family rental housing. The final EIS should account for this result in assessment of Equity categories.

Comment 2-30: Zoning suffixes should indicate the same level of impact in all affected areas; e.g. as noted on page 3.127, in “higher-intensity zones, height increases associated with (M) zoning changes exceed a single story (30 feet or more).” Over-simplification of these designations bely the significance of zoning changes. Zoning suffixes should be revised or a separate nomenclature developed to accurately and transparently communicate what the changes will be:

- “M” category changes in many instances allow one or more additional stories, with height changes of 15’ or even 30’ or more. This is not a “no-change” definition.
- Zoning suffixes should be expanded to provide additional categories for rezones that allow additional stories, or for changes of more than 2 category levels (additional “M” designations – M3, M4 etc., or a separate naming convention from the payment structure system).

Comment 2-31: The DEIS should analyze the Current M classifications that impose higher fees on higher growth areas to evaluate whether higher fees for higher capacity will serve to suppress development in the NC areas, where there is a bigger capacity for growth that needs to be incentivized, not suppressed by the MHA policies.

Comment 2-32: Maps and tables should more clearly differentiate between M1 and M2 zoning changes. Hatched pattern is the same for both categories and therefore does not adequately communicate significance of change.

Comment 2-33: Exhibits 2.11-2.14 are misleading, in that they show areas of more intense development in a lighter color. Data analysis should be shown for each Urban Village, not by Displacement/ Opportunity category.

Comment 2-34: Data analysis should differentiate between Hub Urban Villages and Residential Urban Villages when assessing impact on infrastructure and support services, and determining the area’s ability to accommodate growth.

- Crown Hill Urban Village is designated a **Residential** Urban Village, but per annotations on Appendix H maps, CHUV is assigned more M2 zoning changes under Alternative 2 than all but one of the six **Hub** Urban Villages.
- Per annotations on Appendix H maps, CHUV is assigned more M2 zoning changes under Alternative 3 than all but two of the six **Hub** Urban Villages.

3. [Affected Environment, Significant Impacts, and Mitigation Measures]

3.1 Housing and Socioeconomics

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

Comment 3.1-1: CHUV is classified in the DEIS as High Opportunity/Low Displacement risk. Per the City's classification, CHUV is "borderline." The analysis in the DEIS is misleading and treats disparate areas within the urban village as a single entity.

- The overly simplistic classification of CHUV as High Opportunity/Low Displacement risk masks displacement risk in the urban village, and exaggerates opportunity and the capacity to handle increased growth. CHUV needs to be reclassified, or the DEIS needs to break out analysis for Urban Villages like CHUV to better represent the reality of Displacement and Opportunity.

Comment 3.1-3: Appendix G: Technical Memorandum. DEIS Growth Estimates. This memorandum describes how growth estimates were calculated, the modeling method and the assumptions, but does not provide specific data for each urban village. The number of homes estimated to be demolished was based on historical demolition trends, averaged across the city, and all UV's appear to be estimated using the same, averaged trends.

Comment 3.1-4: Data in Exhibit 3.1-20 cannot be used to properly assess affordability specific to each Urban Village, as the real estate market areas studied do not align with the Urban Villages included in the DEIS study area. For example, CHUV is partly in the Ballard area and partly in the North Seattle area; while Ballard's average rents are 4% higher than the overall Seattle rents, North Seattle's average rents are 23% lower. Thus, the information in this study is not applicable to CHUV. The Final EIS should more accurately represent Urban villages that span multiple traditional evaluation boundaries, rather than rely on assumptions.

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.

3.2 Land Use

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

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

- Seattle 2035 Comp Plan Assumptions that are applied to Alt 1 conclude that CHUV will grow by 700 new housing units by 2035. In June of 2017 the City of Seattle Permitting process identified 21 development projects already under permit that include over 600 new housing units. Planning estimates improperly omit projects under permit now and produce inaccurate growth estimates.

Comment 3.2-2: DEIS Growth Projections in Alt 2 and Alt 3 in CHUV, and potentially other Urban Villages, are unrealistically low; planning assumptions that they are based on exclude current development in the pipeline, and therefore are unrealistically low.

- Alt 1, Alt 2 and Alt 3 scenarios should be re-assessed with growth projections that are in line with the development occurring now and readjusted throughout the DEIS for their impact.

Comment 3.3-3: Page 3.81 references Seattle 2035 Comprehensive Plan goal LUG9, which states that “successful commercial/mixed-use areas [shall]... promote neighborhood vitality, while also accommodating residential development in livable environments.” Current development does not support this goal; ground-floor requirements for retail/ pedestrian-friendly commercial in NC zones are not enforced.

- Along arterials in CHUV and adjacent areas, most sites zoned for “mixed-use” are occupied by residential tenants on the ground floor. Residential spaces with windows covered at all times create an unwelcoming pedestrian experience that discourages foot transit and provide no destinations. Regulations must be enforced for “vitality” and “livability” to be promoted in our neighborhoods.

Comment 3.2-4: Page 3.85 references Seattle 2035 Comprehensive Plan goal LU1.3, which states that residential urban villages shall have a low to moderate density and scale of development. Alternative 3 does not support this goal.

- Alt 3 indicates that CHUV will have zoning limits of up to 75’, which is just short of the definition of a high-rise.
- Without light rail, this scale of development is inappropriate and inadequately supported. MHA zoning within urban villages with no light rail should reflect the limits of future mobility due to lack of multi-modal transit.

Comment 3.2-5: Page 3.86 references Seattle 2035 Comprehensive Plan goal LU1.4, which is to “Provide gradual transition in building height and scale inside urban centers and urban villages where they border lower-scale residential areas.” Alternative 3 does not support this goal.

- In Alternative 3 for CHUV, M2 category zones abut M category zones, sometimes on the same block.
- In Alternative 3 for CHUV, M2/M transitions create height differences of up to 45’, separated by only an alley or narrow street.
- In Alternative 3 for CHUV, M2/M1 transitions create height differences of up to 45’, separated by only an alley or narrow street.

Comment 3.2-6: Page 3.86 references Seattle 2035 Comprehensive Plan goal LU8.4, which states that the urban village strategy shall be to “create desirable multifamily residential neighborhoods, maintain compatible scale, respect views, enhance the streetscape and pedestrian environment, and achieve an efficient use of the land without major impact on the natural environment.” Alternative 3 does not support this goal.

- In CHUV, Alt 3 shows M2 category zones abutting M category zones, in particular NC-75 abutting LR1 or LR2 zones, sometimes on the same block. This does not maintain compatible scale nor does it respect views. Without clear policy and enforcement, the pedestrian and natural environments will have major impact.

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Comment 3.2-7: Seattle 2035 Comprehensive Plan goal CH/B-P9 is to “strive to overcome [15th Avenue NW] as a barrier that isolates the neighborhood areas to the east and west from each other and to improve its contribution to the visual character of Crown Hill” Alternative 3 does not support this goal. M2/M transitions create height differences of up to 45’ from 15th Avenue NW to adjacent neighborhood access streets 16th Ave NW and Mary Ave NW. This height differential means that buildings along 15th Ave NW will be a physical and visual barrier from the arterial to the neighborhoods.

Comment 3.2-8: Exhibit 3.2-6 should be broken down per Urban Village, not per displacement/opportunity category. The information is not communicated in such a way as to be able to determine equity amongst urban villages.

Comment 3.2-9: Exhibit 3.2-7 should be broken down per Urban Village, not per displacement/opportunity category. The information is not communicated in such a way as to be able to determine equity amongst urban villages.

Comment 3.2-10: The EIS does not study the economic displacement risk of rezoning from residential to commercial.

- The EIS should consider the following criteria specifically as they relate to changing from residential to commercial/ mixed use: tax increases, traffic patterns, increased cost of and reduced access to parking, utilities, street access/width, garbage collection, noise, licensing associated with the establishment of new commercial district.

Comment 3.2-11: On page 3.114/3.115, the following description is included regarding Crown Hill UV:

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

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

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

the West side of 16th and East side of Mary would be directly affected by having commercial zoning on the street.

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

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

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

- Seattle 2012 Right-of-Way improvement plan article 4.6.2 table indicates minimum pavement width of non-arterial streets at L2, L3, L4, and NC2-30-65 zones is 32'.
 - a. 16th Ave NW is 25' wide; Alt 2 locates LR2 zoning on this street; Alt 3 locates LR2, NC2-55, and NC3-75 zoning on this street.
 - b. Mary Ave NW is 25' wide; Alt 2 locates LR2 and NC2-55 zoning on this street; Alt 3 locates LR2, NC2-55, and NC2-75 zoning on this street.
 - c. 17th Ave NW is 25' wide; Alt 3 locates LR2 zoning on this street.
 - d. 14th Ave NW is 25' wide; Alt 2 locates LR2 zoning on this street; Alt 3 locates LR2 and NC2-75 zoning on this street.
- Seattle 2012 Right-of-Way improvement plan article 4.6.2 table indicates minimum pavement width of non-arterial streets at NC3 and higher zones is 36'.
 - a. 16th Ave NW is 25' wide; Alt 2 locates NC3-55 zoning on this street; Alt 3 locates NC3-75 zoning on this street.
 - b. Mary Ave NW is 25' wide; Alt 2 locates NC3-55 zoning on this street; Alt 3 locates NC3-40 zoning on this street

Comment 3.2-14: Upzoning in Alternatives 2 and 3 assumes that increasing capacity in residential and commercial land uses by increasing allowed intensity, bulk, and scale of new developments, and expanding the Urban Village areas, will provide greater quantity of affordable housing within the study area. Using this one method of increasing development capacity in housing and commercial uses in all UVs, without thorough and detailed analysis of its impact on other land uses, without analysis of its contribution toward appropriate quantity and quality mix of uses, and without assessment of infrastructure and services required to support the new growth *in each individual UV* will reduce the effectiveness of the mitigation measures included in the Draft EIS.

Comment 3.2-15: The majority of the mitigation measures intended to address land-use impacts under Alt 2 and Alt 3 look at the land use impacts in isolation. More subtle cumulative land-use impacts from Alt 2 and Alt 3 over time have not been examined, such as impact on neighborhood cohesion, identity, and character, displacement rate of current residents, price of housing, availability and price of

commercial rental space - especially for neighborhood-level small businesses - and other land uses that in combination with housing and commercial space create synergy for successful UVs.

Comment 3.2-16: It is premature to expand the Crown Hill UV boundary before successfully building out the original Comprehensive Plan vision within the current UV boundary. Within the current Crown Hill UV boundary, there is significant development capacity remaining, particularly along arterials and within the change from Commercial to Neighborhood Commercial, to meet the adopted Seattle 2035 Comprehensive Plan growth estimate for the village.

Comment 3.2-17: Seattle 2035 Comprehensive Plan anticipates that urban centers and villages function as “compact, pedestrian-friendly areas... at scales that respect Seattle’s character and development pattern.” Expansion of Crown Hill UV into well-established single-family residential blocks would counter this vision residential UV by dispersing the development and abruptly changing the well-established neighborhood character.

Comment 3.2-18: In Crown Hill UV, Alt 2 would increase residential growth/development capacity by 60% (428 units) and Alt 3 would increase residential development capacity by 154% (1,084 units) more over the next 20 years than the planned residential development capacity of 700 units in Seattle 2035 Comprehensive Plan. Analyses of displacement risk and access to opportunity are based on current conditions, and even now CHUV has an incomplete sidewalk network, crowded transit, schools operating at full capacity, and severe storm water drainage problems in some areas. Full utilization of housing growth/development capacity *plus* the MHA increase - without funding and programmatic commitment to address infrastructure and transportation deficiencies - would result in lowering access to opportunity for newcomers and current residents, and significantly increase displacement risk for existing residents.

Comment 3.2-19: A detailed Crown Hill Neighborhood Plan and Crown Hill neighborhood-specific urban design framework and guidelines are needed to address and mitigate land-use impacts on neighborhood- specific character under all Alternatives.

Comment 3.2-20: Outcome-based analysis is needed to track the success of this MHA program, to monitor progress toward the goal of providing good and equitable quality of life for all residents and businesses within the study area.

Comment 3.2-21: Appendix F: Summary of Changes to Land Use Code: Proposed changes to the Municipal Code including removing the requirement to implement a neighborhood plan prior to rezoning SF and LR zones. However, suggested mitigation measures in DEIS Chapter 3.2 include “create and codify neighborhood design guidelines [to] mitigate localized aesthetic impacts for urban villages that do not currently have them.” The final EIS should present mitigation suggestions that comply and are coordinated with city ordinances.

Comment 3.2-22: The Final EIS should address and comply with the SEPA Cumulative Effects Policy, which addresses the phenomenon that “a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment.”

- SMC 25.05.670.B.1 *directs* that “analysis of cumulative effects **shall** include a reasonable assessment of ... the present and planned capacity of such public facilities as ... streets... to

serve the area affected by the proposal; ... [and] The demand upon ... facilities ... of present, simultaneous and known future development in the area of the project or action."

- Per SMC 25.05.670. B.2.,
a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:
 - a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or*
 - b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned ... facilities....*

Comment 3.2-23: The HALA agenda includes preservation as well as construction of new affordable housing units. Various measures to incentivize preservation of existing housing stock should be implemented with MHA. Incentives may include tax provisions and others, and should also include increased options for property owners to add affordable housing units (detached or attached) on the property, while keeping the existing housing on site without being penalized for doing so.

Comment 3.2-24: Action Alternatives 2 and 3 are inconsistent with the following Comprehensive Plan goals and policies:

- LU 7.2 Use range of single-family zones to:
 - Maintain the current low-height and low bulk character of designated single-family areas;
 - Limit development in single-family areas or that have environmental or infrastructure constraints;
 - Allow different densities that reflect historical development patterns; and
 - Respond to neighborhood plans calling for redevelopment or infill development that maintains the single-family character of the area but also allows for a greater range of housing types.
- H 2.3 Consider Land Use Code and Building Code regulations that allow for flexible reuse of existing structures in order to maintain or increase housing supply, while maintaining life-safety standards.
- H 2.6 Seek to identify affordable housing at risk of demolition and work to mitigate the displacement of residents ahead of planned upzones.

3.3 Aesthetics

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

Comment 3.3-1: Exhibit 3.3-1 should be expanded to provide comparative maps of allowed heights under each Action Alternative. The map shows current maximums in CHUV being mostly less than 30'. Under either alternative, significant portions of CHUV will increase by two category levels to 51-85'.

Comment 3.3-2: Page 3.126 notes that a comprehensive summary of building form is not possible due to the extensive study area. Seattle is a city of diverse neighborhoods with unique character. To evaluate all neighborhoods under the same criteria using "common built form conditions" and to discuss impacts to aesthetics and urban design "in a qualitative and generalized manner" is inappropriate.

Comment 3.3-3: Page 3.126 incorrectly characterizes proposed action as primarily concerning "infill development of new buildings in already-developed neighborhoods."

- Alternative 3 indicates that CHUV will have zoning limits of up to 75', which is just short of the definition of a high-rise. A zoning increase of this magnitude will not read as "infill."
- In Alternative 3 for CHUV, M2/M transitions create height differences of up to 45', separated by only an alley or narrow street. A transition of this magnitude will not read as "infill."
- In Alternative 3 for CHUV, M2/M1 transitions create height differences of up to 45', separated by only an alley or narrow street. A transition of this magnitude will not read as "infill."

Comment 3.3-4: Seattle 2035 Comprehensive Plan goal CH/B-P5 is to "Accommodate the majority of new housing units and increases in density in the *central areas* of the Ballard and Crown Hill urban villages." Alternative 3 does not support this goal, as significant "upzoning" is indicated throughout CHUV – not just in the central area – and stretches of the main arterial NW 85th Street are zoned less intensely than neighborhood access streets 16th Ave NW and Mary Ave NW.

Comment 3.3-5: Seattle 2035 Comprehensive Plan goal CH/B-P6 is to "Maintain the physical character of the single-family-zoned areas in the Crown Hill/ Ballard plan area." Alternative 3 does not support this goal, as all existing single-family zones in the current CHUV boundary are upzoned to LR or higher zones; this will effectively eradicate all single-family character within the UV boundary.

Comment 3.3-6: Seattle 2035 Comprehensive Plan goal CH/B-G2 is to create "A community with housing types that range from single-family to moderate-density multifamily." Alternative 3 does not support this goal, as all existing single-family zones in the current CHUV boundary are upzoned to LR or higher zones.

Comment 3.3-7: Exhibits 3.3-2, 3, 4, and 5. Imagery of existing conditions is selective and not representative of the full range of scale of existing single-family and low-rise multi-family buildings. The photographs and 3D illustrations overestimate the height of single family homes in CHUV. Illustrations exclude examples of LR2 units being built right next to single story cottages, and other adjacencies that are already being seen in CHUV and other developing neighborhoods.

Comment 3.3-8: Pages 3.128-130 reference the current City of Seattle Design Review Process. The study should be revised to include pending changes to the Design Review Process that are currently under consideration.

Comment 3.3-9: If the proposed revised thresholds for Design Review are accepted as noted on page 3.120, significant portions of Urban Villages being rezoned to Lowrise would no longer require Design Review. The study needs to address the aesthetic impact of decreased design oversight for LR development in **each individual Urban Village**.

Comment 3.3-10: Seattle Municipal Code should mandate Neighborhood-specific guidelines for all Urban Villages prior to implementation of any MHA Action; as noted they “identify priority design issues and seek to ensure that new development is compatible with specific local neighborhood character,” and thus are crucial to support Seattle 2035 Comp Plan Land Use Goals. Only roughly half of the urban villages in the study area currently have neighborhood design guidelines.

Comment 3.3-11: Impacts of increased “building bulk and visual prominence due to greater height” and the “[reduction of] the amount of direct sunlight reaching ground level” should not be underestimated. Design standards will be crucial to maintaining and supporting Comp Plan Land Use Goals.

Comment 3.3-12: Impact to neighborhood character by M2 development should not be underestimated, as noted on Page 3.139 “(M2) zoning changes would enable new development types that could differ from existing development and could mark a transition to a different neighborhood character where applied.” Individual neighborhood impacts must be studied in order to assess the risk of loss of character.

Comment 3.3-13: Exhibits 3.3-9-14, and 3.3-16-17 are misleading. All existing housing stock is shown as 1 ½ or 2 stories, which overestimates the scale of existing SF development in many areas and minimizes the impact of larger scale infill development. Images should accurately represent the full range of existing conditions in the study area.

Comment 3.3-14: Exhibits 3.3-9-14 and 3.3-16-17 are misleading. They do not show the full range of development scenarios based on proposed upzoning. Conditions such as RSL on one side of a street and LR on the other, and LR on one side with NC on the other should be represented to accurately represent the aesthetic impact.

Comment 3.3-15: Page 3.142 references “privacy standards” as a potential mitigation of the effects of increased bulk and height on neighborhood character. Privacy standards should be defined and their specific impacts assessed, since privacy measures (closed window treatments, lack of transparent openings) often have a negative impact on aesthetics (blank facades or ones with obscured glass are unwelcoming and difficult to incorporate into a neighborhood identity), interior air quality and environment (no windows or windows that cannot open increase the need for mechanical cooling and ventilation), and quality of life (spaces without daylight/ views can be damaging to wellness).

Comment 3.3-16: Page 3.144 notes that as infill development is built, streets would become more “urban” in character. A standardized definition of “urban” should be developed. Many areas in CHUV indicated to be upzoned currently do not have sidewalks, municipal storm drainage, or adequate transit support. These are essential components for any “urban” environment that will support this level of growth.

Comment 3.3-17: Narrative description of Exhibits 3.3-16 and 17 is limited to a singular condition, in which “due to the width of the right-of-way [shadows from buildings] extend only a short distance into the public [open] space.” Crown Hill is listed as a relevant urban village, but it is not clear where in

CHUV this would apply. The impacts on open space should be studied at conditions where ROW is not wide enough to negate shadow impacts, as well as those with wide ROW's.

Comment 3.3-20: Per Exhibits 3.3-22 and 3.3-23, no areas of M2 are applied to Eastlake, Upper Queen Anne, or Fremont UV's under Alternative 2. No explanation is included of why these UV's have not been determined to be able to support M2 increases, though they have more comprehensive transit support than Urban Villages such as Crown Hill, and Fremont is designated as a Hub Urban Village.

Comment 3.3-21: It is noted on page 3.160 that "overall, height increases would be lower under Alternative 3 than under Alternative 2." The averaging of height increases is misleading and inaccurate; in CHUV, the greatest height increase under Alternative 2 is 15'; under Alternative 3, the greatest height increase in CHUV is 35'. This difference is not insignificant in a Residential Urban Village currently zoned primarily single-family residential and mid-rise NC, and should be assessed separately from Hub Urban Villages which have higher transit and infrastructure support.

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.

Comment 3.3-23: Suggested mitigation measures for aesthetic impacts include "create and codify neighborhood design guidelines [to] mitigate localized aesthetic impacts for urban villages that do not currently have them." This is crucial and should be included as mandatory under MHA.

Comment 3.3-24: Suggested mitigation measures for aesthetic impacts include "require detailed shading/ shadow and view studies for new development in areas where the proposed MHA height limit increase is 30 feet or more to protect streetscapes and public open spaces from excessive shading." Shade/shadow and view studies should be required for all height increases of one story or more, as even a single-story increase coupled with decreased setbacks from adjacent structures could cause significant shading.

3.4 Transportation

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

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.

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.

Comment 3.4-3: The DEIS omits analysis of the impact on pedestrian and bike safety and mobility for greenway users in areas that lack sidewalks and have narrow streets.

Comment 3.4-4: The DEIS omits analysis of the impact of growth on greenway routes, and omits consideration for additional mechanical signaling for pedestrian and bicycle safety.

Comment 3.4-5: Pedestrian Crossing of Arterials: The DEIS omits impact analysis and mitigation on pedestrian safety on Urban Villages bisected by highways and major freight routes.

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.

Comment 3.4-7: TDM requirements: DEIS omits analysis of this suggested mitigation applied to CHUV and its impact on the already over-capacity transit system and the mobility of busses on 15th Avenue NW north of Market Street at Peak Hours.

- The DEIS omits analysis on the impact of this mitigation on available parking and the impact on seniors and those with disabilities, and their ability to live unassisted in their homes, and associated displacement risks. The DEIS omits analysis of the impacts on those needing a car for work where overstretched transit is either not feasible or not available.

Comment 3.4-8: Page 3.187 references Seattle’s Performance-Based Parking Program; among the Program’s goals are to make available “adequate street parking” and encourage “efficient use of off-street parking facilities,” as well as “enhanced use of transit and other transportation alternatives.”

- Mitigation strategies on page 3.239 address only ways to *decrease* parking availability, and do not promote *any* of the goals of the Performance-Based Parking Program. The mitigations all operate under the apparent assumption that people will forgo buying or using cars if parking availability is decreased; this is invalid if an increase in transit service is not provided concurrently.

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

- The DEIS notes that in 2016, 75% of surveyed locations experienced parking occupancy above the 85% target. The assessment of impact on residents' ability to park is incomplete and inaccurate without individual analysis of every Urban Village.

Comment 3.4-10: The DEIS omits 15th Avenue NW north of NW Market Street from analysis in Exhibit 3.4-22 and subsequent exhibits on Travel Corridors.

- 15th Avenue / Holman Road is the primary arterial and freight route providing access to and through Crown Hill Urban Village, as well as a major freight corridor, therefore analysis of impacts on travel time to Crown Hill Urban Village is incomplete and inaccurate.

Comment 3.4-11: Appendix J Exhibit J-5 shows that the Metro D line boarding was studied at Ballard, but NOT at transit stops serving CHUV. Information in this figure for the D line is misleading, as the figures show NO difference in the Passenger Load to Crowd Threshold ratio between Alternatives 1, 2 and 3 on the D, apparently relying on the assumption that SDOT will have the resources to increase bus service to alleviate crowding.

Comment 3.4-12: The DEIS omits the 15 Express Metro Bus from analysis in Exhibit 3.4-26 and subsequent exhibits on transit crowding.

- The Seattle 2035 Comprehensive Plan defines "very good transit" as provided with either a light rail station or a RapidRide stop plus at least one other frequent bus route. Crown Hill and Ballard Urban Villages do not have light rail service. Access is provided by the RapidRide "D" line and the 15X. As noted on page 3.196, "Overcrowding ... is an indicator of whether or not adequate transit service is provided to support the planned growth." The 15X is currently overcapacity, so analysis of impacts on access to Crown Hill and Ballard Urban Villages is incomplete and inaccurate.

Comment 3.4-13: The DEIS omits 15th Avenue NW north of NW Market Street from analysis in Exhibit 3.4-27/28 and subsequent exhibits on travel times.

- 15th Avenue is the primary arterial route providing access to Crown Hill Urban Village, as well as a major freight corridor, therefore analysis of impacts on travel time to Crown Hill Urban Village is incomplete and inaccurate.

Comment 3.4-14: Appendix J Exhibit J-8: Auto Corridor Travel Times. 85th between 32nd NW and Greenwood indicates that in Alternatives 1, 2 and 3, travel time increases by only 30 seconds. The final EIS should provide a clear explanation for why the 3 versions would produce the same results, and why this increase is so small.

Comment 3.4-15: The Seattle 2035 Comprehensive Plan defines "very good transit" as provided with either a light rail station or a RapidRide stop plus at least one other frequent bus route.

- The DEIS omits from its analysis the length and efficiency of trips, therefore ignoring the fact that transit from Northwest Seattle to Downtown Seattle often takes longer than transit from Renton to Downtown or Lynnwood to Downtown.

Comment 3.4-16: The Growth and Equity analysis includes *proximity* to transit as an indicator both of Displacement Risk and Access to Opportunity, but omits *length* and *efficiency* of trips; therefore, the accuracy of this indicator is compromised since it considers only one component of access.

Comment 3.4-17: The DEIS neglects to acknowledge that existing transit from CHUV to downtown during rush hour takes 50 min to move 7 miles on average, and therefore people are unlikely to choose public transportation over personal vehicles that are faster.

- Per King County Metro Transit 2016 System Evaluation Table 8, the D Line (serving Crown Hill/Ballard/Seattle Center/Seattle CBD weekdays) is the route with the highest need, requiring 1,050 additional hours. <http://metro.kingcounty.gov/planning/pdf/2011-21/2016/service-guidelines-full-report.pdf>
- Per King County Metro Transit 2016 System Evaluation Table 8, the 15EX (serving Blue Ridge/Ballard/Seattle CBD weekdays) requires 400 additional hours. <http://metro.kingcounty.gov/planning/pdf/2011-21/2016/service-guidelines-full-report.pdf>
- Per King County Metro Transit 2016 System Evaluation Table 8, the 18EX (serving North Beach/Ballard/Seattle CBD weekdays) requires 350 additional hours. <http://metro.kingcounty.gov/planning/pdf/2011-21/2016/service-guidelines-full-report.pdf>
- These three routes that provide service to CHUC have a combined need of 1,800 hours, or 14% of all needs identified for Metro's service area, just to accommodate *current demand*.

Comment 3.4-18: The suggested mitigation measure to complete a feasibility study of a Ballard Bridge replacement must be accompanied by a proposal for how to fund both the study the potential implementation.

Comment 3.4-19: The suggested mitigation measure to “purchase additional bus service from King County Metro along the 15th Ave NW corridor” is necessary but insufficient.

- It does not address the congestion and basic inability for more busses to travel North and South on 15th at peak travel times.
- No proposal is made as to how this would be funded.

Comment 3.4-20: Capital Improvement Plan: The DEIS highlights Complete Streets and Capital Improvement program as addressing safe and efficient movement of people; yet Greenways which the Plan invests in do not offer Complete Streets because of their failure to provide safe pedestrian walkways (i.e. complete sidewalks and crossings).

Comment 3.4-21: Although the DEIS references Move Seattle, Transportation Strategic Plan, Transit Master Plan, Pedestrian Master Plan, Seattle Bicycle Master Plan, and the Seattle Freight Master Plan, it appears that the DEIS has not aligned these planning processes with the growth goals within the urban villages which are impacted by the MHA and Seattle 2035.

Comment 3.4-22: The DEIS grossly underestimates the impact of the action alternatives on vehicle trips, suggesting that a 2% increase in vehicle trips will occur. This suggested increase is utilized to indicate a minor uptick in vehicle collisions and decrease in vehicular safety.

- In June 2017, Crown Hill Urban Village had 21 development projects in the pipeline that include over 600 housing units, and is on track to exceed the 700 total new units the City has projected over the next 20 years through 2035 in a fraction of the time. If only half of the new residents have vehicles, growth in trips by vehicle in CHUV will be well over the estimated 2%.

<http://crownhillurbanvillage.org/wp-content/uploads/2016/04/QA-from-Nov-5th-Community-meeting.pdf>

Comment 3.4-23: The DEIS fails to acknowledge the SEPA Cumulative Effects Policy, which addresses the phenomenon that “a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment.”

- SMC 25.05.670.B.1 *directs* that “analysis of cumulative effects **shall** include a reasonable assessment of ... present and planned capacity of such public facilities as ... parking areas to serve the area affected by the proposal ... [and] The demand upon facilities ... of present, simultaneous and known future development in the area of the project or action.”
- Per SMC 25.05.670. B.2.,
a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:
 - a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or*
 - b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned facilities*

Comment 3.4-24: The DEIS does not address impacts on safety and congestion due to increased cut-through traffic on side-streets and alleys as a result of increasing density.

3.5 Historic Resources

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

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

3.6 Biological Resources

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

Comment 3.6-1: Tree impact assessment for CHUV is inadequate.

- There is no specific analysis of the impact on the tree canopy in Alt 2 or Alt 3 scenarios beyond application of the general citywide assumption. CHUV has an 80-acre boundary expansion to existing single family, and significant additional rezoning of single family within the Urban Village Boundary. Given acknowledged existing storm water drainage issues and ROW work that will be required to mitigate those issues (necessitating removal of trees), the current DEIS analysis of tree canopy loss given the expansion and extensive redevelopment under Alt 3 and Alt 2 are inadequate.

Comment 3.6-2: The DEIS fails to provide information for properties shifting from single family to RSL.

- Most of these properties are categorized as 5,000 feet by MHA. Tree removal for lots under 5,000 square feet is exempt from the city's tree ordinance. <http://invw.org/2017/06/27/as-more-buildings-go-up-how-many-of-seattles-trees-will-come-down/>.

Comment 3.6-3: The DEIS analysis does not adequately address the impact on the tree canopy when converting residential neighborhoods to multi-family, particularly when looking at Alternative 3.

- Current single-family zones contribute 63% of Seattle's tree canopy, while multifamily residential areas contribute only 9%. The tree canopy will be significantly impacted under both Action Alternatives. <http://www.seattle.gov/trees/docs/Seattle2016CCAFinalReportFINAL.pdf>

Comment 3.6-4: The DEIS does not account for the impact on Piper's Creek watershed, which is Seattle's third largest watershed and which drains a total of 1,835 acres into the Puget Sound at Carkeek Park.

- In Exhibit 3.6-3, the watershed, which surfaces on Holman Road at the base of CHUV, is not well demarcated. <http://www.seattle.gov/util/EnvironmentConservation/Education/UrbanWatersheds/PugetSound/PipersCreek/index.htm>

Comment 3.6-5: There is no mitigation suggested in the DEIS for managing increased runoff into major watersheds and consequently into the Puget Sound.

Comment 3.6-6: The DEIS does not evaluate the impact of tree removal and replacement with impermeable surfaces in areas that will experience rezoning from single family to RSL zones. Currently RSL has no requirements for storm water management.

Comment 3.6-7: The final EIS should acknowledge and comply with the SEPA Cumulative Effects Policy, which addresses the phenomenon that "a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment."

- SMC 25.05.670.B.1 *directs* that "analysis of cumulative effects **shall** include a reasonable assessment of ... the capacity of natural systems-such as air, water, light, and land-to absorb the direct and reasonably anticipated indirect impacts of the proposal; ... [and] The demand upon ... natural systems ... of present, simultaneous and known future development in the area of the project or action."
- Per SMC 25.05.670. B.2.,

a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:

- a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or*
- b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned ... natural systems.*

3.7 Open Space & Recreation

This Chapter analyzes potential impacts of the alternatives on open space and recreation.

Comment 3.7-1: According to Seattle Parks Department maps, Greenways are, by definition, walking corridors. Greenways developed in areas without sidewalks are not providing **any** mitigation for pedestrians. http://www.seattle.gov/ArcGIS/SMSeries_GapAnalysisUpdate2017/index.html

Comment 3.7-2: The DEIS fails to acknowledge the SEPA Cumulative Effects Policy, which addresses the phenomenon that “a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment.”

- SMC 25.05.670.B.1 *directs* that “analysis of cumulative effects **shall** include a reasonable assessment of ... the present and planned capacity of such public facilities as ... parks ... to serve the area affected by the proposal; ... [and] The demand upon facilities ... of present, simultaneous and known future development in the area of the project or action.”
- Per SMC 25.05.670. B.2.,
a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:
 - a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or*
 - b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned ... facilities....*

Comment 3.7-3: The DEIS does not address how policy will be implemented that will be necessary to comply with Seattle 2035 Comprehensive Plan Goal CH/B-P2, to “Improve the attractiveness of the business areas in the Ballard Hub Urban Village and the Crown Hill Residential Urban Village to businesses, residents, and shoppers through *creation of pleasant streetscapes and public spaces.*”

Comment 3.7-4: Seattle 2035 Comprehensive Plan goals CH/B-P13, 14, and 15 address increasing the range of and access to recreation opportunities, open spaces, and views. Alternative 3 does not support these goals, as all existing single-family zones in the current CHUV boundary are upzoned to LR or higher zones; this will greatly reduce the opportunity and requirement for providing open spaces and maintaining views.

Comment 3.7-5: Seattle 2035 Comprehensive Plan goal CH/B-P18 is to “Encourage the development of indoor and outdoor facilities in which cultural activities can take place.” Alternative 3 does not support this goal, as all existing single-family zones in the current CHUV boundary are upzoned to LR or higher zones; this will greatly reduce the opportunity and requirement for providing cultural facilities and spaces.

3.8 Public Services & Utilities

This Chapter analyzes potential impacts of the alternatives on public services and utilities.

Comment 3.8-1: Page 3.297: *Alternative 2 has the potential to add a total of 4,465 housing units (965 more than under Alternative 1) to urban villages that Fire Station 31 serves. Fire Station 31 is the second busiest engine company in the city, and additional fire resources may be necessary to address current and projected growth (City of Seattle, 2015).* The report notes that the Seattle Fire Department currently is not meeting its goals of complying with NFPA standards 90% of the time. With increased demand, more service will need to be provided to maintain a standard of service. The DEIS omits mitigation measures to accommodate this burden.

Comment 3.8-2: The DEIS omits impact analysis on EMS ability to access properties on narrow streets with parallel street parking on both sides.

Comment 3.8-3: The DEIS analysis is not specific enough to address mitigations for current slow response times, or the impacts increased development will have on response times. The North Precinct has the lowest recorded response times in Seattle.

Comment 3.8-4: The DEIS analysis relies on the outdated assumption that increased staffing in the North Precinct over the next 20 years will be accommodated at a new facility at N 130th Street and Aurora Ave N, and that this station will provide sufficient building area to meet the needs of both existing and future staff. The DEIS should be updated to reflect that this project is on hold indefinitely and that its increased capacity for service cannot be relied upon.

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.

Comment 3.8-6: Page 3.298 includes a list of sectors analyzed in the Comprehensive Plan. Crown Hill Urban Village is omitted from that study list.

Comment 3.8-7: Page 3.299 includes a list of public schools in Urban Villages that lack full sidewalk infrastructure and therefore are out of compliance with the Safe Routes to School program. The list is incomplete, since Whitman Middle School in CHUV is omitted from this list, as are safe walking paths from Whitman down connecting Greenways on 17th and the proposed N. Seattle Greenway.

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.

Comment 3.8-9: The DEIS mitigation recommendations are inadequate to address the current flooding and drainage problems in Crown Hill Urban Village.

- The informal drainage system cannot withstand increased demand anticipated under Action alternatives. The City must consider additional mitigation measures to address storm water drainage impacts in areas of informal drainage. Specific policies to improve storm water systems in CHUV should be implemented with MHA.
- The suggestion of a “latecomer agreement mechanism” whereby homeowners will pay for sidewalk / drainage improvements over and above city taxes is inappropriate, as it is the

City's duty and policy to provide basic infrastructure that will protect the health, safety, and welfare of the public.

Comment 3.8-10: The DEIS fails to acknowledge the SEPA Cumulative Effects Policy, which addresses the phenomenon that "a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment."

- SMC 25.05.670.B.1 directs that *analysis of cumulative effects shall include a reasonable assessment of ... present and planned capacity of such public facilities as ... sewers, storm drains, solid waste disposal, parks, schools, and parking areas; ... public services such as transit, health, police and fire protection and social services to serve the area affected by the proposal. ... [and] The demand upon facilities [and] services ... of present, simultaneous and known future development in the area of the project or action.*
- Per SMC 25.05.670. B.2.,
a project may be conditioned or denied to lessen or eliminate cumulative effects on the environment:
 - a. When considered together with prior, simultaneous or induced future development (i.e., complete rezone of an entire urban village); or*
 - b. When, taking into account known future development under established zoning, it is determined that a project will use more than its share of present and planned facilities*

Comment 3.8-11: The final EIS should include how the City will commit to and implement specific steps to mitigate overcrowding and increase school capacity under MHA.

3.9 Air Quality & Green House Gas Emissions

This Chapter analyzes potential impacts of the alternatives on air quality and greenhouse gas emissions.



MHA Draft EIS Comments

Summary Points

Description of the Proposed Action and Alternatives

The Draft EIS proposes three zoning change alternative scenarios for study purposes. Alternative 1 offers no change. Alternatives 2 and 3 and their associated maps were developed to study impacts of two different urban village implementation scenarios. Both Alternatives 2 and 3 project significant growth and impacts for Crown Hill Urban Village (CHUV). Both alternatives studied would significantly expand the urban village boundaries. And both alternatives 2 and 3 project significant growth and impacts for CHUV. Both alternatives studied would significantly expand the boundaries, with additional housing and density having significant impacts on the infrastructure and livability of the CHUV community. *Note these maps are scenarios for zoning options, not final maps.*

Alternative 2 projects significant growth for CHUV, concentrating the majority of growth in the central areas within the Urban Village that are currently zoned commercial and under Alternative 2 would be rezoned neighborhood commercial with a height increase to 55 feet. The Alternative 2 maps more closely reflect extensive CHUV community feedback for the direction of desired growth in the community; replacing big box stores and parking lots with geared towards car culture with development with retail on the ground floor and housing above. Alternative 2 would result in an increased burden on existing infrastructure. Transit, schools, police and fire services will *require significant mitigations to accommodate new growth* within CHUV. Given the lack of light rail service, overcrowded buses, existing sewer and drainage problems, lack of sidewalks or safe pedestrian paths north of 85th, overcrowded schools, slow police response, and other critical infrastructure and service deficits; Alternative 2 is very likely to overtax an infrastructure and transit that's already under strain.

Alternative 3 would rezone a broader area of the urban village, and increase heights up to 75 feet. CHUV Committee for Smart Growth is concerned that Alternative 3, if implemented in CHUV, would exceed the ability of the City or private partners to mitigate the significant impacts of increased density. The Committee is also concerned about displacement of neighbors in Alternative 3, which takes a more aggressive approach to rezoning smaller, single family rental homes – particularly socioeconomically vulnerable neighbors living north of 85th street and seniors and those on fixed incomes or with mobility challenges.

Alternative 2 and 3 project that CHUV will absorb some of the heaviest growth of all the urban villages and be subject to many of the largest environmental impacts in the City due to upzoning and MHA implementation. Crown Hill Urban Village is designated a Residential Urban Village, but annotations on Appendix H maps show CHUV is assigned more M2 zoning changes under Alternative 2 than all but one of the six Hub Urban Villages. In Alternative 3 CHUV has more M2 zoning than most of the six Hub Urban Villages.

Implementation of either Action Alternative 2 or 3, or elements of either alternative, will require neighborhood planning and design guidelines. Mitigations for displaced small businesses and concurrent infrastructure investments in transit, schools, parks, drainage and sewer systems, sidewalks and safe pedestrian paths, a solution to slow police response times and other meaningful mitigations will be necessary to sustain a safe and livable community for all residents.

Housing and Socioeconomics

The classifications used to determine displacement risks and opportunities for growth in urban villages are overly simplistic. Many urban villages have disparate regions within the urban village boundary and yet are treated as a single entity. Crown Hill Urban Village (CHUV) is classified in the DEIS as High Opportunity/Low Displacement risk. This classification exaggerates opportunity and the capacity to handle increased growth while downplaying the fact that CHUV has populations with socioeconomic vulnerability who do have a high risk of displacement in the northeast region of the urban village. Crown Hill is borderline in all factors used to categorize urban villages. For example, the City's cut off for considering high displacement is 15% vulnerable populations; CHUV is at 14%.

Land Use

Growth projections used in the DEIS are unrealistically low. Seattle 2035 Comprehensive Plan Assumptions and Growth estimates that serve as a basis for planning are underestimated. Growth assumptions in CHUV, and potentially other urban villages improperly exclude current development in the pipeline, and therefore all Alternatives have unrealistically low growth projects. For example, assumptions applied to Alternative 1 conclude that CHUV will add only 700 new housing units by 2035. In June of 2017, the City of Seattle Permitting process identified 21 development projects already under permit that include over 600 new housing units. Alternative 1, 2, and 3 scenarios should be reassessed with growth projections that are in line with the development occurring now and readjusted throughout the DEIS for their impact.

Alternative 2 and 3 maps in the draft EIS maps both project that CHUV will absorb some of the heaviest growth and be subject to many of the largest environmental impacts in the City due to upzoning and MHA implementation. Crown Hill Urban Village is designated a **Residential** Urban Village, but annotations on Appendix H maps show CHUV is assigned more M2 zoning changes under Alternative 2 than all but one of the six **Hub** Urban Villages. In Alternative 3 more M2 zoning than all but two of the six **Hub** Urban Villages.

Aesthetics

The DEIS ignores impacts of converting Residential to Commercial. The final EIS must evaluate those impacts on displacement and environmental impact.

The DEIS fails to acknowledge the SEPA Cumulative Effects Policy. The Policy addresses the phenomenon that "a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment." The Final EIS should address the cumulative effects and comply the SEPA policy.

If the proposed revised thresholds for Design Review are accepted as noted on page 3.120, significant portions of Urban Villages being rezoned to low-rise would no longer require Design Review. The study needs to address the aesthetic impact of decreased design oversight for LR development in **each individual Urban Village**.

Seattle Municipal Code should mandate Neighborhood-specific guidelines for all Urban Villages prior to implementation of any MHA Action; as noted they "identify priority design issues and seek to ensure that new development is compatible with specific local neighborhood character," and thus are crucial to support Seattle 2035 Comp Plan Land Use Goals. Only half of the urban villages in the study area currently have neighborhood design guidelines. A detailed Crown Hill Neighborhood Plan and Crown Hill neighborhood-specific urban design framework and guidelines are needed to address and mitigate land-use impacts on neighborhood-specific character under all Alternatives.

Development needs to comply with City of Seattle Right of Way requirements. Neither of the DEIS Action Alternative complies with minimum pavement widths for moderate-to-high levels of development on non-arterials streets.

Transportation:

The DEIS transit analysis and mitigations are inadequate to address in the increasing need that will come with growth. In light of the reduced parking requirements for new development in Urban Villages, there will naturally be significant increases in use of transportation systems other than personal vehicle. For example, the Metro D line boarding was studied at Ballard, but NOT at transit stops serving CHUV. Information in this figure for the D line is misleading, as the figures show NO difference in the Passenger-Load-to-Crowd-Threshold ratio between Alternatives 1, 2 and 3 on the D, apparently relying on the assumption that Metro/King County will have the resources to increase bus service to alleviate crowding.

Historic Resources

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

Biological Resources

The DEIS does not evaluate the impact of tree removal and replacement with impermeable surfaces in areas that will experience acres of rezoning from single family to RSL zones. Nearly all of the single-family properties are categorized as 5,000 feet by MHA. Tree removal for lots under 5,000 square feet is exempt from the city's tree ordinance; meaning there are no protections for these trees whatsoever in the DEIS. Additionally, there is no mitigation strategy for Piper's Creek watershed, which is at the base of Crown Hill and is impacted by runoff from CHUV.

Open Space and Recreation

According to Seattle Parks Department maps, Greenways are by definition considered walking corridors. Greenways developed in areas without sidewalks are not providing any mitigation for pedestrians.

Public Services and Utilities

The DEIS does not address the inequitable quality and content of services provided to the various urban villages throughout the City. In CHUV, for example, no substantive mitigation for the impact of growth on various essential utilities is meaningfully addressed. Poor public safety due to overlong police response times will not improve with added growth. The impact of growth on Station #31, the second busiest fire station in the city, is not addressed at all in the mitigation strategies suggested under public utilities. Public utilities that address drainage and flooding in much of the community are subpar, with flooding and open culverts the norm north of 85th NW. The only school in CHUV, Marcus Whitman Middle School, has 16 ancient portables outside the original school structure. It was not referenced at all in the DEIS.

Air Quality and Greenhouse Emissions No Comments

Alternative 2 and 3 maps can be downloaded here. <http://crownhillurbanvillage.org/wp-content/uploads/2017/08/CHUV-EIS-maps-060817.pdf>

Full Draft EIS Comments from the CHUV Committee for Smart Growth can be viewed and downloaded here: <https://drive.google.com/file/d/0B9EwM-o5PD4SWGnLb0dvbTdyemM/view?usp=sharing>

From: Ingrid Krueger
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Comments
Date: Monday, August 07, 2017 11:54:04 AM

To Whom It May Concern:

The assumptions and data used as a basis for proposed changes to zoning under MHA are generally applied equally to all 30 Urban Villages, or equally to all Urban Villages within each Growth and Equity category, without regard for the differences in character, structure, urban conditions, and infrastructure support for each Village.

Many of the areas identified as “urban villages” do not at all exhibit the characteristics of an urban area, nor a compact, self-sustaining village.

The authors of [New London Villages: Creating community](#), (Scanlon, Sagor, Whitehead and Mossa, 2016), explore the concept of villages within the city of London.

In it they identify six characteristics which define a village within a larger city:

1. Small and intimate

- The area can comfortably be covered on foot
- The scale of the buildings and spaces is suitable and comfortable
- The residential density can sustain a range of key services

2. Unique

Spatial identity

- The area has defined boundaries and an identifiable centre
- The area has its own atmosphere and sense of place
- There are community landmarks

Traditions and collective memory

- There are regular community events and festivals
- Residents create collective memory

3. Designed for social interaction

- There is ample public and green space, which is used in many ways
- Facilities are provided for community events and everyday activities
- The central hub generates social interaction, and there is a network of walkable routes

4. Locally driven and locally responsive

- Residents are involved in managing the life of the village
- There is a long-term vision that residents support
- Leaders represent the community and reflect its concerns

5. Functional

- The community is well served by both public and private transport
- Core services are available locally
- There is a mix of uses

6. A mixed community

- There is a mix of ages, backgrounds, incomes and housing tenures
- Residents know and trust each other
- There are long-term residents who provide continuity. ([Scanlon, Sagor, Whitehead and Mossa, 2016](#), p. 13)

Many of these characteristics are similar to the indicators of the Growth and Equity indices. When measured against them, Crown Hill falls far short, and clearly does not meet the definition of “high access to opportunity.”

- The geographic area of CHUV is far too large for the typical resident to traverse on foot. The 10-minute walkshed measured from a frequent transit stop does not account for individuals who may want to travel from one end of the village to the other – not only from the middle to one end.
- The boundaries, atmosphere, and “center” of CHUV are not defined nor identifiable. Those visiting CHUV - and even many of those living within it - are often unaware of its existence. CHUV does not have “Facilities ... provided for community events and everyday activities;” there is nothing anyone could call a “central hub,” nor is there adequate public and green space (in fact, there is very little open space at all if one doesn’t count the cemetery).
- The proposals made under MHA actually *reduce* the requirement for neighborhood planning, in direct opposition to the key attributes noted above that “Residents are involved in managing the life of the village,” and that “There is a long-term vision that residents support.”
- CHUV is one of the only Urban Villages that will not be receiving light rail service. The community is **not** well served by public or private transport, and will not be if capacity/ demand are increased without substantially increasing public transportation and/ or parking.

In short, “Crown Hill Urban Village” is a misnomer. Any action on the City to increase zoning here without significant **concurrent** investment in infrastructure and improvements is *irresponsible* and will result in drastic increases in displacement, traffic congestion, over-taxed utilities, poor public health, and loss of diversity and community.

From: Ray Krueger
To: [PCD_MHAEIS](#)
Subject: HALA MHA DEIS one-page comment form.doc
Date: Monday, August 07, 2017 2:18:09 PM
Attachments: [HALA MHA DEIS one-page comment form.doc](#)

Feedback Re: HALA MHA DEIS

Ray Krueger

COMMENTS ON DRAFT EIS RE: MHA

1

Overall Analysis

DEIS is too superficial. Fails to make street level assessment of things like traffic, parking, waste water, other 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 Morgan 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 conduct an update to the Morgan Junction neighborhood plan before consideration of changes proposed by MHA and other HALA features.

Traffic

DEIS analysis is flawed; Fails to utilize meaningful data.

Green Space

DEIS fails to propose mitigation for loss of greenspace in already constrained neighborhood amenities.

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 that will result in lost affordable housing. Specifically, measures to retain affordable housing fees collected from Morgan Junction development to be expended within Morgan Junction for replacement affordable housing.

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 Morgan 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, especially storm and waste water capacity;

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:

Measures to retain affordable housing fees collected from Morgan Junction development to be expended within Morgan Junction for replacement affordable housing.

Name: Ray Krueger

Address:

From: Walter Kuciej
To: [PCD_MHAEIS](#)
Subject: Comments regarding USE of existing park land
Date: Monday, August 07, 2017 2:46:25 PM

- 1 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.

Sincerely, Walter Kuciej, Seattle Wa

From: allan kutoff
To: [PCD_MHAEIS](#)
Subject: rezoning
Date: Sunday, June 11, 2017 1:10:11 PM

I live at 10327 densmore ave N seattle wa 98133. Between the aurora licton springs urban village and the northgate commercial center. South of 100th st N the zoning is smaller lot some as small as 2500 sq ft. My lot is zoned 7200 sq ft. On the west side of ashworth the zoning is 5000 sq ft. Also on the south side of 103rd st N between densmore and wallingford is a housing complex zoned at 5000 sq ft. Reducing the 7200 sq ft area north of 100th st N to 5000 sq ft would increase the number of family homes with moderate sized yards. This is my suggestion. Allan Kutoff (206) 523-4551 allankm48@q.com

Name	E Labadie
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I would like to see the single-family home character of Ravenna maintained with increased density applied to the areas surrounding the Roosevelt light rail station. There is a specific landlord in the Roosevelt area (Mr. Sisely) who owns numerous properties that are in disrepair. The City seems to turn a blind eye to this tragic mis-use of land and facilities. Why do we need to continue to live with these eyesores AND be asked to increase housing density? When will the City hold Mr. Sisely's feet to the fire, gain control over his properties and make them work harder for this community?</p>
Open Space & Recreation	<p>2 It's amazing to me that a city with the resources of Seattle (at the moment) has failed to maintain and improve the exciting Community Centers (and pools). I could accept greater housing density in my community if I was assured that community resources - such as the Centers - were given the attention they deserve. The extreme popularity and high-use of Green Lake park, the CC and the pool have worn those facilities down to nubs. Talk of finding a non-profit partner with which the City could partner in an effort to make improvements seems very short-sighted. What ever happened to the Parks Levy money? Was it all spent on Rainier Beach? Is it being kept in reserve for the Waterfront? In the meantime, there are facility break-downs at Green Lake CC on a monthly basis.</p> <p>As for the Roosevelt reservoir, if it is decommissioned, please put a lid on it and refurbish the property as was done in Maple Leaf. The green space would be an asset to the existing and future residents of the area. The canyons created by the slew of apartment buildings along Roosevelt leave pedestrians straining to see the sky.</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?	

Name	Patrick Laban
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Very much want to see more affordable housing as a whole. I think the best approach is like my neighborhood Othello where it is very mixed class. Care needs to be taken to avoid displacement. Mixed is the best way to do this I believe.</p>
Demographic Survey (optional)	
Have you been or are you at risk of being displaced from your neighborhood?	<p>2 In the bay area I was a renter. Rental prices would go nuts from people chasing good schools and we kept having to move as we didn't want to spend that % of income in rent. The solution is to make all schools good.</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?	
How long have you resided in the city of Seattle? (total number of years)	
Do you work in Seattle?	

From: Mona Lang
To: [PCD_MHAEIS](#)
Subject: Hala Enviro Impact Statement-
Date: Wednesday, June 28, 2017 8:14:22 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.

Thank you,
Concerned West Seattle Citizen, Home Owner and Tax Payer
Mona Lang

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:

West Seattle was not studied specifically or in depth enough for the great impact these changes will have. Please reconsider a West Seattle EIS study.

Name:

Address:

Mona Lang
5612 40th Ave SW
Seattle WA 98136

ADDENDUM: After finalizing my comment letter, I received an email from Historic Seattle, and I stand in support of these observations, concerns, objections, and suggestions:

Here Are Some Ways Historic Preservation + Affordability + Livability Intersect:

Housing Diversity and "Naturally Occurring" Affordability

Older buildings provide a diversity of housing types and tend to provide more units of affordable rental housing than taller, newer developments. Research shows that neighborhoods with a high concentration of historic buildings and mixed-scale development are more vibrant and perform better in terms of environmental, economic, and social metrics.

Hidden Density

Older neighborhoods contain hidden density. It has been demonstrated that "human-scale neighborhoods with older fabric are the 'missing middle' of cities and can achieve surprisingly high population densities.

Social Equity

Neighborhoods with a smaller-scaled mix of old and new buildings draw a higher proportion of non-chain shops, restaurants, and women and minority-owned businesses than new neighborhoods.

MHA should provide a more balanced approach to achieving growth

Historic Seattle believes City leadership needs to strike a balance to achieve *density without demolition*, and *affordability without sacrificing livability* in order to ensure that *how we grow* is sustainable and resilient - while retaining urban character and sense of place.

The Historic Resources section (3.5) is inadequate and 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 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. Added development pressure will result in increased demolition of potentially historic buildings and neighborhoods and adversely impact the character and scale of neighborhood blocks.

The analysis 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 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 has any import or will be seriously considered. 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.

Aileen M. Langhans July 2017

Comment Letter: Seattle HALA DEIS Document submitted by the Langhans Ladies (July 2017)

PAGE ?TOPIC	QUOTE	REFLECTION
3.86 ADU	"Consider allowing redevelopment or infill development of single-family areas inside urban centers and villages, where new development would maintain the low height and bulk that characterizes the single-family area, while allowing a wider range of housing types such as de-tached accessory units , cottage developments or small duplexes or triplexes	<ol style="list-style-type: none"> 1. This is the only reference to ADUs in the entire lengthy tome (DEIS) 2. There is no mention of removing owner-occupied requirements Is this hopeful? 3. Is this restricted to single-family areas within urban centers/villages? 4. City's use of vague verb of non-commitment: "consider". Comments like this are meaningless!
3.86 Transitions	"Provide a gradual transition in building height and scale inside urban centers and urban villages where they border lower-scale residential areas.	Vague; how will this be accomplished and enforced? How will the city force properties owners to new standards just because of the location of their properties within the perimeter of the urban centers?
3.86 Business Diversity	"Review future legislative rezones to determine if they pose a risk of increasing the displacement of residents, especially marginalized populations and the businesses and institutions that serve them."	If the city is going to required new development to included affordable housing to reduce displacement of lower income and disenfranchised residents, will they also have to provide low rents for those businesses that service these residents? OR Will businesses follow their most reliable source of income: as high rise brings in wealthier residents, will the type of business reflect their needs, such as high-end shopping, fancy boutiques, etc.? How will the small stores which cater to various minority groups be able to survive the soaring rental costs?
1.13 Displacement	"Based on a assumptions, about 13 new affordable units would be built in the study area in Alternatives 2 and 3, for every low-income household.	How are these numbers determined?
3.165 Expanded de- sign review	"... design review could be required for new multi-family developments in areas rezoned from single family, and in urban village expansion areas."	Why is this only a possibility? Why can't the city make a commitment to expand the review process? Here is another example of non-commitment: "could" Perhaps this design review should be linked to conservation districts. (See pgs. 5 & 7 in this comment letter*)

PAGE ?TOPIC	QUOTE	REFLECTION
1.13 Affordable units	"Under Alternative 2, an estimated 7513 new affordable units would be built in the study area... resulting in much greater direct positive impacts for low income households...."	Will the City be able to demand that these units not be limited to single-bedroom or studio apartments, but will provide housing for families as well?
1.14 Economic displacement	Alternative 2: "This additional housing supply has the potential to reduce economic displacement pressures.... 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.	Gobbledygook! In other words, the city cannot predict anything, control anything, nor steer the future! If its efforts fall short, at least we've been duly warned.
1.15 Areas of average housing cost and opportunities	Alternative 3: "More rent- and income-restricted housing in these locations would have a positive housing impact, because more low-income households could live in areas with high average housing costs and good access to opportunity."	If low-income renters are placed in high-rise affluent neighborhoods, it will lead to vertical displacement, including an uneven access to affordable food and other basic needs. If rent escalates for the local businesses, won't they cater mainly to their higher-income neighbors, through specialty stores and boutiques? High rents not only produce displacement of residents, they produce displacement of basic, high-volume, low-priced businesses or businesses that cater to the needs of various minority ethnic groups. Where will those businesses and shops go?
1.16	"Seek state legislation to enact a local-option property tax exemption for existing rental homes. The Preservation Tax Exemption could create a local option for a 15-year tax exemption for property owners in the private market who agree to set aside 25% of units in their buildings for low-income tenants.	1. What happens after 15 years? Eviction? 2. Who makes up for the lost income from those tax exemptions?
3.136	"..zoning changes would result in a similar level of development intensity... in most cases allowing one additional story in new buildings compared to what existing regulations allow."	Since when is one additional story so minor a change that the city can declare that the intensities would remain similar to existing realities?
3.86 Criteria	"Establish evaluation criteria for rezoning land to multi-family designations that support the urban village strategy, create desirable multifamily residential neighborhood, maintain compatible scale, respect views, enhance the streetscape and pedestrian environment , and achieve an efficient use of the land without major impact on the natural environment."	This description is inconsistent with the specifics within the documents, which contain loopholes, justifications, and excuses. If the city is sincere about this statement, the document's specifics should reflect these goals. What about the impact on the human environment: livability, privacy, and sense of community?

PAGE ?TOPIC	QUOTE	REFLECTION
3.93 Minor Impact	"Some moderate impacts could occur in certain tier rezoned areas, in specific locations, depending on proposed height limit increases, the existing land use pattern, presence or absence of transition to lower scale areas, and existing conditions in specific locations."	<ol style="list-style-type: none"> 1. Gobbledygook! 2. Why is the city not requiring transitional zones in all places facing impacts?
3.128 Adjacent	"Seattle's Design Review Program evaluates the appearance of new buildings and their relationship to adjacent sites."	<ol style="list-style-type: none"> 1. All that guarantees is that once a box building is embedded into city block, it becomes all the easier to continue that architectural incongruity along the rest of the block! 2. What are the criteria for these evaluations?
3.131 Views protected	Protection of views includes "the Downtown Skyline"!	<ol style="list-style-type: none"> 1. What skyline: what date is the city choosing as its official downtown skyline image worth protecting? 2. Views are being protected for whom? 3. How are the new buildings in the downtown district being reviewed to protect the skyline? What are the criteria?
3.132 Downtown street views	"In Downtown, upper-level building setbacks are required for new buildings to protect view corridors along [certain] streets."	How will that improve the view on the street level? Or is it just to preserve the views from the skyscraper buildings?
3.262 Trees ?wildlife	"Trees are fundamental to the character of Seattle— a city that celebrates its reputation as one of the country's greenest cities. Trees create beautiful views in their own right...."	<p>This is ridiculous; it makes trees seem like ornamentation! What about the other benefits of trees and natural vegetations, such as shade, a sense of peace, and habitats for other species who have made the city their homes: bugs, butterflies, bees, racoon, possum, and a wonderful array of birds (woodpeckers, humming birds, crows, songbirds, robins, etc.)?</p> <p>If the cement landscaping of new developments (or limited ornamental greenery) takes over, what does that do to our other species, who have adapted to city life and now may once more face displacement? Let's not forget the benefits they bring to us humans!</p>
?	<p>There is a shocking lack of disclosure of the following impacts:</p> <ol style="list-style-type: none"> 1. Increased light pollution 2. The negative impacts of increased density to livability. NOTE: crowding doesn't necessarily lead to a greater sense of community 3. Garbage and other blight, crime, etc. 	If the City of Seattle truly believes that it can foster a greater sense of community and respect, why doesn't this DEIS discuss the potentially negative impacts resulting from increased densities: crime, blight, garbage, noise, and light pollution, all of which will lead to the decline of our neighborhoods? If you don't believe me, just check out our languishing University District, which is dictated by its transients, thus remaining rudderless.

PAGE ?TOPIC	QUOTE	REFLECTION
3.136 Impacts of increased height, scale, and bulk	"The aesthetic impact (of?) taller and larger buildings can vary substantially depending on an area's existing character, the magnitude of change compared to existing limits, and location relative to other development and sensitive resources, such as parks and public open space."	<ol style="list-style-type: none"> 1. What kind of grammar is this? I think you are missing a preposition (of?)! 2. This is just a lame excuse to all of us: if we complain about the impacts, you can always declared that you warned us!
3.137 Single Family Zones	"In Single Family zones, (M) zoning changes apply only for rezones to Residential Small Lot (RSL). The same maximum height limit would apply to new homes in RAL as existing Single Family zones. However, new homes could be built closer to lot lines and could generally cover 15 percentage points more of a lot's area compared to development under existing regulations. A smaller front yard setback requirement would enable new structures to be closer to the street than the typical pattern in established single-family areas. However, the proposed FAR limit of 0.75 would limit the overall quantity of floor area that could be built on a typical lot to roughly the same amount as could be built under existing regulations for development in Single Family zones. The primary aesthetic impacts would be smaller yards between structure, a reduction in separation from neighboring structures, and a break from the established pattern of front yards on typical streets..."	<ol style="list-style-type: none"> 1. REALLY? The city pretends that this is a minor change, like we will hardly notice the difference! 2. If the overall quantity of floor area remains the same, what is the point of these changes? 3. If there is a sudden reduction in setbacks, this will create a wall-like disruption of the streetscape along the block for pedestrians and neighbors, decreasing the sense of community. 4. Closer structures increases the risk of fires traveling rapidly from home to home. 5. Reduced yards often means less landscaping, which often means simple yards of easy care ornamental gardens or cement ramps and walls, along with a messy display of garbage dumpsters. 6. If the new buildings have a larger footprint, perhaps the negative impact could be softened by requiring setbacks for the second story and above, along with rooflines that are compatible with existing single-family homes. Tall box houses create shadows! 7. Why will homes built on smaller lots be able to occupy a larger portion of the lot's area? What does the city hope to gain? 8. Will the City promote a sense of community amidst this higher density through design standards, such as inviting entrances and non-obstructing fences?
3.137	"(M) zoning changes represent the least-impactful tier of MHA rezones, but they still have the potential to affect neighborhood character by allowing taller and larger buildings, changes in building typology, and changes to lot coverage limits and required setbacks. Regardless of change to height limits the primary aesthetic effect of (M) zoning changes would be increased building bulk and visual prominence due to changes in allow building forms."	<ol style="list-style-type: none"> 1. Why does the city continue to downplay impacts that would contradict its assumptions and goals? 2. The sentence highlighted in red showcases the city's belief that they can entice and satisfy the demands of developers and still pretend that, although major growth is coming, it really doesn't amount to anything... just bigger, bulkier buildings.

PAGE TOPIC?	QUOTE	REFLECTION
3.144 Upper-level setbacks	In the (M2) area, height limits increase to 50 feet, allowing buildings two stories taller than the existing single-family context. Apartment buildings..., as opposed to detached single-family homes, would mark a change in character from the existing built form. Smaller front and rear setbacks would reduce the amount of yard space.... Application of design standards, such as upper-level setbacks, side façade modulation requirements, and privacy standards, ... would mitigate the effects of increased height and bulk on neighborhood character	<p>Why not extend these requirements into Single-family zones, especially given the change allowing larger footprint buildings on the smaller lots?</p> <ul style="list-style-type: none"> • If houses are closer to the street, the streetscape will become choppy, obstructed, and uninviting. • If box houses do not have peaked roofs, their bulk will swallow up the adjacent homes. • If houses are closer together, fire can spread more rapidly! • Forget about mitigating effects on neighborhood character, these changes will erase that character!
3.165 Neighborhood design guidelines	“Working with neighborhood groups to create and codify neighborhood design guidelines could mitigate localized aesthetic impacts for urban villages that do not currently have them?”	<ol style="list-style-type: none"> 1. If the city cares so much about local aesthetic impacts, why did it suddenly remove any consideration of establishing Conservation Districts (*)? 2. When will the city realize that one-size doesn't fit all? Various neighborhoods have unique character, histories, and even challenges which cannot be addressed by a city-wide standard approach. In the U District, a extra unit = 8 more unrelated adults!
3.166 Significant unavoidable adverse impacts	<p>3.3.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS “Under all alternatives, additional growth would ... [include] the conversion of lower-intensity uses to higher-intensity uses as allowed by zoning. This transition is an unavoidable and expected characteristic of urban population and employment growth. The Action Alternatives would further this trend by creating additional development capacity, which could accelerate the development of taller, more intense buildings in the study area.</p> <p>However, as described in 3.3.3 Mitigation Measures, the proposal includes a variety of features and development regulation amendments to minimize these impacts. In combination with the City’s adopted development regulations, Design Review process, and the mitigation measures recommended in this EIS, aesthetic impacts should be reduced to less than significant levels. Therefore, no significant unavoidable adverse impacts are anticipated. In the urban context of a rapidly growing city, such changes are substantial but are also subjective in nature and are not necessarily significant impacts pursuant to SEPA.”</p>	<p>This statement produces several concerns:</p> <ol style="list-style-type: none"> 1. Enforcement: Who will make sure that developers comply, especially to the affordable housing fund? So far, the city has a poor record in that area! 2. Accountability: What department will be held accountable for the promises declared in this document? Those that make major decisions always seem to escape any scrutiny or responsibility. 3. On-going review to verify that objectives are being met, that impacts are being minimized, that changing data are included in that review, and that the resulting feedback is used to realign the process. 4. Apparently, the city appears to declare that any and all unavoidable adverse impacts are reduced by this proposal; therefore there is no further need for discussion, feedback, or future evaluation and reflection. 5. We cannot quantify the impacts, because they are subjective in nature; therefore, they must be insignificant! How can change be substantial and insignificant at the same time? In essence the city is stating: This is the best we can do. Live with it!

PAGE ?TOPIC	QUOTE	REFLECTION
<p>3.152 Transition Zones</p>	<p>“Because expansion areas are at the edges of urban villages, they would likely function as transitional areas, forming a buffer between the most intense development in the urban village and the low-intensity neighborhoods surrounding it.</p> <p>However, expanding urban villages would, over time, lead to the conversion of existing development to higher-intensity uses, development of taller buildings, and establishment of a more urban character in the expansion areas, compare with existing conditions. This conversion would include the gradual introduction of taller, more prominent buildings with potentially greater site coverage than existing development.</p> <p>Since development tends to be incremental, temporary conflicts of height and scale may arise between older and newer buildings as properties convert to more intense uses at different times.”</p>	<ol style="list-style-type: none"> 1. Is the city warning that there is no such thing as a stable neighborhood, which is not in constant flux and uncertainty? 2. Why are these changes deemed to be inevitable? And if these changes and impacts are unavoidable, then is this whole process one of futility and perhaps justification to hold the city harmless when future negative impacts become a reality? 3. First the city states that it wants to protect the surrounding neighborhoods by setting up transition zones; then it warns about the creeping impact of invasive growth on those neighborhoods! 4. After recently attending various workshops on design standards for the University District, I was abruptly made aware of the city’s definition of “Transitional areas”. With all its talk and reassuring rhetoric, the city has no intention of enforcing any transition designs. This concept is really only a suggestion to potential developers along the periphery of urban centers. These developers will be made aware of the close proximity of their properties to the lower zone neighborhood and asked to soften their designs in order to lessen any adverse impact on that neighborhood. BUT there is apparently NO code to ensure that any transitional area will be a reality. This was already apparent from the EIS for the U District Up-zone, in which the city passively accepted the aggressive invasion and expansion into established family neighborhood as unavoidable and therefore insignificant! The presently blurry borders will turn into abrupt cliffs, before the inevitable spillover damage occurs! 5. The sentence highlighted in red should bring a chill up and down our spines. It shows the true efforts of this City to erase Seattle’s rich heritage through various transitions, cyclical in nature but permanent in impact. The DEIS talks about ripping the very fabric of our neighborhoods. But on a larger scale, the city’s entire identity is being sent adrift on a sea of uncertainty, rudderless and helpless to the winds of opportunity and speculation.

Section 3.5: Historic Resources

PAGE TOPIC?	QUOTE	REFLECTION
3.256	"3.5.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS Since no changes will occur to existing policies and regulations regarding review of historic and cultural resources under any alternative, projects subject to review under existing policies and regulations would still be reviewed at the project level, if and when redevelopment is proposed. At the programmatic level of this analysis, no significant unavoidable impacts to historic and cultural resources are anticipated under any of the proposed alternatives." (page 3.256)	<ul style="list-style-type: none"> ♦ Why is the city NOT at least reviewing the policies and regulations in light of this DEIS? ♦ What exactly is unavoidable? If any impact is forewarned as "adverse", then the City must make the necessary changes! ♦ Why are developments only reviewed at the project level? Does the city believe that all impacts are confined to the borders of that property? Surely the city needs to see the larger picture. Projects should be reviewed as an integral part of the city block and the larger neighborhood. This is especially true, given the slippery slope the city itself has admitted will occur: Once an aggressive project is allowed, that will give a green light to the total invasion of the block by other such developments. This is not even refuted by the city!
3.252	"As a neighborhood's historic fabric decreases, it is less likely to meet local and federal eligibility criteria for consideration as a historic district"	<p>It is sad that the City accepts the disappearance of the unique historical perspective within our many neighborhoods as inevitable. Without any special identity, the criteria for consideration as a historic district will be lost along with the <i>"setting... which is a contributing element"</i> of historic recognition (page 3.251).</p> <p>Furthermore, the City has already predicted the spreading collapse of neighborhoods as a result of its aim to abruptly replace older structures with newer taller, denser structures void of historical context; even the new is seen as temporary in this city that advocates for planned obsolescence. Indeed, in Seattle 2035, the City stated most profoundly that there will necessarily be non-stop upheaval until the entire city reaches maximum height, bulk, and density. Then what skyline will be preserved and for whom?</p>
?	Absent within this document is any effort to promote our neighborhoods' histories as a sense of pride and the city's quirky personality, not even as destinations for tourism!	The City of Seattle used to immediately be equated with certain special characteristics: friendly, quaint, etc. Even the Chamber of Commerce was searching for a new nickname "Emerald City". But the City apparently wants us to become the "Crane City" "City in Constant Flux" IF you think you know Seattle, you don't and you never will. Our identity can be summed up as transient.

PAGE TOPIC?	QUOTE	REFLECTION
3.244	<p>“It is important to note that not all properties within the study area have been systematically inventoried for their potential eligibility. Therefore, it is likely that the study area contains additional properties that could meet the criteria for designation as a Seattle Landmark... or that meet the criteria for being determined for listing in the National Registry (NRHP)...” (page 3.244 – combined sections)</p>	<p>The city must accelerate this process before there is nothing left to inventory. Furthermore, there must be an effort to educate the property owners of the history of their buildings and what benefits that affords them.</p> <p>The passivity of the City as viewed in this statement speaks loud and clear: The City is warning us about the inevitable, thus absolving it from any responsibility. This is outrageous!</p>
3.255	<p>“3.5.3 MITIGATION MEASURES Mitigation measures to reduce potential impacts to historic and cultural resources include:</p> <ul style="list-style-type: none"> ♦ Comprehensive Plan policies that promote new development consistent with the historic character of the neighborhood. ♦ City regulations including the Seattle City Landmark process and archaeological surveys per the Seattle Municipal Code. ♦ Funding continuation of the comprehensive survey and inventory work that was begun in 2000. 	<p>“Promote” – How active and proactive is the City? Why doesn’t the city have a stronger commitment to educate the owner as to how his project will impact the neighborhood? Why is everything having to do with quality and character merely a suggestion?</p> <p>Surveys and inventory work should be a high priority, especially to ensure a sense of integrity for our neighborhoods and their historic characters. Without this data, and without the City’s strong commitment to formally recognize our many unique communities, the City will remain in constant flux and will lose its identity as defined by its rich history. But maybe that is the city’s goal after all!</p>
3.255	<p>“Other mitigation measures could include conducting 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 such as the City’s Pike/Pine Conservation District in order to limit the size of new development and encourage preservation of older structures (referred to in SMC as “character structures”); establishing Transfer of Development Rights (TDR) programs within new conservation districts to provide incentives for property owners to keep existing character structures; and requiring that any structure over 25 years in age that is subject to demolition, including those undergoing SEPA-exempt development, is assessed for Landmark eligibility, and adding regulatory authority to identify resource-specific mitigation before demolition occurs.”</p>	<ul style="list-style-type: none"> ♦ The City displays its uncertainty and lack of decisive commitment through the use of “could”. If these proposed ideas are worthy of mentioning, perhaps the city should show a commitment to proceeding toward their fruitions. It is as if the city is trying to soften the blow of the upzones and the MHA by suggesting efforts it has no intention of pursuing, just t to bend the attitudes of its residents. ♦ UNBELIEVABLE! Suddenly, Conservation Districts (*) are elevated again to a solution to the city’s dilemmas. NOTE the inconsistency of Mayor Murray and those who have lined up behind is HALA efforts. After demanding that the Conservations Districts no longer be implemented, now the City is providing that concept as a way to ensure historic consciousness and preservation. How hypocritical!)

**Comments
by Historic
Seattle**

"In our opinion, what's being proposed will have a potentially significant adverse impact on historic preservation. We strongly believe that the City can achieve a balance that will ensure that how we grow is sustainable and resilient while retaining urban character and sense of place. If Seattle continues its tear-down mentality, the city will lose what makes it a vibrant, livable place for all who call it home."

This warning should remind the City that it needs to reach out to various groups for their expertise, their long-term experience and vision, and their inspiration. No one expects the City to have all of the solutions but it must respectfully seek guidance from those who can appreciate a wider perspective, can pose meaningful questions and concerns, and can bring the community together toward a positive

Mark Tobey, artist/painter, was a fervent supporter of the Pike Place Market. This description of Seattle should send a powerful message to us not to forget our unique story or our vast natural scenery.

Mr. Tobey also warns us about the aggressive development which is dangerously erasing Seattle's most treasured assets.

In the midst of Seattle's growing pains, Watson went to Switzerland to visit Mark Tobey during the painter's final years. Long after he left the country, Tobey continued to draw upon Seattle as the source of his inspiration: the sky could make four different faces in an hour; the wind jumped off the water and tumbled through the streets; anywhere you looked, from a hilltop neighborhood to a waterfront dock, at any time, the curtains might open and a mountain range would appear. If those peaks had been in hiding for a few weeks of winter, they looked new. Tobey was crushed by the march of the megalopolis toward the Cascades and the wave of generic skyscrapers downtown. Overnight, cities were shaking off their past and repackaging themselves in a single uniform. Seattle in the late twentieth century, once again ignoring the natural blueprint of its setting, was going the same way. "Landmarks with human dimensions are being torn down to be replaced by structures that appear never to have been touched by human hands," said Tobey.

TERMINOLOGY IN NEED OF DEFINITION AND/OR EXPLANATION:


Market-rate housing costs (page 1.12)	The vague use of these words: would, could, should, consider, promote, compatible, respect ...
Adjacent sites	Character
Development character (page 3.136)	Building scale study area (page 3.136)
Aesthetic impact taller and larger buildings (page 3.136)	Building typology
Universal design (page 3.165)	Pedestrian environment (page 3.86, etc.)
Adverse impact	Character structures

July, 2017

Although this massive tome was filled with detail and worthy of total consumption, I was unable to devote enough time to read it from cover to cover. Out of time restraints, I reviewed only certain sections. So, what conclusion have I reached? The City listed all the potential impacts resulting from the MHA implementation, which encourages aggressive development and increased densities; AND which, if left unchecked, will disrupt adjacent communities, when it spills over into and sweeps through our many unique neighborhoods, rich in historical identity and character. Within the pages of the document are the following passive acknowledgments; "neighborhood's historic fabric decreases", and "changes to the historic scale of neighborhoods" are just two examples of how the city envisions the unfortunate impacts that are collateral damage to its grand schemes to remake and reshape Seattle's future.

Then, after a diligent review of this document, it is easy to discover that any solutions offered by the City are softened by words of hesitancy: 'should', 'could', 'encourage', 'promote' and 'guidelines'. The city, as usual, falls short in the area of standards, implementation, education, and enforcement. All efforts are diluted as suggestions and hopeful predictions; all impacts are viewed as inevitable, even "unavoidable". There is no evidence, albeit in words, that the city is serious about minimizing the negative impacts through specific efforts to create stronger more enforceable legislation. In fact, after the many caveats, the City ends the document declaring that the unavoidable impacts are insignificant. What justifies that conclusion? The city doesn't have the fortitude to address them, so it simply announces them as warnings. It also fails to provide evidence that those impacts are offset and even dwarfed by the anticipated positive changes. Since the impacts are inevitable due to no desire to confront them, they are, by their very nature, unavoidable. REALLY? This is just another example of circular justification. As long as the city notifies us ("Well, at least we warned you!"), it has justified its efforts and can sit back on its laurels, reveling in a job well done!

ULTIMATELY: If the city cannot honestly defend its proposal, perhaps it should go back to the drawing board!



Respectfully submitted by Aileen M. Langhans

On behalf of the Langhans Ladies (Aila (97 yo), Aileen, Wendy and Kathy Langhans)

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University District since 1955

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*"We have everywhere an absence of memory.
Architects sometimes talk of building
with context and continuity of mind,
Religious leaders call it tradition,
Social workers say it's a sense of community,
But it is memory we have banished.
We have speed and power, but no place.
Travel, but no destination. Convenience, but no ease."*

Howard Mansfield, author of history, architecture, and preservation.

From: Myra Lara
To: [PCD_MHAEIS](#)
Subject: MHA comments
Date: Monday, August 07, 2017 11:33:15 PM
Attachments: [MHA EIS-Myra comments.pdf](#)

My comments are attached.... have a lot on my mind but these were a few before the time is up!
-Myra

August 7, 2017

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

To Whom it May Concern,

Thanks for all your hard work in finding ways to make our city better for all. Thanks for listening to our countless stories, in and out of City Hall.

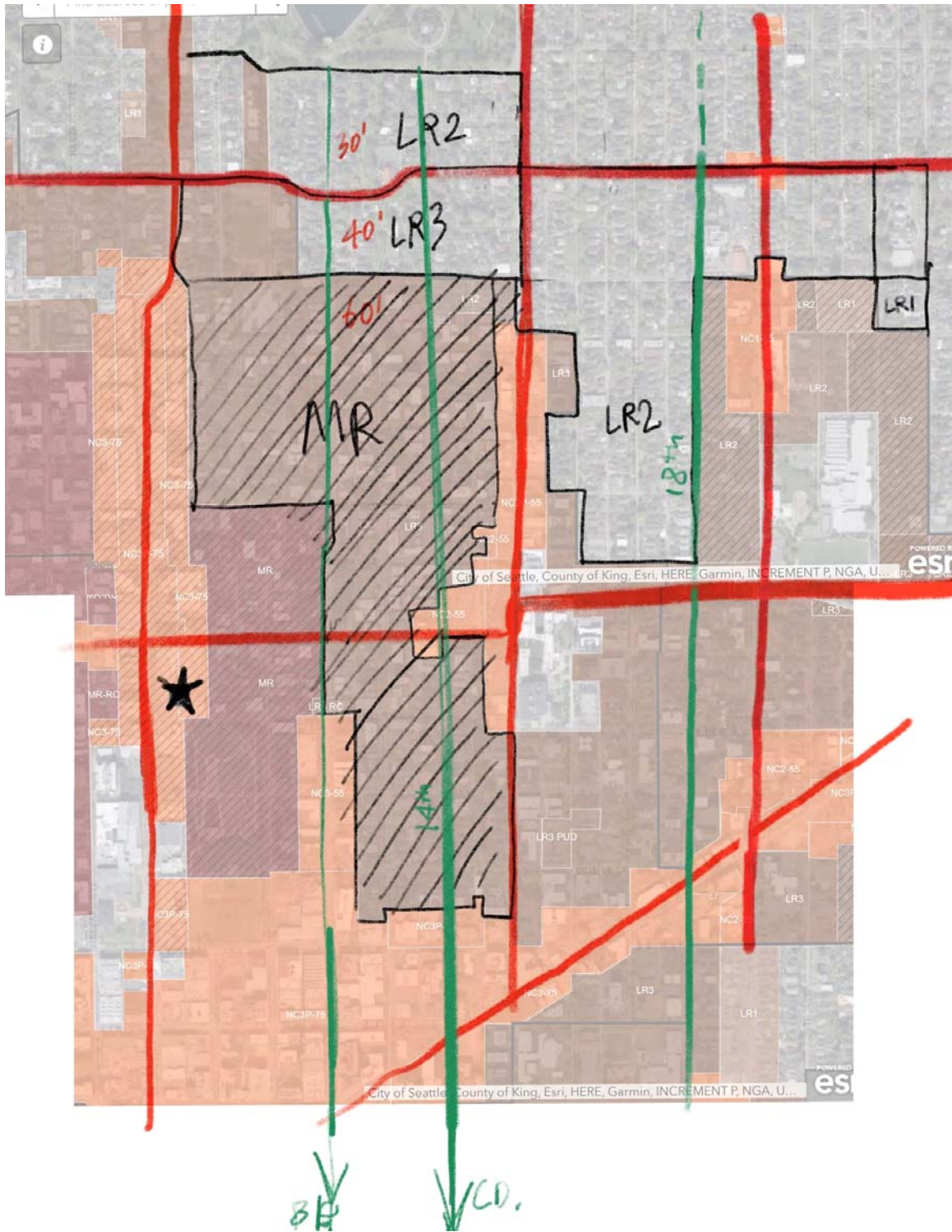
Though I will be using examples from my neighborhood of Capitol Hill, many of my comments are fundamental and can be applied throughout the whole city.

I believe that it is in the city's best interest to upzone the hell out of Capitol Hill. We have one of the most heavily used light rail stations (star below), regularly intervalled arterials with great bus access (red below), and a few frequently-biked on roads that connect North Capitol Hill to Central District, the ID, and Beacon Hill relatively safely.

I personally have a stronger preference to Alternative 2, with one caveat: keeping the area bounded by E Roy, Broadway, E Olive and I-5 the same, as it contains a higher displacement rate than the rest of the neighborhood (more low-income households).

The area east of Broadway should all be midrise, full stop. I also believe the urban village boundary should be increased to at least Aloha. Below is a sketch of these suggestions, keeping with the "stepping down" effect to ease the "impact" of mid-rise to single family zoning.

I



In general, I support the following:

+ Increase boundaries of urban villages and **seriously support the concept of a 20-minute walk shed**. Examples of heavily constrained density can be seen in the Greenwood/Phinney Ridge and Wallingford neighborhoods, where slivers of urban villages feel like false facades to major arterials. Can we renters be respected enough to be counted as households with similar sensitive senses to that of homeowners? Can we not be constrained to just line loud streets for once?

+ Increase density with renters, not homeowners, in mind. Realistically speaking, we were all renters first before taking on a mortgage. Currently language points to protecting the comfort and health of single family zoning without thinking about renter's own rights to comfort and health. "Maintain compatible scale" or "respect views" grants disproportionate entitlement to single family homeowners that use these vague promises to block multifamily housing. **It's codified language meant to retain the status quo**. This language is not exclusive to Seattle, but all growing cities in our country at large. Put renters first.

+ The EIS admits that impacts related to rezoning ("intensification of use", "scale change") includes increased traffic, noise, ambient light and reduced air quality. These are additional impacts to areas that typically have less access to our city's beautiful amenities: urban trails, lush parks and scenic waters. This fact alone points to why we need **an increased housing choices in our largest zoning type in the city**. It's a no-brainer. To start: relegalizing du/tri/fourplexes in single family zones. These are developments that remain in scale with their surroundings, can have more than one household, and are lovely to live in.

+ Increase pitched roof heights from 5' to at least 10'. We all understand that the height isn't 35' in low-rise zones, and is a defacto 30' since nothing useful can be done with 5' of a pitched roof. So many beautiful houses get the benefit of attic spaces that end up being people's rooms. I think that many of resident's criticisms come from the unintended consequence of limiting the heights of buildings in such a way.

+ Acknowledge that anti-displacement strategies aren't just about increasing housing supply, but enacting policy that protects our most vulnerable populations, which are most likely renters. It's absurd we don't have a limit to how much rent can be raised, especially in older buildings.

These are a few things on my mind before the clock strikes midnight. Looking forward to the final document!

Sincerely,

Myra Lara

renter in Capitol Hill

From: suzanne lasser
To: [PCD_MHAEIS](#)
Subject: Fw: Comment re UP ZONING Madison Miller urban village
Date: Monday, June 26, 2017 11:07:03 AM
Attachments: [comment of zoning change, 18th Ave East.docx](#)

See Attachment

From: Smith, Gerald R <gsmith@fredhutch.org>
Sent: Sunday, June 25, 2017 10:34 PM
To: suzanne lasser
Subject: Re: Notes from 6/21/2017 Madison-Miller Park Community Meeting about UP ZONING

Dear Suzanne,

Thanks for sending me the notices. I have attached a statement, which may be useful. Please send it to any appropriate person.

Thank you,

Gerry Smith

Gerald R. Smith
Member, Division of Basic Sciences
Fred Hutchinson Cancer Research Center
1100 Fairview Avenue North, A1-162
P.O. Box 19024
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Tel. 206-667-4438
FAX 206-667-6497

<http://labs.fhcrc.org/gsmith/index.html>
<http://sharedresources.fhcrc.org/profile/smith-gerald>

----- Original Message -----

From: "suzanne lasser" <suzlasser@hotmail.com>
To: doug@rosenbergseattle.com
Sent: Saturday, June 24, 2017 4:38:13 PM
Subject: Fw: Notes from 6/21/2017 Madison-Miller Park Community Meeting about UP ZONING

If changes to the east side of 18th Ave East, between Republican and Roy, must to be made, I strongly oppose Alternative 3, which would greatly reduce the amount of green plants (trees, shrubbery, lawns, gardens, etc.) in our neighborhood. These features make this neighborhood so livable. Without them, we would be starved for nature. Alternative 2 might be OK, if houses do not exceed about 20 or 25 feet high. I respectfully ask that Alternative 3 not be implemented. I would prefer Alternative 1.

Gerald R. Smith

606 17th Avenue East

Seattle, WA 98112

From: suzanne lasser
To: [PCD_MHAEIS](#); nicholas.welch@seattle.gov
Subject: HALA comments draft EIS for Madison Miller urban village
Date: Monday, June 26, 2017 11:34:23 AM
Attachments: [HALA letter 6.25.docx](#)

See comments for Draft EIS

Suzanne Lasser MD

June 26, 2017

Dear HALA Staff

I live on 18th Ave East, corner of East Mercer Street and request that blocks between East Republican and East Roy Street we **not be up zoned (Option 1)** in the Madison Miller urban village. Based on projects currently being built or in the permitting process, my local neighborhood group, Madison-Miller Neighbor Group, **determined that the Madison Miller Residential Urban Village will exceed HALA's 2035 housing density goal within the next few years without rezoning.**

I specifically caution you against up zoning the 18th Ave East blocks between East Roy Street and East Republican (the street I have lived on for 20 years) until you see the aftermath of a current 32 unit mixed use building that is currently under construction on 19th Ave East and East Mercer Street. Additionally, there is a planned expansion of Country Doctor Clinic on 19th and East Republican, this opening of Meany Middle School with 500 students this year, and establishment of a bike corridor on our street. Our neighbors have already notified SDOT (Matt Beaulieu) and the Department of Construction and Inspections (Dave Cordaro, assistant to Neil Torgeson) about our concerns about traffic, pedestrian safety and parking with these changes. With St Joseph's School and Church on 18th Holy Names (commuter schools), we need to have local traffic and parking studies to assure more density and up zoning is safe. This data should be available from the Central Ridge Greenway project; 18th Ave East is planned to be a bike corridor. I plead for the city to up zone in a step wise, incremental fashion in our neighborhood.

My current house (and many houses in this so-called Madison Miller Urban Village) lack parking. My lot was divided in two and there are two homes (I would say we are already a Residential Small Lot) There are many homes on my block that are already multifamily homes or meet RSL criteria. There is no alley access in the 18th Ave East Between East Republican and East Mercer St and that alley will need to be paved and improved with any up zoning.

I am also deeply worried about the loss of green space with new rules out front-yard and back-yard setbacks. I agree with Miller-Madison Neighbor Group's request for the continuation of front and back yard setbacks of 15-20 feet. Indigenous and significant trees that define the neighborhood character need to be protected as well.

Lastly, I think the up zoning is arbitrary and discriminatory. Our Madison Miller urban village follows an old "red line" of Capitol Hill by ending at East Roy Street. Any up zoning should be spread more widely in North Capitol Hill Why not provide incentives to split up mansions into multiple family dwellings? It is very clear to me that certain upscale neighborhoods in the city (namely Madison Park, Laurelhurst and Capitol Hill north of East Aloha) were spared of any up zoning. Please consider this injustice too.

Thank you,

Suzanne Lasser M.D., Resident of Capitol Hill since 1996

533 18th Ave East Seattle WA 98112

Physician at Kaiser (formerly Group Health) on Capitol Hill Campus

From: suzanne lasser
To: [PCD_MHAEIS](#)
Subject: Draft EIS Comments / Madison Miller Aug 6, 2017
Date: Sunday, August 06, 2017 9:15:44 PM
Attachments: [Doc - Aug 6 2017 - 9-10 PM.pdf](#)
[ATT00001.htm](#)

Please see attached letter signed by 19 residents who live on Capitol Hill in or adjacent to proposed Madison Miller urban village

We support suggestions in the 8/2/17 Madison Miller proposal suggested by the Madison Miller Community Group

Thank you,
Suzanne Lasser (for the 19 residents)

Scanned with [TurboScan](#).

August 6, 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:

jesseca.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; Deborah.Juarez@seattle.gov; Mike.O'Brien@seattle.gov; Sally.Bagshaw@seattle.gov; Tim.Burgess@seattle.gov; Lorena.Gonzalez@seattle.gov

Re: Madison - Miller Park urban village proposal


To our City Planners.

One of the wonderful things about living in our Madison - Miller Park area 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 seen buildings added all over the hill and in other neighborhoods too and have seen how this forever changes a city.

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

The professional and thorough response by the Madison / Miller Park Community group dated August 2, 2017, in our opinion, deserves very careful consideration. Thank you for your attention to it.

①  Joe Wendt lifelong resident (73 years);
601 18th Ave East Seattle 98112

② Steve Wendt - BORON CAPITOL
1114 26th Avenue
HILL - LIVE IN C.D. Seattle 98122

- ③ Elaine Nijenhuis 1715 E. Mercer St 98112
- ④ ~~Stephen~~ Stephen Burns 533 18th Ave E 98112
- ⑤ Nicole Burns 533 18th Ave E 98112
- ⑥ Suzanne Lasser 533 18th Ave E 98112
- ⑦ Sarah Burns 533 18th Ave E 98112
- ⑧ ~~Sarah Burns~~ Pat Wendt 601-18th Ave E. 98112
- ⑨ Amy Fern 601 18th Ave E 98112
- ⑩ Joy Wendt 601-18th Ave E 98112
- ⑪ Wendy Reilly 517 18th East 98112
- ⑫ ISAAC MORGENTHAU 18th E 98112
- ⑬ Rebecca Fox 736 17th Ave E 98112
- ⑭ Robert Helber 736 17th Ave East 98112
- ⑮ Grace Z Kich 715 18th Ave E 98112
- ⑯ Titill vs 715 18th Ave E. 98112
- ⑰ Matt J. 1701 E Mercer St Apt G 98112

Matt Stemle
732 17th Ave E
Seattle, 98112
(850) 559-1732

POLLY PURVIS DAVIS Fide
740-17th Ave. E.
Seattle 98112
206-979-9759

From: Mira Latoszek
To: [PCD_MHAEIS](#)
Cc: [Maria Batayola](#)
Subject: Re: Comments by the MHA draft EIS sub-committee of the Beacon Hill Council
Date: Monday, August 07, 2017 4:56:47 PM
Attachments: [17 BHC Comments on MHA EIS draft ML 8-7 MB.pdf](#)
[16 BH Survey Data Report 7-12 Sheet1.pdf](#)

Please accept the attached comments along with the supplementary 2016 Beacon Hill survey results which are referenced in the comments.

Thank you

On Mon, Aug 7, 2017 at 4:49 PM, Mira Latoszek <mira.latoszek@gmail.com> wrote:

Please accept the attached comments to the MHA draft EIS.



August 7, 2017

To: **Office of Planning and Community Development**
Attn: MHA EIS

We are writing on behalf of the Beacon Hill Council to express our concern of the proposed rezones associated with the expansion of the North Beacon Hill Urban Village under Alternatives 2 and 3 for North Beacon Hill in the Draft Environmental Impact Statement (DEIS) for the Citywide Implementation of Mandatory Housing Affordability, the impact on the North Beacon Hill neighborhood and lack of specific mitigation strategies. The two proposed rezone strategies would substantially alter the makeup and feel of large areas of the North Beacon Hill community and surrounding area. The proposed increase in density comes with no assurance of investment in infrastructure, services, amenities, green space and with no protection against the displacement of low-income and elderly residents.

Our Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures. We have noted below in the specific sections our concerns regarding the failure to consider the adverse impacts.

Our comments are based on the past six community meeting discussions and the data from our June 2016 Beacon Hill multi-lingual survey which was mailed to 12,562 Beacon Hill households and an online survey with 7 outreach/tabling/presentation activities for various ethnic groups within Beacon Hill. As a result, we received 1,117 responses (9% survey response rate) from residents of Beacon Hill. The survey was administered in Chinese, English, Somali, Spanish, Tagalog and Vietnamese. Our survey partners include Beacon Hill Merchants Association, El Centro de La Raza, International Drop-In Center, International Examiner, Friends of Lewis Park and Jefferson Community Center. (See attachment 1: 2016 Beacon Hill Survey Summary).

The multi-lingual nature of the survey is driven by the demographics of Beacon Hill Neighborhood which is: 44.4% foreign born, 36% who do not speak English "very well" and close to 80% people of color with 46.8% Asian Pacific Islander, 17.6% African and Blacks, 8.5% Latino, 4.2% mixed and 1.1% Other. Whites comprise 21.7% of the population.

Beacon Hill Neighborhood income levels show that 1 out of 5 people are in poverty. 31.05% of survey respondents living in North Beacon Hill reported that they spend 30% or more of [their](#) household income on housing costs.

In comparison, the City of Seattle HALA/MHA outreach pales in comparison. Their outreach included 1) HALA focus groups of 5 representatives from North Beacon Hill, 2) HALA ConsiderIt online participation of 48 responses as of August 5, 2017, and 3) a supplemental Design Workshop sponsored by PLUZ Chair Councilman Rob Johnson with ~45 Beacon Hill residents attending.

Hence, relevant identification of MHA adverse impact and mitigation measures should be based on the 1,117 tabulated responses of Beacon Hill residents from the 2016 June survey conducted by the Beacon Hill Council.

Housing and Socioeconomics

The Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures for housing in the Beacon Hill neighborhood. Alternatives 2 and 3 distribute affordable housing units generated by in-lieu MHA payments proportionate to the area's share of anticipated citywide residential growth rather than basing it on the risk of displacement of current residents.

From the 2016 Beacon Hill Survey:

- 55% of respondents Agreed/Strongly agreed with the statement "Allow multi-family housing/smaller cottages in single-family zoned areas in the Urban Village."
- 80% Agreed/Strongly Agreed that affordable family-sized homes should be encouraged.
- 77% Agreed/Strongly Agreed that a balance of affordable rental and homeownership should be encouraged.
- 68% Agreed/Strongly Agreed that development of housing close to the light rail station should be encouraged.
- 70% Agreed/Strongly Agreed that development of affordable housing close to the light rail station should be encouraged.

We have noted below concerns regarding the failure to consider the MHA adverse impacts which include but are not limited to the following:

- 1) The DEIS fails to address methods for increasing affordable housing where it is needed most so that residents who need help can stay in their neighborhoods.
- 2) This shortcoming is especially acute for the North Beacon Hill neighborhood in which a high percentage of the population is non-English speaking. Support services, business and cultural resources which developed organically are difficult to replicate if these populations are displaced or dispersed to other parts of the City.
- 3) The DEIS fails to address the scenario that up zoning may increase housing demand over what is expected. An increased modern housing stock may make it more attractive for additional people to move from other places, thereby exacerbating displacement.

Recommended Mitigation Measures:

- 1) Delay implementation of the city-wide MHA policy until the MHA requirement for the North Beacon Hill neighborhood is defined and that specific SEPA review is completed.
- 2) Establish a joint Beacon Hill RSJ Equitable Development Urban Village Impact Task Force with representatives from the City's Office of Planning and Community Development, Office of Civil Rights, Office of Economic Development, PLUZ, and the Beacon Hill community to monitor whether new developments are increasing housing and rental prices that's driving displacement.

- 3) Increase MHA affordable/low income housing requirement for developers to the maximum allowable requirement under Washington state law.
- 4) Exempt North Beacon Hill homeowners who reside on their parcel at the time of permit application from MHA fees for small-scale developments of up to 4 units, to discourage displacement of these homeowners and encourage growth of housing supply. No MHA fee exemption granted to non-resident homeowners.
- 5) Require developments on Beacon Hill not exempted by the above to include MHA housing.
- 6) Create a Beacon Hill land trust and allocate MHA funds to the land trust as a priority. Affordable/low income housing is a shared responsibility of government, non-profit and private developers.
- 7) Allocate MHA funds to the land trust and secondarily build low income/affordable housing and rentals in Beacon Hill.
- 8) Include in the Homelessness Office, a Beacon Hill Homeless Prevention Demonstration Project for our low-income residents who are high risk for displacement, develop a Beacon Hill Low Income/Affordable Housing Placement Preference Policy, create a roster for said people for notification purposes for affordable/low income housing opportunities, and implement the notification and the policy.
- 9) Ensure that the City Ordinance related to MHA underscores that any removal of MHA low income housing requirements means automatic removal of MHA related up zones.
- 10) The City should implement a policy related to monitoring growth in urban centers and villages and implement a mechanism to require the City to make adjustments to investments and growth thresholds when growth exceeds or falls short of projections.

Land Use

The Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures on land use within the Beacon Hill neighborhood.

The North Beacon Hill Urban Village boundary would expand by 83 acres in Alternative 2 and 22 acres in Alternative 3. The expansion area is near the light rail station at S Lander St. In Alternative 2 the expansion approximates a 10-minute walkshed, and in Alternative 3 the expansion approximates a 5-minute walkshed.

We have noted below concerns regarding the failure to consider the MHA adverse impacts which include but are not limited to the following:

- 1) The boundary expansion fails to consider the geography of Beacon Hill in using the walkshed approach. The expansion of the boundary to the east does not take into account the steep hillside in that area. Both Alternative 2 and Alternative 3 expand to the east to a similar extent as they do to the south which is a relatively flat area of Beacon Hill.
- 2) Housing developed in steep areas is unlikely to be utilized by the disabled and elderly who are at more risk of displacement due to financial hardship. The DEIS fails to take into account the affect of geography on a variety of populations.
- 3) Increased and more intense development would have different affects depending on geography in the areas of transportation, public services and utilities, biological

resources and open space and recreation. The DEIS fails to take geography into account in any of these livability factors.

- 4) The DEIS reflects the City's failure to honor the North Beacon Hill Neighborhood Plan and the 2011 Neighborhood Plan Update.

Recommended Mitigation Measures:

- 1) Delay implementation of the city-wide MHA policy until the MHA requirement for the North Beacon Hill neighborhood is defined and that specific SEPA review is completed.
- 2) Align the maps to avoid up zones in steep areas that are not truly representative of a 10-minute walk.
- 3) Consider extending in areas that are flatter even if they represent a longer walk.

Aesthetics

The Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures on the aesthetics of Beacon Hill neighborhood.

We have noted below concerns regarding the failure to consider the MHA adverse impacts which include but are not limited to the following:

- 1) Future MHA development will adversely affect the character of the North Beacon Hill neighborhood because the North Beacon Hill Neighborhood Design Guidelines do not include the Seattle City Design Review Committee guidance to preserve neighborhood character as prescribed by the Citywide Guideline CS3.B.1 – Local History & Culture, Placemaking.

The requirement states:

"i. Explore the history of the site and neighborhood as a potential place making opportunity. Look for historical and cultural significance using neighborhood groups and archives as resources (per below) into our neighborhood guidelines. Consider including reference to the cultural heritage(s) of the neighborhood's population through the use of architectural elements or detailing found in the existing neighborhood or in other historic precedents."

The preservation of Beacon Hill's character is based on the above requirement as administered by the Design Review Process.

Without the requirement, North Beacon Hill's character is easily eroded and effaced. Our neighborhood character is an expression of the times, our layered history and social justice absorption of a multitude of diverse cultures. Beacon Hill constantly welcomed and absorbed excluded and displaced populations.

The Beacon Hill Council membership has asked us to request that this requirement be added to the North Beacon Hill Design Guidelines so future developments include references to the cultural heritage(s) of our neighborhood's population through the use of architectural elements and/or detailing found in the our existing neighborhood or in other

historic precedents. We wrote a letter to this effect on July 5, 2017. (See attachment 2: 17BHC Design Guidelines Letter 7-5).

- 2) Current developments in the Urban Village have introduced the boxlike large structures which are inconsistent with the character of North Beacon Hill Neighborhood. The implementation of MHA has two concurrent adverse impacts 1) the destruction of historic buildings and older housing lessens the character of the neighborhood and 2) the increased building height allowed under the MHA proposal inherently forces developers to build these box-like structures so the project financially pencils out.
- 3) The North Beacon Hill neighborhood is comprised of close to 80% people of color with 44.4% immigrants/refugees/those US citizens born outside the United States. With the City of Seattle's diversity policy, Race and Social Justice Initiative and Welcoming Policy for immigrants and refugees, future developments should be able to express the richness and complexity of the many historical and current cultures that makes Beacon Hill a "diverse, welcoming and healthy community".

Recommended Mitigation:

We strongly recommend that the two mitigation measures below are included to the EIS:

- 1) Delay implementation of the city-wide MHA policy until the MHA requirement for the North Beacon Hill neighborhood is defined and that specific SEPA review is completed.
- 2) Defer Design Review Board reviews of projects on North Beacon Hill until the North Beacon Hill Neighborhood Design Guidelines are amended to include the Citywide Guideline CS3.B.1 – Local History & Culture, Placemaking so that the projects articulate the character of the North Beacon Hill neighborhood.

Transportation

The Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures for transportation in the Beacon Hill neighborhood.

We have noted below concerns regarding the failure to consider the MHA adverse impacts which include but are not limited to the following:

1. Beacon Hill is a convenient alternate route when there are traffic impediments on I-90 and/or I-5. This creates additional congestion that impacts livability in the North Beacon Hill urban village. Increased population in the Seattle area will increase the likelihood of drivers using Beacon Hill as a cut-through. The DEIS fails to identify and address this impact.
2. Beacon Hill is oriented on a north-south axis with Beacon Avenue being the major north-south route through Beacon Hill. The "Move Seattle" plan identified the Beacon/12th/Broadway Complete Streets project as a priority major project. Only a portion of this complete street corridor – mostly on Capitol Hill along Broadway and 12th - was finished due to a lack of funding. A majority of the Beacon Ave corridor has seen no improvements. The DEIS fails to identify and address the impact of unfinished projects

from previous plans. The additional congestion from increased density will impact the livability in the North Beacon Hill urban village.

3. The "North Beacon Hill Town Center" plan, developed during the 2011 "North Beacon Hill Neighborhood Plan Update", has not been funded. Implementation of the plan provided for improved pedestrian/bicycle/transit/vehicle mobility through the North Beacon Hill Urban Village, increased safety for all modalities, and increase parking in the business district. The "North Beacon Hill Town Center" plan was created to provide concurrency of infrastructure for increased density in the urban village due to up zoning in the area. The increased density in the up zoned area is being built, but the concurrent infrastructure is not. The DEIS fails to identify and address the impact of increased density from previous zoning changes that do not have concurrent infrastructure development.

Recommended Mitigation:

We strongly recommend that the following mitigation measures below are included to the EIS:

- 1) Conduct the citywide SEPA review once the MHA designation for the North Beacon Hill Neighborhood is defined for increased population and its intended and unintended impacts.
- 2) Develop a plan to work with WSDOT to keep traffic moving on the freeways to minimize cut-through through the neighborhoods.
- 3) Develop a plan to work with WSDOT and SDOT to provide signage to warn drivers to slow down given the residential nature of the area.
- 4) Defer the North Beacon Hill expanded urban village boundary up zones until the North Beacon Hill Town Center and the Beacon/12th/Broadway Complete Streets project are fully built out.
- 5) Implement impact fees on new development to fund concurrent infrastructure improvement.
- 6) Reduce tension between current and new residents around parking by a) funding parking study to establish capacity, b) issuing parking permits based on capacity, and c) establishing a parking benefit district to be run by community organizations with proceeds to fund community building projects.

Historic Resources

The Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures for historic resources in the Beacon Hill neighborhood.

We have noted below concerns regarding the failure to consider the MHA adverse impacts which include but are not limited to the following:

- 1) The area around Hanford St and Beacon Ave S. is a small commercial district noteworthy for older brick buildings. It is located within the expanded boundary of the North Beacon Hill Urban Village expansion. This historic looking district is small but should be protected. The DEIS fails to identify and address how smaller districts that are not on the National Historic Register, yet are historically/architecturally significant will be protected as development pressure increases.

- 2) Privately owned buildings with historic and architectural significance are in danger of being lost to potential future development because they are not landmarked. An example is the Garden House building at 2326 15th Avenue South. The DEIS does not identify how they will be preserved.
- 3) Many of the homes in the North Beacon Hill Urban Village expansion area contain older homes that contribute to the character of the neighborhood. Many of them have trees and landscapes that reflect the cultural landscape of the many immigrants and foreign-born residents. The DEIS fails to identify and address how to preserve neighborhood character that is embodied in something other than the building itself.
- 4) The DEIS fails to accurately describe existing neighborhood character and the impact of the proposed changes; DEIS fails to propose mitigation for negative impacts.
- 5) The DEIS fails to propose meaningful mitigation with respect to loss of light and air on the ground floor of existing buildings and in existing gardens of adjacent properties.
- 6) The DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.

Recommended Mitigation:

We strongly recommend that the following mitigation measures below are included to the EIS:

- 1) Conduct the citywide SEPA review once the MHA designation for the North Beacon Hill Neighborhood is defined for increased population and its intended and unintended impacts.
- 2) For all redevelopment proposals of properties with buildings in the urban village areas that are over 25 years old, require a historic and architecture analysis to identify important architectural, landscape and cultural characteristics. Add a neighborhood character factor to the design review for new developments, in a similar way in which green building and fast transit is factored in.
- 3) The City should work with private property owners of buildings with historic and architectural significance, such as the Garden House building at 2326 15th Avenue South, to landmark them. Furthermore, the City should work with the property owners to find or create a use for the houses to keep them financially stable and maintained.
- 4) Survey the urban villages to identify small historically or architecturally significant areas and exempt them from up zoning to maintain areas of neighborhood character.
- 5) Implement impact fees on new development to fund seismic retrofitting of unreinforced masonry buildings.

Biological Resources

The Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures for biological resources in the Beacon Hill neighborhood.

We have noted below concerns regarding the failure to consider the MHA adverse impacts which include but are not limited to the following:

- 1) Continuity and connection are an important aspect of biological resources to provide habitat for urban wildlife. Birds and other urban wildlife are also part of neighborhood character and our common heritage as living beings on this planet. The DEIS fails to identify and address how to preserve wildlife and the habitat that is necessary to support it.
- 2) Street tree canopy in the North Beacon Hill Neighborhood is much lower than in many other residential neighborhoods. At the same time, the overall level of pollution from roads is high and is made higher due to the additional pollution from airplane flights (see section below). This is an environmental injustice in a minority community.
- 3) DEIS fails to propose mitigation for loss of greenspace that is already lacking our Beacon Hill neighborhood.

Recommended Mitigation:

We strongly recommend that the following mitigation measures below are included to the EIS:

- 1) Conduct the citywide SEPA review once the MHA designation for the North Beacon Hill Neighborhood is defined for increased population and its intended and unintended impacts.
- 2) Implement impact fees on new development to fund the planting and maintenance of street trees in the North Beacon Hill neighborhood.
- 3) Implement and fund a program to identify, map, enhance and maintain habitat corridors for urban wildlife connecting them to existing green spaces and parks.

Open Space and Recreation

The Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures for open space and recreation facilities in the Beacon Hill neighborhood.

We have noted below concerns regarding the failure to consider the MHA adverse impacts which include but are not limited to the following:

- 1) The DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.
- 2) The North Beacon Hill neighborhood has a large park (Jefferson Park) that is centrally located on Beacon Hill. However, it is lacking in smaller, pocket parks that are within short walking distance.
- 3) The North Beacon Hill neighborhood has a community center (Jefferson Park Community Center) that is centrally located on Beacon Hill. However, it is lacking in recreational opportunities that are within short walking distance.
- 4) The DEIS fails to identify that local public facilities such as the Jefferson Park Lawn Bowling Club, the Jefferson Park Golf course and possibly others in danger of being privatized by SPR. A privately-run organization can implement restrictive access such as new or increased user fees, which is a particular danger in a neighborhood with a vulnerable population of immigrants and refugees and low-income residents.

Recommended Mitigation:

We strongly recommend that the following mitigation measures below are included to the EIS:

- 1) Conduct the citywide SEPA review once the MHA designation for the North Beacon Hill Neighborhood is defined for increased population and its intended and unintended impacts.
- 2) Change the SPR policy of not acquiring land that is smaller than 10,000 sq. feet for use as pocket parks. A well designed pocket park on a smaller lot could help meet open space and recreation goals.
- 3) The City should purchase oddly shaped vacant properties for park or public plaza use. For example, there is a triangular shaped piece of vacant land right next to the Beacon Hill Light Rail Station. It could be a welcoming plaza with trees, plants and benches. Instead it is a patch of weeds surrounded by a chain link fence.
- 4) Implement impact fees on new development to fund the purchase of small spaces for use as parks.
- 5) Allow closure of roads for street festivals. This is a common thing in large cities such as Chicago where even major thoroughfares are closed for street festivals.
- 6) Implement higher usage fees at local facilities for users who do not live in Seattle to subsidize the facilities and usage of them by Seattle residents.

Public Services and Utilities

The Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures for public services and utilities for North Beacon Hill neighborhood.

The DEIS fails to address the scenario that up zoning may increase housing demand over what is expected. An increased modern housing stock may make it more attractive for additional people to move from other places, thereby exacerbating pressure on all of the above services and systems.

The MHA EIS fails to consider the adverse impacts which include but are not limited to the following areas:

1) Police and Emergency Services

The SE District Police leadership and troops are very responsive to the neighborhood and very communicative with the Beacon Hill Council/community.

The MHA EIS fails to consider the increase in recent gang related activities and shootings in the surrounding area. We have been informed that a) the gang members often no longer live in the North Beacon Hill neighborhood and surrounding SE areas but rather return to visit their families and old haunts, and b) the SE District Police has limited capacity to manage the issue given the gang members have moved out of the area, are mobile and that a citywide deployment to manage gang related activity would be more effective.

Commented [MB1]: Moved from end of section to beginning of section.

The SE Precinct's hands are full with the existing workload. Without definition of specific MHA zoning changes in our North Beacon Hill Neighborhood, there is no way to predict the increase in population, and hence the increase in police services that would be necessary.

Additionally, the DEIS fails to take into account existing lack of access emergency services and impact of increased density on response times.

Recommended Mitigation Measures:

- 1) Conduct the citywide SEPA review once the MHA designation for the North Beacon Hill Neighborhood is defined for increased population and its intended and unintended impacts.
- 2) Assess police staffing based on the above.
- 3) Assess and implement alternative citywide deployment of staff to manage the dynamic mobility of gang and gang related activities.

2) Social and Human Services

The MHA EIS fails to consider the need for increased social and human services in the North Beacon Hill Neighborhood.

This projection is based on several pieces of data: The June 2016 Beacon Hill Survey indicate that 80% of respondents consider it to be Important/Very Important and 1 of 5 Beacon Hill residents live in poverty. New developments and property speculation has already increased the rents and housing costs for North Beacon Hill. The 31.05% of North Beacon Hill residents who spend 30% or more of their income on housing will likely increase. Hence the need for a social and human services safety net.

Recommended Mitigation Measures:

- 1) Conduct the citywide SEPA review once the MHA designation for the North Beacon Hill Neighborhood is defined for increased population and its intended and unintended impacts.
- 2) Conduct a social and human services assessment based on the above.
- 3) Implement solutions based on the assessment.

3) Public Schools

The DEIS fails to note existing lack of school capacity and impact of increased density thereon. Additionally, the MHA EIS fails to consider the lack of building insulation in the schools in the North Beacon Hill neighborhood.

The El Centro de la Raza and EPA Collaborative Problem Solving Air and Noise Pollution Health Impact education and empowerment project conducted a three-month literature review and inventory of relevant articles and studies. It found that exposure to aircraft noise impaired learning and concentration in children. The national study of schools exposed to aircraft noise indicated lower scores on standardized tests in reading and math. Beacon Hill

elementary schools participated in this study. The results showed that Beacon Hill elementary schools standardized test scores for reading and math were indeed lower than other parts of the Seattle School District.

What is hopeful is that sound-insulated schools in aircraft noise affected areas had test scores that were relatively the same as schools not impacted by airplane noise. Beacon Hill has 5,593 students from pre-school to high school. 7,051 are children out of 34,332 total population of Beacon Hill (<http://statisticalatlas.com/neighborhood/Washington/Seattle/Beacon-Hill/School-Enrollment>).

It is unconscionable to bring new residents to the North Beacon Hill neighborhood given the adverse impacts of the health risks resulting from airplane noise in non-insulated Beacon Hill school buildings.

References:

<https://www.ncbi.nlm.nih.gov/pubmed/26231366>

<http://www.trb.org/main/blurbs/170328.aspx>

https://fican1.files.wordpress.com/2015/10/findings_test_scores.pdf

<http://reportcard.ospi.k12.wa.us/summary.aspx?schoolId=100&reportLevel=District>

Recommended Mitigation Measures:

- 1) Conduct the citywide SEPA review once the MHA designation for the North Beacon Hill Neighborhood is defined for increased population and its intended and unintended impacts.
- 2) Include in the mitigation plan the insulation of school buildings and facilities, and nearby recreational facilities frequented by children and vulnerable elders in the Beacon Hill neighborhood.
- 3) Collect impact fees to mitigate increase in students and insulate said school buildings and facilities, and nearby recreational facilities frequented by children and vulnerable elders.

4. Utilities

The city wide MHA EIS fails to consider the inadequacy of the King County sewage processing/wastewater treatment plant to process sewage to support the increase in population.

The dumping of hundreds of tons of partially treated solids into Puget Sound after the catastrophic flood on Feb 9", 2017 prompted a review of the plant's capacity and condition. An excerpt from the Seattle Times reported on July 18, 2017 found in <http://www.seattletimes.com/seattle-news/environment/west-point-treatment-plant-ill-prepared-in-growing-region-contractor-finds-after-flood/> states:

"...The constraints on the plant, in terms of its size relative to the flows it routinely handles and the lack of redundancy and backup, were striking to the consultants, said Sujan Punyamurthula, senior vice president at AECOM and principal in charge of the review project.

"This is a particularly complex plant that has to run at peak flow. It makes it somewhat unique," Punyamurthula said. "Most plants have backup systems that can handle outages. This one was particularly constrained and multiple failures could happen."

The challenges to the plant will only get worse as the region's population grows, more pavement replaces forests and green space, and climate change brings bigger rain events, the contractor found..."

The MHA EIS fails to articulate the inadequacy of the King County sewage processing/storm water management system that is already challenged to meet the demands of the region's population growth, housing developments, and climate change related increased rain events. It does not take into account the additional pressure that will be put on the system as population increases even more.

Recommended Mitigation Measures:

- 1) Conduct the citywide SEPA review once the MHA designation for the North Beacon Hill Neighborhood is defined for increased population and its intended and unintended impacts.
- 2) Include in the mitigation plan building capacity in the King County sewage processing/storm water management system to be responsive to increases in service demands from population increase, increase in paved area and intensity of weather from climate change.
- 3) Collect impact fees to fund the above.

Air Quality and Greenhouse Gas Emissions

The Beacon Hill Council and community are very concerned about the lack of specific MHA policy direction changes affecting our Beacon Hill Neighborhood. This makes it impossible to predict with accuracy the positive and adverse impacts on our neighborhood and necessary mitigation measures on air quality, noise pollution and greenhouse gas emissions in the Beacon Hill neighborhood.

The MHA EIS fails to consider the adverse impacts on air quality which include but are not limited to the following areas:

1. The MHA EIS fails to consider the additional air pollutants stemming from airplanes that fly over the North Beacon Hill Neighborhood in addition to air pollutants from I-90 and I-5.
2. It also fails to consider the the noise pollution that comes from said sources which is significantly higher than in other parts of the city. Aircraft fly in and out mostly from Seattle Tacoma Airport, with some flying in and out of King County International Airport and Boeing Field.
3. The impact of the noise and pollution is greater than other parts of Seattle due to the proximity of the air fields to the Beacon Hill neighborhood and the flight paths which concentrate flights over North Beacon Hill.
4. The DEIS fails to address the scenario that up zoning may increase housing demand over what is expected. An increased modern housing stock may make it more attractive

for additional people to move from other places which would in turn increase freight, air travel and transportation demands, thereby exacerbating air and noise pollution

The El Centro de la Raza and EPA Collaborative Problem Solving Air and Noise Pollution Health Impact education and empowerment project research established the following:

a) Air Pollution from Airplanes

Air pollution emissions from airplanes are relentless. Airplanes burn jet fuel which is similar to diesel fuel releasing a variety of pollutants. According to the Port of Seattle, Sea-Tac aircraft landings from 2012 to 2016 increased by 33%. The Port of Seattle's Master Plan projects passenger increase from 38 million in 2014 to 66 million in 2034. The 2017-2021 one Range Plan is looking to double international flights and triple cargo volumes. NOTE: 70-80% of all airplanes arriving at SeaTac Airport fly over North Beacon Hill at approximately 3,000 feet and sometimes at below 2,000 feet. Air pollution concentrations increase the lower a plane flies over a location due to the inability of the pollution to dissipate. In 2016, around 200,000 planes landed in Sea Tac Airport.

Air pollution emissions from the roads are also relentless -- I-5 has 250,000 vehicles on a daily basis with I-90 having 120,000 vehicles traveling on a daily basis. Seattle is ranked number 10 in traffic congestion (which excludes transit and ferries) in the United States and number 20 worldwide.

There is no systematic measurement of actual aggregate air pollution in North Beacon Hill from roads and airplanes.

b) Noise Pollution from Roads and Airplanes

The City of Seattle has a noise ordinance that prohibits noise levels above 55 dBA (decibels) during the day and 45 dBA from 10 p.m. to 7 a.m. SDOT identified 50-65 dBA with likely 70 dBA for areas closest to I-5 and I-90. The FAA does not measure airplane noise but rather models the noise average over a year. The problem with this methodology is that it does not provide actual dBA for the spikes in noise experienced by residents. Planes fly over the North Beacon Hill Neighborhood every 3 minutes on average.

There is no systematic measurement of aggregate actual noise pollution in North Beacon Hill from roads and airplanes.

c) Air and Noise Health Impacts on North Beacon Hill residents

Public health data for Beacon Hill, which includes the North Beacon Hill neighborhood, shows that when compared to county-wide data from King County, Beacon Hill has:

- higher rates of asthma hospitalization for children
- higher rates of hospitalization and death for diabetes and related diseases
- higher rate of deaths due to chronic lower respiratory diseases
- lower life expectancy

Air pollution includes 1) particulate matter (PM) 2.5 which has dust, pollen, mold, soot, etc and 20 air toxins including benzene, formaldehyde and 1,3 butadiene. Harmful health effects include: asthma, reduced lung capacity, irritation to eyes/nose/throat/lungs, heart disease and cancer from prolonged exposure. Furthermore, new construction creates additional air and noise pollution and new construction materials usually use press board which also emits formaldehyde.

Harmful effects from noise pollution include heart disease, sleep disturbance, stress, general annoyance, diabetes and impaired learning/concentration in children.

It is unconscionable to develop and make market-rate and low income housing available to individuals without informing them that their health could be seriously harmed by air and noise pollution in North Beacon Hill, particularly for vulnerable populations such as children, pregnant women, the elderly and those who with previous lung and heart conditions.

Recommended Mitigation Measures:

- 1) Conduct the citywide SEPA review once the MHA designation for the North Beacon Hill Neighborhood is defined for increased population and its intended and unintended impacts.
- 2) Conduct aggregate air pollution and noise measurement studies and identify interventions for for the North Beacon Hill Neighborhood.
- 3) Inform and educate current residents, the general community and prospective residents. Require real estate industry representations to practice truth in advertising and articulate air and noise pollution conditions in North Beacon Hill.
- 4) Implement noise monitoring and enforcement of the city noise ordinance the North Beacon Hill Neighborhood.
- 5) Implement interventions to reduce noise and air pollution exposure for the residents of North Beacon Hill.
- 6) Implement a city policy to advocate the FAA to fund air quality and noise mitigation for North Beacon Hill.
- 7) Collect impact fees to implement items the above items 2 to 7.

Submitted by:

Maria Batayola
Chair– Beacon Hill Council

Mira Latoszek
Vice Chair– Beacon Hill Council
Chair of MHA draft EIS review sub-committee

2016 BEACON HILL SURVEY
(BHMA, EC, FLP, IDIC, IE, JCC, NBHC)

SURVEY DATA PREPARATION

	Total Received	- No Demog	- Late	Missing	TEST		TOTAL TABULATED
#	1139	8	6	6	2		1117
%	100%	1%	1%	1%	0%	0%	98%

Data for "Total Answers" excludes blanks, "?", "X" and intelligible comments.

SURVEY RESPONDENTS DEMOGRAPHIC DATA

1. What is the primary language spoken at your home?

% Tab	Total Answers	Chinese	English	Somali	Spanish	Tagalog	Vietnamese	Other
#	1081	90	925	10	35	14	1	6
97%	100%	8%	86%	1%	3%	1%	0%	1%

2. Where do you live in Beacon Hill?

% Tab	Total Answers	North	Middle	South	Other
#	1089	642	329	118	0
97%	100%	59%	30%	11%	0%

3. What year did you move to Beacon Hill?

Noted below as years lived in Beacon Hill.

% Tab	Total Answers	> 2years	3-5 years	6-10 years	11-20 years	21 years +
#	1088	218	145	207	234	284
97%	100%	20%	13%	19%	22%	26%

4. How many people live in your home?

% Tab	Total Answers	1	2-3	4	5-6	7-8	9 on up
#	1055	156	571	197	99	21	11
94%	100%	15%	54%	19%	9%	2%	1%

5. How many people in your home are employed?

% Tab	Total Answers	0	1	2	3	4	5 on up
#	1097	100	285	608	38	35	31
98%	100%	9%	26%	55%	3%	3%	3%

6. How many people in your home are students?

% Tab	Total Answers	0	1	2	3	4	5 on up
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2016 BEACON HILL SURVEY
(BHMA, EC, FLP, IDIC, IE, JCC, NBHC)

#	1074	667	214	147	37	9	0
96%	100%	62%	20%	14%	3%	1%	0%

7. Do you rent or own?

% Tab	Total Answers	Rent	Own	or e.g. Y, N, X, Yes)
#	1100	267	814	19
98%	100%	24%	74%	2%

8. Around what percent of your household income is spent on housing?

% Tab	Total Answers	Below 30%	30 and above
#	1014	542	472
91%	100%	53%	47%

9. Around what percent of your household income is spent on transportation?

% Tab	Total Answers	> 5%	6-10%	11-20%	21-30%	31-40%	41% on up
#	1001	499	311	139	42	3	7
90%	100%	50%	31%	14%	4%	0%	1%

A. GENERAL NEEDS OF BEACON HILL

How important are the following:

1. "Welcome to Beacon Hill" Signage

% Tab	Total Answers	1 Not Impt at All	2 Not Impt	3 No Opinion	4 Impt	5 Very Impt	Other
#	1086	263	223	247	246	87	20
97%	100%	24%	21%	23%	23%	8%	2%

COMB NOT IMP & NOT IMP AT ALL	COMB IMPORT & VERY IMPORT
486 45%	333 31%

2. Signs that incorporate art, culture and history

% Tab	Total Answers	1 Not Impt at All	2 Not Impt	3 No Opinion	4 Impt	5 Very Impt	Other
#	1087	101	103	226	468	172	17
97%	100%	9%	9%	21%	43%	16%	2%

204 19%	640 59%
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2016 BEACON HILL SURVEY
(BHMA, EC, FLP, IDIC, IE, JCC, NBHC)

3. Safety plan for all road users including pedestrians, bicyclists, drivers and others

% Tab	Total Answers	1 Not Impt at All	2 Not Impt	3 No Opinion	4 Impt	5 Very Impt	Other
#	1092	37	39	91	364	550	11
98%	100%	3%	4%	8%	33%	50%	1%

76 7% 914 84%

4. Public health impact of noise and airplane emissions

% Tab	Total Answers	1 Not Impt at All	2 Not Impt	3 No Opinion	4 Impt	5 Very Impt	Other
#	1089	54	105	165	290	463	12
97%	100%	5%	10%	15%	27%	43%	1%

159 15% 753 69%

5. Social and human services for residents.

% Tab	Total Answers	1 Not Impt at All	2 Not Impt	3 No Opinion	4 Impt	5 Very Impt	Other
#	1090	30	39	135	406	470	10
98%	100%	3%	4%	12%	37%	43%	1%

69 6% 876 80%

6. Multicultural gathering venue and cultural programming

% Tab	Total Answers	1 Not Impt at All	2 Not Impt	3 No Opinion	4 Impt	5 Very Impt	Other
#	1085	46	72	217	407	328	15
97%	100%	4%	7%	20%	38%	30%	1%

118 11% 735 68%

7. Pocket parks throughout Beacon Hill

% Tab	Total Answers	1 Not Impt at All	2 Not Impt	3 No Opinion	4 Impt	5 Very Impt	Other
#	1114	48	91	196	425	340	14
100%	100%	4%	8%	18%	38%	31%	1%

139 12% 765 69%

8. Security and other measures to increase safety at Beacon Hill

% Tab	Total Answers	1 Not Impt at All	2 Not Impt	3 No Opinion	4 Impt	5 Very Impt	Other
#	1001	32	61	59	296	536	17
90%	100%	3%	6%	6%	30%	54%	2%

93 9% 832 83%

9. Other

TO BE DONE.

2016 BEACON HILL SURVEY
(BHMA, EC, FLP, IDIC, IE, JCC, NBHC)

B. POLICY DIRECTION FOR BEACON HILL

These policies came from the 2011 Beacon Hill Neighborhood Plan that was developed with community input.

HOUSING

1. Allow multi-family housing/smaller cottages in single-family zoned areas in the Urban Village.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1089	180	140	164	323	274	8
97%	100%	17%	13%	15%	30%	25%	1%

2. Encourage affordable family-sized homes.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1102	54	37	129	398	479	5
99%	100%	5%	3%	12%	36%	44%	0%

3. Encourage a balance of affordable rental and home ownership.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1095	65	47	138	370	475	
98%	100%	6%	4%	13%	34%	43%	

4. Encourage the development of housing close to the light rail station.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1096	82	84	183	375	365	7
98%	100%	7%	8%	17%	34%	33%	1%

5. Encourage affordable housing development close to the light rail station.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1103	86	84	150	317	456	10
99%	100%	8%	8%	14%	29%	41%	1%

BUSINESS & FOOD ACCESS

6. Support a continuing mix of small businesses and encourage new small businesses.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1086	13	17	65	323	660	8
97%	100%	1%	2%	6%	30%	61%	1%

COMB DISAGREE & STRONGLY DISAGREE COMB AGREE & STRONG AGREE

320 29% 597 55%

91 8% 877 80%
run by NMS residency

112 10% 845 77%
run by NMS residency

166 15% 740 68%
run by NMS residency
correlate with other affordable housing Q

170 15% 773 70%
run by NMS residency
correlate with other affordable housing Q

30 3% 983 91%
run by NMS residency

2016 BEACON HILL SURVEY
(BHMA, EC, FLP, IDIC, IE, JCC, NBHC)

7. Retain and increase local access to food, including a grocery store in the commercial core.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1086	13	20	79	264	698	12
97%	100%	1%	2%	7%	24%	64%	1%

33 3% 962 89%
run by NMS residency

SAFETY

8. Encourage additional eyes on the street through community programs and festivals, the design of new developments and other means.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1089	20	25	169	398	471	6
97%	100%	2%	2%	16%	37%	43%	1%

45 4% 869 80%
run by NMS residency

9. Enhance pedestrian safety along key streets within the Urban Village and discourage projects that would hinder pedestrian access.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1092	16	28	102	310	628	8
98%	100%	1%	3%	9%	28%	58%	1%

44 4% 938 86%
run by NMS residency

C. EXPANDING THE URBAN VILLAGE

1. Are you familiar with the proposal to expand the Beacon Hill Urban Village?

% Tab	Total Answers	YES	NO	Other
#	1098	320	774	4
98%	100%	29%	70%	0%

YES NO
320 29% 774 70%

2. Expand the Beacon Hill Urban Village area to reflect an average 10-minute walking distance to the Light Rail station.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1075	156	101	221	313	277	7
96%	100%	15%	9%	21%	29%	26%	

COMB DISAGREE COMB AGREE
& STRONGLY DISA & STRONG AGREE
257 24% 590 55%
Note 20% No Opinion

3. Do not expand the Beacon Hill Urban Village at all.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1057	264	254	281	81	173	4
95%	100%	25%	24%	27%	8%	16%	0%

518 49% 254 24%

2016 BEACON HILL SURVEY
(BHMA, EC, FLP, IDIC, IE, JCC, NBHC)

4. Explore establishing an Urban Village at the Veteran Affairs (VA) Hospital on South Columbian Way. It is a major employer and has an active transportation hub.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1072	82	79	299	369	234	9
96%	100%	8%	7%	28%	34%	22%	1%

161 15% 603 56%

5. If an Urban Village is going to be established around the VA Hospital, apply the above North Beacon Hill Neighborhood Plan policy directions that are supported by survey responses

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1022	66	46	356	336	213	5
91%	100%	6%	5%	35%	33%	21%	0%

112 11% 549 54%

D. AFFORDABLE HOUSING

1. Support zoning changes to single family areas in the Beacon Hill Urban Village to put the Mandatory Affordable Housing (MHA) program in place.

% Tab	Total Answers	Strongly Disagree	2 Disagree	3 Not Disagree or Agree	4 Agree	5 Strongly Agree	Other
#	1088	206	111	207	264	292	8
97%	100%	19%	10%	19%	24%	27%	1%

317 29% 556 51%

run byNMS residency
correlate with other affordable housing Q

E. BEACON HILL ISSUES

Should the North Beacon Hill Council cover issues affecting all of Beacon Hill?

% Tab	Total Answers	YES	NO	Other
#	1073	756	314	3
96%	100%	70%	29%	0%

YES NO
756 70% 314 29%

run byNMS residency

2016 BEACON HILL SURVEY
(BHMA, EC, FLP, IDIC, IE, JCC, NBHC)

F. SURVEY FEEDBACK

The Survey is easy to understand:

% Tab	Total Answers	YES	NO	Other
#	1070	893	175	2
96%	100%	83%	16%	0%

	YES		NO
893	83%	175	16%

The Survey is educational:

% Tab	Total Answers	YES	NO	Other
#	1074	877	195	2
96%	100%	82%	18%	0%

	YES		NO
877	82%	195	18%

Comments on the Survey

TO BE DONE

SURVEY SUBMISSION

Total Received			Hard Copy	Online	Total Received		Not Valid	Processed
1139	682	457			1139	22	1117	
100%	60%	40%			100%	2%	98%	
Mail	BH Festival	Block Party	Chinese	Somali	Spanish (2)	Tagalog		
#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	

From: Linda Lau
To: [PCD_MHAEIS](#)
Cc: [Linda Lau](#)
Subject: DEIS Feedback
Date: Monday, August 07, 2017 12:02:04 PM

To whom it may concern:

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.

Thank you for your consideration of my comments. Linda Lau

From: Jay Lazerwitz
To: [PCD_MHAEIS](#)
Subject: HALA/DEIS comments
Date: Monday, August 07, 2017 2:55:26 PM

Overall I am impressed by the DEIS, and know that my Roosevelt neighborhood has many “opportunities” (transit, parks, and schools) though I have some comments on specific aspects.

I support aspects of Alternative 3, where these take more realistic view of existing opportunities, and/or outlay the infrastructure needed to adequately fulfill these goals.

1) Schools - while the neighborhood schools have high “opportunity” criteria, there does not seem to be “capacity” at many existing facilities.

2) The DEIS & HALA plans should focus on family housing. This is the type of housing that is needed for families to continue to thrive in Seattle. How to provide incentives/regulations to ensure there are 2 and 3-bedroom units?

3) The DEIS should consider additional mitigation such as waiving MHA requirements for internal conversions or for owner-occupied properties. The DEIS should consider removing restrictions for new units to be added within existing structures?

Provide method/s for homeowners to develop and stay in their homes. MHA requirements would apply to if a homeowner chose to add a separate, standalone unit, or converted an existing structure into multiple units (duplex/triplex), **excluding an ADU or DADU**. If a homeowner were to subdivide their property, a new unit on the new lot would be subject to MHA requirements. This means that this is a disincentive for homeowners to add a unit/s.

4) Establish an “Affordable housing tax exemption” program for smaller developments than under the current MFTE program, in order to develop smaller projects.

5) Broaden the potential for low-rise development in existing single-family zoning throughout the City, and not just in Urban Villages. Making it easier to build a backyard cottage (DADU) without the parking requirements is critical.

thank you

JAY LAZERWITZ

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<http://www.artandarch.net>

From: Jeanne LeDuc
To: [PCD_MHAEIS](#)
Cc: [Olson, Laurie](#); [Kings, Elsa](#); [Roger Tucker](#)
Subject: SEED Comment Letter MHA DEIS
Date: Thursday, July 27, 2017 1:36:16 PM
Attachments: [SEED - MHA DEIS Comment Letter .pdf](#)

Dear Geoff:

Attached please find our comment letter regarding the proposed MHA zone changes. Thanks for the opportunity to comment.

Jeanne Le Duc



July 27, 2017

Geoff Wendlandt, Snr. Planner
Office Planning and Community Development
City of Seattle
PO Box 34109
Seattle, WA 98124-4019
Via email: MHA.EIS@seattle.gov

Dear Geoff:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Mandatory Housing Affordability (MHA) Zoning Change. SouthEast Effective Development (SEED) is a community-based affordable housing provider with over 40 years history in community development in SouthEast Seattle. We are keenly aware of the tremendous need for affordable housing in the community and support the efforts to increase zoning in key areas to accomplish this objective. We write to request the following refinements to the Draft Zoning Changes:

Urban Village Extension & Remove Split Zoning – 3904 Martin Luther King Way (APN 2539500060)

This property is nearly one acre with the predominant zoning LR3 and LR3 RC (see attached). There is a sliver in the northeast area zoned SF 5000. SEED requests that the split zoning on the site be removed. SEED also supports intensification of the zoning on the property, recognizing its location on the light rail line and proximity to stations. In the alternative, and at a minimum, the site should be zoned LR3 across the entire parcel. The SF 5000 zone poses a constraint to redevelopment and intensification of the site by imposing more stringent set-back and open space requirements, and lower density allowance for that lower-zoned area.

Second, as shown in the attached urban village map, the property is located between the North Rainier and Columbia City Urban Villages. The property is proposed as part of the MHA to be incorporated into the North Rainier Urban Village. SEED strongly supports inclusion of the property in the North Rainier Urban Village. The existing use is multi-family and its location along the light rail line, and proximity to stations to the north and south warrant its inclusion. The expansion of the area would eliminate the current remnant area and bring the properties along the light rail on MLK into an urban village.

Intensification of the Property adjacent to the Rainier Court Campus

SEED is owner of Rainier Court Campus, a multi-generational affordable housing complex located off Rainier Avenue generally between Estelle and Charlestown. We have a planned fourth phase on the area south of Spokane between 34th and 35th Avenues, north of the City of Seattle future public park site. The east side of the project site is zoned LR2RC and townhomes were planned. The west side is zoned C1-55 and we are proceeding with an 81-unit apartment building. The property at issue is



located within the North Rainier Urban Village. We are requesting intensification of the east portion of the development site (see attached map).

The site's proximity to the Rainier Campus, location of the future park, and general neighborhood character, which includes large commercial to the south, warrants reconsideration of the zoning to C1-55 or at minimum LR3. Critically, the project represents the last opportunity to provide affordable rental housing in that immediate area. The area is otherwise developed with high density multifamily to the east (Rainier Court), large commercial to the south, and residential to the north and east. In view of the need for more affordable units, it is inefficient and a lost opportunity to not intensify the east side to produce more units. Further, the site seems to be arbitrarily split by an abandoned right of way (for which an alley connecting 34th and 35th Avenues are required to be built as part of the existing MUP entitlement). Intensification of the property is appropriate to bring it consistent with property directly adjacent to the west. The specific parcels where up zoning is requested are:

- 9835200200
- 9835200205
- 9835200210
- 9835200215
- 9835200220
- 9835200225
- 9835200226
- 9835200230
- 3357400005.

I appreciate your consideration of our requests and look forward to implementation the MHA and our recommended changes.

Sincerely,


Jeanne Le Duc
Dir. Real Estate

cc: Laurie Olson, Office of Housing
Roger Tucker, Environmental Works



Departments | Services | Staff Directory

GO

SEATTLE DEPARTMENT OF CONSTRUCTION & INSPECTIONS

Seattle Parcel Data

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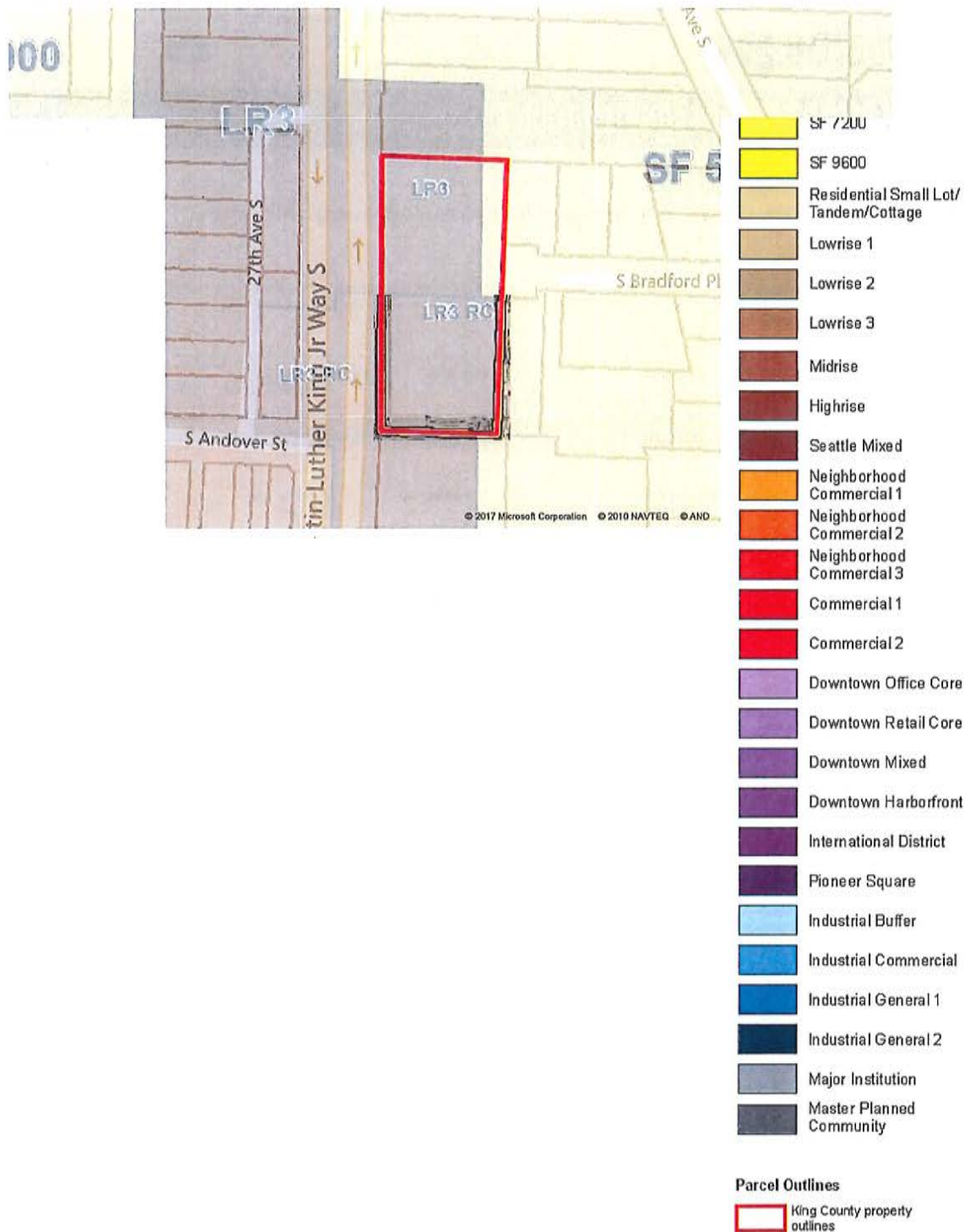
Parcel #2539500060

[Expand All](#) | [Collapse All](#) | [Search Again](#)

This report was generated Thursday, July 27, 2017

Addresses Located on this Parcel									
Zoning and District Info									
Base Zone	SF 5000, LR3, LR3 RC <input checked="" type="checkbox"/>	Shoreline Zone		Pedestrian Area		Airport Height Overlay		Conical Surface	<input type="checkbox"/>
Detached Accessory Dwelling Units	Yes <input type="checkbox"/>	Contract		Light Rail		Urban Village Overlay			
Alki Parking District	No	Downtown Fire District	No	Historic District	No	Historic Landmark	No		
Northgate District	No	Pike/Pine District	No	Rainier/Genesee Business District	No	Sand Point Park	No		
Sand Point District	No	SE Seattle Reinvestment Area	Yes <input type="checkbox"/>	Stadium Area Transition District	No	Est. Tree Canopy Coverage (2007)	2.4%		<input type="checkbox"/>
Frequent Transit	Yes <input type="checkbox"/>	Infiltration Evaluation Not Req'd	Yes <input type="checkbox"/>						
ECA									
King County Assessor Data									
Property Name	SANDRA LEE APTS			Plat Name	FINE ADD				
Property Zip Code	98108			Taxpayer	SEED PROPERTIES LLC				
Present Use	Apartment			Taxpayer Address	5117 RAINIER AVE S SEATTLE WA 98118				
Lot Sq Ft	42,405								
King County Assessed Value Data									
King County Assessor Sales Data									





SEATTLE DEPARTMENT OF CONSTRUCTION & INSPECTIONS

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App v3.3.1

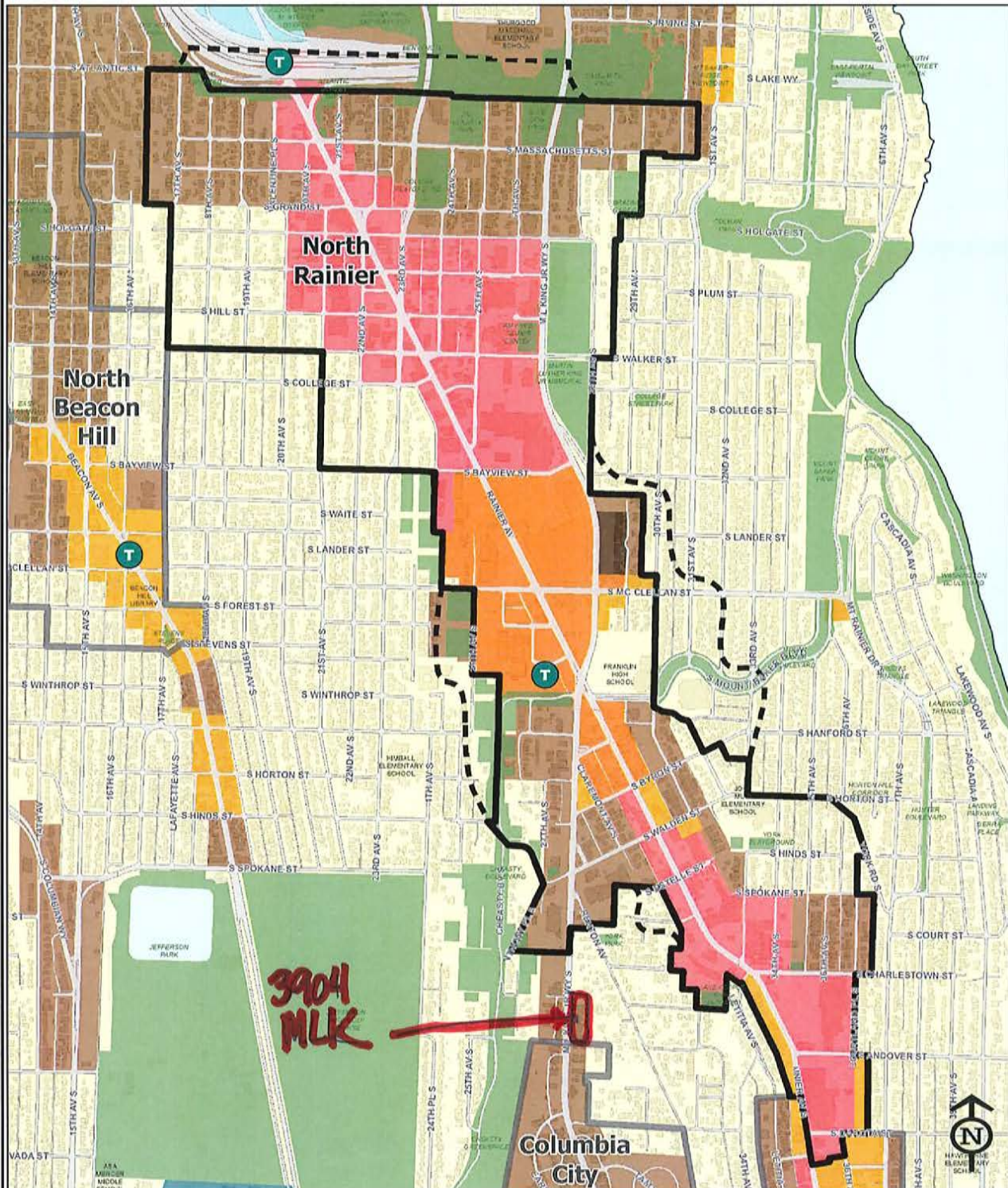
North Rainer Hub Urban Village

LeDuc, Jeanne

-  Hub / Residential Urban Village
-  Potential Urban Village Expansion
-  Frequent Transit Station / Stop

Current Zoning

- | | | | |
|---|---|--|---|
|  City-Owned Open Space |  NC1; NC2; NC3 |  LR1; LR2; LR3 |  IB; IC |
|  Commercial |  SM; SMR |  Single Family |  Major Institution |
|  C1; C2 |  High-Density Multi-Family |  SF 5000 / 7200 / 9800 |  MIO |
| |  HR; MR/RC; MR | | |



For Public Review and Discussion

Single family areas located within the current urban village boundary. DPD is considering policy changes that would treat single-family areas within urban villages differently than single family areas outside urban villages. Changes would make it easier to build other types of housing in these areas.

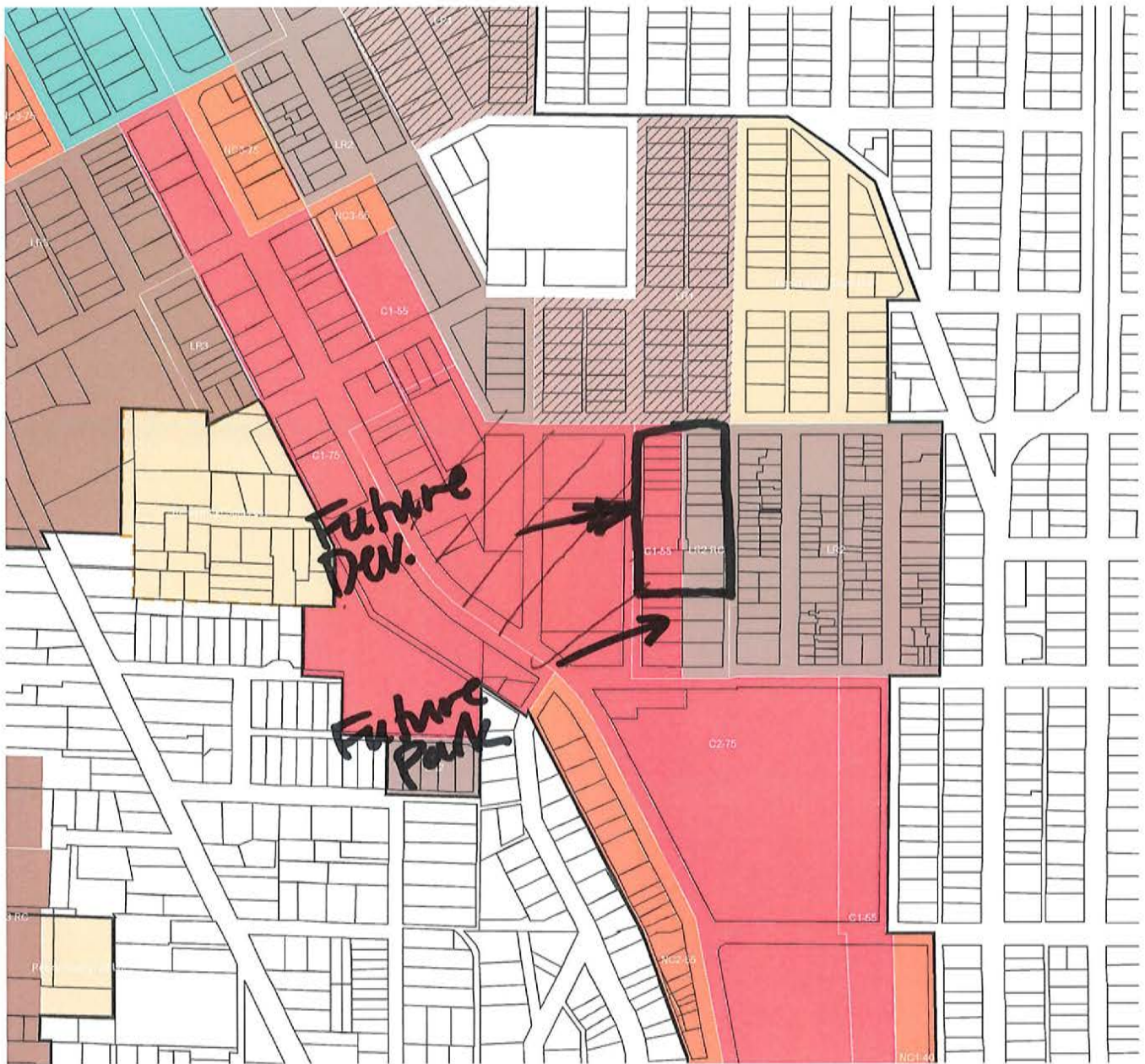
Potential village expansion area. This area, shown with a dashed line, is a generalized boundary based on a 10-minute walk to frequent transit (a light rail station or two or more bus lines serving multiple destinations). DPD is studying this area to develop a proposed urban village boundary. DPD is currently seeking community feedback on this concept. There will be additional opportunities for community feedback as work progresses. Additional analysis and community feedback will be used to develop a proposed urban village boundary to be included with the Mayor's Recommended Plan scheduled for a December 2015 release.

August 10, 2015

0 0.075 0.15 0.3 Miles

Seattle
2035
YOUR CITY, YOUR FUTURE

City of Seattle
Edward B. Murray, Mayor



/// = Rainier Court Existing

Name	Jenny Leis
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.	I am commenting as a private citizen
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Stop the upzone on 65 the in Ravenna between 20th and 25th Ave NE. This is an established historic neighborhood. Adding 50 foot apartments right next two 100 year old homes will permanently destroy this special neighborhood. There are numerous retirees on my block 22nd Ave NE who can not afford to move and will have to live with the consequences of your plan.</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?	

From: Mike Lettunich
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Monday, August 07, 2017 8:38:23 AM

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.

Thank you,

Mike

Name	Maggie Lewis
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I am giving feedback on the Morgan Junction in West Seattle. Alternative 3 is totally unacceptable. The changes are too extreme one zone to the next. Out of character. Making a city out of a neighborhood..NC-75. No Way! Please see comments below where I make further comments on the alternatives for the Morgan Junction.</p> <p>2 Also, I am so sorry to report that when I mentioned to people in my part of town that they should sent comments to you, they said "Why bother? They won't listen to us anyway." Wow. I hope that is not the case. I send these comments as part of a process that I hope is honored. As a lifelong resident of Seattle who has lived in the NE, N and for 35 years the SW part of Seattle, I take pride in our city. I do hope that your HALA plan reflects the comments that residents are sending you now.</p>
Housing and Socioeconomics	<p>3 Your website indicates that this MHA effort citywide will generate about 6,000 new affordable units. That seems like a paltry number for all of the planning and money that has been invested trying to obtain them. I fear that once again the big winners are the developers, they get lots of new units while the affordable units are minimal. I feel that this will not solve the problem of making Seattle affordable for our service workers, teachers, fire fighters, police.</p>
Aesthetics	<p>4 Zoned areas that are contiguous should change no more than one level. This includes across the street changes. Abrupt changes are not pleasing. Right now, even in single family zones, architects do not seem to understand this as they legally place tall box houses utilizing the limits of their footprint right next to small craftsman cottages. Seattle is becoming UGLY in all of its neighborhoods....West Seattle to View Ridge. One way to make it more tolerable is to graduate the zoned steps from area to area without having a two-level change from one zone to its next neighboring zone. This is particularly true of putting Single Family next to or even across the street from LR 1 (M). Instead the neighboring zones should be a progressive one-step change...Single Family next to RSL (M) next to LR1 next to LR2, etc... In the Morgan Junction area Alternative 3 is the most egregious in that regard, but Alternative 2 also violates that idea.</p>
	<p>5 It is already difficult to get into and out of West Seattle by car at rush hours (7:00-10:00 a.m. and 4:00-6:00 p.m. at a minimum) as well as when there are sporting and entertainment events when it can take 30 minutes just to get 2 miles across the WS Bridge/Spokane St viaduct. We only have two ways off the WS Peninsula...the WS Bridges and the First Ave S bridge. This makes West Seattle very much like an island with huge choke</p>

Transportation	<p>points. Although the Rapid Line C serves my neighborhood well, there are too many other WS neighborhoods where there is a lack of efficient bus service. Increasing population requires transportation fixes before new units are built. Not after.</p> <p>Rapid Ride C at the Morgan Junction (and points before that such as by Gatewood School on Fauntleroy) is a well-used bus. Currently M-F you can find space on the bus at the Morgan Junction, but during rush hour by the time the bus gets to Fauntleroy and Alaska frequently it is so full that it does not stop to pick up passengers. Until this issue is dealt with in West Seattle, these new housing units should not be built.</p> <p>Also, currently there are people parking on Fauntleroy, Myrtle and Frontenac near Gatewood school in order to board the bus before it gets full. This problem will be exacerbated by increased population in the area. Not to mention that the on street parking will then become a problem for the people who live in this neighborhood who already have to deal with the Kenney Home employees and Gatewood School employees parking in the same area. If new housing doesn't come with parking places, then this will have even more impact.</p>
Biological Resources	<p>6 There are two ravines, Pelly Place, and another near the Fauntleroy/California Morgan Junction that should be protected green ways for wildlife and birds. New development should not abut these ravines.</p>
Public Services & Utilities	<p>7 Will the new sewage and storm waste water management facility at Lowman Beach be able to deal with increase in sewage generated by these units?</p>
Air Quality & Green House Gas Emissions	<p>See comments above on Transportation and Biological Resources for the Morgan Junction.</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?	

Name	Rose Lew Tsai-Le Whitson
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 In general, my preferred alternative would be Alternative 3 because it provides the most sensitivity with regard to displacement risk and access to opportunity.</p> <p>2 In the stated objectives, I am concerned by the low thresholds. Only providing ~6,200 new rent- and income-restricted households at the level of 60% AMI over a 20-year period seems very low and would likely exclude low income folks who need help the most. Is there any way to improve these numbers?</p> <p>3 How will the City of Seattle enforce the collection of MHA payments and ensure efficient translation of those funds?</p> <p>If not included already, it might also benefit minorities and members of the population if MHA funds can be used for the creation of land trusts to help preserve pockets of affordable housing in at-risk neighborhoods.</p> <p>4 Last (for this section), while I understand the need for SEPA review, requiring SEPA review adds time and labor costs to projects using MHA funds. Is there potentially a way to subsidize this process by perhaps providing streamlined review and/or waiving permit fees? Otherwise, these fees could also be a barrier to implementation.</p>
Housing and Socioeconomics	<p>5 I am also concerned by the lack of distinction between added rental units and added units available for permanent home ownership. If no distinction is made, and Seattle ends up with only new rental units, for example, won't the market still remain stressed because there won't be units available for purchase even if folks who are renting can finally generate enough income to overcome the more than 2:1 income gap to purchase homes?</p> <p>6 I also did not see any requirements for quantities of ADA units. How will the MHA also provide more ADA units?</p>
Land Use	<p>7 One way to minimize impacts of land use and additional impervious surfaces while boosting sustainability would be to require implementation of low impact development for stormwater and/or energy-saving technology (sidewalk rain gardens, vertical walls and/or green roofs, solar panels).</p> <p>8 In addition, it would be nice to see prioritization of pea patches and parks in conjunction with implementation of MHA to ensure that people still have access to green spaces in the face of reduced personal yards from reduced setbacks.</p>
Demographic Survey (optional)	
Have you been or are	

From: Robert Leykam
To: [PCD_MHAEIS](#)
Subject: Photographic Center NW
Date: Monday, August 07, 2017 12:33:16 PM

Dear City of Seattle staff:

- 1 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 the future, we can dedicate 10% of the residential component to affordable housing**, occupy a desired 20,000 square feet (doubling our existing usable space) to provide more art and education to the community, and create a value proposition that supports a community-minded development partner to work with PCNW in this process.

PCNW's staff of 12 part-time and full-time employees is 80% female (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,
Robert Leykam Architect AIA

From: Monika Lidman
To: [PCD_MHAEIS](#)
Subject: Comment on DEIS - Monika Lidman
Date: Monday, August 07, 2017 3:53:28 AM
Attachments: [EIS one-page comment form \("bg105r06t5"\).doc](#)

COMMENTS ON DRAFT EIS RE: MHA

1

- | | | |
|--------------------------|--|---|
| <input type="checkbox"/> | <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 |
| <input type="checkbox"/> | <u>Community Feedback</u> | DEIS fails to take into account documented Junction neighborhood feedback. |
| <input type="checkbox"/> | <u>Lack of Affordable Housing</u> | DEIS reflects Junction will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood. |
| <input type="checkbox"/> | <u>Neighborhood Plan</u> | DEIS reflects City's failure to honor neighborhood plan. |
| <input type="checkbox"/> | <u>Traffic</u> | DEIS analysis is flawed; Fails to utilize meaningful data. |
| <input type="checkbox"/> | <u>Green Space</u> | DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood. |
| <input type="checkbox"/> | <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. |
| <input type="checkbox"/> | <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 |
| <input type="checkbox"/> | <u>Loss of Views</u> | DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation. |
| <input type="checkbox"/> | <u>Historic Buildings</u> | DEIS fails to recognize historic buildings in Junction. |
| <input type="checkbox"/> | <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. |
| <input type="checkbox"/> | <u>Utility Infrastructure</u> | DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed. |
| <input type="checkbox"/> | <u>Schools</u> | DEIS fails to note existing lack of school capacity and impact of increased density thereon. |
| <input type="checkbox"/> | <u>Other</u> | I have other concerns regarding the DEIS including, but not limited to, the following: |

Name: _____
Address: _____

From: Jessica Likins
To: [PCD_MHAEIS](#)
Subject: Comments for Draft Mandatory Housing Affordability Environmental Impact Statement.
Date: Monday, August 07, 2017 2:47:17 PM

1 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.

Thank you,

Jessica Likins

From: Ihsuan Lin
To: [PCD_MHAEIS](#)
Subject: Draft EIS comment_Wallingford
Date: Monday, August 07, 2017 1:28:35 PM

Hi,

- 1 I would like to show my support to HALA. I believe it is right path for Seattle future. Besides, as an urban/planning arch professional, I highly prefer Draft EIS **Alternate 3**. The Fremont/Wallingford neighborhood definitely need to get denser. It is such of waste not utilize this area, which is close to downtown/UW and transit. Rezone it to LR2 can provide more opportunities to other young professional as their starter homes; more local business can strive in the dense area, too. It will be very awkward if leaving the stripe between stone way and Aurora to small residential lot like Alt2. The low dense houses will be "sandwiched" between all other LR2. Please take **Alternate 3** as your final option. Thanks!

Name	Linda
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 Alternative 3 makes the most sense to accommodate the huge influx of people coming to this area (1,000 people a week!.) And it concentrates that growth in urban core areas.
Land Use	2 Residential small lot zoning is a good way to transition between single-family areas and multi-family/commercial areas. It addresses the missing middle.
Aesthetics	3 When new homes are constructed in single-family zones, they are often much larger (and more expensive) than the surrounding homes. They simply overwhelm the street. It would be more appropriate to allow multiple, smaller homes on some single-family lots (in transitional zones), so they would fit in with the neighborhood, by being similar in scale and price.
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	

Name	Liora
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 I agree that it makes sense to pursue the action.
Housing and Socioeconomics	2 I agree that it makes sense to tailor the plan with an eye to what populations would be most affected.
Aesthetics	3 Dense development can be really aesthetically nice.
Transportation	4 This is something I care a lot about. I'm particularly interested in the connection between the Wallingford Urban Village and the University community village. The wallingford village extends east to I-5 where it connects with the University Urban village, but I don't see much thought about what this connection should look like. There should be much more thought put into what that I-5 crossing looks like, with a view to expanding it and making it more bike and pedestrian friendly. I see that there is a plan to create a bike route along 46th, but the fact is that if a person gets off the light rail in the U-district (on 45th) and wants to walk to somewhere in the Wallingford Urban village along 45th, they are going to naturally walk or bike along 45th, not 46th. So some very serious reconsideration of this crossing is key to create a unity between these neighborhoods--which naturally should be united and would be were it not for I-5. Doing everything you can to make the presence of the highway a less dominant presence in crossing between these neighborhoods is going to do a lot to make BOTH of these urban villages more liveable and more interconnected, as they should be.
Open Space & Recreation	5 We need more open space in general, particularly as there are more residents. Wallingford, where I live, is going to become much more dense, but there is no plan to have more parks. Please consider turning some parcels into parks, for example in the urban village section of 45th street heading to the U-district. For example there are no parks at all in the SE part of Wallingford or the SW part of the U-district. There should be parks to serve that growing population, as in elsewhere in the city.
Air Quality & Green House Gas Emissions	6 PLEASE consider impacts of increased traffic on air pollution and sound population, particularly along I-5, which runs past many areas that already have high populations and will have higher populations. There should be sound barriers ALL ALONG. (I'm most interested in south of 45th in Wallingford, but this should be considered everywhere). Lots of people are going to make a lot of money from this redevelopment and some of that money should go to protecting existing and new populations

from noise.

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?

Lipke, Terrence

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

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

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

Thank you.

TERENCE LIPKE
819 S. ROSE ST
SEATTLE, WA. 98108

TAL 06/29/17

From: Katy Lloyd
To: [PCD_MHAEIS](#)
Subject: Request for more time
Date: Thursday, June 29, 2017 11:51:53 AM

To whom it may concern:

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 UNREALISTIC AND ESSENTIALLY SHUTS US OUT OF WHAT IS SUPPOSED TO BE A PUBLIC PROCESS.

The changes will drastically and forever change the character of our neighborhoods, so we are taking this seriously and ask that the city do the same. I am not against density--I am against a failure of leadership to plan density that preserves the unique character of our communities, takes new mass transit plans into account, and preserves open space and affordability for all. Asking developers to pay a fee is ridiculous. They need to provide actual housing in their buildings. We are losing dear neighbors who can't afford to live in our communities anymore, and as such losing diversity that makes our community sustainable and vital.

Thank you,

Katy Lloyd

Sent from my iPhone



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 poor ^{research} methodology, as documented by Junction Land Use Committee

Name: Katy Lloyd

Address: 5410 40th Ave SW Seattle 98136

COMMENTS ON DRAFT EIS RE: MHA

Overall Analysis

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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:

Traffic. The study used Google Maps on a day in March at 5pm, 5:15pm, 5:30pm, and 6pm. No morning study?!

Name: Steve & Kara Loepky
Address: 1411 35th Ave SW
Seattle, WA 98126

From: Ellen Look
To: [PCD_MHAEIS](#)
Subject: Madison Miller Urban Village
Date: Sunday, August 06, 2017 1:03:28 PM

1 To City Planners -

One of the things I enjoy most about living on Capitol Hill is that it is a walkable neighborhood that invites a sense of community and belonging. Private homes, lower/less-imposing buildings, and small businesses are welcoming to all ages.

We have already seen how teardowns and tall new apartment and apodment buildings all around Capitol Hill and in other neighborhoods have forever changed our city. One has only to see the monstrosity being built on Harvard Avenue East south of Aloha to understand the damage that such a construction process and huge lot-filling building does to the neighborhood. If you allow this kind of building to continue, we will lose that welcoming feeling and sense of community.

I know change is unavoidable as the city grows. Allowing enormous buildings to consume entire lots in historic single family neighborhoods is not the answer. I urge you to be very careful in your decision-making. Once the charm is lost, it is lost. The building on Harvard Ave. proves this point.

The Madison Miller Park Community group's August 2, 2017, response to the upzoning proposal by the deserves your very careful consideration.

Thank you for considering an alternative to unrestrained growth and for helping to keep our neighborhoods welcoming and secure.

Sincerely,

Ellen Look

Name	Anne-Marie Lowe
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.	Self
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Section 1-37 mentions "significant controversy" on single family homes and there has been no negotiition To resolve that controversy despite several letters and public comment at city council meetings.</p> <p>2 Section 2-10 addresses displacement. For Madison-miller studies published by the city May 2016 show it to be HIGH displacement and HIGH opportunity, yet in this document we see LOW displacement and HIGH opportunity.</p> <p>Using the HALA Displacement risk index indicators clearly show Madison miller is HIGH and HIGH.</p> <p>1. Housing tenancy is inaccurate, there are many low income earners renting rooms, basements and ADU in Madison Miller Urban Village.</p> <p>8. Not in close proximity to light link.</p> <p>14. Median rent does not include non-published prices in private homes as mentioned in point #1 above.</p> <p>Access to opportunity index indicators</p> <p>5. Not within 1/4 mile to library.</p> <p>9. Not close proximity to Link light.</p> <p>11 close proximity to park that is OVERUTILIZED now with city league teams , school teams and other organizations. This is not a green space the current residents get to use. Higher density will not bring added free space so that leaves MORE people without adequate green space.</p> <p>14. Not include proximity to location that sells fresh produce. At least 6 blocks uphill.</p> <p>3 Section 2-24 and section 3-15 show incorrect data for alternative 1. Neighbor Debra Walker did a house to house study and audited public records to find 1200 units already built or already permitted in Madison Miller. This was submitted to HALA office, mayor office and all members of Seattle city council and this EIS does not reflect that well documented citizen audit. This neighborhood has already achieved target density. Additional density will have negative impacts such as unplanned infrastructure use.</p>

Housing and Socioeconomics	4 Alternative #1 is best for the Madison Miller Urban village because we are at what the city has already determined as Target and Best density.
Land Use	5 If we followed the principals of the HALA and MHA and City plan, we would see increased density and significant zoning changes for all housing on perimeter of volunteer park and all perimeter of Interlaken park but appears city is not targeting the more affluent parts of the city. Why continue to persecute those in the defined Urban Villages (from 1980s) that already have density and diversity?
Historic Resources	6 Please address the coincidence of the northern boundary of the Madison Miller Urban village being the same as the historically racist "red line". Why not four blocks north?
Open Space & Recreation	7 Miller Park is OVER SUBSCRIBED today. The play fields and tennis courts are fully booked with school and recreation leagues team practice and matches. We have inadequate green space now, more density means even more people will be without adequate green space.
Demographic Survey (optional)	
Have you been or are you at risk of being displaced from your neighborhood?	
Have you been or are you at risk of being displaced from Seattle entirely?	
Are you now or have you ever experienced homelessness?	
Do you live in rent- and income-restricted affordable housing?	
How many people are in your household?	
Are there children under the age of 18 in your household?	
What is your household income?	
Do you own or rent your residence?	

From: Douglas A. Luetjen
To: [PCD_MHAEIS](#)
Cc: [Conner, Kathleen](#); [Eugenia Woo \(eugeniaw@historicseattle.org\)](mailto:EugeniaWoo@historicseattle.org)
Subject: MHA Comment Letter - Friends of Dakota Place Park
Date: Monday, August 07, 2017 4:03:36 PM
Attachments: [MHA Letter - Friends of Dakota Pl Park.pdf](#)

Attached is the MHA comment letter submitted on behalf of the Friends of Dakota Place Park.

Douglas A. Luetjen

Attorney at Law | dluetjen@karrtuttle.com | Office: 206.224.8061 | Fax: 206.682.7100
Karr Tuttle Campbell | 701 Fifth Avenue, Suite 3300 | Seattle, WA 98104 | www.karrtuttle.com

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FRIENDS OF DAKOTA PLACE PARK

August 7, 2017

SENT VIA EMAIL: MHA.EIS@SEATTLE.GOV

City of Seattle Office of Planning
and Community Development
ATTN: MHA DEIS
PO Box 34019
Seattle, WA 98124-4019

RE: MHA Comments – Friends of Dakota Place Park

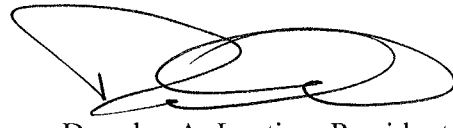
Dear Sirs/Madams:

I am writing on behalf of the Friends of Dakota Place Park, the community volunteer group that supports the Seattle Parks & Recreation park at the northwest corner of SW Dakota St and California Ave SW in West Seattle (4304 SW Dakota St.).

The former Seattle City Light power substation located at the park has been designated a Seattle landmark (Seattle City Council Ord. No. 123624). As such this building has been determined to be a significant historical resource to the city, including our local neighborhood. Our group, the Friends of Dakota Place Park, is dedicated to maintaining the park grounds and preserving the cultural and historical aspects of the landmarked building and surrounding grounds. We view the proposed Mandatory Housing Affordability (“MHA”) policy as a threat to this resource and the programmatic EIS for the MHA as insufficient to inform the community, including the Seattle City Council, as to the impacts of development adjacent to the landmarked site.

In addition, under the proposed MHA alternatives for upzoning there appears to be no acknowledgment of or protection for adjacent historic resources. Thus, in its present form the MHA puts at risk our cultural resources without any consideration of the impacts of a 50 foot building adjacent to a park and a city landmark.

On behalf of the Friends of Dakota Place Park, we ask that (a) the site adjacent to the park be excluded from the MHA policy or (b) the MHA policy be revised to include protections for historic resources, and (c) the EIS be broadened in its analysis of the specific impacts on cultural and historic resources.

Friends of Dakota Place Park

Douglas A. Luetjen, President

cc: Historic Seattle
Seattle Parks and Recreation

Name	Dale Luhman
Email address	
Comment Form	<p>August 7, 2017</p> <p>Comments on the Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS). The comment period will be open for 60 days, from June 8, 2017 to August 7, 2017</p> <p>To: MHA.EIS@seattle.gov</p> <p>1. We live in the Morgan Junction Residential Urban Village area, but think the following thoughts should apply to all of the urban villages in the City of Seattle.</p> <p>2. It seems only ethical to specifically engage each of the urban villages and residential urban villages when proposing massive changes to their living situation and environment. A residential urban village is the smallest unit of government in Seattle and should have a say in the quality of their environment. Decisions should not be imposed from the top down with more intense, dense, higher, numbers of people zoning. The city of Seattle often does not agree with federal mandates that are imposed on them; urban villages don't like the city of Seattle imposing these major zoning changes on them.</p> <p>3. This HALA Draft EIS is too broad to be imposed without specific neighborhood involvement that directly ties to the Morgan Neighborhood Plan. The EIS could be a proposal, but it should specifically involve each village, addressing the Goals and Policies of each village, and how any changes meet or do not meet these Goals and Policies.</p> <p>4. As a starting point, the EIS no action alternative would continue to let the existing zoning be built out to its increased density, height, etc. before proposing to expand density, height, etc. into new areas of the urban village, that would impact more of the single family residences</p> <p>5. We believe that single family residences are the core of Seattle. These single family residences make the city a place of small communities, neighborhoods, where people know their neighbors, their kids go to school, and extended families live close together. If more single family residence areas are upzoned into more dense areas, with more transient populations, single people with fewer ties to a community, it detracts from the current single family residence citizens living situation. Increasing the density can get rid of shading trees, and trade them for looming multiple story, larger more dense buildings that block out the sun and views. The current residents then might have more people with more cars to park along limited street edges. More people bring more density for schools, buses, fire and police responses, impact existing parks. People live where they live because they like the setting, if they wanted to be in a more dense setting they would have bought or rented</p>

Land Use

a house there. It does not seem fair or equitable to impact the living conditions, quality of life, quiet trees, the neighborhood environment to allow more dense housing and the associated impacts to infill. Why impact current residents who are living in their single family homes and want to live there with the zoning that was in place when they bought their homes? You are likely to displace many of the current homeowners who like the single family residences that they live on, with other single family residences on their street, and single family residences on surrounding streets, forming the current neighborhood. Upzoning will discriminate against current residents, much less older people, retired people, who can't or do not want to move from their current home, because of younger or older family members, churches, jobs, historical ties to the area, etc.

6. Up zoning allowing for residential small lots, and low rise can destroy the character of the neighborhood. Maybe the first house that sells is demolished and a taller, denser house is built. The most direct impact is on the immediate neighbors. Maybe the person across the street who lost some of their view. The house next door now has a tall wall for a neighbor 5 feet from his property line instead of a lawn and a tree for a neighbor to give a little breathing room. Housing then can go taller, have more units. The neighborhood becomes less desirable for those who continue to live there. Maybe a few years later a second house is bought and demolished, the neighborhood changes more with more "cottages", with more cars and people. The new buyers think this is all right, that is why they buy. The remaining owners have to live with the evolving less desirable neighborhood. I bought my home to retire here and live here for the next 30 years. It is now zoned as single family residence, which is why I bought here. Now you are randomly changing the status quo without directly involving the neighborhood in the impacts and I have to suffer with my largest asset, my house. Zoning change without representation. Seattle is a liberal city, but that should not be liberal to change things without input from the people you are affecting.

7. In your table, you have Morgan junction residential village with 1,342 housing units now. No action would increase that by 2035 by 400 houses, alternative 2 would increase it by 746, 87%, and alternative 3 would change it 1,086, 172%. Too much, too dense. Let whatever is zoned now be built out before blanketing more areas to be picked apart by sales, speculation, large, dominant housing units placed in single family residential areas.

8. If I had to choose, I would pick the no action alternative. If I had to pick an action alternative, I would pick 2, but not upzone any of the single family residential to residential small lot. And for the Morgan junction area, if I had to pick, at least do not upzone the area south of the California-Fauntleroy junction, between California and Fauntleroy, the single family residences to residential small lots. This area contains intact small homes that have character and are taken care of. Don't upzone to plop taller, denser, more peopled housing units onto these charming livable neighborhoods!

9. I like my residential setting, quiet streets, and trees. These livable characteristics are not addressed in the EIS under affected environment, or effects of implementation. The city has urban villages, and residential urban villages. Let the people who

live in these neighborhoods have a say in what character and what they will look like.

10. Imposing city wide rules and zoning without specifically engaging each neighborhood is not representative democracy. Morgan junction has a Morgan Community Association. Use this organization to engage us, to persuade us to change from our current policies and goals. Our neighborhood defined what we wanted our neighborhood to look like. It was approved. We must be involved and agree to change our expectations. It is only right. If you do not, you are trampling on the rights of the current property owners, plain and simple.

Dale Luhman

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

From: Dan Luong
To: [PCD_MHAEIS](#)
Subject: Draft EIS comment, Wallingford Urban Area
Date: Sunday, August 06, 2017 7:22:54 PM

Hi,

- 1 I am currently a resident in the Wallingford urban area and **STRONGLY SUPPORT** the Draft EIS Alternative 3. In particular, I think the single family area between Aurora and Stone Way should be upzoned to LR2 since there is a lot of high density zoning around it already and the area is well served by transit to the Seattle urban core.

Regards,
Dan

Name	Glenn MacDonald
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Capitol Hill First Hill and Miller Park areas are high displacement high opportunity areas. They should be upzoned as described in the initial draft proposal, especially along arterials such as 19th Ave East. The LR2 zoning proposals north of John Street have been almost completely abandoned in favor of LR1 and or a cottage type housing approach. Those zones will not generate much if any new housing in that area. The LR2 designation, especially along a secondary arterial such as 19th Ave east, should be retained in order to encourage more 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 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?	

Name	Heidi Madden
Email address	
Comment Form	
Land Use	Please study the impact that creating taller buildings will have on the microclimates of surrounding properties. For example, will taller buildings cause shade that damages vegetation and compromises sunlight, air quality and general quality of life of surrounding homes and buildings.
Aesthetics	Please consider the lasting aesthetic impact that taller, flat-roofed, modern buildings which consume more lot size will have on neighborhoods with smaller, older homes.
Public Services & Utilities	Please study the impact that creating larger buildings which consume more lot size and create more and larger non-permeable areas will have on rainwater absorption and runoff.
Air Quality & Green House Gas Emissions	Please study the impact on air quality of removing trees, plants and vegetation on single-family housing lots when converting those lots to either multi-family units or larger single family dwellings - buildings that consume more lot space, leaving less vegetation to provide clean air.
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?	

8/7/2017 23:00:42
Mauricio Malagon

Description of the Proposed Action and Alternatives

1. I support the No Action alternative. As a resident of the Othello/Brighton neighborhoods I can attest how the upzonig will negatively impact the quality of life of the neighborhood. Futhermore, the residential character of the neighborhood would be irreversibly changed.
2. I support affordable housing, but I believe that upzoning Othello/Brighton is not a good way to achieve this goal. Other areas of the city are better suited for increased upzoning.

From: sue maloney
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 3:54:51 PM

- 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.*

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

- 2 *Additionally, the DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined. Seattle residents live in both their own neighborhoods and in the City at large, yet this DEIS has failed to analyze the impacts to both thoroughly and accurately.*

Sincerely,

Sue Maloney

From: Marjan
To: [PCD_MHAEIS](#)
Subject: MHA DEIS Public Comment
Date: Sunday, August 06, 2017 10:18:47 AM

- 1 It is important to view each Urban Village as unique with different cultural traditions, housing and growth needs, businesses and resources. This DEIS does not recognize and review these differences, and does not represent every Urban Village and the City of Seattle overall. Each Urban Village and Surrounding Area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.
- 2 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 has failed to analyze the impacts to both thoroughly and accurately.

Name	Terri Martensen
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	1 Prefer Alternative #3
Transportation	2 In reality a parking place should provided for every individual unit built. Parking on the street becomes a disaster if this is not provided for even where public transportation is provided for.
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)	

From: Carly Martin
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: Mandatory Housing Affordability EIS comments
Date: Friday, August 04, 2017 4:35:13 PM

To whom it may concern,

I am submitting comments on the MHA because I want to see Seattle become more affordable for people and I want a city that is strategic in where it plans for growth. I am not naïve; I know that market forces are powerful and it may never be possible to be an "affordable" city in the same way that any global city with tech and talent struggles with affordability.

I am concerned that the EIS says very little about adding so many new households and the impact on schools. Here is the summary of the impacts on page 1.34; the EIS mentions no mitigation is needed:

"For SPS, growth is expected to be most evident in northwest Seattle, northeast Seattle, Downtown/South Lake Union and Capitol Hill/Central District. The northwest Seattle, northeast Seattle and Capitol Hill/Central Districts currently have capacity to serve potential growth. SPS would respond to the exceedance of capacity as it has done in the past, by adjusting school boundaries and/or geographic zones, adding/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."

While other municipalities have impact fees, Seattle has none. So, while we have more money for affordable housing, the school district is just expected to manage by moving boundaries around or future capital programs. Have you seen the district's future capital needs? The voters are weary of more property tax increases, but there are already massive taxes needed just to keep up with existing capacity constraints. I believe MHA will further put pressure on the school district, and the district needs to be AT THE TABLE when discussing impacts.

Also, I'm concerned about the Child Care Bonus program. The EIS is not clear about the Incentive Zoning Program. What happens to that under MHA? Will fewer developers participate? We need to think about our early child care needs as well and plan strategically for those.

Finally, I want to address something that came out today - the school district and city have been working together on the Seattle Center plan, which includes a new high school. I guarantee you that high school is going to be very expensive. I think the district and city should instead **focus on Fort Lawton** for a new high school. The buildings are already there. I would rather have the school district come to the voters to ask for capital dollars for projects that are truly essential. If the city would let the district take Fort Lawton for a high school, instead of Seattle Center, then those capital dollars could be better spent in other rehab needs caused in part by the increased density as a result of the MHA program. The property owners in this town cannot sustain the growth in taxes. People of modest income (like you, public sector workers) do not have incomes that will rise fast enough to keep up with taxes. Please, consider this when making your plans. While a world-class high school at Seattle Center sounds cool, it will be downright expensive. The city and the school district should give the tax payers some relief and agree to use Fort Lawton for the high school. Affordable housing would be a much better use of the parking lot at Seattle Center, not trying to shoe-horn a high school into that location.

Sincerely,
Carly Martin

Background: I grew up in Seattle, with a single mother who taught in Seattle Public Schools, which I attended for K-12. I care deeply about our city and our schools. We can do better.

Name	sandra martin
Email address	
Comment Form	
Aesthetics	<p>Things that also need to be considered that affect the environment:</p> <p>1) Depending on materials used, there is additional heat and glare that is generated causing it to be uncomfortable to walk and when vegetation is cut back and street surface increased, this becomes a real problem, especially as we are having hotter and hotter summers.</p> <p>2) Increased noise from the mere fact that when more people are present there is more activity. Also, if units do not have AC and residents buy their own units, there is more noise generated from their running as well as visual pollution.</p> <p>3) There is more street trash unless garbage cans are apparent and emptied regularly.</p> <p>4) Large buildings without good landscaping and landscaping between the street and the sidewalk do not encourage walking and actually discourage it. This is further increased if the building is large and presents an unbroken facade to the street because visual engagement is lost so therefore does not create an appealing walking environment.</p> <p>Sandra F Martin, MSW</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	

Name	Sandra Martin
Email address	
Comment Form	
<p>Transportation</p>	<ol style="list-style-type: none"> 1 "Affordable" housing does not work if readily available, inexpensive, close by and timely public transportation is not present. Many of those who need "affordable" housing also need public transit to survive and that includes giving them and all people access to opportunities, freedom of movement and resources. 2 a) .., if we want to create enough new supply to meet the demand, therefore, is to spread that supply out. But, we have to do it in a way that is not like how we used to do it, which was just by creating suburban sprawl. What we need to do is to do it in a way that is intelligent, that is focused on and around our transit nodes. RXR is currently looking at suburban transit nodes where there has been under development, where there is vacant land, where you can . I develop to a level of affordability that works for people who are economically challenged.... if we want to succeed as a region, developers and municipalities need to recognize that they should be doing more of this. It is good for the region because it will eventually create supply that will lower cost and it is good for the municipalities as well because it will attract to them populations that currently they are having trouble attracting, especially young people and aging baby boomers. Will NYC Move Beyond Affordability Band Aids? BY JAMES NELSON, globestreet.com (globest.com/sites/jamesnelson/2017/03/07/can-nyc-move-beyond-affordability-band-aids/) 3 b) Insure an equitable distribution of monies and transit resources. The transit funding bill passed by voters November, 2016, had ZERO dollars specifically allocated to increase transit in the Fremont, Wallingford area and the corridor just west of I5. There is no planned "relief" until 2022 when Rapid Ride will expand to N Stone Way, Fremont. As of a March, 2016, re-org transit service was cut for Fremont buses running less frequently, longer rides (5 minutes each bus as I have the previous 16 and 62 schedules) and residents having to wait for a second or third bus before getting on during rush hour. There are times when the bus is full into the space occupied by the driver which is a horrible accident waiting to happen. 4 The MHA plan misses that in the last two years, there have already been over 2000 new residential units added within a half mile radius of Stone Way. The transit situation will get worse as more residential units are completed. It becomes obvious that people who are making these decisions are sitting behind desks and looking at data rather than experiencing the situations first hand, "boots on the ground". 5 c) Car parking is critical and assuming that most will ride bicycles or pay to use cars they don't own is a goal and wish but is it realistic? From a May 13, 2016, Seattle Times article,

"Although only about 4 percent of Seattle commuters are regular bicyclists, a city study in 2013 found that nearly 30 percent of adult residents — about 158,000 people — ride bikes at least occasionally." Big factors that are overlooked are: weather, the city is not flat and has narrow streets. It has also been forgotten that owning a vehicle has always meant "freedom" and independence and flexibility. I can get all those Costco purchases in my car not Car2GO. That will never go away 100% so there must be realistic accommodation for cars. Also the more we rely on things being delivered to each house or residential unit, there are more and more cars on the road that also need to be parked.

From: Sandy Martin
To: [PCD_MHAEIS](#)
Subject: this process needs to be extended until August 28
Date: Sunday, August 06, 2017 8:03:12 PM

There is entirely too much information to cover in the brief amount of time given. People wanting the extension have jobs, families and other commitments. In spite of these, we are wanting to respond because we love and care deeply about our communities, neighbors, public space and how this all comes together to either diminish or enhance our lives.

Sandra F Martin, MSW
Past President, Association for Women in
Communication, Seattle Professional Chapter

From: Marilyn Mason
To: [PCD_MHAEIS](#)
Subject: Comment on EIS plan for First Hill-Capitol Hill neighborhood
Date: Monday, August 07, 2017 2:05:47 PM
Attachments: [PCNW BOARD EIS Letter 7 August 2017.doc](#)

Please see attached letter.

Marilyn Gell Mason
2929 1st Ave. #1122
Seattle, WA 98121

206-443-5750
206-714-3009 (cell)
<http://www.mgmasonphotography.com>

PHOTOGRAPHIC
CENTER
NORTHWEST

August 7, 2017

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,

Marilyn Mason
m.g.mason@earthlink.net

PHOTOGRAPHIC
CENTER
NORTHWEST

Name	Robert Masonis
Email address	
Comment Form	
Aesthetics	<p>1 We live on 19th Ave NW between 85th and 87th in Crown Hill, one of the urban villages that would be expanded under Alternatives 2 and 3. While generally supportive of the objectives associated with the proposed expansion, the analysis of impacts to specific areas and streets, such as ours, is addressed too generically to be meaningful.</p> <p>2 The proposed expansion of the urban village boundary to encompass 19th in Alternative 2 and the alley behind us in Alternative 3 would have a significant negative aesthetic impacts on current homeowners. Our homes on the west side of 19th sit atop a rise that provides views of the Olympics and the Sound. These views are reflected in property values and contribute significantly to our quality of life. The negative impacts of the proposed UV expansion would be particularly large and unacceptable under Alternative 3. It should be noted that the views would be affected not by building height increases, given the RSL zoning, but by development blocking views between existing single family houses. These gaps provide not only views but sunlight particularly during the late fall, winter and early spring.</p> <p>3 We also greatly value the many large trees that our present in our immediate area. Such trees are uncommon in surrounding blocks, particularly those south of 85th. Again, these trees are an amenity that enhances our quality of life. Alternative 3 would lead to removal of these large trees harming current residents.</p> <p>Lastly, the homes on the west-side of 19th Ave and on the west side of the alley behind our house are very fortunate to have an expansive, open alley that creates a wonderful area for children to play and for neighbors to visit. This type of open alley is rare and valuable, and because the houses across the alley front it, as opposed to facing West, it is aesthetically attractive in that regard as well.</p> <p>4 For all of these reasons we strongly oppose Alternative 3. We also want to make sure that if Alternative 2 is adopted that adjustments will be made to preserve these values. This is consistent with principle 7 in the MHA Implementation Principles, which calls for consideration of unique, location specific factors when making zoning changes.</p> <p>5 I explained the unique location of our home on 19th Ave. NW in my comments on the preceding section on Aesthetics. The alley behind our house is a rare amenity not only because of its aesthetic qualities but also because there is almost no vehicular traffic, which means that the alley functions like a giant sidewalk, where children play and neighbors gather without having to dodge automobiles. There is very limited parking along the alley.</p>

There is also limited parking on 19th Ave, and there are no sidewalks on 19th.

Transportation

- 6 We strongly oppose the westward expansion of the Crown Hill UV in Alternative 3 because it would effectively destroy the character of this part of the neighborhood, degrade our quality of life and impose significant hardship on existing homeowners. It would create congestion, greatly increase vehicular traffic, and greatly restrict parking spaces. Simply put, 19th and 20th lack the infrastructure to support a large increase in density, even of the type permitted in the proposed RSL zone. Moreover increased density on 19th Ave under Alternative 2 should be conditioned on sidewalks being built to accommodate increased pedestrian traffic.

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?

From: guillaume
To: [PCD_MHAEIS](#)
Subject: MHA DEIS -- comments on Madison-Miller Park Neighborhood
Date: Monday, August 07, 2017 9:29:13 PM

Hello,

I am writing to express my concern about the Draft Environmental Impact Statement (DEIS) on the City's Mandatory Housing Affordability (MHA) proposal.

I am a resident of the Madison-Miller Park Neighborhood and feel lucky to be able to live here. I am also strongly in favor of increased density -- I see this as important to maintain affordability and to address inequities in the distribution and quality of housing available to all.

However, I believe the HALA proposal requires some important refinements in our neighborhood and was in fact surprised to find that these were not more diligently addressed in the DEIS. I have a few specific concerns:

(1) Insufficient emphasis on green space and limitations on new development to maintain adequate tree canopy. The neighborhood has limited open space, most of which is occupied by play fields that are reserved at most times. In addition, the proposed re-zoning does not specify setbacks in the proposed LR3 upzones, nor is there adequate insurance that the tree canopy can be maintained or improved, as is likely a goal given the city's stormwater and public health concerns.

(2) Insufficient requirements and/or investments in affordable housing. I do not think there are adequate guarantees that housing remains affordable -- either to middle-income people like myself, or, more importantly, those in lower income brackets.

(3) Upzoning is unnecessarily confined to select areas within the urban village boundary. For example, there is very little upzoning planned for the 23rd Ave corridor. It makes no sense whatsoever to leave single family houses along that corridor while removing them in the quieter residential streets. Instead, both should be upzoned simultaneously. Similarly, there are sections along 19th Ave E that would be ideal for increased density, yet these are left untouched.

(4) Insufficient emphasis on the aesthetics of new development. We're investing in our city's future, and developers have no incentive to do anything but drop large boxes in each lot. The code should specify building design and material quality to ensure that new construction is both long-lived and attractive. This is our chance to set the look and feel of Seattle for the next 50-100 years.

(5) Overemphasis on parking, underemphasis on alternative modes of transportation. We are far from light rail, but well served by bus routes in our neighborhood. I think the upzone should be accompanied by policies which disincentivize car ownership via metering, restricted parking zones (RPZ), and even prohibiting parking on some blocks.

In short, I am a strong supporter of the HALA principles in general, but not in favor of the

specifics of the plan. With additional research, I believe this upzone could really benefit our city over the long-term. Without that, I am worried that our neighborhood will lose both its character and its diversity.

Thank you for your time.

-Guillaume Mauger
328 21st Ave E

From: JOYCE A MAUND
To: [PCD_MHAEIS](#)
Subject: ESI
Date: Thursday, June 29, 2017 2:44:43 PM

Sent from my iPhone

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 residence to review this in 45 days is ridiculous and essentially shut us out of what is supposed to be a public process

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: Joyce M. Ward
Address: 5611 40th Ave SW
SEATTLE, WA 98134

From: McAleer
To: [PCD_MHAEIS](#)
Subject: Comment letter on MHA
Date: Monday, August 07, 2017 2:37:12 PM
Attachments: [MAH DEIS letter.doc](#)

Hello Seattle Office of Planning and Community Development:

Attached is my comment letter on preservation and its role in affordable housing,

Thanks,

Bill McAleer

Voyager Capital

719 Second Ave

Seattle, WA 98104

City of Seattle
Office Planning and Community Development
Attention: MHA DEIS
PO Box 34019
Seattle, WA 98124-4019

Re: Historic Preservation Compatibility with Mandatory Housing Affordability

Dear City of Seattle Office of Planning and Community Development:

There is a need for more affordable housing in Seattle and I support the goals of the Housing Affordability and Livability Agenda (HALA), but am concerned that Seattle is also losing its history and character at every turn in giving developers a "free pass" on preservation. My commitment to preservation goes back to scraping paint off the historic Clinton Hotel in Ithaca, New York as a volunteer student to restoring my homes back to the visions from the original architectural plans. I continue to support the work of the Historic Seattle in their efforts to preserve our great city's cultural resources for the generations to come.

The DEIS for the Mandatory Housing Affordability policies that governs the preservation of buildings, only generally acknowledges the role of Historic Resources in Section 3.5 in the draft of June, 2017. It offers no real incentives nor protection for the older structures and preventing the displacement of their existing tenants, both residential and small businesses.

Preserving older buildings with their eclectic character, and historic stories often provide long term affordable housing options for diverse populations. Developers of new properties squeeze out every square foot for rentable units, rarely providing for family sized apartments that offer more "hidden" density for a variety of multiple generation occupants.

Policies that facilitate the continuous tear downs of older historic buildings does not always provide for more affordable small business or housing offerings, but it does destroy the livable character of Seattle.

The City of Seattle is uniquely built upon the diverse character of these unique neighborhoods, and makes the big city more livable, and appealing to a variety of lifestyles.

The Mandatory Housing Affordability DEIS needs to go back and include the broader protection for saving such existing historic resources and small businesses throughout the City, especially for the Downtown, South Lake Union, the University District, and its residential neighborhoods, which are not included. Up zoning is wiping out all of the history and leaving the history of the neighborhoods in the rubble pile.

The MHA can be enhanced with preservation because these older units were built to last with proper maintenance, and cannot be replicated with more expensive new buildings, and can be more affordable. The other key component needed in the DEIS is social equity of retaining existing buildings which offer livability for diverse sized living units. Social Justice is a value

that Seattle holds dear, and inclusiveness can be met better in older buildings with spacious, extended family sized units.

The DEIS falls short in the "Affected Environment" (3.5.1) , stating just generalities, The DEIS should provide more funding mechanisms and tools for all neighborhoods to analyze and preserve their history and character in some of their existing architecture. Future development impacts should be evaluated with resources on how to best preserve these historical pieces, while providing real building growth opportunities for the City and developers in the DEIS . compatible controls and incentives are vast. Yet, the resources are very thin to support this work, compared to the funding the City allocates to all of the "development" departments. The "preservation" resources should be equally funded.

Section 3.5 of the DEIS needs to include all districts and neighborhoods in Seattle. Preservation of existing housing stock, and small businesses should be of the highest priority. In addition, the DEIS should provide specific funding, and detailed resources for the City 's budget to preserve existing buildings, historic districts and its diverse neighborhoods to save what character remains.

Sincerely,
Bill McAleer

From: John McAlpine
To: [PCD_MHAEIS](#)
Subject: 800 Page HALA DEIS
Date: Monday, June 19, 2017 7:34:06 AM
Attachments: [image001.png](#)
[image003.png](#)

Please extend the deadline for review comments associated with the HALA DEIS. The deadline is currently set for July 23. The document is 800 pages and will require far more time to review. The majority of us work 40 hour weeks, kids will be out of school and home, and plans are already scheduled.

We need more time. A quick review has already indicates the DEIS is deficient in numerous ways..... failing to identify negative impacts to our neighborhood and failing to propose adequate, if any, mitigation of the negative impacts it does identify.

Thank you

John McAlpine P.E. | Project Manager
11255 Kirkland Way | Suite 300 | Kirkland, WA 98033
p. 425.827.2014 | f. 425.827.5043
www.PACEENGRS.com

From: John McAlpine
To: [PCD_MHAEIS](#)
Subject: HALA Rezone
Date: Monday, August 07, 2017 7:56:12 AM

Good Morning,

I'm not an articulate writer. I live in West Seattle. More specifically I live on 41st Ave SW in West Seattle just south of the Junction, within what is proposed to be the removal of a residential neighborhood into an apartment/condo development. The lack of parking for the recently built apartments in my area has made my street a one way only. It's too narrow to have vehicles parked on each side and allow two cars through. It's definitely too narrow for a large truck to make it through. Heck, the other day we all watched a truck try to backup and he hit three parked cars.....it's that narrow. Why is this???.....because the City has decided that new construction doesn't require off street parking, so all the tenants park on the street. It doesn't matter if we are X-distance from a bus stop. The tenants still own and use their cars. Whatever data you've collected stating no vehicles is wrong. Just drive the neighborhood and try driving out of West Seattle over the bridge. It has become a nightmare. The City Planners are trying hard to drop 1,000's of more people in West Seattle with no additional improvements. We need improvements first.... We need to know where the light rail is going in 2030 (Yup.....2030.. and that might not happen with rising construction cost and the failed car tab pricing system) We also need to develop out those areas already zoned for multi-family.

HALA will displace residents that have been in their homes for decades. Do you truly believe someone living in a beautiful quite residential neighborhood wants to stay when a 6 unit 35 foot tall condo complex is built next to them? You know they will leave their family home and that is what you want. I have worked so very hard for my home. Working countless days and many hours. Now it's to be taking away (by making my neighborhood ugly) and given to someone who may have but in half the work I have. That's just not fair.

The City needs to reflect on what they're doing to those of us that have worked extra work to get to where we are today, instead of wanting to give to those that have not put in the years and time that many of us have. Sheeez...I'm sorry that the collage kid 2 years out of school can't afford a \$600,000 house. Neither could I when I graduated. It took me 13 years before I got into a house.

That's all.....I simply find this whole HALA thing a big mess and a blight on Seattle neighborhoods.

John

Name	Ryan McCarthy	
Email address		
Comment Form		
Description of the Proposed Action and Alternatives	¹	In relation to the West Seattle Urban Villages, 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.
Housing and Socioeconomics		In relation to the West Seattle Junction, DEIS reflects that the Urban Village will not gain meaningful affordable housing in exchange for massive rezones to its neighborhood.
Aesthetics		In relation to the West Seattle Urban Villages, DEIS fails to identify protected public views or private views that will be lost or to propose meaningful mitigation.
Transportation		In relation to West Seattle Urban Villages, DEIS analysis is flawed; Fails to utilize meaningful data. C-Line utilization estimates and travel-times across the West Seattle Bridge are inaccurate.
Historic Resources		DEIS fails to recognize historic buildings in West Seattle Junction Urban Village.
Open Space & Recreation		In relation to the West Seattle Urban Villages, the DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhoods.
Public Services & Utilities		In relation to the West Seattle Urban villages, the DEIS fails to acknowledge lack of adequate infrastructure to support proposed increased density; Analysis is flawed.

Name Julie McCleery

Email address

Comment Form

Public Services
& Utilities

- 1 "Schools: The section (3.8) of the DEIS on schools is overly broad and does not account for the neighborhood-based school assignment policy that guides school enrollment. In 2010, Seattle Public Schools, in reaction (in part) to a Supreme Court case challenging its race-based school assignment policies, returned to a neighborhood -based school attendance policy – SPS School Assignment Policy.
- 2 This policy – which calls for students to be assigned to a school near his/her home - means that each neighborhood must have enough seats to accommodate the school-aged children that live there. In fact, the top two priorities for attendance area schools are a) proximity of students to schools, and b) safe walk zones. While the DEIS acknowledges that the school district has a plan for building more schools and updating its facilities, it is clear from the dearth of information in the DEIS that the City does not know whether the School District's plan overlaps with – or even acknowledges – the plan for growth within certain sections of the city. In lieu of a broad-brush analysis, the City must examine whether the growth in specific neighborhoods matches the school capacity in those neighborhood, and, if not, make a plan to mitigate the gap.

For example, Wallingford, which is slated for a major increase in population, currently has NO neighborhood elementary school. In Wallingford the school district's priorities of proximity and safe walking are not currently being met. And yet, major population growth is slated for Wallingford without a plan to address the current gap let alone the gap that will exist in coming years. Failure to have a specific plan – PRIOR to HALA approval - for accommodating school-aged children in each neighborhood means that SPS – a district which already has a budget shortfall of close to 50 million dollars - is likely to be financially burdened by either needing to acquire new buildings in growth areas and/or cover the cost of transportation to un-walkable schools. Families will also bear the burden of having to bus or drive kids out of the neighborhood, and the City will be adversely impacted because this will create greater transportation problems at a time when the city is trying to reduce reliance on cars. Further – and maybe most importantly - if the goal of the overall housing plan is to increase equity and access to opportunity – and access to schools is considered a hallmark of access to opportunity – then each neighborhood deserves careful and detailed analysis about how population growth will specifically impact its families and a mitigation plan to address how SPS and the City will come together to provide equitable levels of service to ALL families in ALL neighborhoods.

The preface to the SPS school assignment policy reads

Finally, and most importantly, our efforts and resources need to be focused on bringing quality educational offerings and opportunities to students who live in all parts of our city. That is what will provide the meaningful, sustainable answer to the question: "Where will my child go to school?" All families want the same answer: "Your child will go to a school where you feel confident in the quality of instruction and learning available to your child, and to all children."

If this City is going to truly and equitably serve its population through this time of challenging growth it must not abdicate its responsibility for providing equitable educational opportunities to its youth. All families must be able to answer the question ""Where will my child go to school?"" The lack of planning and analysis in the DEIS proves that the City has not yet made a good faith effort to help families and link its plan with the educational needs of its citizens – this must be mitigated.

If the link above doesn't work: http://www.seattleschools.org/UserFiles/Servers/Server_543/File/District/Departments/Enrollment%20Planning/Student%20Assignment%20Plan/New%20Student%20Assignment%20Plan.pdf

"

Name	Garrett McCulloch
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Between the three alternatives studied, I believe Alternative 3 would better meet the overall goals of the Mandatory Housing Affordability program (produce a higher number of housing units with generally lower displacement risk among the three options). Alternative 2 would achieve some of these goals, though with greater risks in terms of displacement (though it would better spread the new housing into more areas across the city). Alternative 1 (no action) is not a viable alternative in this context, as it would produce negligible additional housing, and lead to greater increases in housing costs, and in turn displacement.</p> <p>2 Additionally, I would like to point out that it is disappointing that none of the options studied considered upzoning areas outside of urban villages. Doing so would produce more new housing than either of these options, likely produce a wider variety of housing types, spread the economic benefits across a wider area and avoid concentrating the displacement/aesthetic/traffic/parking/etc. impacts into a few small areas.</p>
Housing and Socioeconomics	<p>3 Alternative 3 makes more sense from a socioeconomic perspective. The analysis of displacement risk appears accurate, and asking the lower-risk areas to take on more of the new housing produces a fairer outcome (at least in the short-to-medium-term). Long-term, the displacement effect of producing minimal new housing (as is the case in Alternative 1) would be high. The effects of more people competing for a more limited supply of housing can only be that housing costs increase, and one-for-one replacements that occur are likely to replace existing affordable housing with astronomically more expensive units (e.g. replacing a \$500,000 single family house with a very large, \$1 million + home rather than several less expensive multifamily units).</p>
Land Use	<p>4 Alternatives 2 and 3 have a far more positive effect on land use than the status quo, since they promote dense areas across more of the city. However, the studied alternatives are all far too timid in terms of allowed increases in zoned capacity across the city, and more intensive zoning in more currently single family-zoned areas should have been studied.</p>
Aesthetics	<p>5 Possibly the largest detrimental aesthetic effect on new medium-to-high-density housing is required parking, and the “ugly” architecture that results from trying to accommodate parking requirements. Since Alternatives 2 and 3 will both reduce parking requirements for certain classes of new construction, these are vastly preferable to Alternative 1. However, allowing increased density in more of the city would have had an even better aesthetic effect, since this would have allowed new</p>

	development to be spread across more of the city—creating fewer radical transitions between very high and very low density uses (basically creating density that would not be as noticeable of a change).
Transportation	6 While there will undoubtedly be impacts to automotive transportation and parking under either Alternative 2 or 3, the impact of Alternative 1 (doing nothing) would be much more traffic entering the city from the outside, likely in vehicles with fewer occupants. This means more cars, more competition for street and garage parking, and more traffic gridlock (for cars as well as surface transit). For these reasons, Alternative 1 creates an unacceptable transportation scenario.
Biological Resources	7 The biological environment benefits from decreased car usage, decreased emissions, and decreased requirements for parking (i.e. more green space, less paved car storage). Alternatives 2 and 3 do vastly more for all of these goals than Alternative 1.
Air Quality & Green House Gas Emissions	8 Alternatives 2 and 3 are far more preferable than Alternative 1 for decreasing GHG emissions. Alternative 1 would push regional growth outside of the city, making for longer commutes, more likely to be by single-occupant vehicle. More units closer to the urban core will reduce emissions.
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: Jack McCullough
To: [PCD_MHAEIS](#)
Subject: DEIS Comment
Date: Monday, August 07, 2017 9:00:10 AM
Attachments: [MHA DEIS Comment Letter.pdf](#)

Here is a comment letter.

John C. McCullough

Attorney at Law

McCullough Hill Leary, PS

701 Fifth Avenue, Suite 6600

Seattle, Washington 98104

Tel: 206.812.3388

Fax: 206.812.3389

www.mhseattle.com

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McCULLOUGH HILL LEARY, PS

August 7, 2017

VIA ELECTRONIC MAIL

Office of Planning and Community Development

Attn: MHA EIS

PO Box 34019

Seattle, WA 98124-4019

Re: Citywide MHA Draft EIS

To whom it concerns:

I am writing to provide comments on the Draft Environmental Impact Statement (DEIS) prepared by the City of Seattle for the planned city-wide implementation of HALA and MHA. In general, the DEIS does a commendable job of presenting and evaluating the alternatives in review. My comments have less to do with the impact analysis in the DEIS and more with the elements of the proposal that should be reviewed in the Final EIS.

My comments are as follows:

1. Flexibility. Alternatives 2 and 3 are intended to “bookend” the potential range of rezoning that may occur under the MHA rezone. The DEIS properly notes, however, that in individual cases, ultimate MHA rezones may exceed the Alternative 3 projection. The Final EIS should explore this concept further, and lay a stronger foundation for flexibility in rezone results for individual sites. Since this is a programmatic EIS process, it should be expected that final decisions on individual parcels may lie outside the Alternative 3 case in some instances.
2. IC-zoned Property. The proposed treatment of IC-zoned parcels in the DEIS falls short of zoning that would be appropriate in many of those locations. The action alternatives for IC-zoned parcels project only a very modest increase in density and no increase in height whatsoever. There is little IC-zoned land in the City, but what there is will often be found on major arterials, on or near high-capacity transit corridors and adjacent to urban centers. Consider, for example, the IC-zoned areas on Elliott Avenue (major arterial; high-capacity transit corridor; future light rail; adjacent to Downtown and Uptown Urban Centers); Fairview Avenue (major arterial; adjacent to South Lake Union urban center); Rainier/Dearborn (major arterial; transit corridor; future light rail; adjacent to Downtown

August 7, 2017

Page 2 of 3

urban center). In these and other locations, it would be appropriate for IC-zoned properties to shoulder more significant height and density increases. Such increases would result in millions of additional MHA dollars. I understand that the Industrial Lands Task Force will be reviewing these areas as well, but that is not a reason for the EIS to fail to present this reasonable alternative to the City Council.

3. New Development Standards. The DEIS notes that various new development standards are being contemplated to accompany the MHA rezones:

The Action Alternatives include features intended to reduce the negative effects associated with increased development intensity, including the following proposed Land Use Code amendments: • Requirements for upper-level setbacks in the amended Lowrise 2, Lowrise 3, Midrise, and Highrise zones; • Requirements for upper-level setbacks in the new NC-55, NC-75, and NC-95 zones; • Limiting building depth in MR zones to 80 percent of the lot depth; • Implementation of side façade design standards in Lowrise 1, Lowrise 2, and Lowrise 3 zones—the standards would address the placement of windows on side façades to increase privacy and would require side façade modulation or color/material variation; and • Implementation of side and rear setbacks in NC zones if adjacent to a residential zone.

The DEIS should evaluate the impacts of these mitigating measures on the production of housing under the MHA rezone. While such measures may have positive effects on urban design, it should be clear to the City Council the cost in terms of lost housing units that will result from these measures. Further, if the proposal is to include Code changes that will, in part, substitute for the role of the Design Review process, then steps should be taken to ensure that the reduction in building area resulting from the new development standards does not simply become a new baseline from which design review will further reduce building mass and scale. That would simply magnify the loss of housing resulting from this mitigation measure. If the Code is to be revised in this way, then compliance with the new transition requirements should be deemed compliance with the height, bulk and scale provisions of the design review and SEPA processes.

I appreciate the opportunity to provide these comments. These comments are also provided on behalf of the Coalition for Housing Solutions.

Sincerely,



John C. McCullough

JM:lde

8/7/2017 23:08:46
Mary Kae McCullough

Description of the Proposed Action and Alternatives

None

Housing and Socioeconomics

1. There should be more financial help & protection for older neighborhoods to help people to stay in their existing homes.

Land Use

None

Aesthetics

2. No where is safety addressed. Aesthetics sounds like fluff, but by increasing height, bulk & scale & demolishing smaller scale & often historic buildings you are destroying neighborhoods and creating an unsafe city. With massive height comes 1st floor deadspaces as there isn't enough active commercial to fill all the ground/street levels of new buildings. The historic "eyes on the street", connection to the sidewalk & street (windows, porches) and ownership of neighborhoods with older buildings, would be replaced (have been replaced) with 1-3 floors of blank walls/parking garages/HVAC, service areas, etc, creating dangerous deadzone areas for pedestrians, blank canvases for tagging, and a less desirable city.

Transportation

None

Historic Resources

3. Historic buildings are paramount to retaining Seattle's unique character and safety and neighborhoods. If the city truly wants to help maintain affordable housing, it should help support those who are currently living in historic buildings but need help with retrofitting. The city should look at more creative ways to add density with existing housing - the green solution rather than just taking the simple way out and bowing to high rise developers.

Biological Resources

None

Open Space & Recreation

4. Open space should also address open airspace. The addition of large full block buildings and residential block houses built to the max is reducing the amount of natural light, making for a less healthy city.

Public Services & Utilities

None

Air Quality & Green House Gas Emissions

None

City of Seattle Office of Planning and Community Development
MHA.EIS@seattle.gov

Re: DEIS for Mandatory Housing Affordability Policy

I support the City's efforts to provide for affordable housing throughout the city. This is a critical issue that requires thoughtful consideration and debate to ensure effective actions and solutions.

The DEIS seeks to identify the issues and impacts of the proposed policies. Prior to action, the FEIS must address the important contribution of older buildings to affordability and livability. Older buildings provide diverse housing types, including affordable housing. Research shows that neighborhoods with historic buildings and mixed-scale development are more vibrant and have environmental, economic and equity benefits.

To address these critical issues, the FEIS for Mandatory Housing Affordability Policy must include details on how the proposed policy will affect older buildings and neighborhoods throughout the city, including historic districts and structures.

Sincerely,
Mary McCumber, Urban Planner
mpmccumber@comcast.net

From: Roger McMillen
To: [PCD_MHAEIS](#)
Subject: Draft Environmental Impact Statement (DEIS) for the proposed citywide HALA upzones.
Date: Tuesday, June 27, 2017 5:28:35 AM

To whom it may concern,

As a resident in the West Seattle neighborhood that will be affected by the up zone being proposed, I require more time to review the Draft Environmental Impact Statement. An extended period is necessary in order to provide for an adequate review and response time. I propose mid-September of 2017 as the cutoff date for comment.

Respectfully,
Roger McMillen
5002 42nd Ave SW
Seattle WA

From: A McRory
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](#)
Cc: [Sean McRory](#)
Subject: MHA Draft EIS Comments
Date: Monday, August 07, 2017 5:13:49 PM

As a resident of the Madison-Miller Park neighborhood and parent of children who will be impacted by the proposed MHA requirements I am writing to voice my support for the *MHA Draft EIS Comments from the Madison-Miller Park Community Group* dated August 2, 2017, submitted on behalf of the Madison-Miller Park Community.

Our neighborhood prefers Alternative 1 (with modifications as stated on the Madison-Miller Community Group August 2, 2017 map). We recommend that MHA (*Mandatory Housing Affordability*) **requirements be implemented into the existing zoning** in our residential urban village, allow the new definitions of Low-rise zones, allow more ADU's (*Accessory Dwelling Unit*) and DADU's, (*Detached Accessory Dwelling Unit*) and require developer impact fees to be collected city-wide (not restricted to urban villages) to make the fund generation for affordable units more equitable. We also recommend the MHA requirement (5-11% of housing built or \$7 - \$32.75 p.s.f. payment) be increased to generate a significantly greater quantity of affordable housing units.

Other issues raised in the Madison-Miller Park Group document

1. **Housing and Socioeconomics:** Both the "Low Displacement Risk" and the "High Access to Opportunity" designations misrepresent our neighborhood and need further analysis and mitigation. **We are concerned about the displacement of existing affordable housing, senior and disabled housing, housing for our most vulnerable residents**, (a half-way house and a long-term transitional home for women), and a number of older apartment buildings and large homes with multiple units. As documented in the DEIS, Madison Miller has already had significant displacement impacts from the past two decades of development.
2. **Transportation:** Madison Miller has no direct access to light rail within a ¼ mile or 10 minute walk.
3. **Transportation:** The DEIS identifies significant traffic and parking impacts for Alternatives 2 and 3, and we believe this will result in significant public safety hazards with the opening of Meany Middle School and increased usage of Miller Park/Playfield.
4. **Open Space:** We have virtually no neighborhood park or open space, as the vast majority of "Miller Park" is utilized as a regional playfield for league sports and summer sports camps and is not available for public or neighborhood use. This playfield will also be used as the sole recreational field for Meany Middle School starting this fall.
5. **Public Services:** Existing infrastructure, including storm sewers, sanitary sewers, roadways, and overloaded power lines are already compromised due to

their age and condition. Garbage pickup on our historic and narrow streets creates traffic backups now, and additional volume of apartment buildings will increase that problem.

6. **Historic Resources:** MMRUV (*Madison Miller Residential Urban Village*) is one of the two oldest urban villages which will have over 50% growth increase, yet the DEIS does not address the impact of losing this historic housing stock.

Please consider the impacts to the many residents, families and homeowners who consider this neighborhood their home. Thank you for listening to and considering the voices of the Madison Miller Residents before reaching a conclusion on the future of our already dense and diverse neighborhood.

Regards,
Amy McRory

Name	Rosario Medina
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Mha zoning changes do not fit all neighborhoods in the Seattlw area. Each area should be designed by for each individual community by the community.</p>
Housing and Socioeconomics	<p>2 People are already being displaced. The plans of creating more homes and also creating market rate homes is unhelpful. Developers are taking over and have ben, giving them more height and upzoning in their favor so they can make a choice to provide affordable housing or not is unrealistic. Developers and property owners will just pay the fee instead of allowing low income peoplw rent from them. The city's plans continue to displace people and give developers and the top percent the upper hand. Also the relocation program can only go so far and not many people know of it.</p>
Land Use	<p>3 Increase single family zoning and protect it which will save trees and keep the green space. The city has a long long history of helping the top percent and the industry. The city needs to protect the very few homes that are left. Creating more apartments only keeps people in poverty and does not allow them to own anything. Rent is \$900 to \$3,000 in the Seattle and greater Seattle area which is over \$22,000 a year just on monthly rent. The city needs to work with each individual neighborhood and come up with plans about land use by people who live on that land. Having a cookie cut plan for the whole city does not work. The Duwamish Valley is built completely different than Laurel Hurst, have you read the Community Health Impact Assessment? Have you read community plans and had actual community members make these plans? No, you have not. You should start over and outreach and plab accordingly to all the different communities</p>
Aesthetics	<p>4 Increasing height and scale will demolish historical buildings and decrease green space and create flooding issues.</p>
	<p>5 South Park is not a real urban village and Georgetown cannot fit in a higher density because of the lay out. The Duwamish Valley will never have a light rail and relies on u unreliable bus routes that fight throught freight traffic and free way commuters on a daily basis. The transportation in the area does not serve the community on a basic need and will be unable yo serve a higer density population. There are also no regulations for new development to create parking. Many people share small spaces such as 3 people in a small studio</p>

Transportation	<p>or 5 people in a 1 bedroom apartment because rent is too horrible as it is now and many of those people have cars and parking is a big issue now. Also in the Duwamish Valley Semi trucks are parking on the streets along with rvs. There is no room to increase density in the Duwamish Valley.</p> <p>6 In some neighborhoods that were planned out correctly can take in more of the population but you must plan with the neighborhoods. The city's way of outreach and planning is horrible.</p>
Biological Resources	<p>7 The Duwamish Valley has the lowest tree canopy and is located next to a superfund site with many flooding issues. We must address and fix these issues before adding more vulnerable people to the area.</p>
Open Space & Recreation	<p>8 The Duwamish Valley needs an increase in open space and recreation. MHA does not support the need for green space.</p>
Public Services & Utilities	<p>9 South Park and Georgetown have little to no public services and no grocery store. South Park was designated as an urban village 20 years ago and in that time the Duwamish Valley has suffered many store closures, displacement and little to no help in improving the area. South Park fought to become a recognized urban village to gain more services but in the process lost many that also Georgetown, White Center and Boulevard Park relied on. You must improve the areas that have little to no public services before you increase the density. It took South Park 100 years to get a library and Georgetown does not have a community center. Both neighborhoods do not have a grocery store or public services and therefore cannot take in more density.</p>
Air Quality & Green House Gas Emissions	<p>10 There is a lot of air quality issues and gas emissions happening in Georgetown and South Park. We have horrible transportation and freeway ramps in the middle of the neighborhood and heavy freight traffic. We need more green space and green walls to clean the air.</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?	

Name	Melissa
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 These maps have identified West Seattle as having high access to opportunity. This is flawed. For example, with respect to access to opportunity, West Seattle is severely lacking in several key areas: 1. Public health: there is no hospital or 24 hour urgent care clinic in West Seattle. For emergencies, people must travel relatively far (First Hill). 2. Transit: although West Seattle is served by several bus lines, all downtown-bound busses travel across the West Seattle Bridge. The West Seattle Bridge is the main egress from West Seattle, and is extremely congested. This congestion is getting worse, and increased density will make that worse.</p> <p>Assumptions that people will drive less is not backed up by data, and certainly doesn't match current commuting patterns. There is no longer an "easy" commute to and from West Seattle during main commuting hours. 3. Parks: West Seattle has too few usable green spaces for the existing population, let alone an influx of new people. The golf course-- a restricted, pay-to-use facility-- should not be counted as adequate green space, but it seems that this assessment allows that. 4. Public Services - police: policing in West Seattle, particularly with respect to property crime, is currently inadequate.</p> <p>I also take issue with the "public outreach" section. The meetings were held in too small venues for the number of people who wanted to attend. The facilitators were completely unprepared to answer questions from concerned residents. The facilitators also revealed some troubling issues-- for example, we learned that no one had consulted the existing landslide maps when plotting urban village/upzoning expansions; and in fact, the facilitator at the West Seattle Junction meeting was unaware such a thing existed. Last, the facilitator did not keep track of any comments or feedback provided by the attendees. It was nothing more than a city propaganda session-- extremely disappointing for all who spent time engaging and providing well-researched input.</p> <p>Previous plans have shown that Seattle has plenty of space to build an additional 10,000 units, with no upzoning needed.</p>
Transportation	<p>The travel times calculated for the West Seattle Bridge in figure 3.4-27, particularly for the eastbound route, are absurd. Were they done in the middle of the night, or at similar low traffic times? It is completely impossible to get from 35th to I-5 in 8.5 minutes in normal traffic. In rush hour, it's obviously even worse. This 8.5 minute assertion is laughable and really strains the credibility your analysis.</p>
	<p>The mitigation strategy is inadequate for the areas already</p>

Open Space & Recreation	facing open space shortages. Relying on a developer to set aside a tiny bit of space surrounded by tall apartment buildings is a sad alternative to actual green space.
Public Services & Utilities	The study states "No significant unavoidable impacts to public services or utilities are anticipated at this time for any of the proposed alternatives," yet the section on public schools states EXACTLY the opposite: "Encouraging population growth in urban villages could result in the exceedance of maximum enrollment levels." It goes on to note some things that SPS <i>*could*</i> do to mitigate, but there's no assessment of how rapidly SPS can adjust to accommodate all the new development/people using their services, leaving the impression that those who drafted this study really don't care much about families with school-aged children.
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	Jon Mermelstein
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 I'm encouraged to see the city's ambition to expand housing opportunities. However, I am very concerned by the fact that MHA preserves such wide swaths of single family homes. A simple glance at the proposed maps both show significantly more grey areas than any of the shades of red.</p> <p>Single family homes certainly have a valuable place in our communities. Yet for our city to equitably handle such rapid population growth, we must increase density even in the areas that have always been exclusively inhabited by single family units.</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	

From: Susan Mikkelsen
To: [PCD_MHAEIS](#)
Subject: Too much essential
Date: Sunday, July 02, 2017 8:31:57 PM

Information, all-important information
Was presented with too little time for homeowners to thoroughly read, discuss and convey
Opinions within the
Stated time constraints!!! Please
Extend the end date for comments/input
Past 7/10!!!
PS: do you realize how
Devastating these
Impacts can be, will be to the Older People who planned
For years to live in their Wallingford
Homes until they die?
We will potentially Be
THE HOMELESS/ Unaffordable Home
Seekers, perhaps in our own previous
Neighborhoods?!!
Why was I never told
By Realtors that my future purchased property, my future neighborhood was
SUBJECT TO REZONING at any time
In the future????
I would have seriously
Had to investigate this surprising information and LIKELY would have
CHOSEN TO BUY ELSEWHERE where my future home/ neighborhood would
Not have been subject to MAJOR
CHANGES any time
In the future!!!!!!!!!!
Was this HIDDEN from potential buyers or
Was it just my Realtors who "neglected" to inform
Me of all facts about
My potential Huge
Purchase? Were other purchasers informed... OR NOT?

MAYOR MURRAY SAID, "We'd (he and I)
Would have to talk",
As we stood in front of the theatre at the end of the "Find and
Fix" evening walk thru
The Wallingford neighborhood.

Susan

From: [Levy, Susie](#)
To: [Susan Mikkelsen](#); [PCD_MHAEIS](#)
Subject: RE: Please extend the MHA DEIS comment period!
Date: Wednesday, July 05, 2017 9:26:28 AM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)

Dear Sean,

I am forwarding your request to the office of planning and community development (OPCD) who are overseeing the EIS process.

Best,
Susie

Susie Levy, MPH

Legislative Aide to Councilmember Mike O'Brien

[Seattle City Council](#)

206-684-8800

Follow Mike on:      

[Sign Up for Mike's E-Newsletter](#)

Note that all messages are subject to public disclosure

From: Susan Mikkelsen [mailto:semikkelsen@me.com]

Sent: Tuesday, July 04, 2017 12:29 PM

To: Bagshaw, Sally <Sally.Bagshaw@seattle.gov>; Burgess, Tim <Tim.Burgess@seattle.gov>; O'Brien, Mike <Mike.O'Brien@seattle.gov>; Sawant, Kshama <Kshama.Sawant@seattle.gov>; Johnson, Rob <Rob.Johnson@seattle.gov>; Gonzalez, Lorena <Lorena.Gonzalez@seattle.gov>; Herbold, Lisa <Lisa.Herbold@seattle.gov>; Harrell, Bruce <Bruce.Harrell@seattle.gov>; Juarez, Debora <Debora.Juarez@seattle.gov>

Subject: Please extend the MHA DEIS comment period!

Please extend the MHA DEIS comment period! Released on June 8, 2017, the DEIS is 462 pages long and the appendices are 364 pages long. This is over 800 pages to review within only 32 days.

Please extend the MHA DEIS comment period! This is not enough time to a complete review.

Sean Mikkelsen

Name	Don Miles
Email address	
Comment Form	
Housing and Socioeconomics	<p>1 Brick apartment buildings built in the 1920s and 1930s currently provide affordable housing and character buildings in urban centers, but are threatened by the cost of seismic retrofits and higher land values. Could MHA generated revenues be used to provide funds for the seismic upgrades of unreinforced masonry apartment buildings, if owners of these buildings set aside a percentage of the units for affordable housing for 50 years? This would preserve character buildings and affordable housing in urban centers.</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)	

From: Karin Miller
To: [PCD_MHAEIS](#)
Subject: DEIS comment period
Date: Friday, June 16, 2017 7:43:15 PM

I write to ask that you extend the comment period of the DEIS for Affordable Housing for the City of Seattle. The document is 800 pages long and is difficult for a layperson to read and comprehend. Please extend the comment period so that Seattleites can realistically review and comment. Unless, of course, you don't really want input and are just doing this to say that you did? I hope that is NOT TRUE!

Name	Nicholas Mirra
Email address	
Comment Form	
Land Use	1 I support zoning that allows for increased density, especially near BRT and light rail lines. I also support freeing such developments from needing to include parking.
Aesthetics	2 I would support any policies that encourage more diversity in visual aesthetic in new development in Seattle, from single-family homes all the way up to 40-story towers. They all look the same, and I fear the builders and designers are interested in profit, not the contribution they are making to our build environment. Variety in materials, design, massing and other aesthetic considerations will pay us dividends in the long run.
Transportation	3 New parking spaces should not be encouraged in new development, especially near light rail or BRT lines. We cannot widen our streets so we need to encourage other modes of transit. Building more parking units will only encourage more people to drive, while increasing the cost of those units.
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	Misha
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.	just the working class residents of Udistrict
Comment Form	
Description of the Proposed Action and Alternatives	1 I believe the city needs to Force a greater percent of LOW INCOME & "Affordable" Housing by Developers - this is the ONLY WAY To keep Allied Healthcare Workers, Teachers & Other middle income workers who are Necessary, In The City. 2% is TOO LITTLE and Makes the "HALA" a farce.
Housing and Socioeconomics	2 I believe the city needs to Force a greater percent of LOW INCOME & "Affordable" Housing by Developers - this is the ONLY WAY To keep POC, Allied Healthcare Workers, Teachers & Other middle income workers actually In The City. 1% or 2% is TOO LITTLE and Makes the "HALA" a farce.
Land Use	3 The city of Seattle DPLU needs to Force Higher percent of LOW INCOME & "Affordable" Housing on to Developers - this is the ONLY WAY To keep Allied Healthcare Workers, Teachers, POC, Bus Drivers & Other middle income workers In The City. 2% is NOT ENOUGH making the "HALA" a farce.
Aesthetics	4 STOP ALLOWING DEVELOPERS TO CUT MATURE TREES AND SAVE OPEN SPACES FROM DEVELOPEMENT - the loss of trees and open space and green space affects HEALTH & Stress and children esp! It also helps Lower the HEAT Index for the coming decades. NO ONE IS MONITORING THIS & on rare occasion developers plant spindly saplings they are left to Die almost Immediately!
Transportation	5 I believe METRO NOT Sound Transit is best thing for the city dwellers needs. Force Housing Developers to PAY FEES TO SUPPORT MORE BUSES as the stupid Light Rail doesn't get me to my HOSPITAL JOB nor my neighbors to their Doctors nor most students to School!!! MORE BUSES is the ONLY WAY To keep Allied Healthcare Workers, Older residents & Other non-cyclists & low & middle income workers In The City. LIGHTRAIL IS FOR RICH Commuters to the airport and financial district nothing else!
	6 PLEASE SAVE THE CHARACTER OF OUR NEIGHBORHOODS And older smaller Mom&Pop businesses!

Historic Resources	The big glass steel & concrete things are hideous and the BUILD OUT COSTS ARE OUTRAGEOUS! We are LOOSING OUR ETHNIC Foods and I simply WON'T Buy from big chain eateries moving in.
Biological Resources	7 WE NEED WILDLIFE IN THE CITY = TREES & Parks that are NOT all CONCRETE
Open Space & Recreation	8 TREES & GREEN SPACE not just artificial turf ball fields!!!
Public Services & Utilities	9 The city needs to Force Housing Developers to PAY THE COSTS OF UPGRADES TO WATER SEWER & Electric Production Treatment and Infastructure NOT RATE PAYERS!!! That is the ONLY WAY To keep Allied Healthcare Workers, Teachers & Firefighters & Other middle income workers, and the elderly, all of whom are Necessary, In The City. STOP LETTING DEVELOPERS ROB THE WORKING RESIDENTS. IT LOOKS LIKE CORRUPTION by politicians for one thing.
Air Quality & Green House Gas Emissions	10 SAVE OUR TREES AND GREEN SPACE! STOP Developers from cutting mature trees!!! SAVE PARKS WITH TREES AND GRASS NOT just concrete ball fields!
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: Mary Mittell
To: [PCD_MHAEIS](#)
Subject: rewsponse to MHA DEIS
Date: Thursday, August 03, 2017 11:17:41 PM

1 I have lived at 328 21st Ave East for the past 10 years. I completely support the idea of urban density and agree that the city needs a strategic plan for dealing with the housing crisis. I am concerned, though, that the current proposal is a boon for developers but doesn't do enough for the residents of Seattle.

I would like to see the following:

- more construction of and funding for low-income housing
- more efforts to keep young families in the neighborhood (for example, requiring a certain number of 3 bedroom apartments)
- more guidance about architectural styles (this neighborhood--and Seattle in general--have an established aesthetic and it's not plain modern boxes!)

And while I do want to see density increased, I want to make sure that the streets stay safe for bikers (especially along the greenways) and around the schools. The streets are narrow and there are some unexpected one ways and when Meany re-opens we will have the school bus traffic again, as well. This already makes navigating our streets difficult.

Thank you for taking this into consideration.

Mary

Name	David Moehring
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Affordable Housing is a necessity... yet this has a broad meaning. We are looking to private developers to provide the affordable housing stock. However, in speaking with a Lowrise Zone developer, their idea of an 'affordable' home was a 2-bedroom 11-foot wide rowhouse for over \$600,000. That is a 30-year mortgage at \$3,300 per month. Same game - different moniker.</p> <p>2 The proposed MHA-R "in-lieu of" fees that range between \$7/sf to \$14/sf equates to only small \$20,000 buy-off in order for a developer to build more market-rate housing and no affordable housing units. Just try getting around building that same amount of affordable housing in San Francisco or Boston --- the fee would exceed \$300,000 on a new 3-bedroom townhouse! Guess which city will have the least amount of affordable housing after 5 years: Seattle, San Francisco, or Boston?</p> <p>We are already adding to the allowable density with MHA-R, so what is the purpose of an incredibly low 'in-lieu-of' fee? Let's stick to the Basics and Objectives of the Grand Bargain. INCREASE THE MHA-R 'IN-LIEU-OF' FEE TO A MINIMUM OF \$200 PER SQ FT and get serious about adding more affordable housing stock in lieu of more market-rate developer cash-cows.</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?	
How many people are in your household?	
Are there children under the age of 18 in your household?	

Name	Rick Mohler
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.	I am a member of Welcoming Wallingford but speak for myself in this case.
Comment Form	
	<p>1 I applaud the efforts by the Mayor's Office, OPCD, City Council and others to address Seattle's housing affordability crisis and, by extension, broader issues of environmental sustainability and climate change. The 65 HALA recommendations, including MHA and its attendant upzones, are an impressive and comprehensive multi-pronged strategy for addressing this vexing problem that currently impacts equity and sustainability in every U.S. city experiencing robust economic growth. My comments regarding the MHA DEIS are as follows.</p> <p>MHA Alternatives 1, 2 and 3</p> <ul style="list-style-type: none"> • MHA Alternative 1 – This alternative is unacceptable as it fails to adequately address our housing affordability crisis and the impacts of carbon emissions on climate change. It assumes that land use policies put in place three decades ago are adequate in addressing our current conditions. This is simply not the case. • MHA Alternative 2 – This alternative has the advantage of upzoning a larger area of the city from single family zoning to multi-family. However, modeling suggests that this alternative may lead to increased displacement in areas of high displacement risk and low opportunity. • MHA Alternative 3 - This alternative has the advantage of greater increases in development capacity in areas of low displacement risk and high opportunity and lower increases in development capacity in areas of high displacement risk and low opportunity. Modeling suggests that this may reduce displacement risk. However, this alternative upzones a smaller area of the city from single family zoning to multi-family. <p>2 After consideration of Alternatives 2 and 3, I cautiously endorse Alternative 2. While I am concerned about potential displacement in several neighborhoods, that concern is offset by a desire to see more of the city upzoned from single family to multi-family zoning.</p> <p>3 While short-term displacement is a valid concern I believe that the large area of our city devoted to single family zoning is the greatest long term threat to both housing</p>

**Description of the
Proposed Action and
Alternatives**

affordability and environmental sustainability. Given the opportunity, I would endorse a hybrid alternative that included the increased zoning capacity in areas of low displacement risk and high opportunity per Alternative 3 with the increased overall Urban Village area and zoning capacity per Alternative 2.

Comments beyond the scope of the DEIS

- 4 • Support a Broader Mix of Low Density Housing Types within all SF Zones – Per HALA Recommendation SF.2, the incoming mayoral administration, OPCD and City Council should continue to push for upzoning all SF parcels outside urban village boundaries to RSL zoning. My anecdotal experience in my neighborhood over the past decade confirms the data outlined in section 3.32 of the DEIS. Nearly one third of all demolitions outside of downtown are due to existing modest single family homes being removed and replaced with much larger and more expensive homes generally with a minimum of two off-street parking spaces. With increasing economic inequality this trend will likely continue if not accelerate. It is critical that an alternative to this suburbanization of two thirds of our city be enacted quickly.
- 5 • Bolster existing parking reforms and enact new ones – City Council should act quickly to clarify the definition of ‘frequent transit’ access to eliminate the likelihood of additional appeals to the Hearing Examiner regarding required off-street parking such as the recent successful appeal on Phinney Ridge. In addition, the incoming mayoral administration, OPCD and City Council should push for maximum parking allowances (as opposed to minimum parking requirements) in Urban Centers and, potentially, Hub Urban Villages.

Again, many thanks for the opportunity to comment on the MHA DEIS and other issues and for the herculean effort put forth by the Mayor’s Office, OPCD, City Council and many others in addressing this vexing problem.

Sincerely,

Rick Mohler

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?**

Name	Ron Momoda
Email address	
Comment Form	
Housing and Socioeconomics	<p>1 I am very troubled by Alternative 2 because the rezones do not consider the importance of displacements. To make matters worse, I feel the DEIS Social Economic Analysis plays down the impacts of displacements.</p> <p>2 As noted in the DEIS, "City policies call for reducing racial and social disparities, conducting equity analysis before taking policy actions"(MHA Draft June 2017 p 1.4). The DEIS has a Social Equity Analysis that has identified vulnerable communities like Othello as a high risk of displacement and low on the access to opportunity index. Only Alternative 3 recognizes the importance of displacements at Othello and proposes to minimize the rezones and reduce the expansion area as well.</p> <p>3 To reduce racial and social disparities, the City of Seattle must not practice structural racism that is evident in the Alternative 2 rezones because it ignores displacement concerns. It is critical that the FEIS stress the importance of displacements and select Alternative 3 as the Preferred Alternative.</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?	

Name	Stephanie Morris
Email address	
Comment Form	
Public Services & Utilities	<p>1 The existence of current schools is not enough "educational opportunity" for increasing the population. The SPS master plan barely accounts for population growth WITHOUT HALA. You need to add schools if you are adding people. Pay for it using impact fees like other big cities do.</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?	

From: Ian Morrison
To: [PCD_MHAEIS](#)
Cc: [Dan Swallow](#)
Subject: MHA comment
Date: Monday, August 07, 2017 10:02:22 AM
Attachments: [MHA DEIS Comment Letter 8 7 16.pdf](#)

Dear Geoff,

On behalf of Intracorp Companies, please see attached MHA Proposal DEIS comment.

Please feel free to call/email with any questions. Many thanks.

Ian

Ian S. Morrison

Attorney-at-Law

McCULLOUGH HILL LEARY, PS

701 FIFTH AVENUE, SUITE 6600

SEATTLE, WA 98104

DIRECT: [206.812.3380](tel:206.812.3380)

TEL: [206.812.3388](tel:206.812.3388)

FAX: [206.812.3389](tel:206.812.3389)

IMORRISON@MHSEATTLE.COM

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NOTICE: This communication may contain privileged or confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

McCULLOUGH HILL LEARY, PS

August 7, 2017

VIA Electronic Mail

Office of Planning & Community Development
c/o Geoff Wentlandt
PO Box 34019
Seattle, WA 98124-4019
Email: MHA.EIS@seattle.gov

Re: Mandatory Housing Affordability
Draft Environmental Impact Statement Comment

Dear Mr. Wentlandt:

We are writing on behalf of Intracorp Companies ("Intracorp"). We appreciate the opportunity to provide comments on the City of Seattle ("City") Office of Planning and Community Development's ("OPCD's") Draft Environmental Impact Statement ("DEIS") for the Mandatory Housing Affordability proposal ("MHA Proposal"). Intracorp a Seattle developer who is invested in the passage of the MHA Proposal, particularly with regards to promoting broader housing options.

Intracorp supports the MHA Proposal to increase densities in areas well served by transit and neighborhood assets and to encourage a wide variety of multi-unit housing throughout the City.

Yet, Intracorp has some concerns regarding the inadequacies of the DEIS, particularly the lack of specificity of the Rainier Beach zoning changes and lack of consideration for zoning changes in single-family areas outside of urban villages that are currently in non-residential use and are well served by transit and neighborhood amenities like South Beacon Hill. Intracorp believes that these are opportunities to better achieve the MHA Implementation Principles. Specific comments are:

Land Use.

Intracorp is currently proposing a contract rezone for property within the Rainier Beach Residential Urban Village at 4215 South Trenton Street and 8803 MLK Jr. Way South to NC-3 with a 40-foot height limit ("Rainier Beach Properties"). The Rainier Beach Properties are located north of Henderson Street and approximately one-quarter mile north of the Rainier Beach light rail station.

With regards to zoning, the City's original MHA zoning map issued in October 2016 contemplated that these Rainier Beach Properties would be rezoned to NC-3 with a 75-foot height limit. Now, however, Alternatives 2 and 3 would rezone the Rainier Beach Properties to a SM-RB zoning classification (which we assume is Seattle Mixed-Rainier Beach) with a 95-foot height limit.

Neither the DEIS, nor the supporting appendices appear to discuss this SM-RB zoning.¹ Given the lack of clarity regarding the land use impacts of the potential SM-RB zoning in the DEIS analysis, the Final Environmental Impact Statement must provide additional analysis as to the impacts of the potential new zoning classification, particularly regarding evaluating the impacts of graceful zoning transitions between the Rainier Beach Properties and surrounding low-rise zones.

More importantly, the DEIS fails to evaluate for consistency with the adopted Rainier Beach Neighborhood Plan. Intracorp carefully reviewed the Neighborhood Plan when proposing the rezone of the Rainier Beach Properties, factoring the adjacent townhome development to the north across Trenton Street. Intracorp believe that its contract rezone to NC-3 with a 40-foot height designation is more aligned with the Rainier Beach Neighborhood Plan policies, including:

- RB-P 12: Seek to promote townhomes and mixed-use buildings as the preferred development pattern for meeting the housing growth target for Rainier Beach Residential Urban Village; and
- RB-P 5: Encourage the City to support rezones within the Rainier Beach Residential Urban Village for projects that: (A) meets the overall community vision; (B) promote redevelopment of underutilized and derelict sites; and (C) results in pedestrian friendly, well designed new buildings.

As mentioned above, there is currently new townhome development with 30-foot heights along MLK Jr. Way South just north of the Rainier Beach Properties which will establish a strong sense of scale for the Rainier Beach area north of Henderson Street. We would encourage the City to evaluate and support zoning that gradually transitions from the existing low-rise to more intense development envelopes south of Henderson Street and in closer proximity to the light rail station.

Intracorp has significant concerns that potentially tripling the permitted heights to 95 feet as contemplated in both Alternatives could interrupt the townhome scale that is now emerging and stymie the opportunity for a graceful height/bulk transition envisioned in the Neighborhood Plan.

Intracorp encourages the City to strongly consider appropriate transitional zone relationships between the low-rise areas to the north and west and its Rainier Beach Properties. Upon further evaluation, Intracorp is confident that the City will agree a NC-3 designation with a 55-foot height designation is better aligned with the MHA Implementation Principles, especially Principles 2 and 3.

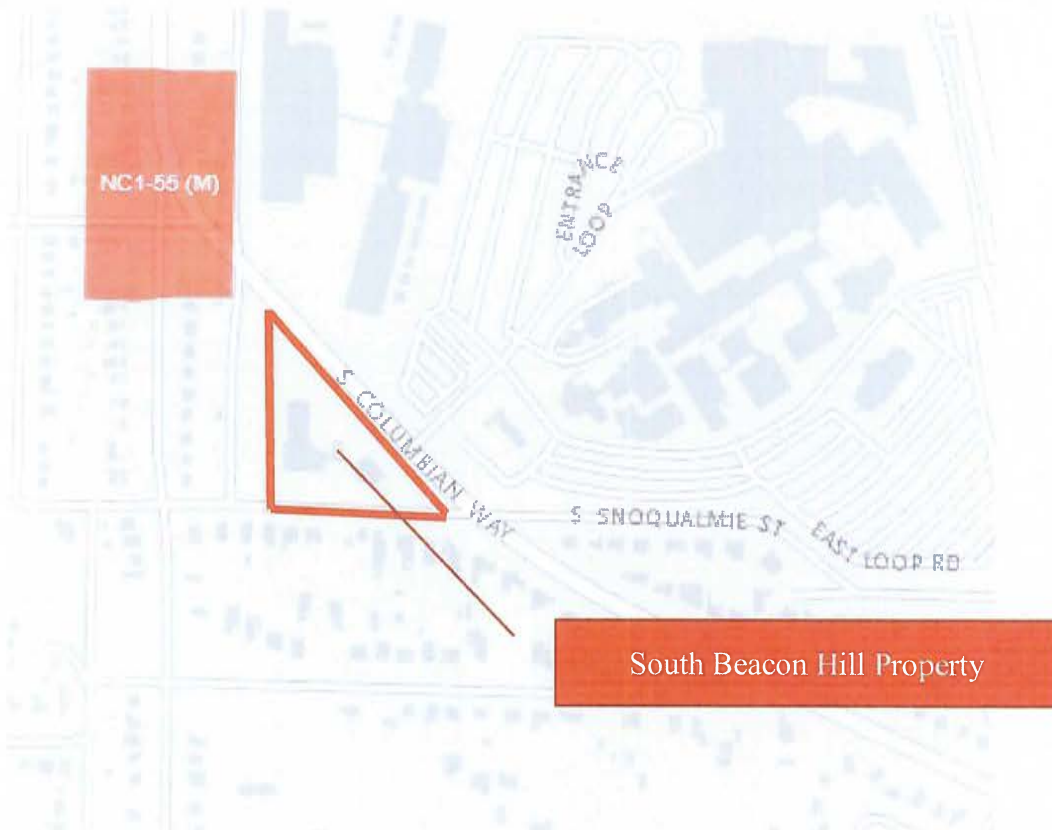
For these reasons, Intracorp respectfully requests that the City's final MHA Proposal implement NC-3 zoning with a 55-foot height designation for the Rainier Beach Properties. At a minimum, the Final Environmental Impact Statement must evaluate the MHA Proposal and SM-RB zoning designations for consistency with the adopted Rainier Beach Neighborhood Plan policies.

¹ Appendix F notes that certain "other zones" will be applied outside of Downtown and South Lake Union and lists a selection of new Seattle Mixed zones, but makes no mention of a Seattle Mixed "RB" zone. Appendix F observes that "additional modeling and analysis of development capacity in these zones will be provided." See Appendix F, pg. 74.

Secondly, Intracorp recognizes the scope of the MHA Proposal outside urban villages and urban centers was limited to current multifamily and commercial/mixed use areas. Intracorp would encourage the City to also evaluate zoning changes in single-family areas outside of urban villages that are currently in non-residential use and are well served by transit and neighborhood amenities.

For example, Intracorp is contemplating a potential rezone at 1625 South Columbia Way (“South Beacon Hill Property”) to low-rise multifamily. The 2.6-acre South Beacon Hill Property is not located in an Urban Village or Urban Center and is currently zoned Single-Family 5000. However, it is an institutional use and currently being used as a private school. The South Beacon Hill Property is just south of the VA Hospital and within a quarter-mile of Jefferson Park, Mercer Middle School and a community pocket of commercial and multifamily uses along 15th Avenue South. The South Beacon Hill Property is well served by transit and just 3 miles from downtown.

Under either Alternative, the adjacent commercial area is rezoned to NC-3 with a 55-foot height designation as shown below.



Absent a rezone, the South Beacon Hill Property could currently be developed with approximately 18 single-family homes costing over a million dollars each. Intracorp believes this is an opportunity to add strategic density to neighborhoods on transit-corridors outside an urban

August 7, 2017

Page 4 of 4

village. Under a potential rezone scenario, the South Beacon Hill could be redeveloped as a multi-family townhome project with up to 90 family-sized two and three-bedroom units. This is an example of how to strategically increase the affordable and market-rate housing stock in the City.

Intracorp encourages the City to upzone the South Beacon Hill Properties to a low-rise multifamily zone, which would be consistent with MHA Implementation Principles:

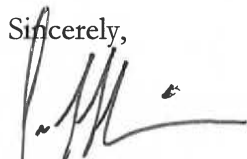
- 1 (Housing) – By encouraging additional family-style housing options and contributing to on-site performance of new affordable housing units; and
- 3 (Transitions) – By strengthening transitions between the commercial and institutional uses to the north and west and single-family areas to the south.

At a minimum, the Final Environmental Impact Statement must evaluate the MHA Proposal and zoning designations for the South Beacon Hill Properties for consistency with the project goals.

Conclusion.

We appreciate the opportunity to comment on the DEIS. Thank you for your consideration. We look forward to continued work with the City to help ensure the final EIS is an accurate, complete evaluation of the MHA Proposal. Please feel free to contact me with questions.

Sincerely,



Ian S. Morrison

From: Ian Morrison
To: [PCD_MHAEIS](#)
Subject: MHA DEIS comment
Date: Monday, August 07, 2017 10:48:14 AM
Attachments: [Fiorito Attachment 5 17 17.pdf](#)

Dear Geoff:

I am writing on behalf of the Fiorito family (Fiorito), who owns the majority of the block in West Woodlands bordered by NW 49th Street, 8th Avenue NW, NW 48th Street and 9th Avenue NW (Property as shown on attachment). The Property is located on the literal edge of the Ballard-Interbay-Northend Manufacturing Industrial Zone (BINMIC). In context of the Ballard Urban Village expansion maps, Fiorito encourages the City to study and support an expansion of the urban village shown in both Alternatives to include all the industrial buffer zoned areas east of 12th Avenue and north of Leary Way.

The BINMIC's easternmost industrial buffer areas are likely within the 10-minute watershed of future light rail. They are currently well served by bus rapid transit and are adjacent to multifamily and single-family residential uses. These industrial buffer areas north of Leary Way lack access to key rail, water or freight corridors, which results in decreased viability for traditional industrial uses.

The DEIS lists the Ballard Urban Village is a high access to opportunity, low displacement risk area, which contemplates larger development capacity increases and fuller boundary expansions.

The City's FEIS should evaluate whether further expansion of the Ballard Urban Village boundaries to include industrial buffer zoned areas would better support the MHA housing production objectives.

As always, thank you for your consideration.

Ian

Ian S. Morrison

Attorney-at-Law

McCULLOUGH HILL LEARY, PS

701 FIFTH AVENUE, SUITE 6600

SEATTLE, WA 98104

DIRECT: [206.812.3380](tel:206.812.3380)

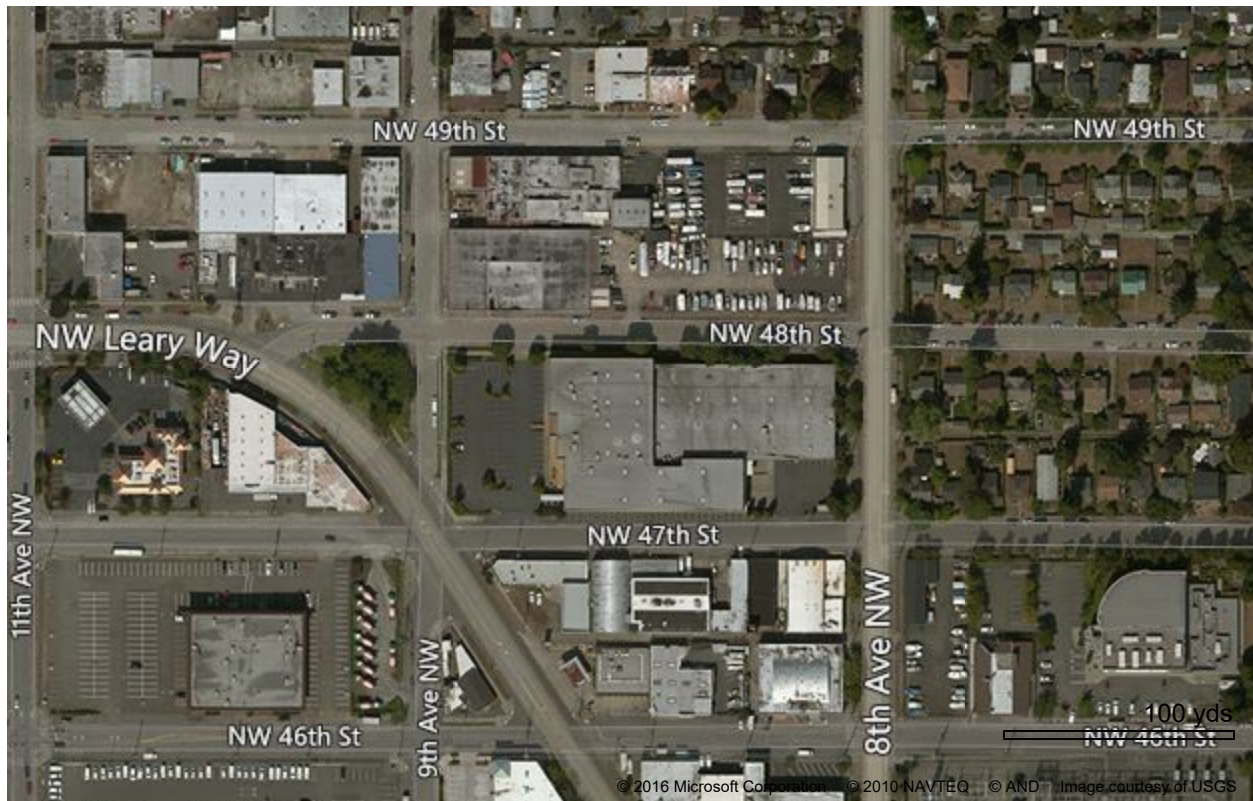
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Name	Michael Morrow
Email address	
Comment Form	
Aesthetics	<div><div>1</div><div>I am a life-long Seattle resident, currently living next to Volunteer Park on 12th E between Prospect and Aloha. I am concerned that the broad approach to zoning adjustments does not take into account the many small subtleties of Seattle's zoning maps.</div></div> <div><div>2</div><div>In particular there is a section of 11th E next to Volunteer Park which is zoned (M). Adding 20 feet of height to this thin strip of housing is completely out of proportion with everything else in the neighborhood. There are many such plots on the map that will create bizarre and likely detrimental impacts on surrounding micro-neighborhoods.</div></div> <div><div>3</div><div>Families who live on our street - several with young (under walking age) - often can't park near their house and must go through an awkward dance of parking and managing family life.</div></div> <div><div>4</div><div>Placing these extra-dense structures right next to family housing is a massive drag on daily quality of life and destroys neighborhood aesthetics. There are plenty of (M) zones where a uniform broad area makes sense to allow a height increase, but I also see many plots across Seattle that are legacy micro-upzones that should not follow the same schematic.</div></div>
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: Tim Motzer
To: [PCD_MHAEIS](#)
Cc: iwall@serv.net; booksgalore22@gmail.com; sandymotzer@aol.com
Subject: MHA Draft EIS Comments from Tim Motzer Related to Opens Space and Recreation and other Issues
Date: Monday, August 07, 2017 8:49:21 AM
Attachments: [MHAEIS17CommnetParksOpenSpace7Aug17Submital.docx](#)

Attached are my comments for the MHA Draft EIS related to Opens Space and Recreation and other issues. Two general comments. The amount of opens space required to mitigate the significant adverse impacts associated with Alternatives 2 and 3 appear not to be achievable with out funding. The amounts established for payment in lieu of building low cost housing units for MHA are drastically below what it will cost to build them. This will result in builders opting to pay the low fees and the City not being able to build the number of units being provided through MHA. In my opinion both to these adverse impacts associated with the implementation of MHA warrant rethinking both alternative 2 and 3.

From: Tim Motzer
To: [PCD_MHAEIS](#)
Cc: sandymotzer@aol.com; director@lakecityfuturefirst.org; r.robinson@i-s-d.com; mvonwalter@comcast.net
Subject: Comments from Tim Motzer Regarding the Propose Tower Zoning for Lake City Under MHA Alternative #2
Date: Monday, August 07, 2017 11:44:49 AM
Attachments: [MHAEIS17CommnetLakeCityTowerZoning7Aug17Submital.docx](#)

Attached are my concerns about the proposed tower zoning for the three separate parcels in the Lake City Urban Village Hub Core. My concerns relate to the lack of community involvement on this zoning change and inconsistencies with MHA original rezone concept of one story increase and our approved Lake City Urban Design Framework Report.

To: Office of Planning and Community Development-MHA EIS
From: Tim Motzer, Member of Lake City Urban Design Framework
Committee and Member of Lake City Neighborhood Alliance
Date: August 7, 2017
Subject: MHA EIS Lake City Proposed Tower Zoning

Alternative number 2 of the MHA shows three parcels in Lake City's Hub Core as being rezoned from the current classification of NC3P-65 to NC3P-145(M1) owned by Bank of America, NC3-65 to NC3-145(M1) owned by the Pierre's, and NC#-85 to NC3-145(M1) also owned by the Pierre's. These proposed zoning changes were never discussed with any of the members of the Lake City Urban Design Framework or representatives from either Lake City Neighborhood Alliance (a group of 26 community organizations representing a board interest of Lake City that meets monthly), or Lake City Future First (recipient of Only In Seattle Grant) who sponsors monthly Lake City Conversation meetings.

The members of the Urban Design Framework Committee had numerous discussions with the Consultant developing the report and the City's Planning Department about the need to have several high rise towners at different locations in Lake City including the Hub Core to allow for more open public space at those locations.

The two issues with the proposed zoning change is the lack of community contact (once again top down decision making-contrary to the adopted 2035 plan public involvement policies) and the concentration of the three locations in the Hub Core rather distributed along the Lake City recently rezoned Neighbor Commercial corridor extending from NE 145th Street south to NE 97th Street. This proposed rezone is inconsistent with the original MHA plan to increase the density of all commercial and multi-family zoned areas by one floor. This proposal also contradicts the approved Lake City Urban Design Framework Report that states that additional height increases

beyond the current zoning and one story increase with the approval of MHA would be allowed only through the contract rezone process and was currently only allowed in urban centers and areas around light rail stations.

From: Erin Moyer
To: [PCD_MHAEIS](#)
Cc: [Erin Moyer](#)
Subject: Response to MHI DEIS
Date: Monday, August 07, 2017 4:58:59 PM

Dear MHA Team,

I am writing in response to the recently released Mandatory Housing Affordability draft Environmental Impact Study addressing the Madison-Miller Park Residential Urban Village.

As a proponent of urban density, I support capacity building to meet the housing needs of our growing city and realize that change is required to make progress. My concern with the city's approach, HALA, and the MHA plan is that it neglects housing for the "missing middle", especially families who do not qualify for subsidized housing and are seeing affordable homes or multi-bedroom rentals disappear from the city's housing stock. The massive up-zoning of urban villages, areas that have historically been where much of the city's "missing middle" resides, without requirements for multi-bedroom units or moderately priced replacement options will cause enormous displacement of lower-and middle-income home owners and renters. The areas targeted by MHA contain older apartments, duplexes and multi-family living options in single-family homes and which currently provide reasonably priced, in-city living options. Additionally, the ability to "buy out" on-site affordable housing units will further segregate the displaced by reducing moderately priced housing options citywide, and replacing it with newer and more expensive housing.

MHA, however well intentioned, will significantly increase racial and economic segregation in Seattle and in return, produce an insufficient amount of low-income housing which, against all best-practices, will be isolated from at-market-rate housing. MHA would be most fairly, equitably, and effectively implemented as a citywide program and as a fee applied to all development in the city. I hope this alternative will be considered.

In reviewing the options currently proposed, I prefer Alternative 1 with the modifications proposed by the Madison-Miller Park Community Group, which I believe better meets both density and affordability goals without sacrificing the fabric of this community. This would be even more effective if the MHA contribution or percentage of affordable housing was significantly higher than the current proposed levels.

The Madison-Miller Park Community Group outlined specific requests, of which I support. I'd like to highlight the following requests:

- All development within areas that are rezoned must include developer impact fees to help pay for infrastructure impacts including storm and sanitary sewers, roads, buried power lines, increased transportation access and increased green/open/recreational

spaces.

- Existing low-income and affordable housing should be protected and designated for affordable housing development exclusively.
- 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.
- Madison-Miller Residential Urban Village should be categorized as "moderate access to opportunity" from "high opportunity" because many community resources are at capacity (since the neighborhood has nearly met our 2035 density goal and is about to absorb the impacts of the soon-to-be open Meany Middle School), and transit access lags needs. Density increases and mitigation actions should reflect this change.
- The request to the Office of Planning and Community Development by HALA of a determination of non-significance for proposed changes to the design review process should be denied. As so many standards (such as required setbacks, etc., parking, etc.) have been relaxed with the new zoning standards, removing the design review process would further erode safeguards that mitigation the adverse impacts that these proposed changes. The impact of losing historic housing stock should be a consideration.

Finally, I'd also like to express how disappointed I've been with the lack of genuine and transparent communication and engagement with residents impacted by the substantial changes being proposed. I was alarmed by the city's lack of advance and direct outreach to impacted residents, the seemingly deliberate confusion caused by making significant changes to the definitions of current zones *and* changing zones at the same time (and sharing a map implying no zone changes where there were changes) so that many residents wouldn't realize that their areas were impacted or by how much, the claim that HALA is about building density and then ignoring the city's density goals and needs, and the lack of impact feedback that the community shared had on this draft EIS. Policies that dramatically alter the fabric and character of our city are too important to be pre-determined and then "sold" to the communities impacted.

Sincerely,

Erin Moyer

Madison-Miller Park Resident

Name	Melinda Mueller
Email address	
Comment Form	
Description of the Proposed Action and Alternatives	<p>1 Regarding the Crown Hill Urban Village: I strongly oppose Alternative 3, for reasons given below. In summary, Alternative 3 will exceed the City's ability to mitigate (via infrastructure, etc.) the effects of increased density. Alternative 2 is preferable, with housing favored over an emphasis on large stores and large parking lots. However, Alternative 2 will also require significant mitigation for the effects of increased density.</p>
Housing and Socioeconomics	<p>2 Particularly north of 85th, the current population would be at significant risk of displacement, due to socio-economic vulnerabilities.. Neither Alternative 2 nor 3 takes this into sufficient account. The CHUV overall has a displacement risk of 14%; the risk is greater than that in the area north of 85th.</p>
Land Use	<p>3 600 new housing units are already under permit for the CHUV area, which makes the "Alternative 1" estimate of only 700 new units by 2035 unrealistically low. The increases in density for Alternatives 2 and 3 are likely also unrealistically low, meaning that the plan's mitigations are insufficient.</p>
Aesthetics	<p>4 The proposed revised thresholds for Design Review would mean that much of the rezoned CHUV would NOT be subject to such review, which means the character of the surrounding neighborhood would not be taken into account as new developments are built. In addition, Alternatives 2 and 3 do NOT comply with the City's ROW requirements for minimum pavement widths.</p>
Transportation	<p>5 Bus routes from the CHUV area to the University District are currently a one-hour trip (or longer, at rush hour). The D-line "Rapid Ride" (which is not rapid--merely frequent) is a 30+ minute trip to downtown, and is already often standing room only during rush hours (I am a frequent rider). The 15 Express route has been reduced to a few trips per day, during weekday rush hours. There is no light-rail service in Ballard. Without sufficient and efficient mass transit options, there will be greater use of cars--but the urban village plans do not require sufficient additional parking. Parking in Ballard is already problematic. The CHUV is the only urban village among those proposed which is not served by light rail.</p>
Historic Resources	<p>6 No systematic inventory has been conducted regarding historic resources that would be impacted or eliminated in Alternatives 2 and 3 of the CHUV proposal.</p>
	<p>7 The DEIS does not include protections for trees within current single-family properties. The plan does not include mitigation for</p>

Biological Resources	loss of these trees, or for replacement of current permeable surfaces with impermeable ones. The plan also has no mitigation plans regarding the effects of CHUV on Piper Creek.
Public Services & Utilities	8 The area of CHUV already has overlong (compared to other areas) police response time, and the 2nd busiest fire station (#31) in Seattle. The public elementary school in the CHUV area already has 16 portables to accommodate current student populations, but this issue is not addressed in the plan. The portion of CHUV north of 85th lacks good culverts, and is without sidewalks.
Air Quality & Green House Gas Emissions	9 Due to issues of mass transit, and likely attending increase in car use (as described above), air quality will likely be impacted.
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	

From: Michael Muller
To: [PCD_MHAEIS](#); [Bagshaw, Sally](#); [Burgess, Tim](#); [O'Brien, Mike](#); [Sawant, Kshama](#); [Johnson, Rob](#); [Gonzalez, Lorena](#); [Herbold, Lisa](#); [Harrell, Bruce](#); [Juarez, Debora](#)
Subject: Extension of the MHA DEIS comment period
Date: Wednesday, June 28, 2017 9:53:16 AM

I would like to request an extension of the MHA DEIS comment period!

Released on June 8, 2017, the DEIS is 462 pages long and the appendices are 364 pages long.

This is over 800 pages to review within only 32 days. I believe more time is needed.

Thanks for considering this.

Michael Muller

Name	E R Murakami
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.	as an individual
Comment Form	
Land Use	<p>1 As Crown Hill will not have light rail service, and only moderate increases in housing density should apply to this neighborhood. Alternative 3 must be excluded for the Crown Hill residential urban village. There is not sufficient space to provide a "gradual transition in building height" between high density buildings of 75' feet to existing single family units in the corridor as shown in the color-coded maps. Alternative 3 would shift areas of single family zones on Mary Ave (in Crown Hill) to commercial, removing small homes in the neighborhood. These small single family homes are precious and part of affordable family housing.</p> <p>2 Alternative 2 estimates an increase of 428 housing units, compared to 1084 units. This is a large enough increase in density for the Crown Hill residential urban village. Even this increase will create parking problems as the transportation service (bus) is insufficient to make households give up ownership of a private vehicle (since parking requirements for new developments in urban villages are basically non-existent).</p>
Transportation	<p>Increases to housing density must be coupled with increases in mass transit. It is not reasonable to believe that people living in "urban villages" will have ZERO cars when the bus service is only good during peak periods, and only toward downtown! To accommodate increased housing density in Crown Hill, the Rapid Ride D and the #40 bus to Northgate and Ballard must have reductions in headways. Also, the #15E and the #18 E must have increase in the number of peak period buses.</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?	

From: [Murdock, Vanessa](#)
To: [Assefa, Samuel](#)
Cc: [Maxana, Sara](#); [Wentlandt, Geoffrey](#); [Driskell, David](#); [Walker, Steve](#); [Nyland, Kathy](#); [Brand, Jesseca](#); [Johnson, Rob](#); [Williams, Spencer](#); [O'Brien, Mike](#); [Burgess, Tim](#); [Juarez, Debora](#); [Gonzalez, Lorena](#); [Bagshaw, Sally](#); [Herbold, Lisa](#); [Harrell, Bruce](#); [Sawant, Kshama](#); [Feldstein, Robert](#)
Subject: Comments on the Citywide Implementation of Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS)
Date: Friday, August 04, 2017 1:15:44 PM
Attachments: [image001.png](#)
[image003.png](#)

Dear Director Assefa:

On behalf of the Seattle Planning Commission, please accept the following comments on the MHA DEIS. The Planning Commission continues to offer strong support for the ongoing work of the Office of Planning and Development (OPCD) and other City agencies to implement Mandatory Housing Affordability (MHA) citywide. We commend the supplemental Housing and Socioeconomic analysis to which you have already committed to include in the Final Environmental Impact Statement (FEIS). This additional racial and cultural analysis in the FEIS will serve to inform community members and elected officials alike as the MHA program moves into an implementation phase.

Comments and considerations regarding a final alternative

After review of all comments received regarding the DEIS, we suggest taking the following into account in selecting a final alternative for the FEIS.

- Consistent with our [Seattle Transit Communities](#) report, we suggest all urban village boundaries be determined by a ten-minute walkshed from frequent and reliable transit, which includes both bus and link light rail service.
- We support maintaining the *proportions* of growth as depicted in Alternative 3, with the village boundaries determined as suggested above. Urban villages with higher access to opportunity and lower risk of displacement should receive greater increases in development capacity than those with low access to opportunity and high risk of displacement.
- In urban villages where a ten-minute walkshed is adjacent to a public investment, including schools, parks, major institutions, and community centers, expand the boundary to include those facilities and adjacent blocks in order to expand housing opportunities near these essential services.
- Expand urban village boundaries to include areas between urban villages and areas in close proximity to urban villages that are already zoned for a mix of uses.
- Consider allowing greater residential density, including taller building heights, around high capacity transit, such as light rail and Rapid Ride stations.
- In areas identified as having a high risk of displacement, shift the proposed capacity towards a denser node at the core of the village and around schools, parks, and community centers—not just along major corridors—and allow for more Residential Small Lot (RSL) zoning designation throughout the rest of the village. RSL zoning, when paired with technical assistance and regulations that encourage homeownership retention and self-development, can be a useful anti-displacement tool. We believe this approach helps balance long-term capacity with near-term anti-displacement strategies.

Suggested additional displacement mitigation measures

Recognizing that zoning has limited ability to respond to market shifts and underlying factors that contribute to displacement, we offer for your consideration the following suggested mitigation

measures to be paired with zoning changes:

- Study future boundary expansions of urban villages not addressed in the current MHA program with high access to opportunity and a low risk of displacement.
- Allow several smaller developments in the same urban village to ‘pool’ MHA requirements for each project if performance units are provided.
- Waive or reduce fees for one to three units created through conversion in RSL and LR1 zones to encourage retention of homeownership.
- Discourage large, new detached housing in RSL through minimum densities or FAR tied to development typologies.
- Minimize the amount of lowest-density zoning, including RSL and LR1, in urban villages with high access to opportunity and a low risk of displacement
- Incentivize and encourage development to choose performance units, especially in areas with a high risk of displacement, through expedited permitting, administrative Design Review, and/or using City subsidies to “buy down” performance units.
- Offer technical assistance to small builders who perform as oppose to pay in lieu.
- Increase City subsidies for ownership units.
- Use ‘Only in Seattle’ grants to keep small businesses and community anchors in place.
- Explore exempting property taxes for seniors and low income home owners.

Element -specific comments

Drawing conclusions based on analysis done with many assumptions is problematic. This is especially evident in the displacement analysis in the **Housing and Socioeconomic** chapter. We suggest clearly stating all the assumptions made and noting conclusive analysis is not possible. We also suggest including the impacts of and mitigation for eviction – a particular form of displacement.

The **Aesthetics** chapter would benefit from a description of how shading is measured and at what time of year and day the shading analysis was done. In addition, a definition of protected view corridors versus personal (unprotected) view corridors would be helpful.

Mitigation measures noted in the **Transportation** chapter include increasing the acceptable threshold of congestion; this action does not mitigate the impact.

As MHA is not required in historic districts, some districts may need to be expanded so as to protect historic and cultural resources not located within a historic district. (**Historic Resources**)

Provide better transit access to the largest parks and open spaces in the City as a mitigation measure to help address the decrease in available park and open space per resident noted in the **Open Space and Recreation** chapter.

In the **Public Services & Utilities** chapter, the internal strategic plans of various agencies including the Police Department and Seattle Public Schools are used to measure potential impact, however the plans themselves are not critically analyzed. While such an analysis is out of the scope of the DEIS, using these internal plans is problematic in making conclusions. Additionally, specific to Seattle Public Schools, making standard adjustments to enrollment practices is noted as mitigation. More focus on adjusting the processes so as to result in more equitable outcomes is encouraged.

The construction impacts noted in the **Air Quality & Greenhouse Gas** chapter are characterized as temporary, however the accumulative effects of construction in a time of increased development are longer term. We support the proposed Air Quality Effects on Sensitive Land Use amendment to the Comprehensive Plan in the 2016/17 cycle that reads “*Consider and seek to reduce the potential health impacts of air pollution on residential populations and other sensitive uses near corridors with high volumes of vehicle traffic, the King County Airport, major rail yards, freight routes, and point sources of pollution.*” and encourage the implementation of this policy to address both short and longer term impacts.

Thank you for the opportunity to comment. Please feel free to contact me if you have any questions or would like to discuss any of these comments further.

Sincerely,
Vanessa

Vanessa Murdock
Executive Director

Seattle Planning Commission

600 – 4th Avenue, 5th Floor
P.O. Box 94788
Seattle, WA 98124-7088
O: 206.733.9271

vanessa.murdock@seattle.gov