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APPENDICES

Comments and Responses

4 Comments and Responses

Chapter 4 of this Final Environmental Impact Statement (Final EIS) contains public comments provided on the Draft Environmental Impact Statement (Draft EIS) during the 60-day comment period and provides responses to those comments. The comment period for the Draft EIS extended from April 24, 2014 to June 23, 2014.

Section 4.1 includes all written public comments and responses to those comments and Section 4.2 provides public meeting comments and response to those comments.

4.1 Public Comments

This section begins with a complete list of comment letters in alphabetical order (by organization or name) showing the assigned letter number. For the convenience of the reader, this list has been divided into ten sub-groups. Each sub-group begins with the list of letters in the group, followed by copies of the letters and responses to all comments. Specific comments in each of the comment letters have been identified and numbered in the margin of the letter. Responses are provided to each numbered comment.

Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted. Comments that address substantive EIS issues are responded to with an explanation of the issue, a correction or other applicable reply.

Table 4–1: **Public Comments Received During the Comment Period**

Letter Number	Name (Last, First)	Agency/Organization	Date
Agencies and Organizations			
1	Chiarello, Gail	Hawthorne Hills Community Council	6/23/14
2	Kooistra, Marty and Stephanie Velasco	Housing Development Consortium	6/23/14
3	Gerhard, Gabrielle and Tony Provine, Co-Chairs	Northeast District Council	6/10/14
4	Bocek, Nancy	Roosevelt Neighbors' Alliance	6/23/14
5	Griffin, Mark	Roosevelt Neighbors' Alliance	6/23/14
6	Fox, John V. and The Rev. Bill Kirlin-Hackett	Seattle Displacement Coalition and Interfaith Task Force on Homelessness	6/20/14
7	Fox, Mathew	City of Seattle—University of Washington Community Advisory Committee	6/13/14
8	Risler, Ruedi	University Park Community Club	6/16/14
9	Stockdale, Jim	University Plaza Condominiums Civic Affairs Committee	6/23/14
10	Fox, Matt	University District Community Council	6/23/14
11	Doherty, Theresa	University of Washington	6/23/14
Citizen Comments			
12	Acorn, Jeff		5/20/2014
13	Alden, N. Sue, FAIA		6/20/2014
14	Alexander, Tyson		6/9/2014
15	Anderson, Richard		6/23/2014
16	Babadjanov, Anton		6/23/2014
17	Bader, Jorgen		6/14/2014
18	Bajuk, Chris		6/22/2014
19	Barrere, Ian		6/19/2014
20	Bennett, John E., AIA		5/16/2014
21	Bennett, John E., AIA		6/19/2014
22	Benson, Arielle		undated
23	Bond, Charles		6/19/2014
24	Bonjukian, Scott		6/23/2014
25	Broesamle, Ben		6/19/2014
26	Campbell, Doug	Bulldog News	6/23/2014
27	Chaddock, Colin		6/19/2014
28	Countryman, Ryan		6/22/2014
29	Crocker, Cory	U District Advocates	6/23/2014
30	Cullen, Kathryn and Thomas		6/8/2014
31	Dampier, Cathy	Malloy Apartments	6/23/2014
32	Dejneka, Alex		5/20/2014

continued on the following page

Table 4–1: **Public Comments Received During the Comment Period (cont.)**

Letter Number	Name (Last, First)	Agency/Organization	Date
Citizen Comments			
33	deMaagd, Chris		6/23/2014
34	DiLeva, Mary Pat		6/22/2014
35	Dubman, Jonathan		
36	Duke, Martin		6/19/2014
37	Espelund, Leif		6/23/2014
38	Fesler, Stephen A.		6/22/2014
39	Fischlin, Segue		4/29/2014
40	Futhey, Kevin		6/19/2014
41	Futterman, Alan		6/19/2014
42	Gangemi, Matt		6/19/2014
43	Grafious, Mary S.		5/20/2014
44	Grafious, Mary S.		6/22/2014
45	Griffin, Mark		5/20/2014
46	Hansen, Justin		6/19/2014
47	Hernandez, Ian		6/19/2014
48	Hopkins, Jonathan J.		6/19/2014
49	Hurrle, J.		5/20/2014
50	Islam, Aminul		6/19/2014
51	Jensen, John		6/19/2014
52	Jergins, JP		6/19/2014
53	John, David		6/19/2014
54	Johnson, Iskra		6/19/2014
55	Johnson, Matt		6/19/2014
56	Johnson, Rebeckah		6/23/2014
57	Joseph, Gabriel		6/22/2014
58	Kostka, Donna		4/29/2014
59	Kyle, Keith		6/19/2014
60	Laird, Charles		4/24/2014
61	Langhans, Aila, Aileen, Wendy and Katherine		6/9/2014 & 6/17/2014
62	Lewis, Penny		6/19/2014
63	Lin, Anson		5/20/2014
64	Lukoff, Benjamin		6/20/2014
65	MacDermid, Todd		6/19/2014
66	Machida, N.		6/23/2014

continued on the following page

Table 4–1: **Public Comments Received During the Comment Period (cont.)**

Letter Number	Name (Last, First)	Agency/Organization	Date
Citizen Comments			
67	Martin, Andrew		6/20/2014
68	McMasters, Andrew	Jet City Improv	6/20/2014
69	Nigh, Peter		6/19/2014
70	Nixon, Shirley		5/20/2014
71	Nostdal, Zach		6/19/2014
72	Nowicki, Gayle	The Gargoyle Statuary	5/20/2014
73	Nowicki, Gayle	The Gargoyle Statuary	6/23/2014
74	Nulty, Brigid		6/19/2014
75	Oakes, Leila W.		6/23/2014
76	Orr, Mike		6/22/2014
77	Pagel, Martin		6/21/2014
78	Peter		6/19/2014
79	Pigotti, Gerry	Gibraltor	6/09/2014
80	Pong, Paul		6/17/2014
81	Reay-Ellers, Andrew		6/19/2014
82	Reid, Brent		5/21/2014
83	Reimers, Milton A.	Schwabe, Williamson & Wyatt	6/23/2014
84	Rice, Fred		6/19/2014
85	Sahabu, Preston		6/19/2014
86	Salomon, Andres		6/23/2014
87	Schmitt, Michael E.		6/21/2014
88	Smyth, Jim		6/23/2014
89	Sommers, Amy		6/21/2014
90	Soules, Scott	Soules Properties, Inc.	6/23/2014
91	Stewart, John		6/23/2014
92	Timberlake, Craig M. and Steve Aleinikoff		undated
93	Whalen, David		6/19/2014
94	White, Alex		6/23/2014
95	Wight, Steve	LCA/IPG patents	6/19/2014
96	Wilkins, Steve		6/17/2014
97	Willis, Darin, and Don Schulze	U District Parking Association	6/23/2014
98	Wilson, Debra		6/2/2014
99	Wilson, Ruth		6/19/2014
100	Wirth, Judith		undated
101	Woelfer, Karl		6/23/2014

Agencies and Organization Comment Letters 1-11

Letter Number	Name (Last, First)	Agency/Organization
1	Chiarello, Gail	Hawthorne Hills Community Council
2	Kooistra, Marty and Stephanie Velasco	Housing Development Consortium
3	Gerhard, Gabrielle and Tony Provine, Co-Chairs	Northeast District Council
4	Bocek, Nancy	Roosevelt Neighbors' Alliance
5	Griffin, Mark	Roosevelt Neighbors' Alliance
6	Fox, John V. and The Rev. Bill Kirlin-Hackett	Seattle Displacement Coalition and Interfaith Task Force on Homelessness
7	Fox, Mathew	City of Seattle—University of Washington Community Advisory Committee
8	Risler, Ruedi	University Park Community Club
9	Stockdale, Jim	University Plaza Condominiums Civic Affairs Committee
10	Fox, Matt	University District Community Council
11	Doherty, Theresa	University of Washington

June 23, 2014

City of Seattle Department of Planning and Development
Attn: Dave LaClergue
700 5th Ave, Suite 2000
PO Box 34019
Seattle, WA 98124-4019
Via email: dave.laclergue@seattle.gov

RE: Comments on the U District Urban Design Alternatives Draft Environmental Impact Statement

Dear Mr. LaClergue,

1 Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the U District Urban Design Alternatives. We realize that the City of Seattle has made great efforts to include input from interested parties over the last few years in terms of what might work for height and density rezoning design alternatives in the U District neighborhood. Some of the residents of Hawthorne Hills were peripherally involved in those public processes. Many of us work in the U District, travel through the U District to get to our jobs, rely on public transit that connects in the U District, attend cultural and sporting events in the U District, shop at stores or eat at restaurants in the U District, teach or attend classes at the University of Washington (UW) or own rental property or businesses in the U District. What happens in the U District has a direct impact on us. Therefore, we appreciate this opportunity to provide our questions and concerns to you so that they may be addressed in the FEIS.

2 We also want to take this opportunity to remind you that Hawthorne Hills Community Council (HHCC) is a member of the Northeast District Council (NEDC) and signed the letter of October 8, 2013 that NEDC submitted on 'scoping' comments for the U District Urban Design Alternatives EIS. That letter specifically asked for consideration and mitigation of the following potential adverse impacts on the elements of the environment listed below that could result from a change in height and density:

1. Recreation - Open space
2. Housing - Preservation of single family zoning and homes
3. Parking - Realistic parking options
4. Traffic - Elimination of traffic congestion
5. Public Services and Utilities - Concurrency for needed infrastructure improvements
6. Aesthetics- Restrict up-zones to ¼ mile walk-shed
7. Impact Fees - Development fees for roads, public services, schools and infrastructure
8. Evaluate distribution of (density) adverse impacts among other Urban & Transit Centers
9. Mitigation - Provide alternatives and concessions to the neighborhood for granting up zones: Infrastructure Improvements, Public Open Space, Public Square, Public Services, Access to Views and Sunlight, Elementary School, Affordable Family Housing and Mitigation of Transportation and Parking Impacts.

2 cont Our review of the DEIS resulted in the conclusion that some of the issues listed above received excellent detailed evaluation, some of the issues received mediocre evaluation and require additional analysis and the remainder of issues received little or no mention or analysis at all. This is of concern to us because we thought that by stating our concerns in the scoping period that we would at least see all of the issues listed above addressed and analyzed. We will discuss these concerns in more detail in our table of comments.

3 HHCC has additional concerns with potential negative effects on the U District and surrounding neighborhoods (including HHCC) due to the proposed design alternatives described in the DEIS. The description of the alternatives in the DEIS and the subsequent analysis of their potential impacts resulted in the overarching concern that we have with the DEIS: **the lack of definition and commitment to the long list of "potential" mitigation measures for the design alternatives.** We believe the potential adverse effects on the neighborhood and the surrounding neighborhoods may be irreversible if there is no commitment and upfront assurance of mitigation.

4 One other major concern we have is that the impact analysis appears to be a checklist of whether the design alternative impacts are within the parameters of laws, guidelines, rules, and set trigger levels rather than a thoughtful response to *"Will there be an adverse impact due to the proposed design alternatives?"* We understand that one test of whether there is an adverse environmental impact is to determine if it meets specific set guidelines. However, the level of analysis that is missing from the entire document is whether there is an adverse impact to the environment over and above the set guidelines.

5 The attached table, "Hawthorne Hills Community Council Comments on the U District Urban Design Alternatives Draft EIS," identifies a number of issues we have identified in review of the DEIS that illustrate the deficiencies that we have found with the analysis that must be addressed before the City makes any further decisions regarding the design alternatives selection.

6 Today, Seattle is faced with important choices about whether we will strengthen or undermine the livability of the U District. This decision will set the course for the future of the U District. We see a need to protect and enhance the neighborhood and policy planning established to preserve the U District neighborhood because the U District is different from many of the other neighborhoods in town that have already undergone height and density change EIS analysis by the City.

For example, both the South Downtown and the South Lake Union Height and Density EIS's examined changes that would occur in an area that was more industrial and did not impact as many residents. In addition, we now have the benefit of reflecting on how proposed impact fees and mitigation proposals have or have not worked in those two areas. As you will see from the newspaper articles that are attached to this comment letter, the proposed fees and mitigation have not worked as well as many in the City had hoped. Since the same or similar approaches are proposed as part of the U District design alternatives, we would like to see evidence of why those approaches will work now when they have not worked in the past.

6 cont The U District neighborhood serves as a central hub of culture, sports, education, and employment for Seattle as a whole and for the community of residents that live there. There is no other neighborhood in Seattle similar to the U District and that is why we are glad to take the time to provide our input. We hope that our comments and involvement will assist in providing the information needed to make good decisions for its future.

7 **Conclusion**: The HHCC finds that the U District Urban Design Alternatives DEIS is lacking in analysis on key issues of the environment and additional information is respectfully requested as noted on the attached table. The change in height and density that is part of the proposed design alternatives results in impacts that require companion mitigation associated with the proposed changes or there will be long-term consequences for the people currently living in the neighborhood and on the people that live in the surrounding neighborhoods such as ours. There are too many unanswered questions about the proposed mitigation for the proposed design alternatives impact to the neighborhood. While we express many concerns in this comment letter, the major concern remains the lack of definition and commitment to the long list of "potential" mitigation measures for the project.

City and regional decision makers must be armed with a thorough and comprehensive analysis of the effects of this decision through the analysis presented in the EIS. Based on the Draft EIS, we don't believe that City or regional decision makers will be armed with critical information needed to make decisions about the design alternatives.

Thank you for the opportunity to provide input into the DEIS. We would be happy to work with your staff in development of the Final EIS process, in particular with regard to our comments above. Please do not hesitate to call me at (206) 523-0175 if you need any further information.

Sincerely,

Gail Chiarello
President, Hawthorne Hills Community Council

Attachments:
Attachment 1: Hills Community Council Table of Comments on U-District Urban Design Alternatives Draft EIS
Attachment 2: Seattle Times, May 9, 2011
Attachment 3: Seattle Times, November 28, 2013
Attachment 4: Puget Sound BizTalk, April 15, 2014
Attachment 5: Incentive Zoning: A Reality Check. Downtown Seattle Association, February 2014. DSA Workforce Housing Subcommittee

CC: Ed Murray, Susan McLain, Tim Burgess, Jean Godden, Sally Clark, Mike Obrien, Nick Licata, Sally Bagshaw, Bruce Harrell, Tom Rasmussen, Kshama Sawant, Diane Sugimura

cc: ed.murray@seattle.gov, Susan.McLain@seattle.gov, tim.burgess@seattle.gov, jean.godden@seattle.gov, sally.clark@seattle.gov, mike.obrien@seattle.gov, nick.licata@seattle.gov, sally.bagshaw@seattle.gov, bruce.harrell@seattle.gov, tom.rasmussen@seattle.gov, kshama.sawant@seattle.gov, Diane.Sugimura@seattle.gov.

Attachment 1: Hawthorne Hills Community Council Table of Comments on U-District Urban Design Alternatives Draft EIS

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required	
GENERAL				
DEIS	Throughout the document	A flaw in the DEIS is that it reads as though it is a checklist for compliance with a variety of laws, regulations, permits, and conditions. We think that assuring that a proposal is in compliance with regulations is important **but it is only one of two levels of review needed for objective SEPA analysis.** The question of impact to the environment beyond sheer regulatory compliance must also be asked. The question "is there a significant impact to the environment including people living in the area?" stops after a review of current regulations and is not fully addressed in this DEIS. The analysis of aesthetics starts to address this but many of the other analyses defer to rules and dismiss the analysis beyond regulations from further review.	Provide an analysis of each element of the environment giving consideration as to whether there is an impact to the environment over and above regulatory compliance.	8
DEIS	Throughout the document	The description of the alternatives in the DEIS and the subsequent analysis of their potential impacts resulted in the overarching concern that we have with the DEIS: **the lack of definition and commitment to the long list of "potential" mitigation measures for the design alternatives.** We believe the potential adverse effects on the neighborhood and the surrounding neighborhoods may be irreversible if there is no commitment and upfront assurance of mitigation. There is no commitment to mitigation for most of the environmental elements. The EIS is programmatic. However, in order to be able to state that there are no significant impacts, the mitigation must be determined, stated and committed to for demonstration of how the impact will be below significant adverse levels. The EIS must commit to one or more of the mitigations that will keep the impact below significant levels. The professional consultants should be able to guide the City staff to understand what the threshold or trigger level is for mitigation for each element of the environment. It is not enough for the EIS to state that the City "may" do something. They "must" do one of the items on the list or	Commit to the mitigation for each element of the environment and explain why the mitigation reduces the impacts to below significant thresholds and when that mitigation will be implemented.	9

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required	
		they cannot truly claim there are not impacts. They don't necessarily have to choose which they will do now but they must **commit that the mitigation will take place before or concurrent with the development efforts**. The statement that there is no significant adverse impact should go hand-in-hand with some substantiation of why that is the case and what the committed mitigation is if it is needed to keep below a certain threshold of impact.		9 cont
DEIS	Table of Content page vii	The numbering for the chapter on Open Space is incorrect.	Correct chapter titles in the Table of Contents to match the chapter titles in the document.	10
DEIS	Fact Sheet pg. ii	Required Approvals and or Permits: The text reads: "*The following actions would be required to adopt a preferred zoning approach: Identification of a preferred approach; and Enactment through zoning and development code revisions of preferred height and density changes for the U-District study area.* " However, the scoping information contradicts this. Page 3 of the Scoping Summary document states: The Draft EIS will not identify a preferred alternative. Will the Final EIS identify a preferred alternative?	Clarify whether the FEIS will identify a preferred alternative and how it will be decided on.	11
Open Space and Recreation				
DEIS	Page 3.7-7	The EIS states on page 3.7-7:*"Today, the U District does not meet some of the open space goals established by the Comprehensive Plan. While several planned parks will increase the supply of open space, this increase alone will not be enough to catch up to a growing neighborhood. Without additional open spaces, the deficit in the study area will grow from approximately 3 acres to 5 acres. (See Table 3.7–3.) Similarly, the U District does not meet the goal for indoor recreational space. With future growth, the goal for community gardens will not be met unless additional space is allocated."* This is a perfect opportunity for the City to meet some of the open space and recreational needs for the U District. Preparing a list of prioritized open space and recreational areas for the U District should be a part of the mitigation plans.	Address how the open space and recreational needs of the neighborhood will be considered as mitigation for the increased density.	12

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
DEIS	Page 3.7.7	The EIS states on page 3.7-7:*"The projections suggest that growth in the neighborhood will out-pace the expansion of open spaces and recreation facilities—generally this means that the neighborhood will be farther from meeting these goals in 2035 than it is today. These existing and projected deficiencies clearly support the acquisition and development of additional open space and recreational facilities to serve the study area. But because the growing deficiencies in supply and type of open space are the same with or without zoning changes, these deficiencies are not considered impacts for purposes of this EIS."* Whether or not the impacts would be the same with or without the rezone, we believe that open space and recreational facilities are so deficient in the U District that they are worthy to prioritize and place into potential mitigation for the design alternative changes.	Consider specific preferences stated in the stakeholder outreach programs and in the scoping comments as part of the mitigation. State specifics of where the City may purchase property or use existing owned property for open space and recreation.
DEIS	Page 3.7.7	The EIS states on page 3.7-7:*"As for the 2004 Comp Plan citywide goal for Breathing Room Open Space, Seattle's 2012 population (634,535 residents) already surpassed the eligible Breathing Room Open Space. To meet the goal of one acre per 100 residents, Seattle would need 6,345 acres—as of 2011, there were 6,187 acres. Citywide population growth by 2035, projected to be approximately 140,000 new residents, will likely out-pace growth of Breathing Room Open Space— therefore it is likely that the city will be farther from meeting its 2004 goal. (Growth in the U District accounts for about 5% of the citywide total over this period.) Like the deficiency in Village Open Space, the growing deficiency in Breathing Room Open Space is projected to be the same with or without zoning changes.* ***Consequently, the increasing lack of Breathing Room Open Space is not considered an impact for purposes of this EIS."*** We understand that Breathing Room Open Space is the same with or without the zoning changes. However, we believe that this is an opportunity to provide for Breathing Room Open Space as part of	Designate specific parcels of land that the City could purchase to meet the open space and recreational needs of the neighborhood including Breathing Room Open Space.

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Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required	
		proposed mitigation opportunities. If the U District is to absorb such intense growth for the region as a whole, there should be some acknowledgment and compensation in return.		14 cont
DEIS	Page 3.7-7	The EIS states on page 3.7-7:*"Inconsistencies relating to Village Open Space goals and Breathing Room Open Space goals are true of all the alternatives, including the "no action" Alternative 3.* ***Because these inconsistencies result from anticipated growth, not the proposed rezone and related actions, they are not significant impacts for purposes of this EIS."*** We understand that the inconsistencies result from anticipated growth, not the proposed rezone. However, if these are truly goals for the U District, we believe they should be taken seriously and deserve a less clinical analysis. Village Open Space and Breathing Room Space are important to the livability in the U District.	Determine how Village Open Space and Breathing Room Space goals can be met as part of the EIS process and include it as part of the mitigation options.	15
DEIS	Page 3.7-11	Since growth under any of the alternatives will affect demand for passive and active recreation opportunities, the EIS should have seized this opportunity to find ways to mitigate the proposed rezone that will provide increased density by stating how the City would address how to fulfill the existing recreational needs.	Commit to specific mitigation measures that are presented in the DEIS.	16
DEIS	Page 3.7-6	The open space chapter states that residents have expressed a wish for highest priority to be given to a green space or park in the vicinity of Brooklyn Avenue between NE 43rd and NE 47th, yet no such plan actually exists.	State how a plan will be put in place to provide for a green space or park in the vicinity of Brooklyn Avenue between NE 43rd and NE 47th.	17
DEIS	Page 3.7-6	Many comments in the scoping summary state that the neighborhood is interested in a plaza over the proposed light rail station. State how the idea of a plaza may be implemented over the proposed light rail station or provide an alternate location.	Provide further analysis of how a plaza over the proposed light rail station could become a reality.	18
TRANSPORTATION				
Transportation Mitigation				

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required	
DEIS	Page 3.5-60	There is no firm commitment to transportation mitigation package strategy.	Commit to a mitigation strategy including implementation, schedule and financing.	19
DEIS	Page 3.5-60	Some of the mitigation measures presented as "optional" with the phrase *"could be..."* should be changed to firm commitments in order to obtain the performance evaluated in the EIS.	The project must either fully commit to mitigation and help fund the traffic control or revise the analysis.	
DEIS	Page 3.5-60	Additional information is requested about the bicycle facilities in each corridor. Combine roadway volumes and speeds with the bicycle facilities in each corridor to estimate an impedance level to provide a relative comparison for each alternative, by corridor. The use and impact of additional bicycle use of the Burke-Gilman Trail should be discussed in the context of the planned trail improvements.	Provide the additional analysis requested.	20
DEIS	Page 3.5-60	We are interested in getting more information about the proposed transportation improvements: What are the planning level cost estimates for the improvements? What projects are near-term, intermediate, or longer-term improvements? Are the proposed projects interdependent? What are the key issues related to implementation of each project? For example, a new parking garage may be identified as needed and would likely need to precede removal of on-street parking to better serve transit or bicyclists.	Please respond to questions stated.	21
DEIS	General transportation	Travel east and west in the U District is extremely difficult. We are concerned about east-west traffic movement. East–west corridor performance is a critical analysis consideration, recognizing that Sound Transit will increase the service and reliability of north-south transit connections, but that it will not directly enhance east–west connections on already congested corridors along Northeast 45th Street, Northeast 50th Street, and Northeast Pacific Street. Within the U District, the success of the transportation system depends on the corridor and the travel mode.	Define the 8 to 10 most critical corridors for the east-west traffic movement for each travel mode. Explain how the east-west traffic movement will be able to function at a reasonable level with the increased density. Reasonable meaning LOS C or	22

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
			better.
DEIS	Page 3.5-66	We are concerned with the plan for parking in the U District. Specific commitments to mitigation measures are essential for livability in the U District.	Provide a commitment to a mitigation package for Parking Strategies.
PUBLIC SERVICES: CHILDCARE FACILITIES AND ELDERCARE			
DEIS	Page 2-13	The DEIS states: *"For the U District study area, the UDF identifies the following list of incentive measures for further consideration and prioritizing:* *New public and private open spaces, including spaces for active and passive recreation* *Mid-block pedestrian pathways* *Affordable housing* *Larger-sized residential units to accommodate families* *Support services and facilities for vulnerable populations including seniors, non-English speakers, and homeless people* *Child care* *Preservation of historic buildings* *Streets and alleys that are friendly to pedestrians, including landscaping, sidewalk cafés and other features* *Preservation of regional forests and farmlands* *Any future decisions about specific incentive measures will be made based on the public comment and city review of this EIS and other data."*	Analyze the lack of childcare and elder care facilities in the U District. Describe how high quality childcare and elder care needs will be met, how they will be funded and when they will be implemented under the different design Alternatives.
DEIS	Page 2-13	We are concerned that childcare is listed as one of the most important priorities but there is no designation or planning for childcare centers (or eldercare – another concern of ours) in the DEIS.	Provide information in the EIS to show how planning for childcare or eldercare facilities may be part of mitigation packages in the different design alternatives.
DEIS	Page 2-13	The waiting list for UW students and faculty to get childcare through UW	Describe how the University of

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Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required	
		centers is frequently more than 2 years because they lack sufficient childcare facilities. Their student and faculty childcare needs are left to be met by social service, religious organizations that are non-profits or other volunteer led groups. The City has an opportunity to accommodate sufficient childcare and eldercare needs as mitigation for the increased density that the neighborhood will be providing. A Seattle Times article describes some of the problems and is attached to our comments: http://seattletimes.com/html/education/2015009857_parents10m.html *"No one knows exactly how many UW students are parents, but the school's Graduate and Professional Student Senate (GPSS) estimates that one in 10 students is raising a child.* *Lack of adequate child care is the third-greatest barrier to completing a college degree, said Ben Henry, vice president of the GPSS and a parent himself. The GPSS has been working on child-care issues for several years, mostly through legislative proposals, and students are now asking the university administration for help."*	Washington will adequately address the issue of providing childcare for their students and faculty to reduce the strain on the rest of the community.	24 cont
INCENTIVE ZONING AND AFFORDABLE HOUSING				
DEIS	Page 3.2-18	The City's existing incentive programs offer development bonuses. However, we have learned that the incentive zoning program may not be working in other areas of the City. A study completed in February 2014 by the Downtown Seattle Association found the following (it is attached to our comments): At current fees, 62% of eligible development in Seattle did NOT to use the incentive since 2001 •In South Lake Union alone, 14 of 20 projects did not use the incentive •Significant public benefit was left on the table as a result of projects in downtown and South Lake Union building below zoned capacity:	What assurance can the City provide as to why the incentive zoning program will work in the U District when it has not worked in other neighborhoods such as South Lake Union. If the incentive zoning will be different, how will it be different?	25

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		http://www.downtownseattle.com/assets/2014/02/DSA_IZRealityCheck_2-12-14-FINAL-FINAL.pdf According to an article from the online source, *Publicola*, February 17, 2014 also provided data on the lack of success of the current incentive zoning program. http://www.seattlemet.com/news-and-profiles/publicola/articles/isnt-it-weird-thatincentive-february-2014 The article states: *"What's been left on the table because developers didn't build to capacity thanks to the fee? According to the city, $49.5 million in affordable housing and day care program funding. Additionally: $74 million in sales tax revenue went poof along with $100.8 million in possible property taxes."*	25 cont
DEIS	Page 3.2-18	A February 13, 2014 City Council Forum on Incentive Zoning and Affordable Housing illustrated that the City is still looking for the right solution to use for areas for increased density. We are concerned that the City is proposing the same incentive zoning and definition of affordable housing for this U-District rezone that has failed in other neighborhood rezones in the City previously (see attachments to these comments). http://www.seattle.gov/council/issues/affordablehousing/default.html The same report concluded that incentive zoning accounted for less than 2% of Seattle's new housing supply in the last 12 years. Under any approach, Incentive Zoning will supply only a fraction of Seattle's affordable housing needs; other tools are needed. The DEIS shows a graph showing % of income going into rent. According to the graph almost half (49%) of renters in the U-distinct pay over 50% of their income in rent, versus 22% Seattle wide (as of 2011). As 30% and below is considered "affordable" this would seem to suggest that the U District in particular needs strong mitigation for affordable housing.	How will incentive zoning and affordable housing goals be met as part of the design alternatives? How can the City make statements about use of incentive zoning as mitigation in this EIS when the entire program is undergoing change due to the lack of success in the past?	26
DEIS	Page 3.2-18	We are especially concerned about how incentive zoning and tax programs relate to providing affordable housing.	How will the City assure that affordable housing is provided	27

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required	
			for? Give details on how the U District program will provide affordable housing, how it will be funding and when it will be implemented.	27 cont
DEIS	Page 3.2-18	There is no provision in the incentive zoning that has been used by the City to keep developers from pulling housing off the market after the expiration of their twelve year tax exemption and converting this housing to more valuable condominiums.	We would like to see a provision that would require developers to retain the housing by eliminating the expiration date.	28
AESTHETICS				
DEIS	Page 1-7 Alternatives 1 and 2	We are concerned with the proposed abrupt changes in building heights for Alternative 1 and Alternative 2. We would like to see a more gradual height differential for the proposed rezone. We understand that most focused growth will be around the transit area. We would like to see building heights differ across the U District but in a gradual manner. We don't want to see 65-ft limits across the board in the U District. However, we also believe that raising the heights, especially on University Avenue, will take away some of the inherent charm that comes with lower height buildings. In addition, many of the historic buildings or buildings with character and history are on University Avenue. We see abrupt building height changes as a significant impact to the environment.	Produce a revised alternative that includes more gradual building height changes.	29
DEIS	Page 1-17	The DEIS states that *"with the proposed mitigation, no significant unavoidable adverse impacts to aesthetics, scenic routes or light and glare are anticipated."* There is no commitment to any of the mitigation. We need to see a commitment to the mitigation before we agree that there are no significant unavoidable adverse impacts.	Provide a commitment to the mitigation proposed to attenuate the impacts analyzed.	30
AESTHETICS: HYBRID ALTERNATIVE				
DEIS	Suggestion	Alternatives 1 and 2 both have pros and cons in terms of proposed building heights and proposed development standards. We would like to see an	Produce a revised or "hybrid" alternative that includes more	31

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required	
		alternative provided that would allow for the maximum building heights of between 125 and 160 feet suggested in Alternative 1 but with the proposed development standards proposed in Alternative 2 that would reduce building bulk and increase building separation.	gradual building height changes.	31 cont
LAND USE				
DEIS	Page 1-8, first paragraph under Alternative 3	The DEIS states: *"Because existing zoning allows for greater intensity than is currently found in the study area, redevelopment would likely be at greater intensities than currently exists. However, compared to the action alternatives, development would generally be less intensive and more distributed throughout the study area."* We find this statement difficult to believe. How are you defining intensity because Alternatives 1 and 2 appear much more intensive than Alternative 3?	Provide a clarification of the definition of intensity and intensive as used in this paragraph.	32
DEIS	Page 1-8, second sentence under Alternative 3	The DEIS states: *Land Use Compatibility. No significant land use compatibility impacts are anticipated."* We are left hanging with this statement that doesn't substantiate why there are no impacts anticipated. This is the case with many other elements of the environment throughout the DEIS.	Provide clarification as to why there are no impacts anticipated with Alternative 3.	33
DEIS	Page 1-8, sentence under Significant Unavoidable Adverse Impacts	The DEIS states: *No significant unavoidable adverse impacts are anticipated."* Again, we are left hanging with no substantiation of why there are no impacts anticipated This is a common problem throughout the document under each environmental element examined.	Clarify why there are no unavoidable adverse impacts anticipated. Is it because they are mitigated? If that is the case, what are the specifics of the mitigation?	
DEIS	Page 1-9 under Mitigating Measures	The DEIS states that adopted UCUC Neighborhood Element policies should be reviewed for consistency with the proposal. We thought that the EIS would review them for consistency and include them in the EIS analysis.	Review the UCUC Neighborhood Element policies with the proposal as part of the EIS analysis.	34

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required	
AIR QUALITY AND GHG EMISSIONS				
DEIS	Suggestion	On June 17, 2013, Seattle City Council adopted Resolution 31447, formally adopting Seattle's 2013 Climate Action Plan. The Climate Action Plan is composed of recommended actions to be taken to meet Seattle's goal of becoming carbon neutral by 2050. The EIS does not provide information as to whether the proposed project would make it more difficult or less difficult for the City to meet its goals as a result of the proposed project action. The EIS states that the Plan has a wide range of GHG-reduction strategies and outlines some operational features that could be included in the proposal but it does not commit to any of these features.	The EIS should provide analysis of whether the proposed project would make it more difficult or less difficult for the City to meet its carbon neutral goals and thereby creating an adverse impact to the environment. The EIS should commit to specific operational features that would meet the carbon neutral goals if the analysis shows that these features are needed to mitigate for adverse impacts.	35
DEIS	Suggestion	The DEIS states: *"With respect to specific types of pollutants, the Seattle area is in an attainment management area for ozone, particulate matter and carbon monoxide. Because growth projections in the EIS alternatives do not exceed growth anticipated in regional growth projections from the Puget Sound Regional Council, no significant adverse air quality impacts are anticipated. However, depending on the nature of future site-specific development, mitigation may be necessary to address site-specific impacts associated with construction. This mitigation will be identified and required as part of future project-level review."* Residential housing proposed along I-5 corridor is the reason that air quality analysis is important. It's a health issue. Previous analyses have indicated that locations near freeways are subject to higher levels of fine particulate matter (PM2.5) as well as other vehicle-related emissions such as NOx, diesel engine exhaust particulate (DPM), and other toxic air pollutants. Some jurisdictions discourage or prohibit development of residential uses within close proximity to major roadways.	Include the implications of the alternative plans on local air quality and the effects of emissions from traffic on I-5 on the suitability of residential development in close proximity to this major emissions source.	36

Document	Location in DEIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required	
NOISE				
DEIS	Suggestion	The increased density will generate significant noise levels from related traffic and crowds entering and leaving the site that must be evaluated in order for a complete EIS. These noise levels should be evaluated relative to a baseline and to model the increase in noise relative to existing conditions. The impact should be compared to the local noise code, relative to potential receivers and whether the noise increase are compatible to the ambient acoustic environment. How the increased density fits into the existing environment and its impacts to existing businesses and land uses both individually and cumulative should also be evaluated.	Provide quantitative analysis of the noise levels relative to a baseline and model the increase in noise relative to existing conditions. Evaluate how the increased density fits into the existing environment and what its potential noise impacts may be to existing businesses and land uses both individually and cumulatively.	37
SCOPING SUMMARY ISSUES				
Scoping Summary	Page 7	The Scoping Summary page 7 states: *The analysis of schools will include a review of existing facilities and capacity, forecast demand under the alternatives and potential impacts. For any significant impacts,* ***proposed mitigation will be identified,*** *but detailed consideration of how to provide a school does not fit within the EIS scope.* If it is needed for mitigation, and there should be a provision, why wouldn't the consideration of how to provide a school or childcare center be considered in the EIS?	Explain why the detailed consideration of how to provide a school does not fit within the scope of the EIS.	38
Scoping Summary	Page 3	The Scoping Summary page 3 states: *The open space analysis will include an inventory of existing and planned facilities within and immediately surrounding the study area, documentation of adopted open space standards and the extent to which the study area does or does not meet these standards under each alternative. Potential mitigation to address identified impacts will be described,* ***but the EIS will not include a detailed implementation strategy for any particular improvement.***"	Provide implementation strategy for improvements that are required to mitigate impacts from the proposed rezone.	39

Attachment 2

The Seattle Times Winner of Eight Pulitzer Prizes

Originally published Monday, May 9, 2011 at 9:18 PM

UW students bring kids to classes, seek child-care help

At the University of Washington on Monday, dozens of student-parents brought their children to class to draw attention to the lack of child care near the UW's Seattle campus, and to ask the university for help in providing more family-friendly areas around the school.

By Katherine Long

Seattle Times higher education reporter

It wasn't easy to keep a 9-month-old baby entertained while trying to absorb the intricacies of the state's Growth Management Act, but University of Washington student Joel McMillan did his best.

While UW lecturer Mike Schechter discussed the history of comprehensive planning in the state, McMillan bounced Nello on his knees, then tried to entertain him with a rattle.

At the UW Monday, dozens of UW student-parents brought their children to class to draw attention to the lack of child care near the UW's Seattle campus, and to ask the university for help in providing more family-friendly areas around the school.

No one knows exactly how many UW students are parents, but the school's Graduate and Professional Student Senate (GPSS) estimates that one in 10 students is raising a child.

Lack of adequate child care is the third-greatest barrier to completing a college degree, said Ben Henry, vice president of the GPSS and a parent himself. The GPSS has been working on child-care issues for several years, mostly through legislative proposals, and students are now asking the university administration for help.

Top comments Hide / Show comments

"Protesting a lack of child care, he brought his six kids to campus with the help ... (May 9, 2011, by krokoko) *Read more*

Your children are not our responsibility! Figure it out or forgo your desire to receive... (May 9, 2011, by nick469) *Read more*

You had the kids...you figure out the child care. Not one dime of money should go to... (May 9, 2011, by CH_3NO_2) *Read more*

Read all **170** comments > Post a comment >

Student-parents describe how difficult it is to complete a college degree while trying to raise a child. Child-care centers closest to campus have long waiting lists, and it can take several years to secure a spot, they say.

Mashael Alsufyani, a student from Saudi Arabia who is in the UW's intensive English program, said her son Othman has had problems adjusting to day care, and the facility is so far away from campus that she has missed some classes while she dashed across town to get him. "We want a day care here," she said. "This is really necessary for us."

Eric Godfrey, the UW's vice provost for student life, said the university has investigated how much it would take to create on-campus child care, but "the cost is just enormous," and "a relatively small number of children" would be helped.

Students also say they plan to ask the administration for family-friendly study rooms, play areas for children, diaper-changing stations and lactation rooms. They'd like to have some sort of drop-in day care offered at the intramural activities building, or IMA, the student-owned recreational sports facility next to Edmundson Pavilion.

"If specific ideas surface, we would look at them," Godfrey said.

A number of community colleges offer child-care programs on campus, including Shoreline, Everett and Edmonds community colleges and Bellevue College. The programs often serve as instructional labs, where students can do observations and internships while working on an education degree.

The UW does offer some aid to student-parents.

Its child-care assistance program provides subsidies to low-income students, covering up to 60 percent of child-care costs; this year, about 300 student-parents got some level of assistance for approximately 400 children.

The program, which used to get a small state matching grant, is now entirely paid through student fees — "basically, students subsidizing students," Henry said.

There is no playground on campus, and diaper-changing areas are few and far between. But the UW's law-school building, William H. Gates Hall, has a remote-learning room that allows students to watch law-school lectures on video screens while their children play in the room, sort of like a movie theater's crying room.

"It's been terrific," said Hudson Hamilton, a third-year law student. He and his wife, Sayaka, have a 13-month-old son, Oliver, and Hamilton said he uses the room in a pinch, when other child-care arrangements fall through. "The professors have been really understanding in our school," he said.

The law school has tried to use its family-friendly atmosphere as a recruiting tool, said Sarah Reyneveld, president of GPSS and also a law student. The more relaxed attitude about children in the law school helps to attract professors and students alike, she said.

But the law school is an exception on a campus where few facilities exist for the children of students.

"I rarely see children on campus, and I can count on one hand the number of times I have brought my own son to campus," said Henry, of the GPSS. "It shouldn't be that way."

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Attachment 3

The Seattle Times
Winner of Nine Pulitzer Prizes

Local News

Originally published November 28, 2013 at 8:25 PM | Page modified November 28, 2013 at 9:27 PM

Visions for the U District: taller, vital and still funky

City planning efforts for the University District envision more density around a future light-rail station and buildings up to 34 stories high.

By Lynn Thompson

Seattle Times staff reporter

On a recent cold and sunny afternoon, a young man in bluejeans and dreadlocks strummed a guitar outside the University District post office. It might have been 1973 or 1993. There's a sameness to the street scene over time here — youthful energy, a creative spirit, the ongoing tension between counterculture and conformity.

But "The Ave" has struggled in recent decades. Much of the retail business shifted long ago to University Village, a long walk and a world away. Narrow storefronts featuring budget teriyaki and pho proliferated. More homeless street kids and drug dealers moved in.

Doug Campbell, who's run Bulldog News since 1983, describes the experience of walking the street today as abrasive.

"The Ave has seriously declined as a business district. It shouldn't be that way," he said.

Now, with construction of a new Sound Transit light-rail station at Northeast 43rd Street and Brooklyn Avenue Northeast set to begin next month, city planners and community leaders are trying to guide new development along The Ave and the surrounding neighborhood.

Through two years of meetings and workshops, they've reached a surprising amount of agreement: Keep the funky, eclectic character. Add several thousand new residents, along with parks and a school to attract families. Build residential and office towers in the heart of the district as high as 340 feet.

With the University of Washington taking an active role in the planning, neighborhood advocates have identified other shared goals: Attract youth-oriented businesses including shops, night life, art galleries and music venues. Provide social services to residents in need. Become an innovation center attracting spinoff businesses from the UW so the U District resembles not just Berkeley, but also Palo Alto and Cambridge.

"In my career, I've never seen such a clear consensus about strategic growth," said Brian Scott, an urban planner and the project manager for the University Livability Partnership, the planning effort sponsored by the city, the UW, the University District Chamber of Commerce and its Business Improvement District. "Clearly people want to see the U District grow and evolve."

Open-space issue

The biggest source of disagreement so far hasn't been about height and increased density, which many feel is necessary to attract more full-time residents, but about open space. The UW paid $4.6 million for the right to develop above the light-rail station that's scheduled to open in 2021.

University officials say they haven't yet determined what they will do with the nearly block-long site on Brooklyn, behind the Neptune Theatre and across the street from

UW Tower, formerly Safeco Tower. Officials say they favor adding housing, including some that might be subsidized so young faculty members or professional staff can afford to live nearby.

But they also say they need additional office space.

"The UW Tower is full. There's not a lot to rent in the district. But it's not just the UW who might want space. We want a diversity of employers who want to locate next to a major research institution," said Theresa Doherty, director of regional and community relations for the university.

"We have a key stake in the U District being safe, with a mix of shops and more innovative things happening," she said.

Some neighborhood activists, including former City Councilmember Peter Steinbrueck, who lives in nearby Ravenna, don't want to see another office tower dominating the station site.

They are advocating for a public plaza above the future light-rail stop to serve as a gathering place for some of the estimated 14,000 commuters and students who will travel daily to and from the district by rail. The plaza also could host a relocated University District Farmers Market, one of the district's most popular draws, or a midweek satellite market.

"If it's an office tower, it will only be active during the day. It will be dead at night and on the weekends," said Cory Crocker, a resident and small-business owner. Alternately, he suggests, the city could create a public space by acquiring the four corner parcels at University Way Northeast and Northeast 43rd Street, another heavily traveled intersection.

Campbell, of Bulldog News, notes that an upzone has the potential to create a lot of wealth for property owners.

"For the neighborhood to recapture some of that wealth in the form of open space seems like a reasonable proposal," he said.

Others involved in the planning process see several problems with the proposals.

"Cory's group has identified three different locations for open space, none of which they control," said Scott, the partnership project manager. The partnership plans to host a series of community meetings on open space in the coming months, he said.

Some of those who actually do control some of the property think more public space will produce more problems — loitering, drug sales, homeless campers.

"The existing urban public parks and spaces in Seattle are centers for crime and anti-social behavior and have been for some time. To think that building another urban open space will somehow avoid those problems, which the city has been unable/unwilling to deal with, is absurd," said Scott Soules, a past president of the University District Chamber of Commerce, Business Improvement Area and Parking Associates, which owns several parking lots in the neighborhood with development potential.

UW's role praised

The UW has gotten high marks for its participation in the planning process. Many of the partnership members noted that university officials have historically not been engaged in the neighborhood. The word "gorilla" (as in 800-pound) was the common description of the university's past relationship to the neighborhood.

But UW President Michael Young arrived in 2011 with the idea that the university could be more entrepreneurial and spin off new businesses or research-and-development companies that could locate nearby. He also told staff that the university could be a better neighbor than it had been in the past.

The city under Mayor Mike McGinn also was praised for bringing a half-dozen different departments to the partnership discussions, including the Office of Economic Development, the Department of Planning and Development, the police, the Department of Transportation and the Department of Neighborhoods.

Barbara Quinn, who has lived for almost 40 years in University Park, the neighborhood north of the UW and Greek Row, said the city, like the university, has more often been an adversary than an ally. She's fought illegal rooming houses, cars parked in yards, noisy drunken parties and absentee landlords, and has feared the neighborhood would be "swallowed whole" by development.

Now she feels like all the major players are working toward the same vision of adding housing and families, new stores and a school. The UW, she said, is talking about some new development along 15th Avenue Northeast that would face the neighborhood. Property owners are talking about the possibility of housing on the opposite side of 15th that would overlook the campus, making less of a wall between the two.

Still, Quinn, whose children went to the former University Heights Elementary School that was closed in 1989 because of declining enrollment, worries that the city will rezone for greater height and density but not provide the amenities like parks, attractive pedestrian routes and a new school.

"We could get all of the bad stuff and none of the good stuff," she said.

Other community advocates worry about the right mix of market rate and affordable housing, of upscale new development and social services to meet some of the district's chronic needs.

On a recent Friday afternoon, volunteers including students from the UW prepared a meal at Roots, a homeless shelter for young people that operates in the basement of the University Temple United Methodist Church.

Roots Executive Director Kristine Cunningham noted that many homeless young people who pass through the neighborhood don't look much different from the students in backpacks and bluejeans walking up and down The Ave. Last year, she said, more than 500 young people came through the shelter's doors.

No matter how much new development is attracted over the coming years, she said, the U District will still have homeless youth, some only temporarily stranded and awaiting financial aid or a vacant room, others aging out of foster care or escaping abusive families, and who are vulnerable to addiction and predation.

And no matter how extensive the revitalization effort now under way, Cunningham said, "there will still be college kids wanting to buy drugs on The Ave."

She also worries that developers incentivized by taller building heights will build only market-rate condos and apartments that displace the many students and lower-income people who call the district home.

"There's amazing diversity here. You can get more international food here than anywhere else in the city. There are incredible cultural and academic opportunities because of the UW. It would be wonderful if we could showcase that without being afraid of our gritty side."

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Puget Sound BizTalk

Attachment 4

Apr 15, 2014, 3:05pm PDT

Tug of war over density, open space in U District

Marc Stiles
Staff Writer- *Puget Sound Business Journal*
Email | Twitter

Seattle's U District light rail station isn't scheduled to open for another seven years, but already there are different ideas about what should go on top.

A community group called U District Square is pushing to have some open space above the station, which is now under construction on the east side of Brooklyn Avenue Northeast near Northeast 45th Street. But an agreement between Sound Transit and the University of Washington calls for construction of housing and office space above the station.

This push and pull between the community and university comes at a pivotal time for the U District, and has a nonagenarian UW professor emeritus pushing for open space where authorities are talking about adding significant amounts of urban density.

In addition to the arrival of light-rail service in 2021, the city is in the early stages of possibly rezoning the U District, and — under one scenario — buildings of up to 340-feet-tall would be permitted in the heart of the neighborhood. That's 15 feet taller than UW Tower, the U District's tallest building, which is just west of the future light-rail station.

Ultimately it is up to the University of Washington to decide what happens on top of the station. UW spokesman Aaron Hoard said the university hasn't decided what it might build on the station. But as part of a property swap with Sound Transit, the UW bought the air rights over the station and the deal commits the transit agency to design and build the station so that a "transit-oriented development" could go there. Sound Transit spokesman Bruce Gray said buildings between 85 feet and 125 feet could be built on top of the station.

As the name implies, transit-oriented developments are real estate projects — usually residential and commercial buildings — near transit stops. The idea is to have people live and work nearby without needing cars.

A TOD makes tremendous sense for the U District Station, which is part of Sound Transit's $2.1 billion light-rail project that will extend service 4.3 miles between the Husky Stadium and Northgate. Sound Transit forecasts that the new segment will add 62,000 daily boardings by 2030 to the overall light-rail system, with 12,000 of those occurring at the U District Station. Riders will be

able to get from the U District to downtown Seattle in just eight minutes. The trip to Northgate will take only about four minutes.

But members of U District Square, a group of citizen volunteers, say development of the station presents a once-in-a-lifetime opportunity to create a public square above the light rail station. According to the group's website, the open space could be furnished with sculptures and murals, and ringed with trees and benches. It would become a center for arts-and-culture events and a farmers' market.

The UW wants to see more open space in the U District, Hoard said but, "We are just not sure where that is most appropriate to happen." He said station entrances and mechanical equipment will rise from the ground plain. "When Sound Transit is done, the site is not going to be a flat, open site."

It seems odd that there's a need for more park space in a neighborhood, which is home to one of the nation's most beautiful college campuses with hundreds of acres. But U District resident and business owner Cory Crocker, a member of U District Square, said city data show the neighborhood needs two more blocks of open space.

The problem with the campus is that it's not technically open to everyone. You can't hold a protest or have a farmers' market there, and homeless people are escorted off the property, Crocker said, adding, "It becomes a social justice issue."

U District Square has looked at several sites in the neighborhood for a plaza, but is focused on the property above the light-rail station. "We think the closest we can get to the station the more successful the square will be," Crocker said.

The group is not inflexible. It has proposed slightly shifting the location of the open space so it would be next to the station. This would allow development on top of the station area, but it also would require buying additional property.

The group isn't opposed to high-rise development, either. Under one U District Square proposal, the public space would be on top of the station but with a new tower across Brooklyn from UW Tower. "Tall slender towers could be very livable," Crocker said, adding what residents don't want is another blocky building like UW Tower, which "does feel claustrophobic." But, he said, high-rise developers should be required to provide or help pay for amenities, such as open space and a new public elementary school.

Philip Thiel, a 93-year-old professor emeritus in the UW's Department of Urban Design and Planning, is a key proponent of having open space on top of the light-rail station. "He has been more or less the passion behind this effort," said Crocker.

Crocker, a web designer who has studied public spaces around the world, said he is helping because it's his passion to ensure the U District ends up with some great public space of its own.

Marc Stiles covers commercial real estate and government for the Puget Sound Business Journal

Attachment 5

INCENTIVE ZONING: A REALITY CHECK

Downtown SEATTLE ASSOCIATION

To champion a healthy, vibrant urban core

February 2014

DSA Workforce Housing Subcommittee

Seattle's affordable housing strategy is failing.

Seattle is focusing on the wrong problem,

which leads to the wrong solution

and limited outcomes.

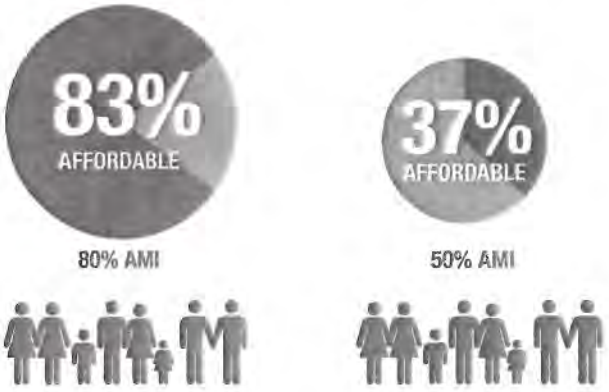
Income disparity results in housing disparity

	80% AMI	50% AMI
Annual income for 2-person household in Seattle	$56,480	$35,300
Hourly wage equivalent	$27.06	$16.91
% of Seattle rental units affordable by income level	83.1%	37.3%

Seattle's most significant affordability gap is at 50% AMI and below, not at 80% AMI.


REALITY
CHECK
AHEAD

Assumption 1: Seattle Doesn't Have Enough Workforce Housing



The Facts:

According to the most recent data available from King County:

- 83% of Seattle's rentals were affordable to incomes at 80% area median (AMI)
- In contrast, only 37% of Seattle's rentals were affordable to incomes at 50% AMI

Conclusion:

There is no shortage of workforce housing, and Incentive Zoning's focus on it neglects Seattle's much greater affordability need for households at 50% AMI and below.

Assumption 2: Incentive Zoning fees are too low

The Facts:

- At current fees, 62% of eligible development in Seattle did NOT to use the incentive since 2001
- In South Lake Union alone, 14 of 20 projects did not use the incentive
- Significant public benefit was left on the table as a result of projects in downtown and South Lake Union building below zoned capacity:

Conclusion:

Increased Incentive Zoning fees will lead to even less participation in the program, resulting in less housing supply, less revenue for affordable housing, and loss of many other significant public benefits.

Assumption 3: Incentive Zoning fees are an effective way to create affordable housing

The Facts:

Over the past 12 years:

- Incentive Zoning has resulted in funding for the equivalent of only 616 units of affordable housing, compared to 46,000 total units developed in Seattle.
- The Housing Levy produced over 3,700 units and the MFTE Program produced 2,563 units, with another 4,312 units in the pipeline.

Conclusion:

Incentive Zoning accounted for less than 2% of Seattle's new housing supply in the last 12 years. Under any approach, Incentive Zoning will supply only a fraction of Seattle's affordable housing needs; other tools are needed.

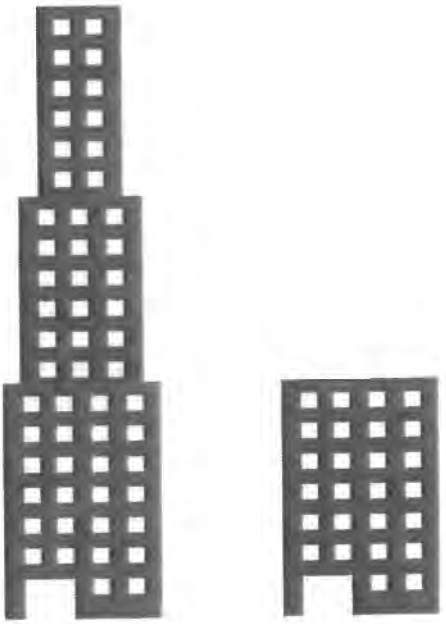
Assumption 4: Requiring affordable housing in on-site performance in high-rise buildings makes sense

The Facts:

- High-rise construction costs 1/3rd more per unit than mid-rise "5-over-2"
- For the same amount of money, 1/3rd more affordable units could be produced in mid-rise construction

Conclusion:

Requiring affordable housing in high-rise buildings results in fewer homes for workers, as 1/3rd more affordable housing units could be produced for the same resources in mid-rise construction.



Assumption 5: Incentive Zoning supports the city's comprehensive plan goals

The Facts:

- Incentive Zoning charges an extra fee for zoned capacity that increases the cost and risk to produce the housing supply goals established by the Comp Plan.
- Incentive Zoning taxes housing supply, ironically, in an effort to produce housing supply.

Conclusion:

By increasing the cost to produce additional housing, Incentive Zoning is a deterrent to building the housing supply envisioned by city policy.

Incentive Zoning is not working – so what should we do?

Fix the incentives:

- Establish true incentives to encourage developers to build to maximum capacity and increase housing supply.
- Re-examine fee rate and the base height to **increase** participation in the program – leading to more housing supply and contributions to the program.

Focus on more productive tools:

- Incentive Zoning accounts for less than 2% of the housing supply while other tools (Housing Levy, MFTE) have been 10X more productive
- Use of City-owned property
- Up-zones around transit areas
- Expansion of the MFTE program
- Purchase/conversion of multi-family properties
- Encouragement of market innovations such as Micro-housing, ADU's, etc.

Using the right tools to tackle the right job, we can meet the policy objectives driving zoning increases in designated urban centers.

Citations

Slide 3
- City of Seattle Office of Housing – Income and Rent Limits – MFTE
- 2009 King County Benchmarks: Affordable Housing

Slide 5
- 2009 King County Benchmarks: Affordable Housing

Slide 6
- Data accumulated from City of Seattle Department of Planning and Development and Office of Housing

Slide 7
- Data accumulated from City of Seattle Department of Planning and Development and Office of Housing

Letter # 2

HOUSING
DEVELOPMENT
consortium

June 23, 2014

City of Seattle Department of Planning and Development
Attn: Dave LaClergue
700 5th Ave, Suite 1900
Seattle, WA 98124

RE: University District Environmental Impact Statement (EIS)

Dear Mr. LaClergue:

On behalf of the Housing Development Consortium Seattle-King County (HDC), thank you for the opportunity to comment on the University District
1 Draft Environmental Impact Statement (DEIS). When drafting the Final EIS, we urge you to emphasize the importance of applying a strong affordable housing incentive zoning program concurrently with any proposed zoning changes. HDC is a nonprofit member organization which represents more than 100 private businesses, nonprofit organizations, and public partners who are working to develop affordable housing in King County and who are dedicated to the vision that all people should be able to live in a safe, healthy, and affordable home in a community of opportunity.

2 As a thriving urban center, the University District is a high-opportunity neighborhood that should be accessible to individuals and families of all incomes. It should also be affordable to the students who work, learn, and live there. We appreciate the recognition in the DEIS that while private market forces, such as "filtering", may provide lower cost housing over time, this process is neither efficient nor adequate "to address lagging incomes and the impact of rising housing cost burdens" (pg. 3.2-14). That said, we support the implementation of strong incentive zoning policies to stimulate the production of affordable alongside new market-rate development.

As we witnessed in Seattle's South Lake Union neighborhood, a lack of concurrency between the area's upzone and the implementation of a strong incentive zoning policy can lead to missed opportunities for public benefit (in
3 this case, affordable housing performance and/or fee contribution). **In order to secure the greatest public benefit from the potential upzone of the University District, we urge you to ensure a strong incentive zoning policy is implemented concurrently with any proposed zoning changes.**

HDC's Affordable Housing Members:
- Low-income Housing Organizations
- Community Development Corporations
- Special Needs Housing Organizations
- Public Housing Authorities
- Community Action Agencies
- Workforce Housing Organizations
- Public Development Authorities
- Government Agencies and Commissions
- Architects and Designers
- Development Specialists
- Certified Public Accountants
- Regional Funders and Lenders
- National Funders and Lenders
- Community Investment Specialists
- Property Managers
- Law Firms
- Contractors

Affording Opportunity
1402 Third Avenue, Suite 1230 Seattle, Washington 98101
206.682.9541 Fax 206.623.4669 www.housingconsortium.org

Thank you for the opportunity to comment on the University District Draft EIS. HDC will continue to closely monitor this process and provide public comment as it progresses. If you have any questions about our comments, please feel free to contact me at stephanie@housingconsortium.org or call 206-682-9541.

Best regards,

Marty Kooistra
Executive Director

Stephanie Velasco
Outreach Coordinator

Letter # 3

Northeast District Council

4534 University Way NE
Seattle, WA 98105
(206)-233-3732

CORRECTED FINAL VERSION

June 10, 2014

Mr. Dave LaClergue
City of Seattle Department and Planning and Development
700 5th Ave, Suite 2000
Seattle, WA 98124

RE: University District Draft Environmental Impact Statement

Dear Mr. LaClergue:

The Northeast District Council (NEDC), representing 16 community and business organizations including those within the University District (UD), submitted comments for the University District Environmental Impact Statement (EIS) scoping process on October 8, 2013. Our letter specifically asked for consideration and mitigation of adverse environmental impacts in these areas:

1

1. More open space
2. Preservation of single family zoning and homes
3. Realistic parking options
4. Elimination of traffic congestion
5. Concurrency for needed infrastructure improvements
6. Restrict up-zones to ¼ mile walk-shed
7. Development fees for roads, public services, schools and infrastructure
8. Evaluate distribution of (density) adverse impacts among other Urban & Transit Centers
9. Provide alternatives and concessions to the neighborhood for granting up zones: Infrastructure Improvements, Public Open Space, Public Square, Public Services, Access to Views and Sunlight, Elementary School, Affordable Family Housing and Mitigation of Transpiration and Parking Impacts

2 The Draft Environmental Impact Statement (DEIS) published by Department of Planning and Development (DPD) on April 24, 2014 provided no mitigation to any of these problems. This document reads as if it provides compliance with laws, regulations, permits and conditions. However, it only complies with one of the two levels required for SEPA analysis. Impacts to the environment beyond this limited review need to be addressed.

3 It is not enough to state that there are no significant impacts or that if problems arise in the future there "may" be ways to deal with them. This document must state what mitigation will take place before these proposed massive zoning changes take place. As is, this document stands in error.

4 NEDC challenges the wisdom of DPD's unwillingness to make judgments or specify mitigation when judgments and mitigation are required. The failure of this document to provide any mitigation to identified long range problems to the neighborhood can be read in some of the findings of this DEIS:

- (Open Space and Recreation) deficiencies are not considered impacts for purposes of this EIS
- (Village Open Space) not considered an impact for purposes of this EIS
- (Fire and Emergency Services) staffing and equipment are anticipated to be sufficient for construction activities (what about the various build alternatives?)
- (Police Services) anticipated sufficient staffing and facilities to accommodate the increased demand
- (Public Schools) Significant impacts associated with the proposal are not anticipated

5 NEDC respectfully requests that this document be resubmitted in a form that provides consideration and mitigation of the above-referenced adverse impacts identified by this neighborhood council and its respective councils. We also request that sufficient time again be allowed for public comment. Further, NEDC opposes any future re-zone until these environmental impacts are addressed by inclusion of specific mitigation measures.

Sincerely,

Gabrielle Gerhard, Co-Chair
5916 NE 60th St.
Seattle, Washington 98115
206-972-6830
ggerhard1@gmail.com

Tony Provine, Co-Chair
7527 Ravenna Avenue NE
Seattle, Washington 98115
206-769-7819
tprovine@msn.com

CC: Seattle City Council
Mayor Ed Murray

Letter # 4

From: Nancy Bocek <nancybocek@gmail.com>
Sent: Monday, June 23, 2014 6:05 PM
To: LaClergue, Dave
Cc: jeannieg9@q.com; jgwirth@clearwire.net; asletteb@u.washington.edu; kslett5308 @comcast.net; oldhammerhand@hotmail.com; sharon.dunn@gmail.com; yher@uw.edu; rowley_jane@yahoo.com; anderson@cs.washington.edu; todd@ 13oclock.com; 'k_kurttila@yahoo.com'; 'Mark Griffin'; Mark Griffin; Bagshaw, Sally; Burgess, Tim; Godden, Jean; Harrell, Bruce; Licata, Nick; O'Brien, Mike; Rasmussen, Tom; Sawant, Kshama; Clark, Sally
Subject: Roosevelt Neighbors' Alliance comments on U District Urban Design DEIS
Attachments: RNA_DEIS letter - revised.pdf; RNA_UD DEIS Section 2 Alternatives_nb.pdf; RNA_UD DEIS Section 3.1 Land use_nb.pdf; RNA_UD DEIS Section 3.2 Population Housing Employment_kk_tb.pdf; RNA_UD DEIS Section 3.3 Aesthetics_sd_yh.pdf; RNA_UD DEIS Section 3.4 Historic Resources_kk_tb.pdf; RNA_UD DEIS Section 3.5 Transportation_ jw_jg.pdf; RNA_UD DEIS Section 3.6 Open Space_sd yh.pdf; RNA_UD DEIS Section 3.8 Public services _ks_as.pdf; RNA_UD DEIS_ Attch_Letter of intent RNA-BSP_signed 051414.pdf

City of Seattle Department of Planning and Development
Attn: Dave LaClergue

Please find attached the Roosevelt Neighbors' Alliance comments on U District Urban Design DEIS by section and the RNA letter written by President Mark Griffin that was submitted today.

Thank you,

Nancy Bocek
206-632-7760

Attached:
RNA_DEIS letter – revised
RNA_UD DEIS Section 2 Alternatives_nb
RNA_UD DEIS Section 3.1 Land use_nb
RNA_UD DEIS Section 3.2 Population Housing Employment_kk_tb
RNA_UD DEIS Section 3.3 Aesthetics_sd_yh
RNA_UD DEIS Section 3.4 Historic Resources_kk_tb
RNA_UD DEIS Section 3.5 Transportation_ jw_jg
RNA_UD DEIS Section 3.6 Open Space_sd yh
RNA_UD DEIS Section 3.8 Public services _ks_as
RNA_UD DEIS_ Attch_Letter of intent RNA-BSP_signed 051414

To: Dave LeClergue
Urban Designer
City of Seattle Department of Planning and Development
700 5th Ave., Suite 1900
Seattle, WA 98124

Subject: U District Urban Design Draft EIS and LR3

Dear Mr. LeClergue,

In regards to the DEIS, the Roosevelt Neighbors Alliance feels that there are a number of items that still need to be addressed in the Final EIS. We feel the following observations and concerns reflect our experience as neighbors within the study area, and reflects the concerns of those who experience the University District at all hours and of impacts not appropriately discussed in the DEIS. We also have specific requests to mitigate those adverse impacts.

1 The DEIS limits itself by stating that adverse impacts which currently exist, or will occur under the Alternate 3 (no change scenario), should not be considered an impact. It is our belief that a deficit that is currently reflected in the neighborhood should be addressed in this process. It is our understanding that the city should be addressing and mitigating these impacts and deficiencies in neighborhoods whenever possible, but especially those targeted for substantial growth.

2 A change in zoning offers an opportunity for the City to craft changes that will encourage the mitigation of those impacts by coupling them with incentives for development. Those mitigations should be discussed in more depth in the DEIS. However, considering the presence of a very large nonprofit institution in the UW, improvements must also be made by the City of Seattle as well as the UW to bring the deficiencies in the neighborhood up to acceptable standards. Those improvements must be explicitly noted within the FEIS or we risk a continuation of hollow promises and continued deficiencies.

The following represents significant impacts that currently exist and will increase with additional density, and which must be addressed in the FEIS:

3 **Traffic Mitigation** – the DEIS states that there is no significant traffic impact to the neighborhood. However, any time spent in the U District will reveal dramatic gridlock in the neighborhood, as a majority of the east/west traffic from Ballard to I-5, as well as Windermere/Laurelhurst/U Village/etc. to I-5 utilize 45th and 50th Streets, which turns the U District into gridlock seven days a week, both in the mornings and the evenings. Roosevelt and 11th are also a major north/south arterial and bike routes as it is one of six bridges (including I5, 99, Ballard, Mountlake and Fremont bridges) to cross the ship canal. While the addition of light

3 cont rail will benefit the neighborhood, it won't address the east/west traffic. The EIS should be modified to call for a new overpass over I-5 between 45th and extending north of 50th dedicated to busses, cyclists, and pedestrians.

4 Parking Mitigation - The single family and lowrise neighborhoods currently soak up a lot of the parking demands of non-permitted group housing (generally houses broken up into individual room rentals) throughout the U District, and faces further demand by the modification of the rule previously requiring developers to provide parking for new developments in the U District. Currently the U District includes Zone 10 parking restriction which encompasses single family, lowerise, and midrise zoning. Zone 10 was created at a time in which parking was still required of developers. With the recent change in which no parking is required by developers, Zone 10 no longer protects single family and lowrise family neighborhoods from being inundated with cars. The original intent of this modification to the rule was to encourage people living in midrise or taller buildings to use mass transit by making cars less convenient without ready parking. With the Zone 10 geography, rather than encouraging midrise building occupants to use mass transit, it enables them to get around the requirement by acquiring a Zone pass and parking in the single family or lowerise blocks. Not only does this change the character of the blocks of traditional single family structures from one that is family friendly, it dramatically increases traffic on residential streets, decreasing safety and increasing the likelihood of a significant accident occurring. For the safety of all of the current and future residents, especially the youngest residents, we strongly request that the EIS include as mitigation the breaking up of Zone 10 into two zones, one encompassing the areas zoned LR3 and denser/higher, and another encompassing the more family oriented areas zoned LR2/LR1/Single Family.

5 **Open Space** – The U District currently has the lowest ratio of park space to households in the city. As the DEIS notes, this ratio will become substantially worse with additional density. Whether that density is related to continued growth in Alternate 3 or higher density noted in Alternates 1 and 2. While the UW has open space, it serves the student and employee population of the University, and not the general public, and the DEIS correctly excludes the University of Washington from the analysis on open space. As the different alternates being examined include significant upzoning, the opportunities to expand the open space in the U District will only decrease as properties are redeveloped and the cost of land increases.

We request that three forms of mitigation be included in the FEIS to address this 'worst in the city' deficit. For the immediate term to address the open space shortfall, is the full funding of the park at 50th and University, which has been designed but as of yet construction has not yet begun. For the intermediate term, we request that as an offset to increased height opportunities that will benefit the UW being examined in Alternates 1 and 2, that the University of Washington dedicate the space above the Light Rail station at 43rd and Brooklyn to create the Commons or U District Square. For the long term, to balance out the space alternative and in conjunction with the traffic congestion noted above, we request that the FEIS require the City to fund an analysis on placing a cap over the freeway between 45th and 50th. In addition, as part of any additional federal or state highway projects related to work on I5 north of downtown or

5 cont I520/I5 freeway exchange, that funding for a lid between 45th and north of 50th be included as mitigation to the University District. A cap at that location should include a mixture of playfields, gathering space and balanced with trees.

6 **Zoning** – Roosevelt Neighbors Alliance, with broad support of the neighbors and Blessed Sacrament Church, has sponsored a request to change the urban center boundary to exclude the LR1 and LR2 zoned properties around University Playground. This area is home to a number of owner occupied single family structures composed of families as well as long term residents of the neighborhood. We request that the FEIS note this application to not upzone these areas, with the exception of unifying the Blessed Sacrament campus under LR1 with a contract rezone, which in Alternate #1 shows being be upzoned to LR3.

7 **Schools** – Currently the U District has no public school (elementary, secondary or high school) within its boundaries. The two closest elementary schools to the University District are Sanford and MacDonald. Both of these elementary schools have immersion programs and the Seattle School District has recently changed the designations for those schools to full city application rather than drawing from the U District. As mitigation for the influx of additional households into the U District with additional density, and to address a current deficit, we request that the Seattle School District give all residents of the U District a first priority in applications to Sanford or MacDonald over other geographical locations in the City. When combined with Green Lake Elementary as the future geographical elementary school, the option to attend any of these three schools will help to mitigate the anticipated growth in school children and prevent the likely result of bussing elementary children longer distances. As a longer term mitigation, we request continued study and funding of attempts to building an elementary school within the University District.

8 **Development Fees** – As part of any upzoning, developer fees are often added to the additional zoning density. We request that any developer fees be segregated from the general City of Seattle funds, and specifically held separately to be spent only within the University District. Considering the current deficiencies in the U District, especially in comparison to most other Seattle neighborhoods, any added fees associated with development, whether it be instituted by DPD, Seattle Light, SDOT, sidewalk rentals, Seattle Public Utilities, low income housing fund, etc., should be segregated and used to improve the infrastructure and open space requirements within the neighborhood. It should not be accumulated in the general fund and utilized in other neighborhoods given the U District's current deficiencies in services, infrastructure, and open space, which will be magnified with increased density.

9 **Circulation and Setbacks** – the FEIS should provide greater detail in regards to set backs both on the street level as well as at higher elevations the setbacks related to the different zoning heights. Specific language should be included on how mid-block cross-throughs and street set backs will offset greater density/heights.

These mitigation requests represent a general consensus from many people within the Roosevelt Neighbors Alliance. While this doesn't represent all of the thoughts or opinions on the EIS, and we will include other general thoughts and feedback from individuals and groups as well, there is strong consensus that these mitigations must be included in the FEIS.

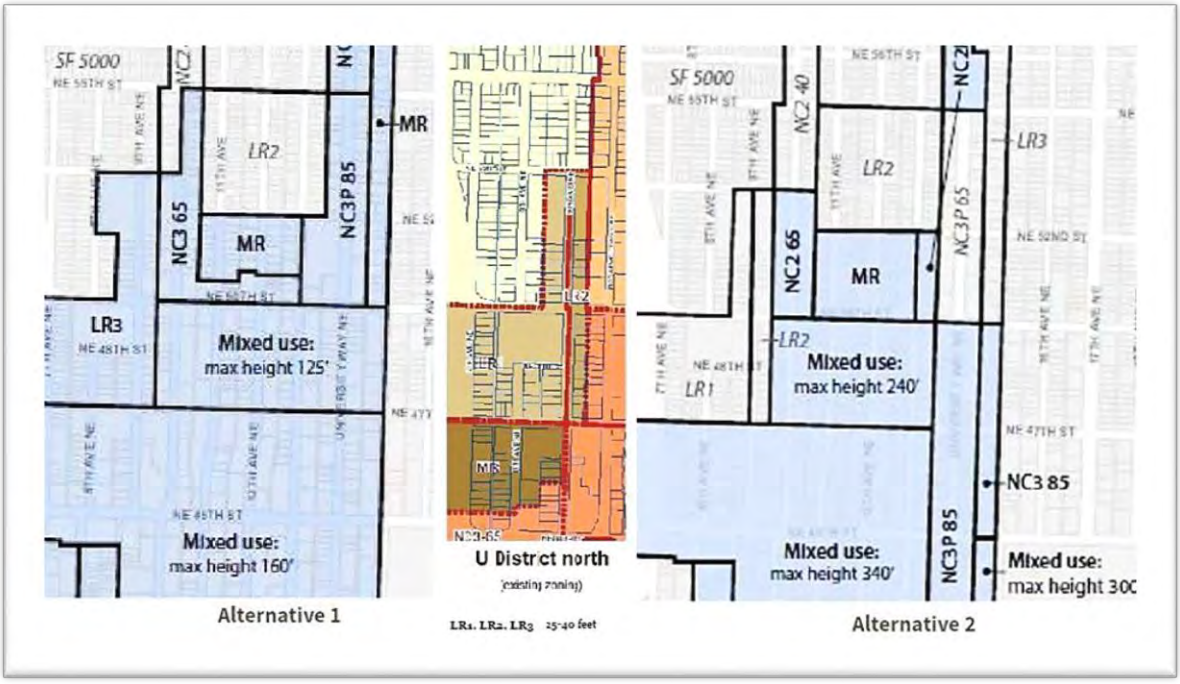
10 Please also confirm that the FEIS will conform to the SEPA. We request that the issuance of the FEIS be delayed, if necessary, until all of these mitigations are addressed and incorporated into the DEIS.

Sincerely,

Mark Griffin
President
Roosevelt Neighbors Alliance

Section 2 Alternatives

Authored by Nancy Bocek



Comment on Alternatives and UCUC plan:

11 The DEIS identifies Alternative 3 as "No Action". This is the adopted University Communty Urban Center Plan. Understandably, it was included in the study as "existing conditions". The UCUC acknowledged and supported the community's unique character with a complete and thorough set of guidelines (design, transportation, zoning, affordable housing, etc) that is not evident in the DEIS and must be part of the FEIS. The FEIS must include and identify all differences and changes between the UCUC plan and Alternatives 1 and 2 to provide best guidance to the City.

12 It is critical that real and functional mitigation measures are adopted by the City before any upzoning is approved.

The upzoning is too sweeping and generalized. Zoning must be more targeted and zoning heights more gradual, especially near residential lowrise.

- Alt 1 shows 125, 160, abutting Lowrise 1, 2 and 3, Midrise and NC 65 zones
- Alt 2 shows 240 and 340 abutting LR1 & LR2 (25'+), MR, NC 65 and NC3P85

Pg. 2-5 **Objectives**

13 **Comment:** Jobs and housing unit targets will be met by all 3 alternatives. We are concerned that Alternatives 1 and 2 would entail greater density and development with greater impacts than anticipated and planned for in Alternative 3, the adopted UCUC plan - there are not adequate resolutions for mitigating these in the DEIS and must be in the FEIS.

14 **Problem**: Housing diversity goals discussed in study area includes SF zones that are actually outside of the Urban Center. The Urban Center has no single family zone and thus does not have a wide range of housing options and zoning if built to maximum zoning, which means all old structures would be demolished for new multifamily structures.

15 **Mitigation**: retain existing zoning in historic neighborhood around the University Playground Park and University Branch Library, downzone to SF these LR1-2 blocks, and exclude these blocks from Urban Center boundaries.

Note –SF zones/single family structures: The study area is not entirely within UCUC – The UCUC does not fully meet goals for housing/residential diversity and it is not accurate to include zones outside of it. For the purposes of this study, the SF zones were included.

However, the reality is that the UCUC does not include ANY SF zone. It does have a few remaining blocks of 80-100 year old Seattle single family structures, "historic", which are occupied by families, unrelated individuals and divided into apartments. These types of housing are diverse and not being met by new built and planned structures of studio and one bed room apartments. These ways of living such as shared student housing and apartments in single family structures are preferred by many people, and single family owners and renters are long term stakeholders who form the basis of a strong neighborhood.

These structures are necessary to preserve to meet diversity goals, however none of the alternatives do this. Therefore, residents of the University Playground Park and Library blocks have submitted an amendment to the Seattle Comprehensive Plan to exclude these blocks from the Urban Center in order to preserve this old housing stock, type residential diversity and an existing close knit community. The community intends to work on getting the blocks downzoned from L1 &2. The residents reject any upzone.

Pg. 2-13 **Incentive zoning**

16 **Incentive measures noted as for "consideration and prioritizing":**

- Stated here is a long list of measures without any stated "teeth".
- There needs to be a clear definition of what incentive programs and development bonuses are, and how they are exchanged for example: one item missing from the list of measures is preserving mature trees on a property or the street. The community needs to have sufficient time to help the City review and strengthen incentive measures. The community may not regard some "trade-offs" as beneficial to UCUC quality of life.
- 17 The incentive measures need specifics and describe how they functionally and aesthetically contribute to the UCUC meet its needs for infrastructure, open space,

17 cont

community space, safety, mature trees and the "urban canopy" and preservation of valued structures. They must, for example, specifically name ownership of public open space as the City of Seattle, public open space traded for development bonuses should have a minimum square footage appropriate for actual public use, should have sun and air to be truly functional as public open space, etc. Public open space should never be "private-public", a roof top garden, a breeze-way, a wide sidewalk, etc.

18

- Our community has grave concerns that the schedule for the process to upzone the University District will not allow the community sufficient time to consider and prioritize incentive programs and development bonuses.

19

Pg. 2-14 **Problem:** map shows LR-3 zone north of NE 50th, west of Roosevelt Way NE.

- L3 is rejected by the neighborhood.
- Blessed Sacrament Church does not request an L3 in order to complete their master plan and has signed a letter of intent with the neighborhood to upzone to L1 through a Contract Rezone with neighborhood involvement. The request is submitted as an amendment to Seattle's Comprehensive Plan (2014). (Please refer to attachment: *Letter of intent RNA-BSP_signed 051414*)
- L3 destroys an existing community of long term residents, destroys historic Seattle structures, and destroys a valid types of desirable multifamily use of single family structures rapidly disappearing from the UCUC.

Alternative 1

Pg. 2-18 **Problem:** Blessed Sacrament Church is on record as needing to upzone to LR1. Alternative 1 upzones "for" Blessed Sacrament to LR3 (unnecessary) and also upzones the neighborhood around University Playground Park and University Branch Library while it's at it. The neighbors totally reject this upzone. (Please see attachment: *Letter of intent RNA-BSP_signed 051414*)

20

Alternative 2

Pg. 2-20 **Omitted:** Description of LR1 zone north of NE 50th St and west of Roosevelt. No changes appear to be proposed to LR1, however there is not a statement of this. "No changes are proposed to existing SF5000 and LR2 designations in this area."

21

Alternative 3

Pg. 2-22 **LR1&2** zoning around University Playground Park and University Branch Library endangers the existing single family structures and longtime residential community. These old houses offer a different, valid type of housing diversity and residential diversity that will not exist in new built townhouses, row houses (etc), midrises or high rises. The community wishes to preserve the uniqueness of its community and these old single family structures.

22 **2.4 Environmental Review**

Pg. 2-23 **Questions:**

Do these alternatives actually best enhance environmental quality?

Do they minimize and/or negate adverse impacts?

23 **2.5 Benefits and Disadvantages of Delaying the Proposed Action**

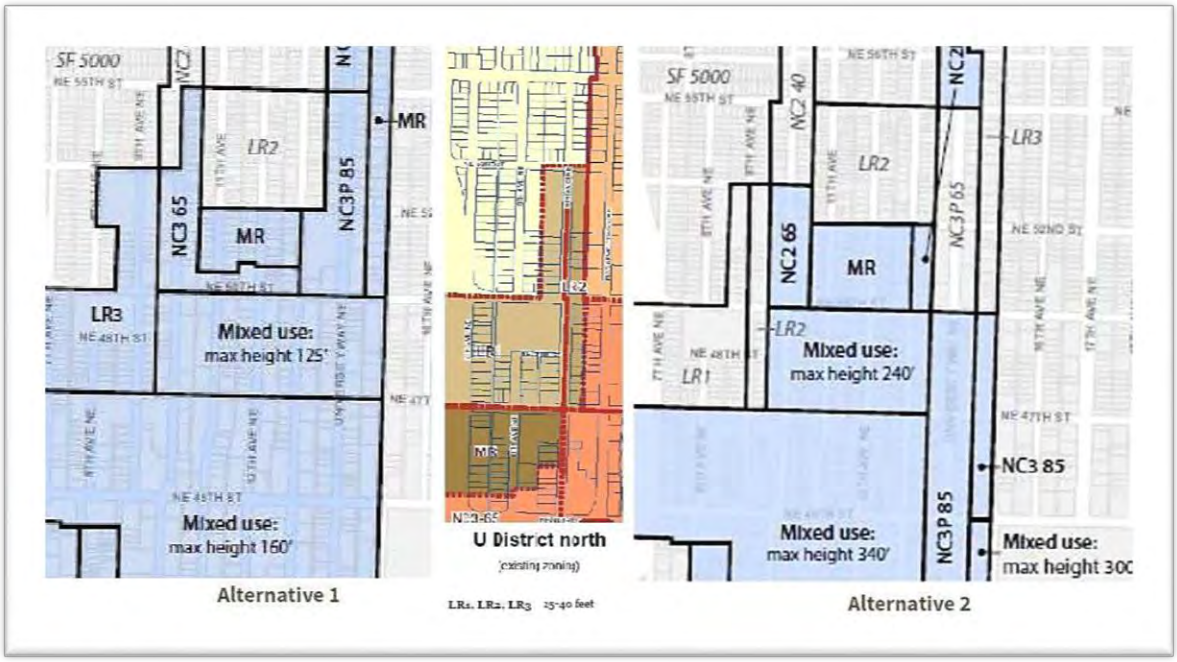
Pg. 2-24 **Benefit of Delaying adoption of zoning**

Problem: The DEIS declares concern for slowing down the process to follow through on upzoning. This paragraph appears to assume that the existing standards and height limits for existing zoning are not adequate. ("depending on the individual")

- This assertion that adverse impacts of new, higher and denser zoning will be adequately mitigated is not at all certain. The community wants the City to be specific and targeted in where zoning will occur, types and set in place real, functional mitigations before putting the cart before the horse and completing rezoning.
- This paragraph contradicts assertions in later sections that existing City building standards and codes are sufficient mitigation for upzones next to existing zones.
- The paragraph does not include the benefit of delaying action of allowing the City and community to carefully consider through public process new development standards, incentive programs and development bonuses. Additionally, rushing zoning recommendations will potentially overlook adverse impacts and functional mitigations.

Section 3.1 Landuse

Authored by Nancy Bocek



General comment:

24 The section is vague in content.

Lacks detail to fully understand the ramifications of zoning and problems.

Lacks appropriate and critical mitigations to support a huge increase of density.

Analysis of impacts and mitigations do not take into account or make projections regarding a maximum build-out of zoning, which is necessary to understand reality over time.

Zoning creep and Maximum Build-out:

A concern is a spread of higher, denser developments into neighborhoods, as well as unanticipated exemptions that allow more than zoning standards and codes specify. The FEIS must identify specifics on all development configurations, parcel subdivisions and exemptions for each type of zoning; how zoning standards and codes may be different than anticipated by the community. The FEIS must consider these in Adverse Impacts and mitigations.

- The DEIS does not include maximum build-out in analyzing Adverse Impacts and Mitigations. Adverse impacts may be much more intense and negative if a development is more dense, higher, has subdivided parcels than what is anticipated and studied in the DEIS.

24 cont

- The DEIS analyses does not examine maximum build-out as a likely scenario for any/all alternatives. This in effect would be an unanticipated "upzone" in the future zoning plan (FLUM) and be characterized as zoning "creep" into unsuspecting neighborhoods.

Guidance: "If" there are to be high rises, the DEIS should consider more carefully where they are to be as opposed to presenting the very broad area of blocks as proposed for 340 ft.

- Zoning specificity by block is required in FEIS.
- Zoning maps are too generalized.

25 **Downzoning**

Downzoning was not evident in any alternative studied. Although, perhaps, downzoning does not cause negative impacts, it should be studied in the DEIS especially in conjunction with upzoning.

Downzoning should be studied in all alternatives with an aim to preserve the old neighborhoods of historic houses that offer the Urban Center a desirable and valid type of density and diversity that will not survive otherwise. The new zoning plan needs to include the housing types, community character and quality of life appreciated by the people who live here now as well as planning for the needs of a future population.

Recommendation: The city could reinstate the Lowrise/Duplex/Triplex zone to increase options for "multifamily" zoning. It reflects the reality of the historic single family houses that are divided into multifamily residences and helps preserve this historic housing stock, the urban gardens, mature trees and a life style option that many people prefer and are living now. Sharing a home or living in an apartment in a house is preferred by many people who do not thrive living solitary in a studio apartment. Additionally, preserving these historic houses also provides the opportunity for traditional family homes; the Urban Center very much needs to attract families to ensure an established, invested community.

Land Use Compatibility

26 Pg. 3.1-8 **Within the Study Area:** There is great potential for impacts between increased development intensity and residential areas, and within residential areas as new construction replaces the existing, long time neighborhood.

Core: It is stated that it is "unlikely to result in significant land use conflicts within these areas– this is not true for the University Playground Park and University Branch Library blocks, which will experience extreme land use conflicts as old houses are demolished for new multifamily construction and experience both an extreme reduction in the quality of the residential life and destruction of a long time community.

27 **Alt 1**

Problem: Zoning heights are too extreme next to lower height zones, especially abutting residential lowrise.

- Alt 1 shows 125, 160 abutting Lowrise 1, 2 and 3, Midrise and NC 65 zones

28 **Problem:** LR3 zone

Pg. 3.1-9 **Core Area:** It is not acknowledged that there is a major impact of upzoning residential blocks to LR3.

29 Pg. 3.1-10 **North Study Area:**

- Needs to expand on understanding the impact of Single family zone next to new LR2 & LR3.
- Needs to address upzones and impact to current residents of the neighborhoods.

Core: Upzoning and density is too widespread, will destroy a community, not adequate mitigations to support this.

No mention of significant adverse impact of LR3. There are many, including:

- It abuts a single family zone, which would experience problems associated with it.
- It abuts three institutions *on one block* and a popular park.
- Will close in the University Playground Park, UCUC's only "large" open space
  - Adversely impact the quality of experience people need from the park.
  - UPG Park needs to be protected as a place to recreate in the sun and to away from city hustle with a view of trees and open sky.
- Uproots and destroys an established, long-time community around the park and library.
- Reduces housing diversity (type and variety) and single family housing options (single family and apartments, preferred by many and more affordable than new construction.
- Eliminates back yards and urban canopy (mature trees).
- Will significantly increase traffic congestion and parking woes on residential streets.
- Will make walking in the community potentially more hazardous – more people, more cars, more residential units and businesses.

Note: There is a large church, the city library, a private elementary school, a popular city park, local businesses, movie theater on 9th Ave NE in this proposed LR3 zone; and several soon to be built studio apartment buildings (6 story), a food bank (BSP and soon the University Food Bank), a car dealership, Trader Joe's, pizza and drinking establishments and more that are accessed or impact the small residential streets in this potential LR3 zone. Increased zoning density will have impacts to an already dense and densely used neighborhood.

- There is a lack of understanding in the study of the University Playground Park and University Branch Library neighborhood as *exists* and therefore the DEIS is missing data and information about the adverse impacts of increased zoning and mitigations for this proposed LR3 zone.

30 **Alt 2**

Problem: 340 and 240 heights:

- Too generalized and broad in mapped zoning. Zoning is necessary to be identified by specific blocks to fully understand the reality of impacts and potential mitigations.

30 cont

- Too abrupt in height changes between zones and not appropriate for 240/360 heights to abut Lowrise zones.
- 340’ height zone abuts LR1, LR2 and LR3, MR, NC85 zones.
- 240’ abuts LR1 & LR2 (25’+), MR, NC 65 and NC3P85.

31

Land Use Compatibility

Pg. 3.1-13 **Core:** Omits describing LR1 and LR2 zones.

“Abrupt transitions” – “limited in magnitude and duration”: This assumes that all old structures will be demolished and replaced. “Limited” but not in magnitude: This is not adequately addressed in sections regarding Adverse Impacts and Mitigations – Old structures are home to small business and affordable residential. Old structures give the University District a sense of history, place and a better quality of life.

- Accurate zoning description is necessary in FEIS and all zoning, including Lowrise, analyzed accordingly.

32

3.1.3 Mitigating Measures

Pg 3.1-14 **Problem:** We have great concerns about lack of specificity. DEIS doesn’t say much about providing mitigations but states vague assurances about “monitoring” and “considering” that are not specific or to be deemed straightforward in dealing with reality, today or in the future. Currently the Urban Center is in deficit of critical, necessary infrastructures. The DEIS offers no real solutions to support the target growth in any Alternative.

- DEIS needs to specify actual, real mitigations
- Mitigations must be in place to support the anticipated doubling/quadrupling of density
- Lack of actual mitigations for the significant increased density created by this zoning will be catastrophic for the community.

33

Significant Unavoidable Adverse Impacts

States NONE. Ergo, impacts are avoidable?

Section 3.2 Population, Housing, Employment

Authored by Kelly Kurtilla and Todd Bradley

Concerns with the DEIS:

34 The study lists 92% of the estimated available housing units in the study area as occupied. Leaving a remainder of 8% vacant which is much higher than the current vacancy rate of 4.6% throughout the city as a whole.

According to the study the new development will likely be in smaller units, conducive to one-person households, which is an inefficient way to increase density, as only 22% of the occupants in the study area live in one-person households currently, this leaves the remaining population in households with an average of 3.6 people. Suggesting that if new units are needed within the study area, 78% of them should accommodate an average occupancy of 3.6 people. To maintain the character and diversity of the neighborhood. This is in direct conflict with the DEIS which states new housing will likely be smaller units.

With this in mind, provisions for protecting single-family dwellings should be written into the EIS as the new housing will not support the current housing trends within the study area.

Construction of larger units than occurring in current and proposed construction projects would provide the opportunity to increase the number of residences suitable for families, families with children, and students who wish to live in small groups.

In summary: within the study area, there is a deficit of single-family homes. With this in mind, preservation of current single-family dwellings in the area should be given higher priority - allowing for more flexible housing options. The new construction of smaller units result in:

- Increase in price due to construction costs
- Decrease in livability/potential for shared housing
- Decrease of long-term residency

This study seems to be written solely for the concerns of the University of Washington and to the detriment of the current long-term residents and homeowners within the study area.

35 In an area already burdened with high housing costs, a decrease in affordability and no guarantees for any of the mitigation listed, makes the statement "no unavoidable significant adverse impacts to affordable housing are anticipated" incorrect.

Listed as "Significant Impacts" are:

- "Immediate loss of low cost housing"
- "Potential demolition of lower cost housing"
- "The effect of filtering takes decades and does not affect short term cost burdens of households in the area."

Because these are listed as common to all three alternatives they would seem unavoidable according to current planning. It would be an injustice to not take the opportunity to address housing affordability during the drafting of the EIS as it is our best chance and it is being ignored.

Section 3.3 Aesthetics

Authored by Sharon Dunn and Ylva Hurnlund

Section 3.3. 1 "Affected Environment"

"The study area contains three designated Neighborhood Green Streets:

Brooklyn Avenue NE, extending through the study area

NE 43rd Street, from I-5 to the west edge of the UW campus

NE 42nd Street, from I-5 to the west edge of the UW campus

Neighborhood Green Streets are generally defined as a street right-of-way that, through a variety of design and operational treatments, give priority to pedestrian circulation and open space over other transportation uses.

36 ***Comment:*** Brooklyn, NE 43rd and 42nd are all defined as "Green Streets" If the building heights are extended to the greatest impact, Alternative 1, or even the second highest limit, Alternative 2, these "Green Streets" will experience shadow and wind impacts. If the proposed community-backed plaza for the light rail station is not approved, there will be a negative impact on the aesthetics for circulating pedestrians and bicyclists, and no new, direct connection forged between Brooklyn and University Way.

37 **"The University Heights Community Center is a Seattle landmark listed on the National Register of Historic Places. The Seattle Parks and Recreation Department is redeveloping the south parking lot into public open space for the neighborhood."**

Comment: At present, this "park" is still a parking lot. The neighborhood has been informed that it will be a park, but lacks the evidence of a defined timeline, in a community critically short of public green space.

38 **"Roosevelt Way NE is an active southbound thoroughfare with low-rise commercial uses, multi-family housing, single-family housing, and the public library. It runs from the Roosevelt Neighborhood and connects to the north slope of Capitol Hill."**

Comment: While this characterization is roughly correct in the immediate present, it is not fully reflective of five facts:

1. The northeast corner of 50th and Roosevelt is being redeveloped, as of June 2014, into a multi-story apartment building.
2. The current low-rise site of an Indian restaurant and parking lot on the west side of Roosevelt Way, between 47th and 50th, is to be redeveloped into a multi-story dwelling that will function as a private dormitory, meaning that it is slated to have some 500 residents for approximately 160 units.
3. The entire site of the current Trader Joe's, the block between 47th and 45th, is already planned to be redeveloped into a multi-story dwelling building with commercial space.
4. A multi-story building is to be constructed on Roosevelt Way in the lot directly north of the historic library.

38 cont

5. All of the development already underway, i.e., the new buildings being constructed for UW-Children's Hospital staff between 47th and 45th along 11th Avenue is already having a dramatic impact on traffic conditions, which are often backed up on weekends from north of 50th all the way across the University Bridge.

39 **"Auto dealerships are located along Roosevelt Way NE between NE 50th and NE 45th Streets."**

Comment: This statement is no longer as fully accurate, since it ignores that fact that the new Audi facility is an auto dealerships that occupies the entirety of the west side of 11th Avenue, NE, between 47th and 50th streets; it is, essentially, a three-block long structure.

40 **"The half-mile walkshed surrounding the future U District station extends from I-5 on the west to the UW campus on the east and from NE 52nd Street in the north to NE Pacific Street in the south."**

Comment: This refers to an area with only two open space features,. One that is quite distant from the station is University Playground, located at almost the northern boundary of this so-called 'walkshed.' University Playground is, in fact, the only actual "park" green space of any size in the University District's inner core. It is currently not only used for athletics and children's activities, but is essentially occupied by homeless people, often inebriated, for hours every day. The homeless used the benches and picnic tables located immediately adjacent to the children's play area and the new, neighborhood-sponsored health activities course.

The other "open space" in the walkshed is the equivalent of a *pocket park* called Christie Park. This park's greatest expanse is in the form of cement, as it has a paved seating area and an occasionally used basketball court. This park is not generally visible to most residents and users of the neighborhood, as it is west of Roosevelt, and west of a multi-story brick condominium building and the UW Medical Center clinic building.

41 **Re Transit Center illustration** Pg. 3.3-6.

Comments: The rendering of the transit station that appears on this page of the DEIS is of a large, rectangular block of some sort of material—perhaps green glass? It is a large, intrusive glass box that would reflect anything around it and, if Alternative 2 is approved, would be surrounded by vast highrises. This illustration, 3.3-5, has no indication of any open space amenities or pedestrian and culture friendly aspects that relate it to the commercial and residential character of the area adjacent to it on all sides. It is rendered as a functional bock structure existing for people to enter and exit, stepping out on to the street to immediately, if Alternative 1 goes through, put up their guard against wind. When the rains come, as they will, if the amount of high rise development for that small area is allowed to go through, with no open space, we can have a most excellent area for turned up collars, and turned inside-out umbrellas.

Shade and wind factors, including shadows that would extend to the campus, would result from either alternative, but especially Alternative 2.

41 cont

Street amenities—current building boom has already occupied the street such that there is less light, air, and more wind and shadow. Ava apartments on 47th

There is nothing that fronts the streets and is conducive to mingling—many of the new buildings are focused inward. They have roof gardens that minimally reduce the carbon imprint but do nothing for the neighbors

42

The area has "some high-rise buildings (up to about 320 feet)" Pg. 3.3-7

Comment: This statement is notably vague; the area actually has *only two structures* of that height, both of which are several blocks away from each other: the former Safeco Tower that is now U.W.'s single tallest building, and the University Plaza condominiums. The latter structure, though bordered on 8th by notably tall trees and set back with grass around it, creates a definite wind and, in inclement weather, rain impact on all who pass it by or enter it. Residents of the building can supply photos that document its shadow impact at various times of day.

43

"Due to its location and topography, the study area does not impact views from the viewpoints designated in Attachment (sic) 1 to the features identified in SMC 25.05.675, above. Therefore, viewsheds are not further discussed in this EIS."

Seattle's SEPA regulations do not protect specific views from private property, but they do encourage reducing private view impacts through height, bulk and setback controls in the Land Use Code. Pg.3.3-8

Comment: While the community may not have "viewsheds" that meet the specific criteria of the SEPA, it absolutely has views by virtue of its predominately low- and mid-rise character. The University District has open sky, multiple locations where Lake Union, the campus, Montlake, etc. are visible.

Additional points:

- The topography of the U District is that it slopes up from its southern boundary along the Montlake Cut and Portage Bay in a gradual incline, and levels off at about 43rd. To the west, it drops down to Roosevelt and then goes uphill to 7th and the freeway, along 50th. Along 45th, structures of a certain height will have a shadow and wind impact on the remaining open view corridors of the N-S streets themselves.
- Right now, residents and occupants of University of Washington buildings indisputably have views. The UW tour is the tallest structure; occupants of offices in that building can, depending upon their situation, see Mount Ranier, the Cascades, or the Olympics, etc. The residents of the UW dormitories along Pacific have views of Lake Union and the Ship Canal; a portion of the community view that previously existed along the northeastern end of the University Bridge is obstructed by those dorms.
- ***Regarding Alternatives 1 and 2:*** Any buildings constructed at the high end of either of these height limits that have residences on the upper stories, will indubitably be marketed in part for their views, with the higher rental or purchase rates for the upper stories. Occupants, depending on their location, will be able to enjoy the views of the campus, the Eastside, the Cascades, Mount Rainier, the Montlake Cut, Lake Union, downtown, or the Olympics – as well as the sight of the huddled masses below, rapidly trying to get into and out of the building and out of the weather.

Shadows

44 **"It is the City of Seattle's SEPA policy to "minimize or prevent light blockage and the creation of shadows on open spaces most used by the public" (SMC 25.05.675 Q2). The concern is the impact to these public places in terms of topography, the built environment and vegetation. "** Pg. 3.3-10

Overall, impacts are typical of an urbanizing area changing from lower intensity development to that of more intensive development. Generalized impacts to each of the parks in the study area are briefly described below.

University Heights Open Space. Under all alternatives, development to the north, east and west of the University Heights Open Space would result in shadows during some daylight hours. **Alternative 2:** "**University Heights Open Space.** To the west, proposed zoning changes from LR3 (40 feet) to MR (85 feet), while to the east LR3 (40 feet) changes to NC3P 85 feet. Area to the north of this open space will remain LR2 (up to 40 feet). During the fall months, this space will experience shadows to the northeast and southeast corners during the morning hours, the south end of the space will be shaded by noon and all but the northwest tip will be covered by 3:00 pm. During the winter months, this space will be entirely covered in shadow.

Comment: This statement makes it clear that the University Heights open space would be unacceptably in shadow.

45 **Christie Park. Under all alternatives, development to the southwest of Christie Park would create shadows on portions of the park.**

Alternative 2: Christie Park. Around Christie Park, the proposed zoning would allow a significant increase in building height, from LR3 (40 feet) to a maximum of 340 feet. In the morning hours, this park will be covered in shadow in the fall months and in the afternoon in the winter months.

Comment: This statement makes it clear that the Christie Park's open space would be unacceptably in shadow.

46 **University Playground. Development surrounding University Playground will increase in all alternatives and result in shade and shadow impacts."**

Alternative 2: University Playground. Zoning at the immediate surroundings of University Playground will remain unchanged under this alternative. However, development of towers to 240 feet in height to the east would cast shadows in the morning hours during the fall and winter months.

Comment: This statement makes it clear that the University Playground open space, the only true "green space" of these three parks, would be unacceptably in shadow.

47 ***Comment:*** Given that the U District already has a document shortfall of green space even relative to its current residents, additional "shade and shadow" impacts are not acceptable, especially with no confirmed support for provision of public space by the planned light rail station. The neighborhood only experiences a net loss of light, warmth, and air; receives no

47 cont substantial additions of *genuinely public* green space, and experiences the impact of significantly higher population and traffic density.

Section 3.3.2 Significant Impacts

Height, Bulk and Scale, Pg. 3.3-15

48 **Alt 1:**
To the north of the core area, proposed zoning would allow a combination of low- and mid-rise, neighborhood commercial (NC3) along the University Way NE and Roosevelt Way NE corridors. Along these commercial corridors, permitted building heights would range from 40 to 65 feet along NE Ravenna Boulevard to 85 feet south of NE 55th Street on the University Way corridor. Building heights would transition up to 125 feet immediately south of NE 50th Street." Pg. 3.3-27

Comment:

1. This alternative will have a profound impact on Ravenna, a street that has an existing mix of homes and small apartment buildings. It will damage an existing open space zone between the University District and the Roosevelt Neighborhood.
2. Alternative 1 appears to be placing the area by University Playground *inside* LR3 for redevelopment

49 **"Alt 2**
Along 15th Avenue NE, proposed zoning under Alternative 2 would increase maximum building heights from 65 feet to 300 feet. However, because this development potential is limited to a relatively small area and does not result in impacts to distant scenic views, no significant impacts to this portion of the scenic route are anticipated." 3.3-44

Comment: This language is ambiguous. "Limited to a relatively small area" – the intensity of density in height in a very small area is profound because of the concentration of shadow and wind impacts.

Section 3.4 Historic Resources

Authored by Kelly Kurttila, Todd Bradley, Judith Wirth, Mike Schmitt

Concerns with DEIS

50 The major concern is that all of the quoted study informed relied on research from 1998 and 2002. Due to budget restrictions during the 2002 study, only 1/3rd of the buildings identified as possibly historically significant were researched and documented. Relying on these studies to assess significant impacts in the DEIS does not adequately demonstrate the richness or historical importance within the study area.

Planning and Policy Content 3.4-4

51 There are several policy and goals established by the City that should be used to evaluate construction in the study area. They include:

d. When a project is proposed adjacent to or across the street from a designated site or structure, the proposal shall be referred to the City's Historic Preservation officer for an assessment of any adverse impacts on the designated landmark...

City of Seattle Comprehensive Plan

Goals and policies include UC-G12, A community where the historic resources...that add to the community's sense of history and unique character should be conserved. (3.5-6)

City of Seattle Landmarks Process

Although this does not directly apply to the single family areas in the study area, the intent is clear. "It" embodies the distinctive visible characteristics of an architectural style or period. This idea is further embodied in the language on page 3.5-14 of the DEIS which states "The project area includes several notable character features that have not been evaluated for NRHP, WHR or SL eligibility: **Single family residential concentration north of NE 50th Street and west of Roosevelt Way NE".**

The study area includes three buildings listed on different registers, University Branch Library, University Heights School and Church of the Blessed Sacrament. The above principles should be applied to the areas surrounding them.

Significant Impacts 3.4.2

52 In terms of significant impacts, the DEIS states that "these older SF residential areas may be affected over time by the projected increased development and density around them, resulting mounting pressure to convert large homes into multi-family or congregate dwellings or to demolish them in favor of larger buildings." (3.5-15) Unfortunately, this is already happening to the great detriment of those of who live here and cherish our humble old homes which are still considered "affordable", in relation to many parts of the city.

53 The DEIS also states rezoning "could accelerate the real estate pressures in the area and **potentially** impact older buildings and recognized historic buildings."

Using even stronger language in 3.4-17 the DEIS states "All alternatives **potentially** affect designated historic buildings and those identified as eligible for historic status, including demolition and inappropriate rehabilitation and re-use. (Notice the frequent use of **potentially)**

54 Another major impact not discussed is that homes, whether owned or rented create more stable residents. These residents pay taxes, work to enhance their own and public properties and create more stable school populations. Kids who are stable at school tend do better than those that move frequently and are able to become more productive citizens.

Unbelievably, the DEIS states there will be no significant impacts from any of the proposed alternatives.

Mitigation

55 We agree with the proposals to update the 2002 survey, expand the age and range of buildings evaluated, survey apartment buildings from 1910-1930's for landmark status and the proposal to provide financial and other assistance to owners of these properties.

56 Section 3.4.3 talks about "the intact neighborhood and religious properties that together create a distinct neighborhood within the city and that these properties will be used to inform the nature of new and infill development". If only this were true. It isn't happening now and, therefore, means nothing in the future.

57 Saving individual buildings, designated as landmarks or not, makes little sense unless their physical context is also preserved. (See 3.4-4) Treating these intact neighborhoods as historical districts would provide meaningful mitigation and would increase the value and livability of the area while preserving a range of housing options. In addition, these graceful "craftsman" style homes have gardens, shrubs and fully-mature trees that add beauty to the area and a diverse ecosystem.

Section 3.5 Transportation

Authored by Judith Wirth and Jeannie Gorman

58 The U District is a truly unique Seattle neighborhood. We have a sustainable mix of shopping, business, education, medical, religious, services and residential uses. We are in the middle of the city, serve as a hub for transportation for thousands of Seattle residents to access these services and facilities and absorb tens of thousands of transient students every school year. No other neighborhood deals with these unique stresses. We residents of the U District pride ourselves on dealing gracefully and creatively with the numbers of students, patients, congregants and homeless that utilize this area. We do it while embracing ethnic and economic diversity and sustaining an urban, healthy and livable neighborhood. Students, professors, patients and congregants leave but the homeowners and long-term renters of the U District remain. We maintain our houses and lawns, plant traffic circles, organize trash cleanups and serve as the mainstay to an otherwise shifting neighborhood. Our commitment to maintaining this vitality and the historic homes of the U District makes this the desirable neighborhood it is today.

We understand the inevitability of growth and as our neighborhood plan and the No-Action Alternative prove, are willing to accept our share. However, the City's Urban Center plan shifts a disproportionate amount of growth on our neighborhood, putting more and more pressure on homeowners and long-term renters. The City must consider the impact of towering apartment buildings with no lot-lines, no green space, no amenities and transient residents on quality of life for residents and businesses alike. Long-term residents are a mix of older, younger, active and disabled and even families with small children. Any changes must take into account varying degrees of mobility and activity, both in terms of building and traffic.

According to the DEIS, all the alternatives provide **MORE THAN SUFFICIENT CAPACITY** in the study area to accommodate both the residential and employment growth estimates. (3.2 5) **Even Alt 3, no action** provides, 2,706 more capacity than the 3900 the City is using as a baseline.

TRANSPORTATION 3.5

59 We are not engineers or urban planners; we are concerned residents who live here and know the problems we encounter daily leaving and returning to the U district. The analysis of traffic and transportation impacts associated with the three alternatives in the DEIS are woefully inadequate, especially in regard to Alternatives one and two. Further increasing density in the area, along with increased growth in Seattle will certainly exacerbate transportation problems, despite the claims in the DEIS stating there will be no significant impacts. We are baffled by the EIS' apparent conclusion that Seattle can increase almost twice the number of new residential units and 3-4 times the number of jobs in the area and end up with the same number of trips across all modes of transportation. Dramatic differences in density will generate differences in trips for all modes, not almost identical numbers.

60 Please provide information on the analytical approach, data and assumptions used to reach this surprising conclusion. We also question the use of the MDX traffic model rather than the Institute of Transportation Engineers methodology and rates, which is the industry standard for

60 cont determining trip generation data. Does the MDX model have a track record that shows it can accurately predict the future, especially in twenty years?

61 **SINGLE OCCUPANCY VEHICLE (SOV) GOAL:**
Increased density will create increased traffic, whether by bus, car or bicycle. The goal of 70% non-SOV travel in the U District Urban Center (UDUC) does not take into account the aging population, the disabled and families with children. Also, Seattle is a region with a high percentage of outdoor pursuits that draw a younger population who also need vehicles to get to recreation areas. Alternative 3 would still meet the City's mode split goal of 70% non-SOV. According to the DEIS (3.5-44) the auto mode share percentage would decrease compared to 2015, but the absolute number of auto trips would increase by roughly 12% without needing the density levels of the Action Alternatives.

62 We are also wondering how the City expects to ensure that the projected transit mode split can be achieved, considering our Region's inability to adequately fund transportation infrastructure and transit service. A recent letter by the Federal Transit Administration's Rick Krochalis to the Puget Sound Regional Council questioned the region's ability to provide the funds necessary to implement the Transportation Improvement Plan. Transit service is being cut due to lack of funding, yet future transportation plans are based on a dramatic increase in the transit mode split. The letter indicated that the federal government may no longer accept the region's certification without guarantees that the funding to implement our Transportation Plan is actually available, potentially threatening the City's ability to receive federal funds for future projects. Please explain how the City would ensure that the funding to support the transit service required to meet the projected transit mode split goal will be guaranteed.

TRAFFIC STUDY

63 The most telling statement in the traffic study is that "...from both a policy and feasibility perspective, increasing roadway capacity ...is undesirable and cost-prohibitive (3.5- 70)Thus the study only considered non-auto mode mitigation, a minor part of the problem The study does not quantify in any way the efficacy of the types of proposed mitigation and it does not discuss any implementation strategies other than "possible" impact fees, changes to the City municipal code and additional monitoring of parking etc.

64 The traffic study in the Draft EIS is woefully inadequate. The City has used limited data to analyze current conditions and, thus, makes general projections about future growth based on inadequate data from a regional model. Much of the data is based on information from 2006 to 2010, too old to be accurate. Existing traffic, 3.5-2; parking data 2010, 3.5-19.

65 The DEIS shows only two areas of congestion projected for 2015, Roosevelt Way and 11th Ave, both from 45th to 50th. This is inaccurate. 50th westbound is so congested from 9th Ave to the southbound 1-5 onramp that it is impossible to a) access the left hand lane from west of Roosevelt, and (b) impossible to travel through each intersection from Roosevelt to the 1-5 onramp. Often access to the 1-5 southbound onramp is blocked by the quantity of travelers heading eastbound on 50th, gridlocking U district traffic from Roosevelt (or 11th) to 1-5. Again, we need more comprehensive and current data on traffic congestion as any increased density in the U District will negatively impact already deteriorating traffic conditions.

66 Transit service is already inadequate(3.5-7) and 20% of VMT is at LOSF (3.5-45) with Roosevelt and 11th NE predicted to be at LOSF by 2015 and this is with Alternative three, the No Action Alternative.

PARKING

67 The City's DEIS acknowledges that demand for parking presently exceeds supply. Seattle DPD (3.5 49; 3.5-57) Increased density will exacerbate this problem. Also, much of the discussion was based on a 2010 parking study. Current data must be used to analyze impacts for the UDUC and also for the region as we now know Seattle is one of the fastest growing areas in the country. Lack of parking also impacts many small businesses in the area. For example, one business near Trader Joe's rents the drive-ways of nearby residents for their customer's cars.

68 There is inadequate parking even with the RPZ's and increased enforcement. Residents on unregulated streets are routinely unable to park in front of or near their homes. Again no meaningful mitigation is offered. We have two proposals to help alleviate this problem. First, make all residential streets in the UDUC into RPZ's. Second, restrict the availability of RPZ permits outside of single family areas and limit the number of permits per household.

Another solution is to require all new developments to provide adequate parking for its residents. This requirement has recently been abandoned to the detriment of the residents who live here all the time. Developers who build, guarantee occupancy and who then leave our neighborhood have no stake in addressing the problems they create. Nor do the residents of these complexes, as they tend to be transient.

SAFETY 3.5 - 35

69 Again, the data is inadequate. The study projects data from January 2010 to September 2013 to represent 2015. That is ludicrous given the rapid growth in the region and UDUC. Also, the study needs to use a multiplier to project the actual numbers of accidents as many, undoubtedly, were not reported.

Based on this faulty assumption, the DEIS states there are no high accident locations in the study area. Using the study definitions (see chart on 3.5 - 37 Annual Collision Rates), there were eight locations that were in the 5-7 accident range and eight locations in the 4-5 accident range, both of which denote high accident locations. Pedestrian and bicycle collisions are shown on 3.5-38 and again two locations show 5 to 7 accidents and six show 3 to 4.

MITIGATING MEASURES 3.5.3

70 This document offers almost no mitigation measures and apparently doesn't think they are necessary, despite the proposed increase in density and the inability to improve roadways in the area. The DEIS claims that the "*proposed mitigation packages (3.5-4) would reduce the magnitude of all the identified impacts of the rezone alternatives to less-than-significant level, therefore there are no significant unavoidable adverse impacts to transportation".* This, despite the City's acknowledgement that there are "*unavoidable adverse impacts to transportation" (3.5.72)* Yet the DEIS embraces the increased density and upzones in the UDUC, particular in reference to Alternatives one and two. An example of this bias can be seen in the language used throughout this document, such as using "Deficiencies of No Action Alternative (3.5-43)

70 cont

and then describing “Impacts of Action Alternatives”. Also the use of words such as “could” and “potential” which tell us nothing.

Some of the proposed mitigation measures, such as the requirement for more active transportation demand management on the employer side are very difficult to implement for the small local businesses that make the U District the lively place it is today. Requiring more active TDM measures from employers would favor large companies and corporations, threatening the economic fabric and character of the study area.

No adverse impacts is the most egregious statement we have ever seen in a DEIS and uses sophistry in an absolutely indefensible manner. We are demanding that the City pay for an independent transportation expert, who will also work with the community, to review this section, the studies used, more recent data and the basic assumptions used to make such outlandish statements, before proceeding with this DEIS process. We also want more discussion about who defines what is acceptable.

Section 3.7 Open Space

Authored by Sharon Dunn and Ylva Hurnlund

71

From the DEIS:
"For total supply of open space, the following goals apply:

One acre of Village Open Space per 1,000 households (within the urban center)
One acre of Village Open Space per 10,000 jobs (within the urban center)
One acre of "Breathing Room Open Space" per 100 residents (citywide)

Comprehensive Plan goals for specific facilities within urban centers:

At least one "Village Commons" of at least one acre in size
One indoor, multiple use recreation facility
One dedicated community garden for each 2,500 households, with at least one dedicated garden site

Goals for distribution of open space in the Comprehensive Plan:

All locations within an urban village boundary should be "within approximately ⅛ mile of Village Open Space"
All locations outside of urban villages should be within ¼ to ½ mile of Usable Open Space"

Development adjacent to these designated green streets is required to provide street improvements that prioritize pedestrian and open space functions priorities. These street improvements are not counted toward the Village Open Space goals stated in the Comprehensive Plan, but they do provide public amenity space for residents and workers.
The 2005 University District Park Plan provides a detailed analysis of open space needs specific to the U District. It establishes open space priorities based on community input:

> ***1. Highest Priority****: A centrally located park, approximately one-half acre, in a high-volume pedestrian area with current or projected multi-family mixed-use buildings; this type of park should be designed to accommodate a variety of recreation uses. Work with property owners in the vicinity of Brooklyn Avenue between NE 43rd and NE 47th streets to develop a central multi-use park.*
> ***2. Highest Priority****: A number of smaller plazas in high-volume pedestrian areas. The design of these parks should be coordinated with adjacent development and need not necessarily be provided through Department of Parks and Recreation acquisition.*
> ***3. High Priority****: Smaller neighborhood-oriented parks (approximately one-quarter acre) to serve local needs.*

3.7.2 Significant Impacts

IMPACTS COMMON TO ALL ALTERNATIVES
Today, the U District does not meet some of the open space goals established by the Comprehensive Plan. While several planned parks will increase the supply of open space, this increase alone will not be enough to catch up to a growing neighborhood. Without additional

71 cont

open spaces, the deficit in the study area will grow from approximately 3 acres to 5 acres. (See Table 3.7–3.) Similarly, the U District does not meet the goal for indoor recreational space. With future growth, the goal for community gardens will not be met unless additional space is allocated.

Table 3.7-3 (pg. 3.7–8) U District Urban Design Draft EIS April 24, 2014

Comprehensive Plan Goal		U District Target	Resource	Status
Open Space Supply				
2013	**Village Open Space** ▸ one acre per 1,000 households ▸ one acre per 10,000 jobs	**6.77 acres total** 6.14 acres, by household 0.63 acres, by jobs	3.85 acres	Goal not met: **2.9-acre deficit**
2035	**Village Open Space** ▸ one acre per 1,000 households ▸ one acre per 10,000 jobs	**11.15 acres total** 10.04 acres, by household 1.11 acres, by jobs	6.04 acres anticipated, per planned projects	Goal not met: **5.1-acre deficit**
One "Village Commons" ▸ where the existing or projected ▸ households total 2,500 or more		1 Village Commons	1 Village Commons (University Playground)	**Goal met**
Specific facilities				
One indoor, multi-use recreation facility ▸ per Urban Center		1 recreation center	No City-owned recreation center	**Goal not met**
2013	**One dedicated community garden** ▸ for each 2,500 households	2 community gardens	3 community gardens	**Goal met**
2035	**One dedicated community garden** ▸ for each 2,500 households	4 community gardens	3 community gardens	**Goal not met**

72 **ALTERNATIVE 1** increases the capacity for job and residential growth in this same core area, which is currently under-served with open space amenities. This increases the likelihood that more people will live and work in an area that does not meet Comprehensive Plan goals for access to open space. This is a potential adverse impact of Alternative 1.
When the three planned parks (Christie Park expansion, University Heights south lot, and the waterfront) are complete, they will reduce but not eliminate the gap in the U District's core.

ALTERNATIVE 2
Same as Alternative 1. More development capacity in the core of the neighborhood increases the likelihood that new jobs and homes will not meet Comprehensive Plan goals for access to open space. This is a potential adverse impact of Alternative 2.

ALTERNATIVE 3
There are no impacts unique to Alternative 3.

73 ***Comment:*** The quoted portions of the DEIS, above, essentially speak for themselves. They make explicit a fact everyone who lives in this community knows: the University District *already, with no zoning change whatsoever, and not counting the additional population and density impacts*

73 cont *of construction recently completed or underway, has an open space deficit. This deficit is clearly not slated to be rectified in any clear, comprehensive, funded manner in the immediate or even the long-term future relative to the increased pace of building presently permitted and to the much greater degree of development that would be permitted under Alternatives 1 or 2.*

3.7.3 Mitigating Measures

74 "Section 3.7.2 highlights existing deficiencies and potential future adverse impacts relating to Seattle's open space goals and policies. Various actions could help provide more open spaces and recreational opportunities for the growing neighborhood (including Village Open Space, Breathing Room Open Space, and open space "offsets"):

New property acquisition and improvement by Seattle Parks, funded through a future levy, open space impact fees, or other means—especially in the existing gap between NE 47th and NE 41st streets

Comment: This wording makes it clear: actions ***could help***, but they are only vague possibilities. Meanwhile, rapid construction in the community *is already underway.*

"Provision of dedicated, publicly accessible open space as part of private development ("POPS"), through development standards or an incentive zoning program in the Land Use Code

On-site open space provided as residential amenities through new development

Public/private partnerships to develop, manage, and program public open spaces.

Additional community gardens.

Improvement of designated green streets to provide outdoor seating and other amenities. Adopt green street concept plans to the Right-of-Way Improvements Manual to guide private development, and/or grant funding for streetscape improvements.

Improvement of "festival streets," i.e., special streets that can be shut down to vehicular traffic for community events.

Improved access to campus for the public for the purposes of public access to open spaces located on the UW campus within the immediate vicinity of the planning area. "

Comment:

1. This wording makes it clear: actions ***could help***, but they are only vague possibilities. Meanwhile, rapid construction in the community *is already underway.*
2. Furthermore, publicly accessible open space incorporated into private developments do not offer the same guarantee of full public access and freedom of usage that public open spaces have.
3. The existing public open space, especially University Playground, already receives an undue level of high impact usage by transient and homeless populations.
4. While a small parcel of formerly residential property has been acquired, under the levy, as an adjacent extension to Christie Park, it is small, it is behind the UW medical building and distant from the heavy use corridors of the University District, and is unlikely to make any notable aesthetic or usage impact on the University District. Furthermore, this small park will need attention to ensure it does not become a location for transient populations.
5. All parks and any open spaced in the U District have continual problems with overnight camping and substance use, especially the area of University Playground.

75

3.7.4 Significant Unavoidable Adverse Impacts

This section describes potential significant adverse impacts to open space that could result through implementation of the rezone alternatives. The proposed mitigation packages would reduce the magnitude of all identified impacts of the rezone alternatives to a less than significant level.

Comment: There is no visible see content for this section. That is unacceptable.

Section 3.8 Public Services

Authored by Kathy Slettebak and Arn Slettebak

3.8.1 Affected Environment

76

Fire and Emergency Services

- Statement made without comment on 3.8-3. No explanation about how any of Alt 1, 2 or existing plans would affect fire fighter response.
- "Building and associated densities are critical factors in estimating fire fighter requirements."
- Fire station #17 had an increase incident responses in 2012, 8% increase for fire engine and 5% increase for ladder. No statistics available for 2013. With increased growth and density anticipation would be for more calls resulting in increased incident responses.
- SFD reports that special operations and technical rescues such as use of ladder trucks require 8.41 minutes for arrival. We note that the proposed high-rise buildings would potentially require more use of ladder trucks in all plans, especially Alt 1 & 2. 3.8-4
- Mitigation: assumes all alternatives would have the same impact. However taller buildings in higher density would have the potential for a negative impact as for maneuvering fire engines and ladders. Also, increased population especially during the day with outside workers present in the U. District will result in an increase in calls for emergency medical services which already comprise 80% of total calls to SFD. DEIS says additional staffing and equipment may be required but does not address who will foot the bill. 3.8-11

77

Police Services

The North Precinct facility is currently overcrowded and does not meet the needs of precinct personnel even at this time. The University District is in Union sector U2 and U3. The overall crime activity in the North Precinct between 2009 and 2012 fell 8%, while U3 has seen a 20% increase in major crime reports and U2 has seen a 4% increase over the same time period. U3 with its high increase in major crime encompasses Greek Row where students are easy targets. The city of Seattle meantime saw a 12.5% drop in major crime. It is evident that more police activity is needed here right now and much more will be needed when the increase in population occurs as more proposed developments are built.

- The DEIS states the average response time in the city is 7 minutes. However response time can be different depending on geographic area, time of day and day of week. No data is given for response time in the University District.
- Precinct priorities for the University District include more patrol in the business core and emphasis on patrolling Greek Row on Friday and Saturday nights in the spring. We note there has been substantially more crime in that sector on any day of the week, any season of the year and any time of day. Consider involving University Police in patrolling section U3.

78 **Public Schools**

There is an important relationship between families and schools. Families give a lot of consideration to what schools are available and their reputation for excellence before they decide to move into an area. Without a school, the University District began losing families after University Heights was closed in 1989. Families anchor a neighborhood and the school anchors families. Hard to have one without the other. Even the DEIS supports a school in the University District.

79 **3.8.2 Significant Impacts**

DEIS states the "current study area population is characterized by a large number of student households and relatively few families." That is not too surprising considering recent developments have targeted student housing in apodments and other studio-style housing. How many new single-family homes have been built in the area? How many older homes have been destroyed to make way for these student houses? Where is the new housing that would attract families? 3.8-12

- Among all households the percentage of married couples with children is 66% in the University District compared to 33% for the city of Seattle. The percentage of single-mother households is 22% compared to 10% for the city of Seattle. Yet the University District does not have a public school facility. Seattle Public Schools projects a 1300 increase in enrollment for 2014-15. Of the public schools that currently serve the University District, 2 of the 3 are already over capacity.
- The Seattle Public School District includes these guiding principles related to how school boundaries are set:

Maximize walkability: only Roosevelt High School could be considered a walkable distance. No public elementary or middle school is in walkable distance.

Be responsive to family input to the extent feasible. Huh?

80 **3.8.3 Mitigating Measures**

"The School District has the option of collecting impact fees under Washington State's Growth Management Act and voluntary mitigation fees paid pursuant to the State Environmental Policy Act." Questions: Who will see that the school district actually does collect these fees and where do the voluntary mitigation fees come from? Is the money locked into the University District or does the School District use it at will? 3.8-14

Letter of intent re. Contract Rezone for Blessed Sacrament Master Plan and application to amend Seattle's Comprehensive Plan

Signatories: The Priory of the Blessed Sacrament dba Blessed Sacrament Parish and Roosevelt Neighbors Alliance

The Roosevelt Neighbors Alliance (RNA) a 501(c)3 community organization in Seattle's University District, and the Priory of the Blessed Sacrament dba Blessed Sacrament Parish (encompasses all legal authorities associated with the non-profit organization) support an amendment to the City of Seattle's Comprehensive Plan allowing inclusion of BSP property in the University Urban Center and exclusion of some nearby property from the Urban Center (see map). If the Comprehensive Plan amendment is approved, BSP will apply for an up-zone of its SF zoned property to LR1 through a Contract Rezone. Following the protocol of the Contract Rezone, the Priory of the Blessed Sacrament dba Blessed Sacrament Parish, in an effort to minimize negative impacts on the neighborhood, will collaborate with neighbors on 9th and 8th Avenues NE and the RNA community in the design and implementation of the BSP Master Plan. This collaboration should ensure projects compatible with the neighborhood and help mitigate negative impacts.

Potential Impacts could include:

- increased traffic on the narrow neighborhood streets, and increased pedestrian and car accidents,
- increased neighborhood parking (until parking garage is constructed)
- adverse visual impact of the new structures (priory, parking garage, plinth , entrances and exits)
- neighbors' concern regarding potential for increased housing density

The RNA and BSP will submit a joint application to Seattle's Comprehensive Plan requesting the inclusion of BSP in the Urban Center and excluding neighborhood properties on the west edge of the Urban Center (west side of 9th Ave NE to 7th Ave NE, between BSP and University Child Development School (UCDS) and NE 47th St, including 5 residential properties on the east side of 9th Ave NE between the library and UCDS.)

The requested adjustment to the Urban Center boundary will have two effects beneficial to both BSP and the surrounding neighborhood.

1. It will allow BSP to request the up-zone that will allow them to develop their property in accordance with their Master Plan (a new priory, ADA access via a plinth on the north side of the church, a below grade two floor parking garage), respect the historic

nature of their buildings, house clergy, and serve their congregation and the larger community, including neighbors.

2. The adjustment would also remove certain blocks around University Playground Park and University Branch Library from the Urban Center, protecting them from an upzone in future Urban Center rezoning processes and allowing the community to explore a future downzone that further preserves the existing single-family housing character, yard trees and gardens of the residential areas around the church, University Playfield, the University Child Development School and the public library (see map).

The joint request for adjustment of the Urban Center boundary is the result of a long (and continuing) conversation between RNA and BSP and we believe that this change is in the best interests of both BSP, its clergy and congregation, and the residents of the surrounding neighborhood. Through the City of Seattle planning processes we anticipate ongoing outreach to the neighborhood to allow for more feedback on the requested changes and ensure all homeowners are well informed.

We respectfully request an amendment to the Comprehensive Plan as described in the attached map.

Debbie Gonzalez, Parish Administrator on behalf of Fr. Daniel Syverstad, Pastor through his delegated authority.

Debbie Gonzalez

Date 5-14-14

Mark Griffin, President Roosevelt Neighbors' Alliance (2014)

Date 5/14/14

Judith Wirth, Member at large, Roosevelt Neighbors' Alliance (2014)

Judith Wirth

Date 5-14-14

This letter duplicates the first 10 comments in Letter No. 4. Please refer to Letter No. 4, Comments No. 1-10 for responses to the comments in this letter.

Letter # 5

From: Mark Griffin <markg@compass-gc.com>
Sent: Monday, June 23, 2014 5:27 PM
To: LaClergue, Dave
Cc: Mark Griffin; nancybocek@gmail.com
Subject: Roosevelt Neighbors Alliance comments on DEIS
Attachments: DEIS letter - revised.docx

Dave,

Attached is the letter from the RNA regarding the DEIS. A bunch of the neighbors have been meeting for several weeks and discussing concerns. The letter reflects a broad consensus on mitigations that we would like to see incorporated into the EIS for current issues that will continue to compounded with changes in the future (especially additional density).

We have additional and more detailed comments that we will also forward to you that is reflective of the different voices that contributed to our discussions (Nancy was going to tabulate and send them to you). I would suggest that all of the comments be read, as there are many good points and suggestions that we didn't include in our attached letter. However those comments reflect more of individual perspectives, and doesn't necessarily reflect consensus.

We do feel that the mitigation we call out for in this letter is reasonable and should be incorporated into the FEIS.

Let me know when you get a chance to review.

Thanks,
Mark
President
Roosevelt Neighbors Alliance

THIS LETTER IS INCLUDED IN THE ROOSEVELT NEIGHBORS ALLIANCE 1 DOCUMENT.

To: Dave LeClergue
Urban Designer
City of Seattle Department of Planning and Development
700 5th Ave., Suite 1900
Seattle, WA 98124

Subject: U District Urban Design Draft EIS and LR3

Dear Mr. LeClergue,

In regards to the DEIS, the Roosevelt Neighbors Alliance feels that there are a number of items that still need to be addressed in the Final EIS. We feel the following observations and concerns reflect our experience as neighbors within the study area, and reflects the concerns of those who experience the University District at all hours and of impacts not appropriately discussed in the DEIS. We also have specific requests to mitigate those adverse impacts.

The DEIS limits itself by stating that adverse impacts which currently exist, or will occur under the Alternate 3 (no change scenario), should not be considered an impact. It is our belief that a deficit that is currently reflected in the neighborhood should be addressed in this process. It is our understanding that the city should be addressing and mitigating these impacts and deficiencies in neighborhoods whenever possible, but especially those targeted for substantial growth.

A change in zoning offers an opportunity for the City to craft changes that will encourage the mitigation of those impacts by coupling them with incentives for development. Those mitigations should be discussed in more depth in the DEIS. However, considering the presence of a very large nonprofit institution in the UW, improvements must also be made by the City of Seattle as well as the UW to bring the deficiencies in the neighborhood up to acceptable standards. Those improvements must be explicitly noted within the FEIS or we risk a continuation of hollow promises and continued deficiencies.

The following represents significant impacts that currently exist and will increase with additional density, and which must be addressed in the FEIS:

Traffic Mitigation – the DEIS states that there is no significant traffic impact to the neighborhood. However, any time spent in the U District will reveal dramatic gridlock in the neighborhood, as a majority of the east/west traffic from Ballard to I-5, as well as Windermere/Laurelhurst/U Village/etc. to I-5 utilize 45th and 50th Streets, which turns the U District into gridlock seven days a week, both in the mornings and the evenings. Roosevelt and 11th are also a major north/south arterial and bike routes as it is one of six bridges (including I5, 99, Ballard, Mountlake and Fremont bridges) to cross the ship canal. While the addition of light

rail will benefit the neighborhood, it won't address the east/west traffic. The EIS should be modified to call for a new overpass over I-5 between 45th and extending north of 50th dedicated to busses, cyclists, and pedestrians.

Parking Mitigation - The single family and lowrise neighborhoods currently soak up a lot of the parking demands of non-permitted group housing (generally houses broken up into individual room rentals) throughout the U District, and faces further demand by the modification of the rule previously requiring developers to provide parking for new developments in the U District. Currently the U District includes Zone 10 parking restriction which encompasses single family, lowerise, and midrise zoning. Zone 10 was created at a time in which parking was still required of developers. With the recent change in which no parking is required by developers, Zone 10 no longer protects single family and lowrise family neighborhoods from being inundated with cars. The original intent of this modification to the rule was to encourage people living in midrise or taller buildings to use mass transit by making cars less convenient without ready parking. With the Zone 10 geography, rather than encouraging midrise building occupants to use mass transit, it enables them to get around the requirement by acquiring a Zone pass and parking in the single family or lowerise blocks. Not only does this change the character of the blocks of traditional single family structures from one that is family friendly, it dramatically increases traffic on residential streets, decreasing safety and increasing the likelihood of a significant accident occurring. For the safety of all of the current and future residents, especially the youngest residents, we strongly request that the EIS include as mitigation the breaking up of Zone 10 into two zones, one encompassing the areas zoned LR3 and denser/higher, and another encompassing the more family oriented areas zoned LR2/LR1/Single Family.

Open Space – The U District currently has the lowest ratio of park space to households in the city. As the DEIS notes, this ratio will become substantially worse with additional density. Whether that density is related to continued growth in Alternate 3 or higher density noted in Alternates 1 and 2. While the UW has open space, it serves the student and employee population of the University, and not the general public, and the DEIS correctly excludes the University of Washington from the analysis on open space. As the different alternates being examined include significant upzoning, the opportunities to expand the open space in the U District will only decrease as properties are redeveloped and the cost of land increases.

We request that three forms of mitigation be included in the FEIS to address this 'worst in the city' deficit. For the immediate term to address the open space shortfall, is the full funding of the park at 50th and University, which has been designed but as of yet construction has not yet begun. For the intermediate term, we request that as an offset to increased height opportunities that will benefit the UW being examined in Alternates 1 and 2, that the University of Washington dedicate the space above the Light Rail station at 43rd and Brooklyn to create the Commons or U District Square. For the long term, to balance out the space alternative and in conjunction with the traffic congestion noted above, we request that the FEIS require the City to fund an analysis on placing a cap over the freeway between 45th and 50th. In addition, as part of any additional federal or state highway projects related to work on I5 north of downtown or

I520/I5 freeway exchange, that funding for a lid between 45th and north of 50th be included as mitigation to the University District. A cap at that location should include a mixture of playfields, gathering space and balanced with trees.

Zoning – Roosevelt Neighbors Alliance, with broad support of the neighbors and Blessed Sacrament Church, has sponsored a request to change the urban center boundary to exclude the LR1 and LR2 zoned properties around University Playground. This area is home to a number of owner occupied single family structures composed of families as well as long term residents of the neighborhood. We request that the FEIS note this application to not upzone these areas, with the exception of unifying the Blessed Sacrament campus under LR1 with a contract rezone, which in Alternate #1 shows being be upzoned to LR3.

Schools – Currently the U District has no public school (elementary, secondary or high school) within its boundaries. The two closest elementary schools to the University District are Sanford and MacDonald. Both of these elementary schools have immersion programs and the Seattle School District has recently changed the designations for those schools to full city application rather than drawing from the U District. As mitigation for the influx of additional households into the U District with additional density, and to address a current deficit, we request that the Seattle School District give all residents of the U District a first priority in applications to Sanford or MacDonald over other geographical locations in the City. When combined with Green Lake Elementary as the future geographical elementary school, the option to attend any of these three schools will help to mitigate the anticipated growth in school children and prevent the likely result of bussing elementary children longer distances. As a longer term mitigation, we request continued study and funding of attempts to building an elementary school within the University District.

Development Fees – As part of any upzoning, developer fees are often added to the additional zoning density. We request that any developer fees be segregated from the general City of Seattle funds, and specifically held separately to be spent only within the University District. Considering the current deficiencies in the U District, especially in comparison to most other Seattle neighborhoods, any added fees associated with development, whether it be instituted by DPD, Seattle Light, SDOT, sidewalk rentals, Seattle Public Utilities, low income housing fund, etc., should be segregated and used to improve the infrastructure and open space requirements within the neighborhood. It should not be accumulated in the general fund and utilized in other neighborhoods given the U District's current deficiencies in services, infrastructure, and open space, which will be magnified with increased density.

Circulation and Setbacks – the FEIS should provide greater detail in regards to set backs both on the street level as well as at higher elevations the setbacks related to the different zoning heights. Specific language should be included on how mid-block cross-throughs and street set backs will offset greater density/heights.

These mitigation requests represent a general consensus from many people within the Roosevelt Neighbors Alliance. While this doesn't represent all of the thoughts or opinions on the EIS, and we will include other general thoughts and feedback from individuals and groups as well, there is strong consensus that these mitigations must be included in the FEIS.

Please also confirm that the FEIS will conform to the SEPA. We request that the issuance of the FEIS be delayed, if necessary, until all of these mitigations are addressed and incorporated into the DEIS.

Sincerely,

Mark Griffin
President
Roosevelt Neighbors Alliance

Letter # 6

Seattle Displacement Coalition

5031 University Way NE * Seattle * Washington * 98105 * 206-632-0668 * jvf4119@zipcon.net

Interfaith Task Force on Homelessness

creating the political will to end homelessness in king county in ten years

June 20, 2014

Dave LaClergue, City of Seattle (dave.laclergue@seattle.gov)
700 5th Ave. Ste 2000
P.O. Box 34019
Seattle, WA
98124-4019

Re: Our Comments on the DEIS – University District 'Urban Design' Upzone Alternatives

Dear Mr. LaClergue and others who it concerns,

The Seattle Displacement Coalition is a 37 year-old city-wide low income housing and homeless non-profit organization here in Seattle whose membership is made up of residents of Seattle and representatives of various church, community, and social service organizations within our city. Our membership includes residents of the University District and our offices have been located here in the District since 1987. As such, we are directly affected by the proposed upzones now under consideration and analyzed in the "Urban Design" University District DEIS.

The Interfaith Task Force on Homelessness was officially convened in December 2001 and has partnered with the Seattle Displacement Coalition, the Church Council of Greater Seattle, the Archdiocesan Housing Authority, and other organizations. The organization works regionally to bring leadership and members of faith communities together to do advocacy for increased public funding for low income housing and homeless programs. The group for years has been involved in programs affecting homeless youth and adults in the University District.

1 To remain consistent with requirements for full analysis of significant environmental impacts under SEPA and in order to ensure decision-makers full and accurate disclosure of those impacts, it is necessary to revise/amend the DEIS, particularly with respect to those sections related to direct, indirect, and cumulative impacts of the considered alternatives on housing, population, and land use and the unique historic character of the University District. Lacking this information, the document also fails to identify specific forms of prescribed mitigation decisions-makers could otherwise employ to mitigate those impacts.

For purposes of identifying our specific concerns, herein, we shall refer to the two alternatives being considered as "the 340' Highrise Alternative" and the "150' Highrise Alternative". However, given that either of these options is so grossly out of scale and at odds with the current lower density character of the UDistrict (and its current zoned capacity), most of our comments will apply to either option.

Here are key points of concern that we believe must be addressed in order to meet the legal requirements of SEPA:

2 1. The assessment of impacts associated with either of the two alternatives whether the 340' or 150' Highrise Option, makes a fundamental error in it's calculation which leads to an analysis that grossly underestimates the impacts of each option on all SEPA elements of the environment especially impacts on housing, land use, population, historic structures, utilities and other elements related to demands on public infrastructure. .

As the following quote from the DEIS indicates, their analysis proceeds from the following assumption (see Sec 1-3 DEIS):

"PLANNING ESTIMATES FOR GROWTH
For the purpose of analysis in this EIS, a growth estimate (thru 2035) of 3,900 housing units and 4,800 jobs is assumed. This assumption is informed by the City's adopted 2024 growth targets, historic development trends, anticipated regional growth estimates and a recent analysis of the U District real estate market."

This assumption provides the rationale throughout the document especially in their arguments used in the housing and land use sections) to argue that the growth (or demand) is fixed at 3900 units and 4800 jobs through the planning period 2035. Therefore, regardless of which option you examine, the environmental impacts of each option are relatively similar – in fact almost the same. It also is what allows writers of the DEIS to conclude erroneously and throughout the document that there are few adverse impacts associated with either of the highrise options when compared to the no action option.

3 In the Housing and Land Use Sections, the DEIS goes even one step further, arguing that under either highrise options, a lot more existing housing could be preserved (and not demolished/redeveloped) because the upzones would serve to concentrate more of these 3900 units to be developed on fewer sites. In contrast, it is claimed that the 'do nothing' option would spread that development over more sites, meaning more existing housing could be lost.

4 There are several errors inherent in their conclusion that the amount of growth is fixed at 3900 units and 4800 jobs thru 2035, regardless of which option you implement over the planning period. In the first place, the writers of the DEIS fail to explain adequately the basis for "cherry picking" those growth estimates that inform this analysis. Further the analysis incorrectly assumes that changes in zoning (from the no action option) won't set in motion additional and variable rates of growth (and demand).

5 Both highrise options are grossly out of scale – at odds - with current uses and current zoned capacity. Each has the real potential to bring several thousand more units and several thousand more jobs to the area above the 2035 projections (and above the no action alternative). In fact, this clearly is the intent of the proposed highrise zoning as indicated in scoping documents and as stated in the "goals" section of the document – to shift more of the citys and region's office and residential growth into neighborhoods that surround rail stops. The added allowable densities under each of the highrise options would give the UDistrict nearly three times the growth capacity over the 2035 projections whereas the no action alternative would leave the district with only about twice the capacity.

6 This added increment of growth above current zoned capacity and current uses and up to the new zoned capacity - this is the additional growth that is likely to occur, and it is this increment that must be the subject of analysis in the EIS. The differences in allowed capacity between the options – this is what needs to be analyzed – direct, indirect, and cumulative adverse impacts – of all three options. And mitigation must be identified and discussed to address these impacts for each option.

7 One of the scoping documents referenced in the DEIS is the Heartland Report analyzing the feasibility of adding highrises across the University District. Referring specifically to sections in their report related to demand and supply, and we quote:

"Any new high---rise capacity introduced in the U---District will compete for a limited amount of demand or for high---rise Development city---wide. The question is how well the U---District will compete with other sub---markets/neighborhoods based on the relative value and cost that this Urban Center can offer when compared to other competitive areas.

Although a comprehensive assessment is beyond the scope of this analysis, it is our opinion that the U---District can compete relatively well with other sub---markets within the city and should capture some number of new high---rise development over the planning period.

Overall,the housing options offered in the U---District make the area one of the more affordable of the Urban Centers or Villages in the city. And, as the demand for affordable housing is seemingly endless….

The deepest pool of potential residents is students and faculty who study and work at the University of Washington. As of the autumn 2012 quarter there were 42,570 students enrolled with 3,752 employed as instructional faculty (3,075 ofWhich are full---time). Together this totals over 46,300 people and that does not include administrative staff and other university related employees.

Other residential groups that may become attracted to the Study Area in the future include professional households without children, empty---nesters, and families….. Another group that could be attracted to high---rise development includes empty---nesters/life---long learners.

A new group of higher end market developments are being developed in the U---District at present. This group will measure the strength of demand in the U--- District for higher---end mid---rise product. These units should add substantial demand for new retail services in the District. ***"***

(For full report, see Heartland Report referenced in the DEIS and scoping documents)

The Heartland Report states, albeit with some caution, that if the area is upzoned for highrises, more households and jobs will be attracted to the area to fill up those highrises. Heartland identified considerable potential for added or new demand that could support or "be attracted" to the UDistrict by highrise zoning. This is in fact what informs their belief that highrise zoning is "feasible" given that more of the city's highrise office and residential development (meaning more demand) will switch from areas like Belltown and Downtown to the U-District.

8 Further, it is this analysis that informs DPD's decision to proceed with these proposed highrise options in the first place – the belief that it will attract this greater share of new or additional demand. In other words if you build them, "they will come". There are numerous planning documents, in addition to the Heartland report, including the Comprehensive Plan that reference the City and City leader's interest in attracting and concentrating more of the region and city's households to urban villages and into areas around planned rail stops such as the UDistrict. The current comprehensive plan is now in the process of being revised to further these aims. These policies and goals should be specifically cited in and referenced in the final EIS.

8 cont This DEIS generally references this goal – concentrating more growth in the UDistrict - in the introduction and summary of reasons the city is undertaking this upzone at all. Effectively the new highrise buildings accompanying the upzones (both office and housing development) itself will attract more demand from these groups including professionals, faculty, empty nesters, even wealthier seniors. The Heartland Report (forming the basis for the upzones) specifically makes this case. That is the intent of the upzones.

9 The document identifies current zoned capacity of 6800 units - about twice the 2035 target (3900 units). Each of the upzone alternatives would bring the zoned housing capacity up to about 10,000 units - an increase of about 3000 units. On the jobs side, either upzone option adds capacity for another 8000-10000 jobs. This is the increment of growth that is more than "probable" but likely if the upzones are granted that have not been analyzed in accordance with SEPA.

See State SEPA law, RCW 43.21 C.031:
(1) An environmental impact statement (the detailed statement required by RCW 43.21C.030(2)(c)) shall be prepared on proposals for legislation and other major actions having a probable significant, adverse environmental impact.

Even if the extra growth, up to the new added capacity allowed by the highrise rezones, is not a certainty that doesn't absolve DPD from studying the eventuality i.e, the "probability" that the new and larger envelope will be filled up. Indeed, the "experts" from Heartland substantiate the need for the upzones and say its feasible to upzone the area precisely because that new highrise zoning will attract more of the city's share of residential and office development to fill up those new towers and the new zoning envelope over the planning period. Despite that, there is no analysis provided of the impacts of such growth that could "feasibly" occur and accompany the rezones.

All sections of the Final EIS must include and examination of the impacts of this added increment above current uses and current zoned capacity up to these new capacity thresholds on all elements of the environments and for each of the options.

10 2. We are particularly concerned about the failure to assess the housing, population, and land use impacts of this added increment of growth on the Districts supply of existing low income and affordable housing.

The DEIS should contain a detailed "susceptibility to change" analysis (as Seattle planners have done in other DEIS's), identifying these buildings and totaling the exact number of units placed at risk in the rezone area. It's a relatively simple and critical analysis that is needed to inform decision makers.

This has all been written off in the DEIS by the specious observation there would be no increase in demand called forth by the upzones, no additional jobs in the District, and no additional increment of households moving in to all those shiny new highrises over and above the 3900 units city planners in DPD have projected over the planning horizon. This is what allows the DEIS to ludicrously conclude that perhaps only 40 existing units would be lost during the planning period.

11 We have conducted our own "windshield survey" of the areas affected by the planned upzone and we identify about 40 low income and affordable apartment buildings (containing approximately 1000

11 cont

units) directly affected in the rezone area and likely to be removed over the 20 year planning – much of it lost early in the period - units that likely would be removed if either rezone ultimately is adopted. This would be directly attributable to the added increment of growth generated by the upzones themselves (in contrast to the do nothing option).

Much of the loss would occur in earlier years during the planning period because the change in zoning (at such an extreme scale) from lower allowed densities to much higher densities would significantly affect land values and taxes. This would have the immediate affect of driving up rents in many cases above low income thresholds on these properties.

In other cases (when there is such a disparity between existing and zoned uses), particularly in areas of high demand, it leads to the speculative selling and buying (and refinancing) of these older structures. Longterm owners will no debt sell to speculators using debt financing. These excessive costs are immediately passed on to the existing tenants in the form of higher rents. This would occur quickly and very early in the planning period upon the heels of either upzone. Then of course, over time, these lower density units are demolished to make way for new more expensive rentals built to the new higher zoned capacity.

12

The DEIS includes no analysis of these impacts – no windshield survey or susceptibility to change analysis identifying the number of existing low income rents in the affected area that are likely to be placed at risk or lost. There are commonly conducted forms of EIS study and ways to readily understand and reasonably estimate housing units likely to be lost.

Instead of providing any such reasonable and required assessment of impacts on land uses, housing, and population, the DEIS waxes on about the marvels of "filtering" – a glorified version of trickle down taken from an econ 101 text book.

Ironically, in these related sections of the DEIS their own charts demonstrate the value of existing older apartment buildings as a much needed source of low income and affordable housing. Older buildings are priced by their own charts at rent levels hundreds of dollars below newly constructed buildings, or apartments built in recent years. (see Charts 3.2 – 7 and – 8). Upzones will accelerate the loss of these older affordable existing structures and this must be analyzed in the final EIS.

13

The DEIS should (and could easily do so) document (under "current conditions") what percentage of the existing stock in the affected rezone area is offered at below market rates and affordable to low income and average wage earners. The DEIS also could readily calculate what portion of the current total stock in the District now is affordable to these income groups and what the gap or need currently is in supply. Further, how much of this stock is located in the areas of rezone could be easily calculated.

This is necessary to inform decisionmakers how much existing affordable housing is placed at risk under each of the two upzone options, and on the significance of how that gap (between current and new upzoned capacity) ould be exacerbated by that loss. Our windshield survey indicates that it could be as high as a loss of 1000 existing older rental units – directly resulting from either of these rezones.

14

The impacts of such a dramatic loss of lower priced units would significantly affect the rent levels on the remaining existing affordable units. This assessment must be included for each of the upzone options – how much this loss would impact rents for low income households.

14 cont The loss of 1000 units represents over 15 percent of the existing rental stock in the District estimated at about 6000 units. However, most of that loss would be lower priced older rentals and represent potentially as much as 70 or 80 percent of current or existing affordable rentals stock.

15 There is ample evidence indicating that rezones of this scale and the additional market rate development that is generated (and added demolition of lower density existing affordable housing that will occur) will place substantial upward pressure on rents in the UDistrict and city wide. Our window survey identifies about 40 low income and affordable apartment buildings (containing approximately 1000 units) in the rezone area likely to be removed over the 20 year planning period if not sooner and that are directly threatened with removal should either rezone be adopted.

The final EIS should acknowledge these losses and assess their impacts on housing need in our community and its impacts on the demand for subsidized housing, shelter and social services.

16 Further, there is not such thing as "trickle down" or "filtering" in Seattle's housing market. Throughout the Coalition's 37 year life, supply and accelerated rates of new construction in Seattle have never led to lower prices. In fact, in times of high growth as we are seeing now, historically, supply that is added cannot keep pace with the added demand.

The charts in the DEIS prove this point. Despite new construction reaching record levels in Seattle and the District - the UDistrict now is at 94 percent of its 2024 growth target and Seattle has reached 104 percent of its 2024 target. As charts in the DEIS demonstrate, it has been accompanied not by falling rents or lower vacancy rates. City-wide we have seen record rent increases up 8 percent in just the last year city wide and up even higher in the UDistrict. Dupres and Scott's rental housing analysis for the UDistrict also shows this.

It highlights the risk accompanying upzones that bring more expensive new rental construction, which attracts more demand to the district for those units, but also causes more demolitions of existing units driving up rents on what remains of the existing affordable stock…. and displacing hundreds of lower income households in the process. .

17 The DEIS should refer to and document over time how current rates of rent increases have gone up at the same time rates of new construction have gone up. Documenting rates of housing loss should also be included in the DEIS and increased rates of homelessness over time as rates of construction go up.

The department (DPD) has at its disposal a digitalized program that can plot where and when housing demolitions occur in the UDistrict (and for every neighborhood of the City.). That data base shows rates of demolition have accelerated dramatically in the District as growth has accelerated in recent years. The Final EIS can readily access this information and provide this documentation which provides a base to compare how the accelerated rates of growth brought on by the proposed upzones could exacerbate these trends. (See link here: http://web1.seattle.gov/dpd/maps/)

18 3. Given the flawed assumption that demand won't change with the upzones, the DEIS fails to include any accurate assessement of the indirect and cumulative effect that either upzone option will have on land uses, population trends, and housing trends especially prices and rents across the entire neighborhood, adjacent neighborhoods, and city-wide not just within the rezone area. To what degree

18 cont will that increase and loss of existing units affect the demand for subsidized housing, shelter, and social services in the District, adjacent neighborhoods and City Wide.

There is ample evidence from past experience to be drawn upon here to demonstrate and to catalogue these effects. In Seattle we've recently gone thru a series of substantial upzoning and are now at record levels of new residential growth. Since 2005, we've added city wide some 50,000 units of new market rate espensive units (counting those going thru permitting). That correlates with the loss of 6500 existing units due to demolition (counting those going thru permitting. During this period rents have skyrocked. Homelessness city-wide has skyrocketed.

How will the accelerated loss of low income units under each rezone option effect the City's overall housing needs assessment and demand for subsidized housing – these impacts should also be considered and documented.

Again this failure to undertake an analysis of these effects primarily tracks back to the false assumption currently informing the City analysis, the DEIS proceeds with the assumption that demand is fixed at 3900 regardless of the added capacity (and demand)

19 4. Since there has been no adequate assessment of these impacts cited above, there has been no inclusion of proper forms of mitigation or proper levels of mitigation. There should be a thorough documenting and cataloguing of additional regulatory measures that must be put in place – even selective downzones – in order to preserve the existing affordable stock threatened by these upzoned. What measures can be put in place that require developers to replace housing they remove or that could prevent these demolitions from occurring in the first place – such as measures that incentivize infill and penalize demolition of existing units.

The PSRC has documented that the UDistrict is at more than a moderate risk of displacement due to Transit Oriented Development (see their growth management committee risk assessment report). That document proposes a number of anti-displacement strategies to mitigate these effects. Their also are several other anti-displacement reports recently produced that apply to Seattle that should be referenced in the final EIS including especially the anti-displacement strategies these reports reference. See especially SAGE report, Licata 2010 Forum Report, among others.

Studies should be referenced in the final EIS showing formulas and planning measures that are commonly used to ensure that developers share in the cost of adding infrastructure to meet demands caused by their projects. Over sixty cities in the region make use of impact fees to help cover development induced impacts on transportation, schools, parks and utilities. None of these mitigation measures are even identified let along discussed.

20 5. We've referenced above the failure to adequately assess impacts on housing, land use, population, social and human services largely due to the failure of the Draft EIS to assess impacts accompanying the added increment of growth allowed under each of the two upzones when compared to the no action option. This is growth that is probable and being sought by city planners over the planning period, i.e., new growth up to or that would fill the new zoned envelope under each highrise option.

This is an increment not studied in the DEIS - that amounts to an added capacity for about 3000 residential units and 8000-10,000 jobs –above the 2035 planning period targets rather arbitrarily set by DPD (3900 units and 4800 jobs).

20 cont The planners have a responsibility to include an assessment of impacts accompanying this added increment on all other SEPA environmental elements as well. It would be especially important to assess the direct, indirect, and cumulative impacts of this increment on infrastructure such as impacts on transportation, schools, CO2 emissions, historic buildings, utilities, etc. All of this has been conspicuously left out of the DEIS.

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21 The University District as we know it – it's unique mix of lower density affordable homes, townhomes, 3 story apartments and its rich social, racial and economic diversity, it's unique blend of affordable small businesses and shops serving young and old – all these things are at grave risk if either of these upzones are approved.

Should the City Council ultimately approve the proposed upzones, over time it would irrevocably alter the existing physical and social character and affordability of the community. The U-District's unique historic mix of affordable homes, townhomes, 3-story apartments, and its rich social, racial and economic diversity would all be tossed aside. Small businesses that line the Ave -- many owned by first generation immigrants--could not withstand such changes. The upzones would push their lower income customers out and storefront rents sky high.

In fact, the city's proposed upzones seem intentionally designed to pave the way for a corporate makeover of the community. The city recently convened an "economic task force" where plans were drawn up to turn the U-District into the region's next "high tech" hub, with new office space and shiny high-rise apartments for 'techies' living within walking distance of the new jobs. The University could expand its campus into these areas as well.

The public – through the EIS process – at least deserves an honest assessment of these impacts as is legally required under SEPA. We urge that substantial additional study be undertaken as prescribed above. .

Sincerely,

Signing for both of the following parties:

John V. Fox
Seattle Displacement Coalition
5031 University Way NE
Seattle, Washington 98105
206-632-0668 jvf4119@zipcon.net

The Rev. Bill Kirlin-Hackett
Interfaith Task Force on Homelessness
3030 Bellevue Way NE
Bellevue WA 98004
425-442-5418 itfh@comcast.net

Letter # 7

City of Seattle
Seattle Department of Neighborhoods

UNIVERSITY OF WASHINGTON
OFFICE OF REGIONAL AFFAIRS

City of Seattle - University of Washington Community Advisory Committee

June 13. 2014

Dianne Sugimura
Department of Planning and Development
700 5th Avenue,
PO Box 34019Seattle, WA 98124-

Attn: Dave LaClergue

Sent Via E-mail

RE: Formal CUCAC Comments on the Draft Environmental Impact Statement for the U District Urban Design Alternatives

Dear Ms. Sugimura,

We are writing to offer comments from the City-University Community Advisory Committee on the Draft Environmental Impact Statement for the Urban Design Alternatives/zoning changes being proposed for the University District. We would also like offer our thanks for honoring the request from CUCAC and other groups/individuals that this comment deadline be extended.

CUCAC first wrote to DPD back in October of 2013 regarding our concerns with this project, and we refer you to it again as many of the points raised in our initial comments were not addressed in the DEIS. Most notably, the DEIS does not include any evaluation of possible downzones to ensure that development under the two alternatives that would increase heights would actually be focused around the light rail station (we will also touch on this point again later in this letter). In addition, there is no analysis of the effects that doubling the allowable heights along University Way would have on the pedestrian environment there. Similarly, our request that the DEIS evaluate the potential impact that 300' and greater height limits would have on the proliferation of office tower development and that it identify policy and regulatory mechanism to preclude this possibility remains unaddressed. 1 2 3

The DEIS is also silent on the concern expressed by CUCAC back in October 2013 that permitting greater height and density could expand further into the surrounding neighborhoods. This latter point is particularly salient given that 4

DPD allowed a significant up-zone of properties owned by University Christian Church to NC65, including along the east side of 15th Ave NE, and that current plans for these projects now under consideration by DPD would not require transitions to lower-intensity zones across the alley there. This does not inspire confidence that similar exemptions will not be permitted in the future - indeed, it seems to almost guarantee the opposite (and one technical note – the zoning maps in the DEIS need to be corrected to reflect the up-zoning of these properties). 5

CUCAC reached consensus at our May 2014 meeting about a number of areas in the DEIS that still raise concerns for its members. First among these is the proposal to up-zone University Way NE to 125' – our members were unanimous that this proposal would undermine the pedestrian scale and experience of the Ave in a manner that simply cannot be mitigated given the narrowness of the street. In addition, new buildings would likely not have the sort of smaller spaces that make it possible for local non-chain businesses to thrive there. 6

Another area of concern for CUCAC is the lack of specific street-level design in the DEIS. The existing neighborhood plan had a great deal more in the way of specific design guidelines that were unique to our unique neighborhood, where the proposed DEIS apparently intends to push this off to some future process. We believe the FEIS needs to have far greater specificity about specific street-level design rules, as well as the teeth to enforce them. 7

With regard to consistency with adopted plans, CUCAC notes that the DEIS only makes a few passing general references to the adopted University Community Urban Center (UCUC) neighborhood plan. The Final EIS must do a much more thorough job of documenting the inconsistencies between the existing neighborhood plan and the changes DPD now proposes, including but not limited to zoned heights, streetscape design and design guidelines, transportation planning, affordable housing, and numerous other areas where there are significant discrepancies. 8

CUCAC strongly believes that DPD's assumption that all three alternatives would yield the same level of development is fatally flawed, and that the FEIS must do the analysis of the far more likely scenario that Alternatives 1 and 2 would yield significantly higher levels of development than the so-called "No Action" alternative. As the DEIS notes, property ownership in the U-District is fragmented, and the decision of a property owner whether or not to develop a property outside of an area that has been upzoned to 125' or 340' is not simply a decision to develop closer to the light rail station, which is what the DEIS currently implies. The current City Comprehensive Plan (and related zoning changes) was adopted with the promise that new development would be focused in Urban Centers and Villages, and that other areas would be protected from growth. The reality has been that growth is occurring both inside and outside of Urban Villages and Centers, and we are very concerned that this DEIS makes assumptions regarding new development where history has shown us that rather than the promised either/or scenario, with regard to new density the reality has actually been "both." 9

10 The impacts analysis relies upon levels of projected development that pre-suppose a relatively limited replacement of existing low- and mid-rise developments. This appears to assume that relatively newer development at much lower scales will remains and that only the oldest or least fully developed sites will see growth under the proposal. We remain skeptical. Under the worst case, almost all land developed below the new maximums might develop, making the University District essentially a secondary central business district. This lack of analysis of a true worst case is a fatal flaw in the analysis. Relying upon some rapid rollback if development progresses more rapidly than anticipated are problematic. Removing development authority once given is infinitely more difficult than granting it.

11 CUCAC members are also concerned that the proposed 30-100 foot spacing between new towers may not provide a sufficient guarantee that the visual and shadowing effects of this level of new high-rise development can/will be minimized. In an NC 65 zone with the addition of a few towers, the ground-level view is still going to be a 6 or 7 story wall of buildings with a few somewhat more slender towers for another 10-20 stories above that –
12 which is hardly a welcoming pedestrian environment. In addition, the FEIS must do view studies for both Alternatives 1 and 2 that show what the visual environment would be under a full build-out of the potential zoning, and the effects of the higher possible levels of build-out on transportation, open space, utilities, and all other infrastructure must also be analyzed.

13 Finally, CUCAC is concerned that the mitigation measures proposed throughout the DEIS to ameliorate the effects of Alternatives 1 and 2 on the neighborhood must be firmly in place before ANY zoning changes are made.

We appreciate your attention to these comments, and look forward to seeing greater detail on how these concerns can be addressed in the Final Environmental Impact Statement.

Sincerely,

Mathew Fox
Chair

Letter # 8

From: Ruedi Risler <risler@u.washington.edu>
Sent: Monday, June 16, 2014 3:24 PM
To: LaClergue, Dave
Subject: U-District DEIS Comments fro University Park Community Club
Attachments: UPCC DEIS COMMENTS FINAL.pdf

Hello Dave,

Attached you find our comment letter regarding the DEIS. I will also mail the original hard copy today. While I am the primary author of this letter, it has undergone several revisions based on comments from board members and neighbors, who were sent a draft version. While our comments are quite negative, we hope this will trigger the City to seriously address the issues raised, so we can move forward.

Ruedi Risler

UNIVERSITY PARK COMMUNITY CLUB

City of Seattle
Department of Planning & Development
Attn: Dave LaClergue
700 5th Ave, Suite 2000
PO Box 34019
Seattle, WA 98124-4019

RE: University Park Community Club Comments on the Draft U-District Urban Design EIS

16 June 2014

Dear Mr. La Clergue:

Please accept the following comments from the University Park Community Club (UPCC) as our input into the Draft U-District Urban Design Environmental Impact Statement (DEIS).

1 After all the work by many U-District groups involved with the U-District Urban Design Framework, we are very disappointed with this document. While most of the major discussion points in the Design Framework report and in our UPCC scoping letter of October 6, 2013 are mentioned in this lengthy document, **no hard recommendations and conclusions come out of it, with the exception of higher zoning limits in Alternatives 1 and 2.** For all other points the document states: "the City **could pursue** these improvements", "Incentive zoning provisions **could also be explored**", "The City **could consider** updating municipal code" or similar wishy-washy sentences. It also concludes "Significant impacts associated with the proposal are not anticipated" for areas of interest considered, where in fact we and other community groups have indicated that there are serious negative impacts.

2 We understand that the EIS process is only part of the overall Neighborhood Plan update, but we are nevertheless expected to support higher buildings and increased density, without any guarantee that public amenities and infrastructure improvements are going to be integral parts of this up-zone. We are not willing to do this, and **oppose any zoning changes, unless public interests are addressed in binding legislation, and mechanisms to fund improvements in the public realm are identified,** for instance through development impact fees.

Specifically we have concerns with the following:

General:

3 While all three alternatives can accommodate the projected 2035 growth targets, the up-zone Alternatives 1 and 2 clearly provide more capacity beyond the 2035 projected numbers, as documented under “Development Capacity” on page 2-5, pdf 69. The potential development depicted under 3.3 Aesthetics (figures on pages 3.3-17 to 23, pdf 161-167) is therefore misleading, as it only shows how the U-District might appear in 2035 and not how a full build-out at a later stage is going to look. The conclusions that Alternatives 1 and 2 are “unlikely to result in significant incompatibilities in height, bulk or scale” are not justified in the long run (pages 3.3-39 and 3.3-43, pdf 183, 187).

During the Urban Design Framework discussions there was never talk about such a full build-out. Rather it was proposed that the overall number of towers be limited, although how this was legally going to be made feasible was left open. We do not want the U-District to become a clone of downtown Bellevue or South Lake Union.

Public Schools (pages 3.8-8 to 3.8-13, pdf 318-323)

4 The DEIS acknowledges that ”There are no public schools in the study area” and “schools in NE Seattle will be at or over capacity”. It also lists seven nice guiding principles as to how the School Board identifies attendance boundaries and states that any of the alternatives “would contribute to a continuing need by the Seattle School District…to construct new and expanded facilities”. However, it concludes that ”Significant impacts associated with the proposal are not anticipated” and “the alternatives are unlikely to have an impact on the potential for locating a new school in the study area”. It also concludes that as the “study area population is characterized by a large number of student households and relatively few families”, … “potential increases in public school student population would be incremental”. This does not take into account one of the main planning objectives to “provide for a more diverse neighborhood character” (page 1-2, pdf 28). While the concerns about schools we brought up in our scoping letter of October 6, 2013 are acknowledged, no statement is made in the DEIS that these problems must be addressed and solved.

Instead of leading the way and using the Neighborhood Plan and zoning changes to address these longstanding issues, the DEIS basically says it is a mess, we can make no impact on the mess, but it will only get incrementally worse. Any consideration of up-zoning must include specific actions by the City to identify sites for new public schools where they will be needed, and to provide the necessary funding for site acquisition and construction.

Public Safety

5 The DEIS does not mention the safety challenges facing the U-District as identified in the U-District Strategic Plan, among others the need for stronger rules for behavior in public places, including enforcement, policies that effectively address problems with alcohol and illegal drugs, improved collaboration and seamless interoperability between law enforcement agencies, and establishing a clear alley program.

More people in the streets and proper design standards for lighting and such, if implemented, will help with public safety, but additional efforts will be needed to reverse the current trend of increased major crime in the U-District as documented in the DEIS (page 3.8-7, pdf 317). Safety concerns mentioned in our letter of October 6, 2013 and suggestions for improvements, such as integrating SPD space in the future UWPD facility, have not been incorporated in the DEIS.

Before new zoning is approved, these issues must be addressed, and necessary funding mechanisms must be identified.

Social Services

6 This is an issue not addressed in the EIS but it must be included to address one of the primary objectives stated as “Support for equitable communities with a diversity of housing choices” (page 1-2, pdf 28).

While there are huge requirements for social services city-wide, a major issue in the U-District are the many homeless youth. They are attracted to this area because of the many students of similar age, which make them feel more welcome than elsewhere in the City. This is not expected to change in the future. Services for this population, such as expansion of overnight shelter space, must be part of the planning for any future development, and funding must be made available. Other services, such as health care and help with training and employment are important as well. Fortunately we have many excellent organizations already working in the U-District, but they are stretched to the limit without any further density increase. They cannot simply be burdened with additional demands created by the increased population, without serious support from the City.

We want an updated Neighborhood Plan to proactively address these issues through specific actions that include binding legislation and mechanisms to fund improvements.

Transportation

7 The transportation section purports to “present a multimodal transportation analysis” (page 3.5-1, pdf 217). It contains a huge amount of data and study results, but it is very weak on actual proposals, with only small incremental changes being considered. It follows Seattle’s tradition of disjointed transportation planning with separate pedestrian, bicycle,

7 cont transit and freight mobility plans. We need an integrated approach, with a mobility plan, that balances these modalities.

8 What are lacking are solutions that would be more visionary and bold. If we consider the construction of the light rail line or an up-zone to 340 ft. towers as bold steps forward, we should also consider matching bold changes to the transportation infrastructure.

An example would be to create a pedestrian-only Ave south of 50th, or an Ave with pedestrian and buses only. This would be in line with the fact that 60% of all school or work trips in the U-District are on foot or by bus (page 3.5-4, pdf 220).

This type of out-of-the-box thinking is entirely discouraged by the chosen planning approach, where "only "reasonably forseeable" transportation improvement projects were included" (page 3.5-40, pdf 356). Not even trivial pedestrian improvements, such as getting rid of the stupid push buttons at crossings are considered, despite the declared strategy in the Pedestrian Master Plan (PMP) to "Improve crossing conditions, especially in areas with high pedestrian demand". Is this how we "Make Seattle the most Walkable City in the Nation" (PMP Home Page)?

As part of a U-District Mobility Plan, buses must be rerouted to allow seamless transfers to and from the light rail system. This would not even be visionary, but it is not considered in this "multimodal transportation analysis".

With this outdated transportation planning approach we have locked ourselves into some concepts that were defined before the location of the U-District light rail station was chosen, for instance the fact that Brooklyn is going to be a Green Street. Before more work goes into this we should consider if it would not be better to route some buses on Brooklyn, in particular in the light rail station vicinity. It may very well be possible to do this and still maintain the Green Street concept.

9 None of the problems pointed out in our scoping letter of October 6, 2013 have been addressed in the DEIS.

Open Space

10 The DEIS clearly identifies that "the U-District does not meet some of the open space goals established by the Comprehensive Plan" and "Without additional open spaces, the deficit in the study area will grow from approximately 3 acres to 5 acres" (page 3.7-7, pdf 305).

In 2005 the University District Park Plan gave highest priority to a centrally located park in a high-volume pedestrian area (page 3.7-6, pdf 304). Now, nine years later, only vague statements are made regarding this need, rather than a proposal for decisive action.

However, "because the growing deficiencies in supply and type of open space are the same with or without zoning changes, these deficiencies are not considered impacts for purposes of this EIS" (page 3.7-7, pdf 305).

10 cont

Because of the higher development potential for alternatives 1 and 2 beyond the planning horizon, there **will** be significant long-term impacts if one of these two alternatives is chosen.

Just as for other areas of interest the DEIS goes on to state "Various actions **could help** provide more open spaces" (page 3.7-11, pdf 309). Any up-zone **must include binding legislation** to mitigate the open space deficiencies, and **must include funding mechanisms to achieve this goal** by acquiring suitable parcels of land and constructing the desired amenities.

Conclusion

11

We strongly believe that the present update of our U-District Neighborhood Plan is a once-in-a-lifetime chance for our neighborhood, and that we have to get this right. To achieve our goals, we must identify problems, determine solutions, find the necessary funding and implement changes as agreed. While we have identified the problems, this DEIS is not helpful in determining a path to future improvements, because it makes only vague statements about potential approaches and has no strong recommendations about the necessity for the City to act in a decisive manner.

Any up-zone in our very desirable neighborhood will increase property values and the potential for major financial gains through development. There is nothing wrong with this, if part of this increased value flows back to the citizens of Seattle in the form of improved infrastructure and amenities that enhance our quality of life. We oppose give-aways to developers and then having to pay for public improvements and services through our overly regressive tax system.

We therefore regretfully cannot support Alternatives 1 or 2, unless the public interest issues are comprehensively addressed. Consequently we request that any zoning action by the City be put on hold until an acceptable solution to these issues is found.

With best regards,

Ruedi Risler

Ruedi Risler
For the University Park Community Club

5256 19th Ave NE
Seattle, WA 98105

cc.(electronically) Mayor Ed Murray
City Council Members

Letter # 9

UNIVERSITY PLAZA CONDOMINIUMS CIVIC AFFAIRS COMMITTEE
4540 8th Ave. NE #100; Seattle, WA 98105

June 23, 2014

Seattle Department of Planning & Development
Attention: Dave LaClergue, Urban Designer
PO Box 34019
700 Fifth Ave. Suite 1900
Seattle, WA 98124-4019

Re: Comments on Draft EIS, University District Urban Design Alternatives

Dear DPD and Mr. LaClergue,

The tall, slim, mid-century-modern University Plaza Condominium tower anchors a city block between 8th and 9th Avenues NE, on the south side of NE 47th Street in the University District. It was designed by architect Manson Bennett, with the help of the structural engineers who masterminded the Space Needle. This 24-story high-rise is believed to be among the first condominium projects in the state to be organized under the Horizontal Regimes Property Act of 1963. Members of the University Plaza Civic Affairs Committee are resident homeowners at University Plaza, and appreciate the opportunity to comment upon the DEIS for the University District Urban Design Alternatives.

1 Our overall impression is that the DEIS is slanted toward the desires of those who see the University District as a short-term destination, and not as a place to live. It falls far short of fully exploring the Proposal's Objectives, as stated in Section 1.3. Instead of attempting to balance increased density pressure with measures that would mitigate adverse impacts, it feels as if the DEIS is treating our residential neighborhood as a sacrifice zone --- to be inevitably encroached upon, paved-over and turned into a dreary, viewless, treeless, architecturally uninspiring, and unhealthy place. Without adequate open spaces, without wide sidewalks with green plantings on either side, without adequate parking for residents, visitors, and customers of small businesses, without sunlight being able to shine into residences and onto play fields, without schools and neighborhood shops, the University District will not attract and support a family-friendly, age-group-diverse set of permanent residents. It will become a district filled with transients and short-timers: renters and students who can endure unattractive surroundings for a relatively short time, or commuters who flee the area at night to live their lives elsewhere.

Members of the University Plaza Civic Affairs Committee testified individually at the May 20, 2014 Public Hearing on the DEIS. These comments therefore incorporate by reference the verbal and written comments made by Sue Alden, Brendan Coleman, Mary Grafious, Shirley Nixon, and Jim Stockdale. In addition, the Committee applauds the work of the Roosevelt Neighbors Alliance in commenting upon the DEIS, and supports the RNA's efforts to amend the Comprehensive Plan to down-zone the area north of NE 47th Street.

Respectfully submitted on behalf of the University Plaza Condominiums Civic Affairs Committee,

J. Stockdale

Jim Stockdale, Chair
cc: Sue Alden, Brendan Coleman, Mary Grafious, Bob Nixon, Shirley Nixon, UPOA Board of Trustees

Letter # 10

UNIVERSITY DISTRICT COMMUNITY COUNCIL
C/O 4534 UNIVERSITY WAY NE
SEATTLE, WA 98105
(206) 527-0648
udistrictcouncil@hotmail.com

June 23, 2014

Dave LeClergue, Planner
Department of Planning and Development
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124-4019
Via email to dave.leclergue@seattle.gov

Dear Mr. LeClergue,

I am writing on behalf of the University District Community Council to offer our comments on the Draft Environmental Impact Statement for the Urban Design Alternatives/zoning changes being
1 proposed for the University District. In summary, we believe that the DEIS is inconsistent with the requirements of SEPA for environmental analyses such as this; that the assumption that growth would be the same under all three alternatives is a fatally flawed one that renders the DEIS essentially meaningless; that mitigation measures discussed in the DEIS are not binding and therefore do not actually mitigate the effects of the two action alternatives; that proposals to develop new open space in conjunction with the new light rail station do not receive sufficient consideration, and that the DEIS also does not document how new development will displace existing open space; that the "analysis" of the effects of new construction on existing unsubsidized low-income housing is specious at best and laughable at worst; that the transportation element is largely an exercise in wishful thinking; and that the DEIS does not adequately document the inconsistencies between what DPD now proposes and the existing University Community Urban Center Plan. We believe that these flaws are so serious that the DEIS process must go back to the drawing board in order to adequately address them.

2 As we understand SEPA, the "proposed action" should be the comprehensive framework of projects and activities included in the "University District Urban Design Framework." However, it seems to us that the DEIS instead takes the upzoning and submits that as the sole action, with all of the other mitigation, design review, and other essential measures being punted off to some future undefined process. This raises the distinct possibility that these actions will be taken piecemeal, with substantial upzones being undertaken based on promises of later mitigation that cannot and will not be enforced. The UDCC concurs with this and the other points made regarding this issue in the detailed discussion in Jorgen Bader's 6/14/14 comment letter as well as the points made by the Northeast District Council in their comments.

3 The UDCC strongly believes that DPD's assumption that all three alternatives would yield the same level of development is fatally flawed, and that the DEIS must be revised with an analysis of the far more likely scenario(s) that Alternatives 1 and 2 would yield significantly higher levels of development than the so-called "No Action" alternative. As the DEIS notes, property ownership in the U-District is fragmented, and the decision of a property owner whether or not to develop a property outside of an area that has been upzoned to 125' or 340' is not simply a decision to develop closer to the light rail station, which is what the DEIS currently implies. The current City Comprehensive Plan (and related zoning changes) was adopted with the promise that new development would be focused in Urban Centers and Villages, and that other areas would be protected from growth. The reality has been that growth is occurring both inside and outside of Urban Villages and Centers, and we are very concerned that this DEIS makes assumptions regarding new development where history has shown us that rather than the promised either/or scenario advocated by DPD, with regard to new density the reality has actually been "both." The DEIS must be revised to reflect this fact.

4 The UDCC shares CUCAC's concern that the impacts analysis relies upon levels of projected development that pre-suppose a relatively limited replacement of existing low- and mid-rise developments. This appears to assume that relatively newer development at much lower scales will remain and that only the oldest or least fully developed sites will see growth under the proposal. We remain skeptical. Under the worst case, almost all land developed below the new maximums might develop, making the University District essentially a secondary central business district. This lack of analysis of a true worst case is another fatal flaw in the DEIS. Relying upon some rapid rollback if development progresses more rapidly than anticipated is problematic, as removing development authority once given is infinitely more difficult than granting it.

5 On page 12-29, DPD asserts that "…redevelopment under Alternatives 1 and 2 would displace about 40 housing units and under Alternative 3, 60 housing units." I will be frank – this assertion is LUDICROUS, and calls into question the credibility (if not the sanity) of those who think it is defensible. There are dozens and dozens of small older apartment buildings between NE 41st and NE 45th St from Brooklyn Ave west to 9th Ave NE – and this entire area is proposed to be upzoned to either 125' or 340'. There are also as many or more older apartments in other parts of the neighborhood that would be equally threatened by the upzones proposed in Alternatives 1 and 2. A 10-minute walk of the two blocks between NE 41st and NE 43rd Streets along Brooklyn Ave NE and 12th Ave NE yielded a count of nearly 40 buildings – the majority of which are older lowrise 3 and 4-story apartments that themselves contain far more than 40 units, and that will almost certainly be displaced if this area is upzoned. These are unsubsidized apartments that are actually affordable to working people and students, and no amount of new luxury apartments in 340' buildings will mitigate the loss of this stock of these modestly-priced housing units.

While it is certainly true that many of those buildings may be displaced over time under the existing MR zoning (which was the result of an significant upzone under the UCUCA plan, by the way), it defies credulity to assert that there won't be significantly greater pressure to redevelop them when it becomes massively more lucrative to do so – and this is doubly the case once the owners of these properties start receiving property tax bills predicated on a new "highest and best use" valuation of their land based on what they can now build. It is worth noting that many of these buildings also are owned free and clear – which is why their owners can keep their rents at reasonable levels. The construction and financing costs of new development mean that these units are literally

5 cont irreplaceable. A revised DEIS/FEIS must include a full inventory of housing that is threatened by displacement if/when these areas are so drastically upzoned.

6 With regard to other social services, the UDCC is concerned that Alternative 1 and 2 will create significant development pressure on several hard-to-relocate facilities, most notably the ROOTS Young Adult Shelter and University District Youth Center's drop-in program. To the extent older churches are redeveloped, this could also threaten sites used by Teen Feed for their meal program. Given the proximity of the neighborhood to the U of W, low-income and homeless young people in need of services will continue to be drawn to this neighborhood, and City policies that encourage redevelopment and gentrification will undermine the ability of many service providers to meet these needs.

7 The UDCC also strongly opposes the proposal to upzone University Way NE to 125' –we remain convinced that it would undermine the pedestrian scale and experience of the Ave in a manner that simply cannot be mitigated given the narrowness of the street. In addition, new buildings would likely not have the sort of smaller spaces that make it possible for local non-chain businesses to thrive there. In addition, we oppose the proposed upzones in the area of University Way north of 50th that was downzoned as part of the UCUC Plan – property owners have made and implemented development and/or renovation plans there in good faith and should not be penalized or put at a competitive disadvantage if this area is upzoned and neighboring property owners subsequently reap the benefits of those changes. We also oppose any expansion of the existing Urban Center Boundary.

8 Another area of concern for the UDCC is the lack of specific street-level design in the DEIS. The existing neighborhood plan had a great deal more in the way of specific design guidelines that were unique to our unique neighborhood, where the proposed DEIS apparently intends to push this off to some future process. We believe a revised DEIS/FEIS needs to have far greater specificity about specific street-level design rules, as well as the teeth to enforce them.

9 With regard to consistency with adopted plans, the UDCC notes that the DEIS only makes a very few cursory references to vague goals in the adopted University Community Urban Center (UCUC) neighborhood plan without addressing any specific issues. A revised DEIS and/or the FEIS must do a much more thorough job of documenting the myriad inconsistencies between the existing neighborhood plan (and its Approval and Adoption Matrices) and the changes DPD now proposes, including but not limited to zoned heights, streetscape design and design guidelines, transportation planning, affordable housing, and numerous other areas where there are significant discrepancies. For example, one specific area of contention is the UCUC Plan's policy of ensuring adequate transitions between high and lower intensity zoning. DPD has already begun undermining that by allowing NC65 zoning on 15th Ave NE (which the zoning maps in the DEIS should be corrected to account for), and the upzones in the DEIS give even shorter shrift to this policy.

10 Frankly, we were appalled at the statement on page 3.1-31 that "Adopted UCUC Neighborhood Element policies should be reviewed for consistency with the proposal. As needed, policies should be amended, or the final proposal revised, to ensure continued consistency." This formulation has things precisely backwards, and the DEIS ought to be made consistent with UCUC plans rather than the reverse. The UDCC was very skeptical about participating in the UDLP precisely because it looked like a backdoor attempt on the part of DPD and the U of W to re-write our neighborhood plan, and this fear has proven to be accurate.

11 The UDCC remains concerned that the proposed 60-100 foot spacing between new towers will not provide a sufficient guarantee that the visual and shadowing effects of this level of new high-rise development can/will be minimized. In an NC 65 zone with the addition of a few towers, the ground-level view is still going to be a 6 or 7 story wall of buildings with a few somewhat more slender towers for another 8-20+ stories above that – which is hardly a welcoming pedestrian environment. In addition, a revised DEIS/ FEIS must do view studies for both Alternatives 1 and 2 that show what the visual environment would be under a full build-out of the potential zoning, and the effects of the higher possible levels of build-out on transportation, open space, utilities, and all other infrastructure must also be analyzed. The University District has already achieved 94% of our 2024 growth targets, and this gives us little confidence that DPD has the ability to accurately forecast future growth given how far ahead of DPD's last set of targets we already are. A revised DEIS/FEIS must include visual depictions of what a full-build out under these alternatives would look like (and also what additional mitigation would be needed if the DEIS growth targets are exceeded) – after all, that level of possible development is what these zoning changes would ultimately permit, market studies and growth "targets" notwithstanding. A revised DEIS/FEIS must account for the amount of development that occurred in a scenario such as those we have seen in Ballard and South Lake Union, rather than hoping that it will come in at more manageable Northgate-like levels.

12 The UDCC is also generally concerned that most of the view/massing studies in the DEIS do a far better job of representing how various development scenarios would look from someone looking down at them from a vantage point in a small airplane rather than how they would look to people on the ground, or from Interstate 5, Roosevelt Way, or any number of other real-world perspectives.

13 While there is passing mention of a proposal to create open space (which has broad and deep community support) in conjunction with the new light rail station, the DEIS lacks specifics on this. The FEIS needs stronger language about the need for new open space to meet the existing City-identified parks deficit, let alone the higher deficit that will result from the higher levels of growth that are likely to result from Alternatives 1 and 2. Mitigating this deficit must be part of the DEIS/FEIS process, and cannot be separated out from it. In addition, the proposal to upzone the north end of University Way NE will almost certainly displace the community open space that has been created at the Shiga's Garden site just south of NE 56th St.

14 While the University of Washington is still only in the beginning stages of scoping for their next Campus Master Plan, if the last 10 years of development are any indication this updated plan will likely result in a significant amount of additional development. While most of this development will occur in the UW's Major Institution Overlay, a revised DEIS/Final EIS should at least acknowledge the cumulative impact of those projects in conjunction with the significant development envisioned in the University Design Framework (let alone the higher levels of development that will occur under Alternatives 1 and 2).

15 With regard to transportation, we note that the DEIS acknowledges that even under current levels of development (i.e. – the "No-Action" alternative), intersection levels of service would decline significantly. Because the DEIS makes the fatally flawed assumption that growth under all three alternatives would be essentially the same, it fails to take into account the additional traffic that will almost certainly result from the higher levels of development that are more likely to occur under Alternatives 1 and 2.

16 While the UDCC certainly agrees that the sidewalks around the light rail station will need to be widened to accommodate rush hour travelers, we do not see so-called "green streets" or other measures driving most people's mode choice decisions – if walking is practical, people will do so whether the sidewalk is 8 or 12 feet wide. If it isn't, they won't. In addition, existing levels of transit cannot be guaranteed given recent funding concerns, let alone the higher levels that will likely be necessary for all of the transit users who take buses from other parts of Seattle and the region that will not be served by light rail for the foreseeable future. A revised DEIS or the FEIS must include information on what happens if the U-District is upzoned but transit service declines. Moreover, while the DEIS acknowledges that there are competing proposals for cycle tracks, streetcars, and bicycle greenways on several critical U-District arterials, it does not appear to model what will happen if one or more of them are implemented and vehicle travel lanes are reduced or otherwise impacted. This too must be analyzed in the DEIS/FEIS. We would also note that one policy of the existing UCUC Plan is to preserve arterial capacity – will the plans to widen sidewalks along NE 50th Street result in lane reductions? If so, we note that this idea was floated in the UCUC plan process and specifically and emphatically rejected by the community.

17 Finally, the UDCC is concerned that the mitigation measures proposed throughout the DEIS to ameliorate the effects of Alternatives 1 and 2 on the neighborhood must be firmly in place before ANY zoning changes are made. The apparent attempt to piece-meal these measures outside of the EIS process seems to us to run counter to the letter and intent of SEPA, and the DEIS/FEIS must include provisions to ensure that mitigation is in place and binding before any increases in zoned heights are allowed.

18 The UDCC could support some additional high-rise zoning in conjunction with the new U-District light rail station, particularly if it is done in a manner that ensured that a substantial new centrally-located open space is developed in conjunction with new high-rise TOD projects. However, the current framework provides a recipe for unfettered growth without mitigation or a thorough analysis of its impacts, and without the necessary safeguards to ensure that the increased values that would come with such substantial upzones are recaptured in a way that provides true public benefits. As a result, we cannot support any of the action alternatives now under consideration.

We appreciate your attention to these comments, and look forward to seeing greater detail on how these concerns are to be addressed in either a re-write of the Draft EIS or the Final Environmental Impact Statement for this proposal

Sincerely,

Matt Fox,
UDCC President

Letter # 11

UNIVERSITY of WASHINGTON

June 23, 2014

Diane M. Sugimura
Director, Department of Planning and Development
P.O. Box 34019
Seattle, WA. 98124-4019

Dear Diane,

The University of Washington is pleased to submit this letter in response to the U District Urban Design Draft Environmental Impact Statement (DEIS) .

1 We have reviewed the document and feel that options one and two under consideration could achieve the objectives as outlined in the U District Urban Design Framework and the DEIS. The two action alternatives accommodate the growth that will come to the U District in different ways but both acknowledge, through height, density and mixed uses, the importance of planning for growth. By planning for the growth that is sure to come, we can shape the future in a way that is congruent with the communities' values.

In July of 2011, shortly after President Young arrived on campus, he spoke to the Seattle City Council and answered the question "what is your vision for the University." His vision for the U District was to "… take its shape from a vision shared by the community, the City, and the University, each of us contributing to the dialog our best ideas and knowledge. A district that will contribute resources, energies and ideas to further imagine and then to realize the 21st Century potential of an urban center" in this great City.

We look forward to continuing our work with the community, City and the University District Partnership as we move these ideas and values forward for consideration by the City Council.

Sincerely,

Theresa Doherty
Director, Regional and Community Relations

Letter No. 1 HAWTHORNE HILLS COMMUNITY CLUB

1. **Introductory comments.** The comment is acknowledged.
2. **EIS Scoping Process.** Thank you for the comment. The scoping process for issues to be considered in an EIS is established by the SEPA Rules. The process is described in Draft EIS Section 2.4 and summarized in Appendix C. The Seattle Department of Planning and Development (DPD) reviewed and considered all comments that were received during the comment period. Issues included in the scope correspond to SEPA elements of the environment (WAC 197-11-444). Of the topics listed in the comment, open space, housing, traffic and parking, public services, utilities, and aesthetics are addressed in the EIS at a level of detail appropriate for a programmatic document. Applicable mitigation is identified for each of these topics.

   Some other issues raised in the scoping comments were determined to be non-SEPA issues and/or beyond the scope of the proposal. The use of transportation impact fees, for example, is a citywide legislative issue and is not part of the U District rezoning proposal. At present, Seattle has not adopted legislation to enable imposition of impact fees. It is noted that the 2035 Comprehensive Plan Update, which is now underway, is considering a transportation impact fee.
3. **Mitigation Measures.** The purpose of an EIS is to disclose information about probably significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts. Please refer to WAC 197-11-400. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.
4. **SEPA Analysis.** The comment is acknowledged. SEPA's requirement for an EIS on a non-project area-wide legislative proposal is limited to a

general discussion of the impacts of alternative proposals (WAC 197-11-442(4)). The EIS meets this standard.

Seattle's adopted SEPA policies and procedures set forth the relationship of proposed actions (project and non-project) that are subject to SEPA to adopted plans, policies and regulations (SMC 25.05.665). This provision acknowledges that many environmental concerns have been incorporated into adopted City codes and development regulations.

Responses to the individual issues raised in the comment letter are provided below. As noted in the comment, the EIS considers existing regulations and standards as a reference point to aid in assessing impacts and mitigation strategies.

While adopted standards often are used to create a framework for discussion, the analysis goes well beyond a checklist for compliance. For example, the housing affordability analysis in Draft EIS Section 3.2.5 contains a thorough discussion of the housing market and housing affordability.

5. **Comment table.** The issues raised in the table are addressed in responses to Comments 8 through 39 below.
6. **U District character.** The comment about characteristics of the U District neighborhood is acknowledged.
7. **EIS analysis.** Please see the responses to Comment No. 2, this letter regarding the scope of the EIS, and Comment No. 3, this letter concerning mitigation measures.
8. **EIS analysis.** Please see to the response to Comment No. 4, this letter above.
9. **Mitigation measures.** Please refer to the response to Comment No. 3, this letter above.
10. **Table of contents.** The comment is noted. The Final EIS refers to the Open Space section correctly.
11. **Preferred Alternative.** This Final EIS does not identify a preferred alternative. As described in WAC 197-11-440, SEPA does not require identification of a preferred alternative. The Fact Sheet states that, prior to adoption of Comprehensive Plan and Land Use Code amendments, identification of a preferred approach for text and map amendments to the Comprehensive Plan and Land Use Code would occur. This determination will be a future policy decision by the City and is not required to be part of the Final EIS.
12. **Open space.** The Draft EIS alternatives do not specifically propose an amount of additional open space that could be provided in the U District,

nor do they propose specific locations for such open space. As noted in the comment, the EIS analysis does identify the existing and potential future deficit in open space in the study area.

Based on this information, the City could make a policy decision regarding the requirement for specific amounts or locations of open space in the future. Priorities for parks and open space have been established in a number of other plans, including the Seattle Comprehensive Plan, the University Community Neighborhood Plan, the Urban Design Framework and the University District Parks Plan.

Please also refer to the response to Comment No. 3, this letter above.

13. **Open space.** The comment is noted. Please also refer to the response to Comment No. 12, this letter, above.
14. **Open space.** The comment is acknowledged. Please also refer to the response to Comment No. 12, this letter, above.
15. **Open space.** The EIS evaluates potential park and open space impacts based on projected growth and adopted parks and open space standards. Please also refer to the response to Comment No. 12, this letter, above.
16. **Open space.** The comment is acknowledged. Please see the responses to Comments No. 3 and 12, this letter, above.
17. **Plaza over light rail station.** The reference to a centrally located park is from an extract of the 2005 University District Park Plan and is part of a larger EIS description of the planning context for park and open space planning in the U District. Such a park is not part of the proposed action, nor is a park at the specific location noted in the Park Plan required mitigation for the proposal or alternatives.
18. **Plaza over light rail station.** The proposal is a non-project action that is considering alternatives for an area-wide rezone, development standards and comprehensive plan amendment. A plaza over the future light rail station is not part of the proposal and a non-project EIS is not required to evaluate individual projects or individual sites that could be proposed for some type of redevelopment (WAC 197-11-442(3)). Future project proposals for specific sites by individuals or other agencies, such as an open space over the planned light rail station or in another location, would be subject to project-specific SEPA review when such an action is planned or proposed.
19. **Transportation mitigation.** This EIS provides a programmatic evaluation of area-wide land use zoning changes. Since the actual locations and sizes of development are unknown at this time, specific mitigation projects (as well as details including schedule and financing) that may

be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; specific mitigation will be determined at that time. Please refer to the response to Comment No. 3, this letter, above.

20. **Bicycle facilities.** The EIS relies on the analysis in the 2014 Bicycle Master Plan to identify areas needing improvement. This Plan accurately represents the current best available information about bicycle needs; additional bicycle level of service analysis is not required. Pedestrian and bicycle impacts were identified at the area-wide level; the Burke-Gilman Trail was addressed in the pedestrian and bicycle network, collision analysis, and mitigation measure sections of the EIS. Specific projects would undergo separate and more detailed SEPA review. If a specific project is proposed near the Burke-Gilman Trail, additional analysis of the Burke-Gilman Trail would be included at that time.

21. **Transportation improvements.** The commenter requests cost estimates for the mitigation measures. Planning-level cost estimates have been prepared for many of the measures and can be found in the source documents listed in Table 3.5-15 (University Area Transportation Action Strategy, Bicycle Master Plan, Transit Master Plan). The cost estimates included in those documents are preliminary planning-level cost estimates and may not be current. Refined cost estimates would be required if and when projects enter the project development phase.

    Regarding the other questions, this EIS provides a programmatic evaluation of the proposal and Alternative 3. Since the actual locations and sizes of future development are unknown at this time, the specific mitigation projects (as well as details including schedule, financing, and interdependence) that would be required are also unknown. This programmatic EIS defines the types of mitigations that are likely to be effective for individual development projects. Individual development projects would undergo separate and more detail SEPA review; mitigation would be determined at that time. The phasing of projects will be continually assessed through the City's annual update of its Six-Year Capital Improvement Program.

22. **Transportation circulation.** The EIS includes travel time analysis of 12 east-west segments along NE Ravenna Boulevard, NE 50th Street, NE 45th Street, NE 40th Street, NE Campus Parkway, and NE Pacific Street corridors. Results are provided in Table 3.5-13 for autos and Table 3.5-14 for transit. Pages 3.5-49 and 3.5-52 of the Draft EIS define the impact threshold for which a significant impact is identified.

23. **Parking plan.** This EIS provides a programmatic evaluation of area-wide land use zoning changes. Since the actual locations and sizes of future development are unknown at this time, the specific parking mitigation projects that may be required are also unknown. Individual development projects would undergo separate and more detailed SEPA review; mitigation could be determined at that time. Note that SDOT routinely monitors the effectiveness of its parking programs and makes adjustments to adapt to changing conditions. Please also refer to the response to Comment No. 3, this letter, above.

24. **Childcare and elder care.** Please refer to Draft EIS Section 2.4 and Appendix C and to the response to Comment No. 1, this letter, above regarding the scope of the EIS. Draft EIS Section 3.8 addresses public services considered to be relevant to the proposal and related to environmental issues. Child care facilities are not identified as an element of the environment for consideration in an EIS either in the SEPA Rules (WAC 197-11-444) or in Seattle's SEPA policies and procedures (SMC 25.05.675.2.O.1).

25. **Incentive zoning.** The comment regarding incentive zoning is noted. As described in the EIS, the city's incentive zoning program is voluntary. It allows developers to exceed base zoning in exchange for provision of public benefits, including affordable housing. Use of the incentive is dependent on the market for density above base zoning. Not all projects take advantage of incentive zoning for reasons that include market demand for additional space, cost of providing the public benefit, risk associated with a larger project, and other development concerns.

    Currently, the Seattle City Council and Mayor are leading a comprehensive examination of incentive zoning, as well as other strategies that may address the city's affordable housing needs (Housing Affordability & Livability Agenda).

    In recent years, rezones have been adopted concurrently with introduction of incentive zoning.

26. **Incentive zoning.** Incentive zoning is one of several strategies that address affordable housing needs. The example seeks to show how variables such as development type (residential or non-residential) and bonus floor area influences affordable housing provided through incentive zoning under each of the three alternatives. This assessment is not an estimate of future production of affordable units through incentive zoning. The potential production of affordable housing units through incentive zoning cited in the Draft EIS is shown only to allow for comparison between alternatives.

27. **Affordable housing.** Affordable housing is a challenging problem for the City. In response, the City works with both private for-profit and non-profit sectors to provide affordable housing to households with a range of lower incomes. Currently, the demand for affordable housing exceeds supply. In recognition of this, the Seattle City Council and Mayor are leading a comprehensive effort (Housing Affordability & Livability Agenda) to re-examine existing housing strategies and identify new ones. Some of the City's current affordable housing programs are listed on pages 3.2-14 through 17 of the Draft EIS. The multifamily tax exemption program, which helps increase affordable housing in the University District, is summarized on page 3.2-17.

    The city's incentive zoning is one housing program that is currently under review. In recent years, rezones have been adopted concurrently with introduction of incentive zoning.

28. **Affordable housing.** This comment most likely refers to the multifamily tax exemption program, which provides a property tax exemption for a period of 12 years when 20 percent of the total housing units are affordable to income-eligible households. Extending the 12-year tax exemption/housing affordability period would require a change in state law. This is an example of the level of detail being discussed by the City Council/Mayor's Housing Affordability & Livability Agenda Advisory Committee.

29. **Building height transitions.** The comment regarding abrupt transitions in building height is noted. This impact is described and depicted in Draft EIS Section 3.7. This impact is also described in this Final EIS for the additional alternatives that are analyzed. Please see Section 3.1 of this Final EIS.

30. **Aesthetics mitigation.** The comment is acknowledged. Please refer to the response to Comment No. 3, this letter, above.

31. **Hybrid alternative.** The alternative scenario described in the comment is not addressed in this EIS. However, the EIS does not preclude a future policy decision to adopt a hybrid approach.

32. **Text clarification.** The referenced paragraph discusses the potential impacts of Alternative 3, the No Action Alternative, on the existing land use pattern. The intent of the paragraph is to say that currently, much of the existing development does not fully utilize the full building envelope permitted by existing zoning. If future development were to develop to the full zoning capacity, it will appear larger (more intensive) than existing development. However, because Alternative 3 does not

allow the same height and FAR as the action alternatives, development will still be smaller (less intensive) than under the action alternatives.

33. **Land use compatibility.** The comment refers to a summary statement in Chapter 1 of the Draft EIS. Draft EIS Chapter 3.1, Land Use, provides a discussion of potential land use impacts. This discussion provides a programmatic description of potential land use impacts within the study area and adjacent to the study area. For the area adjacent to the study area, the EIS states that there are potential land use compatibility impacts at the boundary between the study area and the surrounding lower density area. However, this impact is more likely to be significant under the action alternatives, which allow for taller and larger buildings than Alternative 3 (No Action). Within the study area, the existing land use pattern is already characterized as a dense mixed use urban area. Therefore, future development is unlikely to result in significant land use conflicts.

34. **University Community Urban Center (UCUC) Neighborhood Element.** Draft EIS Section 3.1 includes the goals and policies pertinent to the study area contained in the University Community Urban Center section of the Comprehensive Plan Neighborhood Planning Element. The comment correctly notes that the applicable plan policies will guide development of the complete package of zoning amendments that will be part of the City's decision-making process following this EIS.

    It should be noted that Policy UC-P2 calls for limiting building height to 65 feet in the area south of NE 43rd Street and west of Brooklyn Ave NE. Alternatives 1 and 2 and the portion of Alternative 3 that is zoned MR are not consistent with this policy. Several other policies describe amenities, such as pedestrian improvements and open space, that are not specifically included as part of any of the alternatives, but could be consistent with future incentive zoning considered as part of the action alternatives in this EIS. Policies that call for a diverse mix of uses and a vibrant mixed-use residential neighborhood are consistent with all three alternatives.

35. **Greenhouse gas analysis.** The action alternatives (Alternatives 1 & 2) are projected to produce equivalent greenhouse gas (GHG) emissions per capita than the No Action Alternative. Please see Section 3.2 of this Final EIS.

36. **Air quality.** The comment refers to a paragraph in the Scoping Summary, Draft EIS Appendix C. The scoping process for issues to be considered

in the EIS is established by the SEPA Rules and is described in Section 2.4 of the Draft EIS. DPD reviewed and considered all comments that were received during the comment period. Some other issues raised in the scoping comments were determined to be non-SEPA issues and/or beyond the scope of the proposal. As described in the Scoping Summary, the proposal is not expected to result in significant adverse impacts to air quality. However, depending on the nature of future site-specific development, mitigation may be necessary to address site specific impacts associated with construction. This mitigation will be identified and required as part of future project-level review.

37. **Noise.** The comment refers to a paragraph in the Scoping Summary, Draft EIS Appendix C. The scoping process for issues to be considered in the EIS is established by the SEPA Rules and is described in Section 2.4 of the Draft EIS. DPD reviewed and considered all comments that were received during the comment period. Some other issues raised in the scoping comments were determined to be non-SEPA issues and/or beyond the scope of the proposal. As described in the Scoping Summary, the Noise Code sets levels and durations of allowable daytime/nighttime operational noise and daytime construction noise. These limits are based on the zoning of the source and receiving properties. Because the proposed uses under any of the alternatives would be consistent with existing uses, no significant impacts to noise levels, as defined in the Seattle Noise Code, are anticipated.

38. **Schools.** The comment refers to the Scoping Summary, Draft EIS Appendix C. For a non-project rezone proposal, the SEPA Rules provide that an EIS shall be limited to a general discussion of alternative designations and implementation measures (WAC 197-11-442(4)); mitigation measures need not be, and typically cannot be, discussed in detail (WAC 197-11-440(6)(c)(iv)). Planning for school facilities is within the jurisdiction of the Seattle School District; as noted in the Draft EIS (Section 3.8.2), the Comprehensive Plan supports a collaborative effort to locate a public school within the University Community Urban Center. In addition, the proposed rezone is not the direct cause of the future housing and population growth that may generate impacts, in this case a need for a school. Rather, the proposal is considering alternative ways to organize that growth physically and spatially.

39. **Open space.** The comment refers to the Scoping Summary, Draft EIS Appendix C. Please refer to the response to Comments No. 3 and 38, this letter, above.

Letter No. 2 HOUSING DEVELOPMENT CONSORTIUM

1. **Incentive zoning.** Comment noted. The City's incentive zoning is under review. In recent years, rezones have been adopted concurrently with introduction of incentive zoning.

   See also response to Letter No. 1, Comment No. 25.

2. **Incentive zoning.** Please see the response to Comment No. 1, this letter, above.

3. **Incentive zoning.** Please see the response to Comment No. 1, this letter, above.

Letter No. 3 NORTHEAST DISTRICT COUNCIL

1. **EIS scope.** Please see the open space analysis in Draft EIS, Section 3.6. See also the response to Letter No. 1, Comment No. 2.

2. **EIS analysis.** The proposal is a non-project action and the level of analysis contained in the EIS is consistent with SEPA's requirements for a non-project EIS; please refer to WAC 197-11-442(4).

3. **Mitigation.** The comment is noted. Please refer to the response to Letter No. 1, Comment No. 3. Mitigation measures are identified at a reasonable and appropriate level of detail.

4. **Mitigation.** Please see the response to Comment No. 3, this letter. Please also refer to the pertinent Draft EIS sections for discussion of impacts and mitigation associated with the elements of the environment cited in the comment.

5. **Additional analysis.** The comment is noted. Please see the response to Comments No. 2 and 3, this letter, above.

Letter No. 4 ROOSEVELT NEIGHBORS ALLIANCE

1. **Environmental analysis.** The EIS uses a 2035 growth estimate for the U District as a basis for comparing and evaluating alternative patterns of height and density. The proposal does not include different growth projections and is not, in and of itself, the direct cause of growth. Existing deficiencies and future deficiencies that may be associated with projected growth are disclosed in the EIS. However, the impacts of the proposal are limited to the impacts associated with the alternative patterns of height and density represented by the action alternatives. Mitigation measures are identified consistent with the scope of the proposal, and

will be addressed pursuant to numerous City processes, including the CIP and ongoing planning for parks. Please also refer to the response to Letter No. 1, Comment No. 3.

2. **Mitigation.** The EIS identifies a menu of mitigation measures at a general level, which is consistent with the requirements for a non-project document; refer to WAC 197-11-440(6) and 197-11-442(4). Please also refer to the previous response, and the response to Letter No. 1, Comment No. 3.
3. **Traffic mitigation.** Pages 3.5-49 and 3.5-52 of the Draft EIS define the impact threshold for which a significant traffic impact is identified. Based on the relative difference between the traffic generated by the No Action Alternative and the Action Alternatives, the Action Alternatives are not expected to generate significant impacts. Note that the overall traffic generation for all the future alternatives is similar.

   The Draft EIS includes a pedestrian/bicycle crossing at NE 47th Street over I-5 as a potential mitigation measure. However, including transit on that overpass is inconsistent with the Transit Master Plan as that connection was not identified as part of the recommended transit network.
4. **Parking mitigation.** The Draft EIS includes splitting existing Residential Parking Zones (RPZ) into multiple zones, adding new RPZs or adjusting RPZ boundaries as potential mitigation measures. The commenter's proposal is consistent with the spirit of the Draft EIS mitigation measure, but is subject to SDOT's established process for initiation and modification of RPZs. The final decision on RPZ modifications is made by the SDOT Traffic Management Division Director.
5. **Open space mitigation.** The comment regarding open space is acknowledged. Draft EIS Section 3.7 describes potential impacts associated with the proposal and alternatives and identifies a range of mitigation measures that could address identified impacts. Please also refer to the response to Letter No. 1, Comment No. 3.
6. **Urban Growth Boundary.** The comment that the Roosevelt Neighbors Alliance has sponsored a request to change the urban center boundary to exclude the LR1 and LR2 zoned properties around University Playground is noted.
7. **Public School Attendance Areas.** The comment is noted.
8. **Development Fees.** The procedures for administering impact fees are established by state law. In general, any fees assessed pursuant to SEPA must be used to mitigate those impacts specifically identified in an EIS

and attributable to a proposal (WAC 197-11-660(1)(b)). While the City does not currently assess GMA-based impact fees, state law requires that such fees be earmarked and deposited in a separate account (RCW 82.02.070).

9. **Circulation and Setback Mitigation Strategies.** Please see the response to Letter No. 1, Comment No. 3.
10. **Final EIS.** As noted in the responses to Comments No. 1 and 2, this letter, the EIS is being prepared consistent with the requirements of SEPA.
11. **No Action Alternative.** The No Action Alternative is based on existing zoning designations in the study area and does not represent itself to be based on the University Community Urban Center (UCUC) Plan. As described in Draft EIS Section 3.1, the UCUC Plan was not formally adopted by the City, although many of the findings and direction helped inform the City's University Community Urban Center section of the Comprehensive Plan Neighborhood Planning Element. The Draft EIS summarizes the vision statement and overarching strategies contained in the UCUC Plan as well as pertinent UCUC goals and policies contained in the Comprehensive Plan Neighborhood Planning Element. Please see response to Letter No. 1, Comment No. 34.
12. **Mitigation Measures and Zoning Options.** The comment regarding preferences for rezoning is acknowledged. The EIS alternatives are area-wide and are intended to examine the effects of different spatial patterns, density and building forms, and design. Please refer to the response to Comment No. 2, this letter, regarding mitigation.
13. **Alternatives.** The Draft EIS provides a comparative discussion of the potential for impacts of the action alternatives and the No Action Alternative. As described in the response to Comment No. 11, this letter, the No Action Alternative is based on existing zoning and is not based on the UCUC Plan.
14. **Single Family Zones.** As noted in the comment, a portion of the study area is outside of the University District Urban Center. This is discussed in Draft EIS Section 3.1 and shown in Figure 3.1-2. Under Alternatives 2 and 3, the existing single family zoning would be retained as it currently exists. Under Alternative 1, the majority of the current single family zoned area would be retained, but two small areas are proposed for change. These are described in Draft EIS Chapter 2.
15. **Proposed Downzone.** The comment is noted. All of the proposed alternatives would retain the existing LR zoning around the University Playground and the University Branch Library.

16. **Mitigation Measures.** The requirements for the type of analysis that must be contained in a non-project EIS and the specificity of mitigation measures for identified impacts is contained in WAC 197-11-440(6)(c)(iv) and 197-11-442(4), respectively. Please see the responses to comments No. 2, 12 and 13 above regarding mitigation measures. The process for adopting area-wide comprehensive plan and zoning changes is legislative in nature and includes notice and public hearings.
17. **Incentive measures.** The comment regarding preferred incentive measures is acknowledged. The EIS identifies the general direction of potential implementation measures as they exist at this time, which is consistent with the requirements of SEPA; please refer to the response to Comment No. 16 above. More detailed information about proposed incentives and regulatory programs will be developed in a subsequent phase of discussion regarding the proposal. Please also refer to the response to Letter No. 1, Comment No. 25 regarding affordable housing programs.
18. **The comment regarding the timing of the process is acknowledged.** The City is committed to working with the community to ensure opportunities for meaningful input and discussion of the issues. DPD anticipates releasing draft recommendations in spring 2015 for public review. After receiving and incorporating feedback, DPD will transmit formal recommendations to City Council in the second half of 2015. Council will have a series of public hearings on the U District before taking any legislative action.
19. **Blessed Sacrament Church.** The map on Draft EIS page 2-14 shows the LR3 zone at the referenced location because that is part of the Alternative 1 proposal. Comments in opposition to this change are noted.
20. **LR1 zone north of NE 50th Street.** As the comment notes, Alternative 2 does not propose any changes to the LR1 zoning north of NE 50th Street.
21. **LR1 and LR2 zoning.** The comment is noted.
22. **Alternatives.** SEPA requires that an EIS consider a "reasonable" range of alternatives, to permit decision makers to compare the impacts of different courses of action (WAC 197-11-440(5). For non-project proposals, such as the proposal, the SEPA rules require a general discussion of alternative designations; all possible designations do not need to be examined (WAC 197-11-442(4)). Identifying the "best" alternative is a question of judgment and opinion, and is ultimately a legislative decision that will be made by the City Council.

    The range of alternatives considered in the Draft EIS allows decision makers to see the trade-offs and to identify mitigation measures related

to density, height and design; those zoning issues are the focus of the EIS. Different measures to avoid, reduce or minimize impacts are already incorporated in the alternatives. Additional alternative actions that would address concerns about impacts and mitigation expressed in several comment letters are also included in the Final EIS.

23. **Benefits and disadvantages of delaying the proposed action.** The comment is acknowledged. Please see Chapter 2 in this Final EIS for revisions to Section 2.5. The paragraph in Section 2.5 is intended to state that future mitigating measures associated with the proposal and identified in the Draft EIS could increase the likelihood that improvements and amenities would be developed under the action alternatives. If and when such standards are adopted in the Land Use Code, they would mitigate impacts that would otherwise occur in the absence of such standards. This statement does not contradict the fact that other adopted development regulations—such as for critical areas—would also mitigate impacts to other elements of the environment. As stated in Seattle's SEPA policies, the City presumes that adopted regulations are sufficient to mitigate most development impacts (SMC 25.05.665.D).

    The statement is also intended to acknowledge that some individuals may prefer existing building height and scale compared to that considered in the alternatives. Existing building heights and development standards (i.e., the No Action alternative) are used to compare the impacts of the alternatives, and the EIS does not presume that such standards are insufficient.

    The process the City is following to prepare the EIS and to consider comments, including the timing of the process, is specified in state law and city code. The City Council will establish the schedule to review a formal rezoning proposal based on adopted procedures for legislative decisions.

24. **Land use analysis.** The comment is acknowledged. Please refer to the response to Comment No. 16, this letter, above regarding the required level of detail of analysis and the specificity of mitigation measures for a non-project EIS.

    In jurisdictions planning under Washington's GMA, a twenty-year planning horizon is required to be used to evaluate anticipated growth in comprehensive plans, sub-area plans and area-wide zoning actions. Analysis in the EIS is based on development that would accommodate the 2035 housing and employment estimates for the University District; both the time period and the amount of growth coincide with the twenty-year planning horizon and planning estimates for the Comprehensive

Plan Update that is currently underway. Looking out more than twenty years in the future would produce conclusions that are highly speculative; in addition, buildout is a hypothetical state that can change in extent or time in response to unforeseeable events or discoveries, such as new building technologies, planning and regulatory approaches, and economic and social conditions.

25. **Downzoning.** The comment is acknowledged. The alternatives do not propose downzoning. A downzone of property in the study area would not help the City achieve the objectives described in Draft EIS Chapter 2.
26. **Land use compatibility.** As noted in the comment, the Draft EIS identifies the potential for land use compatibility impacts at the boundary between the UCUC and the adjacent low-density residential area. It is acknowledged that land use compatibility impacts may be more significant for the single family development around the University Playground and University Library than other parts of the study area that are already characterized by mixed use, commercial and multifamily developments. The potential for this impact is present under all alternatives, including the No Action Alternative.
27. **Alternative 1 building heights.** The comment is noted.
28. **LR3 zoning.** Under Alternative 1, the area referenced by the comment would change from the existing LR1 to an LR3 zoning designation. These two zoning designations are intended to be compatible with each other, with similar permitted uses and development standards. It is acknowledged that, under either the existing zoning or the LR3 proposed by Alternative 1, future development may be significantly different than the existing development character. Please see the response to Comment No. 26, this letter.
29. **LR zone compatibility with single family residential development.** The comments in opposition to the LR2 and LR3 zoning designations proposed by Alternative 1 are noted. As described in the Draft EIS, the proposed rezones would not permit different kinds of uses to the area, but would increase the intensity of uses already found in the area. The Draft EIS notes that the LR zone is a relatively low or moderate intensity multifamily zone intended to fit compatibly in residential areas and that City of Seattle development standards, including setbacks, landscaping and screening standards, building façade limits, and noise, light and glare standards, are intended to adequately avoid or minimize potential impacts and promote compatibility.
30. **Alternative 2 building heights.** The comment is noted. Please see the response to Comment No. 24, this letter.

31. **Alternative 2 land use compatibility.** The comment is acknowledged and the following paragraph is added to the Alternative 2 impact discussion:

    In the northwest corner of the Core Area, the proposed mixed use zone with a maximum height of 340 feet would adjoin the existing LR1 and LR2 zones at NE 47th Street, extending from I-5 to just west of Roosevelt Way NE. The LR zones allow a maximum building height of 30 or 40 feet. Along this boundary, consideration should be given to ensure a compatible transition between these zones. Please see potential mitigation strategies in Draft EIS Section 3.3, Aesthetics.

32. **Mitigation measures.** Please refer to the response to Comment No. 2, this letter, above.

33. **Significant unavoidable adverse impacts.** The statement indicates that impacts are considered to be either avoidable or not significant.

34. **Housing data.** As the comment notes, the Draft EIS cites that 92% of the estimated available housing is occupied. This is based on information from the City's 2012 University District Urban Design Framework - Existing Conditions Report. It was derived from 2010 Census data (100% count). Vacancy rates were at a relative high in the City between 2009 and 2010 and have subsequently come down. Data from Dupre and Scott's March 2014 Apartment Vacancy Report notes a vacancy rate of 1.8 percent for the U District.

    The Draft EIS (page 3.2-2), indicates that 22 percent of the residential structures in the study area are apartment buildings. However, 72 percent of the residential units in the study area are apartment units. The Existing Conditions Report noted that 51.1 percent of the study area's housing units were occupied by householders living alone. This data was from the 2010 census.

    Under all three of the alternatives, there would no substantial changes to the single family zoned (SF-5000) areas north of 50th Street. The Draft EIS does state that residential development has been trending toward smaller rental units in larger structures. It is also noted that, while market demand has not supported development of larger units, the future light rail station may result in some shifts in demand.

35. **Housing affordability.** The Draft EIS concludes that housing affordability is a significant challenge in the University District and will continue to be under all alternatives. A menu of land use code and programmatic strategies for addressing housing affordability are included in Draft EIS Section 3.2.5.

36. **Green streets.** Comments are noted. Potential for shade and shadow impacts are described in the Draft EIS. The EIS evaluates the alternatives

described in Chapter 2 of the document and does not propose or evaluate other actions, such as the plaza mentioned in the comment.

37. **Future park.** Comment regarding the future park at the University Heights Community Center is noted. As described in Draft EIS Section 3.7, Seattle Parks has purchased this property for development as a public park. As of April 2013, improvements were funded and the planning process under way.
38. **Roosevelt Way NE character.** The comment is noted and it is acknowledged that this area is experiencing redevelopment at many locations.
39. **Auto dealerships.** The comment is noted.
40. **Open space.** The comments are noted. Please see the discussion of open space in Draft EIS Section 3.7.
41. **Transit center illustration.** The referenced illustration is a rendering prepared by Sound Transit and intended to provide a sense of building mass, but not to establish design character, amenities, pedestrian improvements, etc.
42. **Existing building heights.** The Draft EIS identifies the UW Tower at 320 feet, the University Plaza Condominiums at approximately 220 feet, the Hotel Deca at 170 feet and a number of other buildings that range between 65 and 100 feet.
43. **Viewsheds.** As described in the Draft EIS, development in the study area does not impact views from the viewpoints designated by Seattle Municipal Code 25.05.675.
44. **Shadow.** As the comment notes, the Draft EIS discloses potential shadow impacts to the future University Heights Open Space.
45. **Shadow.** As the comment notes, the Draft EIS discloses potential shadow impacts to Christie Park.
46. **Shadow.** As the comment notes, the Draft EIS discloses potential shadow impacts to University Playground.
47. **Shade and shadow.** The comment is noted.
48. **Alternative 1 Height Bulk and Scale.** As described in the comment, proposed changes to the area adjacent to Ravenna Boulevard under Alternative 1 are disclosed in the Draft EIS. Under Alternative 1, much of the area around the University Playground would be in an LR3 zone.
49. **Alternative 2 Scenic Route.** The "small area" referenced in the comment extends between NE 45th and approximately NE 42nd Streets, and comprising the half-block between 15th Avenue NE and University Way NE. As noted in the Draft EIS and comment, future development here

would not result in impacts to distant scenic views, so no significant impacts to designated scenic views are anticipated.

50. **Historic resources data.** The comment is noted. Please refer to the historic resources mitigation measures for recommended additional survey and inventory work to augment the 1998 and 2002 studies.
51. **Historic character.** The comment is noted. Please refer to mitigation measures for discussion on design guidelines. Design guidelines for the neighborhood should include parameters for new construction that take into account these policies and concerns.
52. **Single family residential character.** As noted in the comment, the Draft EIS identifies the potential impact to the single family residential character as an impact. Please refer to the mitigation section for measures to address this impact.
53. **Historic resources impacts.** As noted in the comment, the Draft EIS identifies the potential for impacts to historic resources in the study area.
54. **Stable school populations.** The comment is noted.
55. **Historic resources survey.** The comment is noted.
56. **Neighborhood character.** The comment is extracted from the introduction to the mitigating measures section that describes the contribution that historic buildings make to neighborhood character. The referenced text states that the low rise streetscape of University Way NE, collection of distinguished masonry apartment buildings, civic, community and religious properties and the intact neighborhoods all work together to create a distinct neighborhood in the city. It further states that these properties should be used to inform the nature of new and infill development.
57. **Historic districts.** The comment is noted. Please refer to the discussion of historic registers in the mitigation measures section for recommendations to identify potential individual properties and districts.
58. **U District character.** The comments are noted.
59. **Density and traffic.** The total number of PM peak hour trips generated in the U District is expected to increase substantially with increased density: from 14,210 trips in 2015 to 20,480 in 2035 (Table 3.5-9). As shown in Tables 3.5-10, 3.5-11, 3.5-13 and 3.5-14, travel times are also expected to increase between 2015 and 2035. However, the performance of the Action Alternatives is compared against the No Action Alternative, rather than existing conditions. The similarity in projections among the three 2035 alternatives is due to the assumption that the same overall growth would occur under all 2035 alternatives. While the growth would

be distributed differently within the U District, the differences are not expected to cause large shifts to mode share at the area-wide level. This leads to the conclusion of no significant impacts compared to the No Action Alternative.

60. **MXD traffic model.** The MXD tool used in the Draft EIS has been reviewed by academics as part of submissions to peer-reviewed scholarly journals. As part of this academic review process, the methodology, validation, and applicability of this model to a variety of environments were deemed to be adequate as to warrant publication in academic journals. The MXD model was documented in an article published in the Journal of Urban Planning and Development in September of 2011 (Vol. 137, No. 3). This paper presents the statistical evidence demonstrating that the MXD model is an appropriate tool for analyzing dense mixed use environments, such as the U District.

    The Institute of Transportation Engineers (ITE) Trip Generation Handbook, 2nd Edition, notes that the information in ITE's Trip Generation document is provided as general information only and if more relevant and locally valid information is available, it should be used instead of or in conjunction with, the national average information in Trip Generation. The MXD approach has been shown to be superior to ITE in urban areas. Using traditional ITE rates in a dense mixed use area such as the U District would overestimate the number of automobile trips generated by the potential land uses allowed by the proposed zoning changes. The upcoming ITE Trip Generation Handbook, 3rd Edition, will include a new mixed use trip generation methodology based, in part on the MXD approach.

61. **Single occupancy vehicle goal.** The comment is acknowledged.

62. **Transit service.** The transit investments being made by Sound Transit have committed funding in place. It is true that the current funding picture for King County Metro is in question and that there is the potential for near-term cuts in transit service. However, the Draft EIS is a forward-looking document, and assumes the regionally accepted levels of future transit defined by the Puget Sound Regional Council per Seattle Department of Transportation direction. It should be noted what while transit funding fluctuates in the short-run, transit funding and service over the last 20 years has expanded substantially in the Puget Sound Region.

63. **Roadway capacity and mitigation.** No significant automobile traffic impacts are expected (impact thresholds defined on pages 3.5-49 and 3.5-52 and results summarized on page 3.5-53). Therefore, no automobile related mitigation measures were identified. Three mitigation packages

were identified in response to the expected impacts: improving the pedestrian and bicycle network, implementing speed and reliability improvements, and implementing travel demand management and parking strategies. The estimated effects of the proposed pedestrian/bicycle, and speed and reliability mitigation measures are quantified on pages 3.5-68 to 3.5-69 of the Draft EIS. General implementation strategies are identified, consistent with a programmatic EIS.

64. **Age of data.** The commenter notes the following data is too old to be accurate: "existing traffic, 3.5-2; parking data 2010, 3.5-19." The basis for this assertion is unclear. As stated on page 3.5-27, travel times were collected in October 2013 and factored to approximate the base year of 2015 using travel time changes predicted by the project's travel demand forecasting model.

    Related to potential parking impacts, as noted on page 3.5-52, impacts are only identified for on-street parking, since this is the supply over which the City has direct control. The on-street parking data cited in the Draft EIS was collected in 2013 and showed that demand exceeds supply in some areas. Based on this data, a parking impact was identified. Other parking data sources were provided for informational purposes only.

65. **Travel times.** The travel times reported in the Draft EIS are accurate and were collected through multiple travel time runs in October 2013. These travel times were subsequently factored up to approximate the base year of 2015 using travel time changes predicted by an analysis of the project travel demand forecasting model. The results shown in the figure are deemed to be accurate by the authors and the lead agency. As noted on page 3.5-30, the I-5 ramps can cause queues in turn lanes that exacerbate congestion.

66. **Transportation impacts.** Please note that none of the alternatives result in 20% of VMT operating at LOS F (the threshold for an impact).

67. **Parking study.** As stated on page 3.5-52, impacts are only identified for on-street parking, since this is the supply over which the City has direct control. The on-street parking data cited in the Draft EIS was collected in 2013 and showed that demand exceeds supply in some areas. Based on this data, a parking impact was identified. Other data, including the utilization of off-street, private parking, were provided for informational purposes only.

68. **Parking capacity.** As noted, City policy does not require parking within Urban Centers nor withina quarter mile of frequent transit service, which includes most of the U District study area. Modifications to the parking code for frequent transit service areas is not included as one of the

mitigation measures for this study. The comment suggests several other means to manage parking related to RPZs, which are consistent with actions that could be taken under the suggested mitigation measure. The commenter's proposal to modify the RPZ areas and operating rules is subject to SDOT's established process for initiation and modification of RPZs with the final decision being made by the SDOT Traffic Management Division Director; this change is not in the purview of this EIS.

69. **Safety data.** Traffic growth between 2013 and 2015 was estimated using the travel demand model to factor up the existing collision data. Even with this increase, no High Accident Locations are projected for 2015. However, the data have been updated in Figures 3.5-14 and 3.5-15 to reflect the projected 2015 collisions. Additionally, the legend has been updated to clarify that intersections with at least 5 collisions fall into only one category: the "≥5" category. The commenter brought up the potential for unreported collisions. Since there is no data source, there is no way to account for collisions that were not reported and it would be speculative to use an ungrounded factor to adjust for these types of collisions.

    High accident locations are defined as an average of 10 or more collisions per year at a signalized intersection or an average of 5 or more collisions per year at an unsignalized intersection. Three of the eight locations cited by the commenter are segment results for which the City does not define collision thresholds. The remaining five are at signalized intersections which have a 10 collision threshold. All of those collision rates are less than 10 so they do not constitute a high accident location.

    In the Draft EIS, Figure 3.5-15 showed the total collisions from January 2010 to September 2013, rather than annual collisions (see text on page 3.5-36). Therefore, none of the locations have an annual collision total higher than 5 (these collisions are also accounted for in the annual collision rate analysis shown in Figure 3.5-14.) To provide clarity, Figure 3.5-15 has been revised to show annual collision rates instead of the 3-year total.

70. **Significant unavoidable adverse impacts.** The commenter's underlying premise that there are significant unavoidable adverse transportation impacts is not correct. The Draft EIS does not conclude on page 3.5-72 or elsewhere that there are significant unavoidable adverse impacts. The commenter also identifies the difference in Draft EIS language (deficiency vs. impact) used for the No Action and Action Alternatives. These terms are commonly used to distinguish between the No Action Alternative—what will happen if nothing is done—and the impacts of

an action (modifying the zoning in this case). A programmatic EIS is primarily a disclosure document. The words "could" and "potential" are common in a programmatic EIS to help define a reasonable range of measures that could be taken in response to future proposals.

The commenter's opinions about transportation demand management are noted.

The commenter requests an independent review of the transportation analysis. The analysis was prepared by qualified transportation planners and engineers using a methodology and approach that was reviewed and approved by the City. Because of this, the City does not believe that additional independent review is necessary. As lead agency for this EIS, DPD confirms the threshold of significance for impacts used in the impact analysis. These thresholds are based on the policies and goals in the Comprehensive Plan and prior precedents set in other environmental documents.

71. **Open space discussion.** The extract from the Draft EIS is noted.

72. **Open space discussion.** The extract from the Draft EIS is noted.

73. **Open space deficit.** As described in the Draft EIS, the open space inventory in the study area does not meet the Comprehensive Plan goals for park and open space facilities. Without additional open spaces, the deficit in the study area will increase from approximately 3 acres currently to approximately 5 acres in the future under all three alternatives.

74. **Open space mitigation.** As a programmatic document, this EIS discloses information about significant impacts to the environment and identifies a range of mitigation measures that could address identified impacts. This information is intended to be used by decision makers when they consider taking an action, which in this case is a legislative decision about an area-wide rezone. In making this decision, the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but it does not have the authority to commit the City Council to take a specific action, such as adopting legislation or spending money. Mitigation, therefore, is presented as a range of measures that DPD could recommend that the City Council consider. The decision to plan and fund a particular facility, such as a park, is not within the jurisdiction of DPD and would require approval by the City Council, commitment to fund such construction through the CIP, and appropriate planning by the City agencies with jurisdiction.

75. **Significant unavoidable adverse impacts.** The discussion of existing conditions, significant impacts and mitigation measures supports the conclusions of this section.

76. **Fire services.** The referenced statement is intended to convey that the overall amount of development and density of residents/workers are critical factors in estimating fire fighter requirements. The statement is based on input from the Seattle Fire Department.[1] The most current available data were used in this section of the Draft EIS.

    Regarding impacts, the Draft EIS states that an increased number of residents and workers would likely result in a proportional increase in calls. Depending on the rate and amount of new development, additional staffing may be required to maintain performance levels. While the height of buildings is one factor; the overall amount and density of development are the most significant factors in determining future demand for service. Given the presence of high-rise buildings in many locations in Seattle, it is reasonable to conclude that the Fire Department is prepared and equipped to handle emergencies in tall buildings.

77. **Police services.** The comments restating information from the Draft EIS are noted. The most current available data were used in this section of the Draft EIS and reviewed by the Seattle Police Department.[2].

78. **Public schools.** The Draft EIS documents City policy related to a school in the U District and School District policy related to school attendance boundaries and walkability. Whether to locate a school in the U District is a policy decision to be made by the City and School District and is outside the scope of this EIS.

79. **Public school impacts.** The Draft EIS documents School District policy as it relates to school attendance boundaries and walkability and notes City policy statements about a school in the U District. Whether to locate a school in the U District is a policy decision to be made by the City and School District, and is outside the scope of this EIS.

80. **Public school mitigation.** Any impact or voluntary mitigation fees collected by a public agency are subject to procedures established in state law that guide how these funds are collected and used. Please see response to Comment No. 8, this letter.

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1 *Deputy Chief Gary English, Assistant Fire Marshall, City of Seattle Fire Department. February, 2014.*

2 *Officer Michael Lanz, Community Police Team, University District Seattle Police Department North Precinct. November, 2014.*

Letter No. 5 ROOSEVELT NEIGHBORS ALLIANCE

Letter No. 5 is a duplicate of the first portion of Letter No. 4. Letter No. 4, Comments No. 1-10 also address the comments in Letter No. 5.

Letter No. 6 SEATTLE DISPLACEMENT COALITION

1. **Environmental analysis.** The comment is noted. SEPA's requirement for an EIS on a non-project area-wide legislative proposal is limited to a general discussion of the impacts of alternative proposals (WAC 197-11-442(4)). The EIS meets this standard. Responses are provided below for individual comments relating to the issues identified collectively in Comment No. 1.
2. **Growth estimates.** The housing and employment estimates were held constant under the alternatives for two reasons: (1) because they are consistent with the estimates that are being used for the U District in the Comprehensive Plan update, and will therefore be consistent with the assumptions in the Comprehensive Plan; and (2) by holding the amount of growth constant, the analysis can more easily isolate the impacts of different zoning configurations, development and design standards, which are the essence of the proposed action. Comparisons among alternatives are more difficult to discern when there are multiple variables to take into account.

   It is acknowledged that many environmental impacts identified in the U District EIS—such as for parks and public services, for example - are driven by population and, therefore, are related to the amount of growth assumed in the alternatives, rather than to building height, intensity or design. This is a fact that corresponds to how some levels of service are established and how impacts are typically measured in EIS analysis. The growth estimates used in the EIS are consistent with the growth estimates assumed for the U District in the 2035 Comprehensive Plan Update; it is reasonable to use them for the proposed action. That increment of growth, therefore, is considered to be a function of the 2035 planning estimates/targets for the U District, and is not a result of rezoning. As noted in the previous paragraph, holding growth constant across the alternatives also helps to focus on the specific elements of the zoning proposals. It would not be reasonable to assume different amounts of growth merely to produce different impacts, which is what the comment seems to suggest.

Nevertheless, in response to this and similar comments, the Final EIS identifies two additional alternatives which consider higher levels of assumed growth compared to what was considered in the Draft EIS. Please see Chapter 2 for a description of these additional alternatives and Chapter 3 for an evaluation of impacts.

3. **Land use patterns.** It is acknowledged that the two action alternatives seek to focus growth around the future transit center to a greater extent than is found in the current pattern of zoning. Focusing the highest densities around the transit center could result in a concentration of growth in the core of the study area, with relatively less disturbance occurring outside the core.
4. **Growth estimates.** Please refer to the response to Comment No. 2, this letter.
5. **High rise zoning.** The commenter's opinions are noted. Please see the response to Comment 2, this letter. As noted in this comment and described in EIS Section 2.2, there is ample development capacity for all alternatives. Please see Draft EIS p. 3.2-18 for a discussion of the role that excess zoning capacity plays in helping to reduce impacts on housing affordability.

   Note that this Final EIS reviews two additional alternatives that provide for slightly higher levels of growth compared to what was considered in the Draft EIS.
6. **Analysis of development capacity.** The assumption in the comment that excess development capacity in itself will automatically result in additional growth beyond the 20-year planning estimates is not supported by available market data. The rezone alternatives are planning for a twenty-year increment of housing and employment growth, and are evaluating how that growth could be accommodated in different spatial patterns and building forms. The maximum theoretical development capacity in itself is not considered to be an environmental impact, nor is it a useful measure or predictor of future impacts. It cannot be predicted if, when or how buildout will occur, and any analysis of a buildout condition at some undeterminable future time would be extremely speculative.
7. **Heartland market analysis.** The comment is noted.
8. **Future growth.** As noted in the responses to Comments No. 2 and 6, the rezone alternatives are examining how the 2035 planning estimates could be accommodated in different land use patterns and building forms. It is acknowledged that the City's Urban Village Strategy is based on the principle of attracting larger increments of growth to designated Urban Villages, and particularly to Urban Centers such as the University District.

To the extent that high-rise development can efficiently accommodate this growth, it would be consistent with the fundamental strategy of the Comprehensive Plan. Relevant Comprehensive Plan policies are cited in Section 3.1.5 of the Draft EIS.

9. **Development capacity.** Please refer to responses to Comments No. 2 and 6 above.

10. **Growth assumptions and affordable housing impacts.** As described in the Draft EIS, housing affordability is a complex issue influenced by a number of factors including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the number of affordable units developed in the study area.

    With respect to potential impacts of the proposed action, the area-wide analysis in this EIS focuses on two key questions: (1) does the existing regulatory framework (Alternative 3, no action) or the proposed new regulatory framework (Alternatives 1 and 2) expand the potential supply of housing above the likely market demand; and (2) does the existing regulatory framework (Alternative 3, no action) or the proposed new regulatory framework (Alternatives 1 and 2) expand the potential use of housing affordability tools. The discussion concludes that all three alternatives accommodate a supply of housing above the growth estimates established by the City and that the excess supply should help reduce the upward pressure on rents. Use of incentive zoning to create affordable housing units is contemplated under the action alternatives and expansion of other strategies, such as the MFTE program, could further address the housing affordability challenge.

    The estimate of housing units demolished was based on King County Assessor's data for the re-developable sites defined for each alternative, as described in Draft EIS Chapter 2 and Section 3.3.2. The authors identified the most likely redevelopment sites based on ratios of improvement value to land value, as well as existing land uses (i.e., large sites with surface parking lots or older, low-rise buildings were identified as most likely to redevelop). After selecting, the authors analyzed a range of impacts based on redevelopment of those sites. For each alternative, King County Assessor's data was consulted to identify existing housing units on each site. The total estimated housing displacement under each alternative is based on this information. While development could occur on any site under any of the three alternatives, it would be speculative to model the impacts of redevelopment on less likely development sites.

As noted in the Draft EIS, this analysis is not a projection of housing demolition, but seeks to stress how Alternatives 1 and 2 envision flexibility for a more efficient use of land allowing for higher concentrations of housing. The implication of this framework is the need for less land (and the potential demolition of lower cost housing) to meet the future growth estimate.

Also, because the action alternatives would concentrate new development in the core of the neighborhood, which has a high concentration of low-rise commercial buildings and surface parking, it is reasonable to assume that housing development in those scenarios would lead to a lower rate of demolition per unit built than what would occur in a more distributed growth pattern. Between 1995 and 2014, redevelopment in that commercial core has produced or permitted 1,803 housing units while resulting in 36 units demolished.

Regarding the use of a constant growth assumption for all three alternatives, please see the response to Comments No. 2 and 6, this letter, above. As noted, the growth assumption is for planning purposes only. It is recognized that actual growth may be less than or greater than the planning assumption.

11. **Affordable housing supply.** The comment regarding a windshield survey of affordable housing is noted. It appears that the comment may assume that all existing affordable apartment buildings in the study area would be demolished over the 20-year time horizon. This is not consistent with the development assumptions described in the Draft EIS.

    It would be difficult to correlate zoning changes with rental housing costs, isolated from numerous other factors, economic and otherwise. As shown in the Draft EIS (Section 3.2.5), market-rate apartment rents have increased in neighborhoods throughout Seattle, including the University District. Increases in inflation-adjusted rents in the study area have eroded affordability for U District residents absent any large-scale changes in zoning.

    Please also see response to Comment No. 10, this letter, above.

12. **Housing affordability impacts.** Please see the responses to Comments No. 10 and 11, this letter. .

13. **Housing affordability.** Please see the response to Comment No. 10, this letter, above.

14. **Housing supply and affordability.** The comment concludes that 1,000 affordable/low-income housing units would be demolished as a result of the action alternatives. As noted in the response to Comment No. 11, this letter, this conclusion is not supported by the EIS. At a programmatic

level, the EIS acknowledges that limited housing supply may cause rents to increase and negatively impact housing affordability (page 3.2-17).

15. **Displacement and housing affordability.** The evidence cited in the comment cannot be evaluated because no data was provided. The EIS addresses housing affordability at a level of discussion appropriate for an EIS on a programmatic area-wide legislative proposal. It also identifies the need for programmatic and code actions that the City could take to address housing affordability challenges. Regarding the windshield survey cited in the comment, please see the response to Comment No. 11, this letter.

16. **Filtering.** Draft EIS Section 3.2.5 includes a discussion and data demonstrating apartment rental price filtering for the study area and the City of Seattle as a whole. The Draft EIS notes that filtering is a relative process and does little to ameliorate the short-term cost impacts on households and on low-income households.

17. **Rent increases.** The EIS addresses housing affordability at a level of discussion appropriate for an EIS on a programmatic area-wide legislative proposal. Please see the response to Comment No. 10, this letter.

18. **Housing affordability impacts.** The proposal is legislative/non-project in nature and in itself would not result in any direct, physical impacts to the natural or built environment. Future development that is proposed consistent with any adopted rezone would be the direct cause of any environmental impacts. All impacts identified in the EIS are indirect and cumulative in nature.

    It should be noted that the Final EIS includes two additional alternatives that are intended to test the sensitivity of impacts identified in the Draft EIS to increased growth levels. These alternatives assume a growth estimate of 5,000 housing units compared to the growth assumption of 3,900 housing units assumed in the Draft EIS. Please see Final EIS Chapter 3 for a discussion of these additional rezone alternatives.

19. **Mitigation measures.** Mitigation measures are identified consistent with WAC 197-11-440(6)(c)(iv) and 197-11-442(4). Potential mitigation includes programmatic strategies and land use code changes that the City could take to address housing affordability challenges.

    Please refer to the responses to Letter No. 1, Comments No. 3 and 38, and Letter No. 4, Comments No. 2, 12 and 13.

20. **Development Capacity.** Please refer to the responses to Comments No. 6, 9 and 18 above.

21. **Additional study.** The comment is noted.

Letter No. 7 CITY OF SEATTLE-U.W. COMMUNITY ADVISORY COMMITTEE (CUCAC)

1. **Downzones.** Downzones of property are not part of the proposal or alternatives. A downzone of property in the study area would not help the City achieve the objectives of the proposal as described in Draft EIS Chapter 2.
2. **Building heights on University Way.** The results of a visual model that depicts street level views of increased building heights on University Way together with supporting discussion is provided in Draft EIS Section 3.3.
3. **Office tower proliferation.** The EIS analysis assumes development of towers based on a growth estimate that is constant among alternatives and zoning designations and standards that differ among alternatives. Please see Draft EIS Section 2.3 for a description of the assumptions for growth allocations within the study area.

   As described in the Scoping Summary, the EIS does not include an economic analysis of the alternatives. As described in WAC 197-11-448, SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible effects and considerations of a decision. Rather it focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.
4. **Height and density expansion.** Please see the response to Comment 3, above.
5. **Zoning maps.** The existing zoning maps shown in the Draft EIS are current and correct.
6. **Building height on University Way.** The comment is noted.
7. **Street level design.** Street level design measures are identified as possible mitigation in Draft EIS Section 3.3, Aesthetics. Because this is a programmatic EIS, mitigation is identified as a range of options which the City may consider. The decision to further develop and adopt specific mitigation as part of a future implementing action is a legislative decision by the City Council and will be made according to the City's established decision-making process.
8. **University Community Urban Center (UCUC) Neighborhood Plan.** In Draft EIS Section 3.1, the UCUC Neighborhood Plan planning process is briefly described and the vision statement and plan directives are listed. As noted in the discussion, the UCUC Plan was not formally adopted by the City, but many of the Plan findings helped inform the City's

University Community Urban Center section of the Comprehensive Plan Neighborhood Plan Element. Draft EIS Section 3.1 includes the goals and policies pertinent to the study area contained in the University Community Urban Center section of the Comprehensive Plan Neighborhood Planning Element. Please see also the response to Letter No. 1, Comment No. 34.

9. **Alternatives.** Please see the response to Letter No. 6, Comment No. 2.
10. **Development capacity.** Please see the response to Letter No. 6, Comment No. 6.
11. **Tower spacing.** The comment is noted. Please see the visual analysis in Draft EIS Section 3.3.
12. **Full build-out.** Please see the response to Comment No. 10, above.
13. **Mitigation measures.** The comment is noted.

Letter No. 8 UNIVERSITY PARK COMMUNITY CLUB

1. **Mitigation measures.** Mitigation measures are identified consistent with WAC 197-11-440(6)(c)(iv) and 197-11-442(4).

   Please refer to the responses to Letter No. 1, Comments No. 3, 25 and 38, and Letter No. 4, Comment No. 2, 12 and 13.
2. **Public amenities and infrastructure.** The comment is noted. Please refer to the response to Comment 1, this letter.
3. **Development capacity.** Please refer to the responses to Letter No. 6, Comment No. 6 and 9 regarding development capacity.
4. **Public schools.** The comment is noted. Please refer to the responses to Letter No. 1, Comment No. 3 and 38.
5. **Police services.** The comment is noted. Please refer to the responses to Letter No. 1, Comment No. 3.
6. **Social services.** Please refer to Section 2.4 of the Draft EIS and the response to Letter No. 1, Comment No. 1 regarding the scope of the EIS. Section 3.8 of the Draft EIS addresses those public services pertinent to the proposal and related to environmental issues. Social services are not identified as an element of the environment for consideration in an EIS, either in the SEPA Rules (WAC 197-11-444) or in Seattle's SEPA policies and procedures (SMC 25.05.675.2.O.1).

   Priorities for parks and open space and other public facilities have been established in a number of other plans, including the Seattle Comprehensive Plan, the University Community Neighborhood Plan, the Urban Design Framework, the University District Parks Plan and

Seattle School District plans. These plans and policies were considered in the EIS.

7. **Transportation.** The City has undertaken comprehensive planning efforts in the U District, such as the Urban Design Framework and University Area Transportation Action Strategy, from which some of this EIS's proposals originated. Tables 3.5-15 and 3.5-16 summarize the potential proposals to mitigate impacts of the proposed Action Alternatives.
8. **Transportation improvements.** The commenter identifies specific improvements, all of which are consistent with the mitigation strategy in the EIS. Given the programmatic nature of this EIS, this level of detail has not been explored at this time. The City will study more specific proposals as development occurs in the U District.

   Bus routes within the U District were modified within the travel demand model to provide connectivity to the light rail station, using assumptions of service from Sound Transit's 2035 travel demand model (page 3.5-39).
9. **Scoping comments.** Please refer to the response to Letter No. 1, Comment No. 2 regarding the scope of the EIS. See also the Scoping Summary, Draft EIS Appendix C.
10. **Open space.** The comment is acknowledged. Please refer to the response to Letter No. 1, Comment No. 3, and the response to Comment No. 3, this letter, above.
11. **Develop specific recommendations.** The comment is noted.

Letter No. 9 UNIVERSITY PLAZA CONDOMINIUMS CIVIC AFFAIRS COMMITTEE

1. **Residential zones.** The comment is noted.

Letter No. 10 UNIVERSITY DISTRICT COMMUNITY COUNCIL (UDCC)

1. **SEPA review.** The comment lists a number of issues which are explained in greater detail in subsequent comments. Issues are addressed individually in the responses to comments No. 2 through 18.
2. **Proposal and alternatives.** As described in the Draft EIS, the proposed action consists of text and map amendments to the Seattle Comprehensive Plan and Land Use Code to allow greater height and density in the U District study area. Mitigation described in the EIS includes measures that may be incorporated into the proposal to help address identified

impacts. The Urban Design Framework, along with other City policy and planning documents, have helped to inform the proposal and the mitigation described in the EIS.

The term "piecemealing" is used in SEPA to refer to actions that are parts of a whole but which are inappropriately divided into smaller pieces so as to avoid environmental review of some or all of the pieces. That is not the case here. The proposal is an independent action and could proceed without the Urban Design Framework.

In regard to mitigation measures, please refer to the response to Letter No. 1, Comment No. 3. Mitigation measures are identified at a reasonable and appropriate level of detail for a non-project action.

3. **Growth Estimates.** The question of the amount of growth that is being planned for in the University District is addressed in the responses to Letter No. 6, Comments No. 2 and 6. Note that the Final EIS includes two new alternatives which assess the impacts of increased residential growth in the study area.

   It is acknowledged that growth in the City over the past two decades has been occurring both within and outside Urban Villages. However, the majority of that growth has, in fact, been focused within Urban Villages, and that is the intent of the Comprehensive Plan's Urban Village Strategy. It was never contemplated or intended that all city growth would occur within Urban Villages. As examples, please refer to the Urban Village Element of the Comprehensive Plan, Goals UVG5 ("the greatest share of future development") and UVG30 ("the most substantial share of Seattle's growth"). This distribution of growth in the Urban Village Strategy is also consistent with the Countywide Planning Policies and Vision 2040.

4. **Projected Development.** SEPA requires a "worst case" analysis in very limited, specific situations, which do not apply to the present proposal; refer to WAC 197-11-080. While there may be some level of uncertainty or disagreement as to outcomes in regard to operation of real estate markets, the City may disclose such uncertainty and proceed to make a reasoned decision without performing a worst case analysis.

5. **Housing demolition.** The opinions expressed in the comment are acknowledged. The estimate of housing units demolished was based on King County Assessor's data for the re-developable sites defined for each alternative, as described in Draft EIS Chapter 2 and Section 3.3.2. The authors identified the most likely redevelopment sites based on ratios of improvement value to land value, as well as existing land uses

(i.e., large sites with surface parking lots or older, low-rise buildings were identified as most likely to redevelop). After selecting, the authors analyzed a range of impacts based on redevelopment of those sites. For each alternative, King County Assessor's data was consulted to identify existing housing units on each site. The total estimated housing displacement under each alternative is based on this information. While development could occur on any site under any of the three alternatives, it would be speculative to model the impacts of redevelopment on less likely development sites.

As noted in the Draft EIS, this analysis is not a projection of housing demolition, but seeks to stress how Alternatives 1 and 2 envision flexibility for a more efficient use of land, allowing for higher concentrations of housing. The implication of this framework is the need for less land (and the potential demolition of lower cost housing) to meet the future growth estimate.

Also, because the action alternatives would concentrate new development in the core of the neighborhood, which has a high concentration of low-rise commercial buildings and surface parking, it is reasonable to assume that housing development in those scenarios would lead to a lower rate of demolition per unit built than what would occur in a more distributed growth pattern. Between 1995 and 2014, redevelopment in that commercial core has produced or permitted 1,803 housing units while resulting in 36 units demolished.

Regarding the identification of 40 apartment buildings in the area surrounding the future transit center, it is acknowledged that the study area contains many low-rise older multifamily buildings. However, as noted in the response to Letter No. 6, Comment No. 11, it appears that the comment may assume that all existing affordable apartment buildings will be removed over the 20-year time horizon. This is not consistent with the development assumptions described in the Draft EIS or with recent development trends in the U District.

The EIS addresses housing affordability at a level of discussion appropriate for an EIS on a programmatic area-wide legislative proposal. Please see the response to Letter No. 6, Comment No. 13.

6. **Social services.** Please refer to Section 2.4 of the Draft EIS and the response to Letter No. 1, Comment No. 1 regarding the scope of the EIS. Section 3.8 of the Draft EIS addresses those Public Services considered to be relevant to the proposal and subject to potentially significant adverse environmental impacts.

The potential exists for displacement of some existing uses under any zoning scenario, including the No Action Alternative. Any such indirect impact would not likely be caused by rezoning alone; the operation of the local real estate market, property values, perceived economic opportunities, and numerous other factors would also influence or determine any conversion of use.

7. **Opposition to upzones.** The comments are acknowledged.
8. **Street-level design.** The comment is acknowledged. Please see the response to Comment No. 2, this letter. The impact analysis and mitigation measures identified in the EIS, along with the Urban Design Framework and adopted neighborhood plan, will be used to help guide more specific proposals for development standards and design guidelines.
9. **University Community Urban Center (UCUC) Neighborhood Plan.** In Draft EIS Section 3.1, the UCUC Neighborhood Plan planning process is briefly described and the vision statement and plan directives are listed. As noted in the discussion, the UCUC Plan was not formally adopted by the City, but many of the Plan findings helped inform the City's University Community Urban Center section of the Comprehensive Plan Neighborhood Plan Element. Draft EIS Section 3.1 includes the goals and policies pertinent to the study area contained in the University Community Urban Center section of the Comprehensive Plan Neighborhood Planning Element. Please see also the response to Letter No. 1, Comment No. 34.
10. **UCUC Plan consistency.** The comment is acknowledged. The referenced statement was intended to recognize that a preferred alternative and package of mitigating measures has not yet been fully specified; the statement is consistent with language in Comprehensive Plan policy N2, Neighborhood Planning Element. Comparison of the UCUC Plan goals would be most informative as part of development of this package. Please see also the response to Letter No. 1, Comment No. 34.
11. **Visual impacts and growth estimates.** The results of a visual model that depicts street level views of increased building heights on University Way together with supporting discussion is provided in Draft EIS Section 3.3.

    Please refer to the response to Comment No. 3 above regarding growth planning estimates and buildout.
12. **View perspectives.** In Section 3.3, the Draft EIS provides both street-level and aerial perspectives.

    The four aerial perspectives are: (1) looking south from Roosevelt Way NE; (2) looking west from 17th Avenue NE along NE 45th Street (3) looking east from I-5 at NE 45th Street; and (4) looking northeast from

I-5 at the University Bridge. These are intended to provide a big picture sense of the different development patterns that could be expected from the different alternatives. In addition, the view from I-5 at the University Bridge represents the study area might appear to a northbound traveler on I-5 at this location.

Five street-level perspectives are provided. These include: (1) University Way NE, looking north from NE 41st Street; (2) University Way NE, looking south from NE 47th Street; (3) NE 45th Street, looking east from 7th Avenue NE; (4) NE 45th Street, looking west from 15th Avenue NE; and (5) Brooklyn Avenue NE, looking north from NE 40th Street. These perspectives were selected based on a review of preliminary model findings, which showed that views from these locations showed the greatest impact and difference between the alternatives.

Regarding an analysis of a full build-out scenario, please see the responses to Letter No. 6, Comments No. 6 and 9.

13. **Open space.** Please see the responses to Letter No. 1, Comment No. 3 and Letter No. 4, Comment No. 1 regarding parks and open space. As noted in the Draft EIS, population growth under any scenario, with or without rezoning, will exacerbate existing park deficiency. Also please refer to the response to Comment No. 6 above regarding the potential for displacement of existing land uses.

14. **University of Washington Master Plan.** As noted in the comment, the UW has not yet begun its planned update of the Campus Master Plan, so it is not possible to accurately identify the magnitude of cumulative impacts that may be associated with this separate proposal.

15. **Transportation and growth estimates.** The transportation analysis is based on the EIS alternatives, which plan for a twenty-year increment of housing and employment growth. The transportation analysis evaluates whether the different spatial pattern of development contemplated in each alternative would result in an impact to the transportation system. The theoretical gross development capacity in itself is not considered to be an environmental impact, nor is it a useful or accurate measure or predictor of future impacts. It cannot be predicted if, when or how buildout will occur, and any analysis of a buildout condition at some undeterminable future time would be speculative. The apparent assumption in the comment that excess development capacity in itself will automatically result in additional growth beyond the 20-year planning estimates is not supported by market information.

16. **Transit service.** The transit investments being made by Sound Transit have committed funding in place. It is true that the current funding picture

for King County Metro is in question and that there is the potential for near-term cuts in transit service. However, the Draft EIS is a forward-looking document, and assumes the regionally accepted levels of future transit as directed by the Seattle Department of Transportation and defined by the Puget Sound Regional Council. It should be noted what while transit funding fluctuates on the short-run, transit funding and service over the last 20 years has expanded substantially in the Puget Sound Region. There is no basis to assume that transit service to the U District would decline in the future.

The commenter requests analysis of traffic impacts due to vehicle lane reductions as a result of potential mitigation measures such as cycle tracks, streetcars or greenways. This programmatic document identified the potential for some secondary impacts, for instance if a parking lane was taken to serve transit (page 3.5-66). Based on SDOT's current plans, it is unlikely that travel lanes would be removed on major streets. Any specific SDOT project to modify the right-of-way would have a separate SEPA analysis to evaluate automobile-related impacts.

With regard to NE 50th Street, widened sidewalks could be accomplished through property setbacks as redevelopment occurs, rather than reducing vehicle lanes.

17. **Mitigation measures.** The comment is acknowledged. Please see the responses to Letter No. 1, Comments 3 and 38 regarding the specificity and timing of mitigation measures.
18. **High rise zoning.** The comment is acknowledged.

Letter No. 11 UNIVERSITY OF WASHINGTON

1. **Preference for options 1 or 2.** The comment is noted.

Citizen Comment Letters 12-20

Letter Number	Name (Last, First)	Agency/Organization
12	Acorn, Jeff	
13	Alden, N. Sue, FAIA	
14	Alexander, Tyson	
15	Anderson, Richard	
16	Babadjanov, Anton	
17	Bader, Jorgen	
18	Bajuk, Chris	
19	Barrere, Ian	
20	Bennett, John E., AIA	

Letter # 12

U DISTRICT URBAN DESIGN

Draft EIS Public Hearing May 20, 2014

City of Seattle
Department of Planning & Development

Draft EIS comments are due by June 9, 2014

Please let us know your comments about the Draft EIS:

1

Please consider making Roosevelt Way and 11th AVE into 2 way streets. This would slow traffic:

1) To increase safety
2) to help and support the businesses on Roosevelt
3) ~~to~~ reduce the number of cars that go downtown
4) increase ridership on the light Rail line.

Please fill in your contact information below.

☐ Please add me to project e-mail list.

Name Jeff Acorn

Phone 206-361-1027

E-mail

Address 5810 Cowen Pl. NE #101
Seattle, WA 98105

Alternate formats provided upon request: 206-684-4466, **TTY Relay: 711**

Letter # 13

Date: 6/20/14
To: Seattle Department of Planning and Development
Attn: Dave LaClergue, Urban Planner
700 Fifth Avenue, Suite 1900
P. O. Box 34019
Seattle, WA 98124-4019

From: N. Sue Alden, FAIA
4540 8th Ave. N.E. Unit 802
Seattle, WA 98105

Re: Response to Draft EIS on U District Urban Design Alternatives.

1 I am a retired architect and Fellow in the AIA for my 30+ years serving on State, County and Seattle Building Code and Fire Code advisory boards and committees, looking after our client/public and professional interests. I received my B. Arch. degree at the UW and have lived and worked for architectural firms in this area and now enjoy retirement in a unit at University Plaza Condominium, at the corner of 8th NE and NE 47th, so I may have all this area offers. Therefore, I must respond to this DEIS and related regulations.

University Plaza (UP) is a mix of original owners, of workers, students and a few families. It was built in 1974, one of the first, if not the first, condos in Seattle. It was built to maximize the number of units with the least impact on this neighborhood. The tower has a footprint on the property of less than 17% and a height of 198 feet, casting a very thin shadow on its neighbors. It has 136 units and a parking stall for each unit, plus secure bicycle racks. These spaces are not enough. There are posted notices to get another space, and the need seems to be increasing. The resident parking is two levels below grade, with 28 at grade stalls for guests, shielded from neighbors by landscaping.

2 This DEIS seems to concentrate on the exterior amenities to be provided as seen by those outside the buildings, pedestrians, traffic, transportation, street parking, shadows, etc. I am more concerned about the needs of those inside the buildings such as privacy (more than 20 feet across an alley), a sense of space, views, secure parking on site while at home.

3 The City has no requirement for on-site parking in this area, so the number of such stalls is decreasing with each new building and the number of on-street cars is increasing. (or they try parking in the UP lot). On-street parking is not secure. Vandalism and auto theft is high in this area, so overnight parking is a risk, keeping local police busy. If the use of our streets is for local, overnight parking, where do visitors and customers park?

We are not NYC or Chicago. This is the Northwest, Seattle, with hills, views, sense of space, surrounded by the Sound, lakes, mountains and forests, plus the deserts and canyon cliffs of Eastern Washington. We love to go out and enjoy them whenever possible, going to remote places not served by public transportation. We need our own cars to carry kayaks, skis, back packs and all the camping gear to do this. We are going to continue to do this with our own cars which should be stored in a secure place for a week or months to be ready when needed. Not in an on-street space. (This should eventually be a boon for parking garage developers.)

4 Because of the proliferation of new and proposed construction in this area, I wonder where any additional buildings will go. There are a few parking lots and a couple of abandoned houses to be replaced. Otherwise, there will have to be demolition of low rise commercial to be replaced by high rise buildings. None of the new construction seems to anticipate high rise zoning. One must wonder why this pair of Options is needed.

I am a proponant of high rise buildings, if they are as considerate of our neighborhood as UP has been, but I am most doubtful they will be, so support Option 3.

5 In the meantime, I hope the City will recognize the need for more on-site parking to be required before our streets become parking lots, too full to provide spaces for guests of residences, shops, offices, etc.

Thank you for the opportunity to comment.

N. Sue Alden

Letter # 14

From: Tyson Alexander <tyson@xanderholdingsllc.com>
Sent: Monday, June 9, 2014 4:33 PM
To: LaClergue, Dave
Subject: U-District rezoning

Hi Dave,

I've had a chance to look over the U-District draft EIS and am very encouraged by the direction the neighborhood will likely go, creating more density in our fast-growing city. Changes like this are essential to provide affordable housing and more jobs within Seattle's urban neighborhoods. Everyone is benefited if we can reduce commuting and encourage live-where-you-work opportunities. By making the zoning changes suggested in the draft EIS, people and their contributions will be kept in the city rather than outlying suburbs, all while utilizing the city's pre-established systems.

1 As the property owner of 5001 Brooklyn Ave NE, my preference for the rezoning of this area north of 50th would be NC3-65. The intersection is already very metropolitan and commercial. Rezoning in this fashion would allow a more natural transition from the commercially-zoned areas to the south and the residentially-zoned areas to the north while fitting in with the immediate surroundings.

Thank you for your time to consider my comments. I appreciate the work you've put into this and the receptiveness with which you've received my inquiries in the past. Please feel free to contact me if any further input is desired.

Best regards,
Tyson Alexander

Tyson Alexander, CFA | Principal | Xander Real Holdings LLC
Tel: (206) 650-4616 | tyson@xanderholdingsllc.com

Letter # 15

From: Richard Anderson <rjanderson@gmail.com>
Sent: Monday, June 23, 2014 10:19 PM
To: LaClergue, Dave
Cc: dianehoeft@gmail.com; jgwirth@clearwire.net; asletteb@u.washington.edu; kslett5308@comcast.net; oldhammerhand@hotmail.com; sharon.dunn@gmail.com; rowley_jane@yahoo.com; todd@13oclock.com; markgriffin_@hotmail.com; gsbullat@yahoo.com; mary_hausladen@yahoo.com; ehlarson@uw.edu; wirth.jd@gmail.com; rowley_matthew@hotmail.com; udistrictcouncil@hotmail.com; cjbanderson@gmail.com; Bagshaw, Sally; Burgess, Tim; Godden, Jean; Harrell, Bruce; Licata, Nick; O'Brien, Mike; Rasmussen, Tom; Sawant, Kshama; Clark, Sally; nancybocek@gmail.com; Richard Anderson; k_kurttila@yahoo.com
Subject: Comment for U District Urban Design draft DEIS
Attachments: LeClergueLetter_ UD DEIS_Park Library neighbors.pdf

City of Seattle Department of Planning and Development

Dave LaClergue

Dear Dave,

The neighbors living in the University Playground and the University Branch Library neighborhood submit to you the attached letter regarding the U D Urban Design DEIS and the proposed LR3 zone for our blocks.

1 Many of us have contributed to the Roosevelt Neighbors' Alliance comment. Our letter is in no way intended to contradict the RNA's. We have a unique perspective on living in this neighborhood to share with you. We care very much about what might occur under increased zoning as well as being very unhappy to see the old houses being torn down for LR structures on subdivided lots.

Thank you,

Richard Anderson

6/23/2014

To: Dave LeClergue
Project Manager
City of Seattle Department of Planning and Development
700 5th Ave., Suite 2000
Seattle, WA 98124-4019

Subject: Comments regarding the University Playground Park and University Branch Library neighborhood and the U District Urban Design Draft EIS

Dear Mr. LeClergue,

As neighbors of the University Playground Park and University Branch Library, we are writing regarding the U District Urban Design DEIS. We would like to share our unique perspective regarding zoning and other issues for our residential blocks. First, thank you for working with us through this Urban Design process; sharing with us the draft EIS options on the table for the U District Urban Design, meeting with a small group of neighbors to explain and update us on the EIS process and meeting with the Roosevelt Neighbors' Alliance membership. We also appreciate your work in recommending that the area between 47th and 53rd (discussed in detail below) be kept lowrise only.

We respectfully submit the following recommendations and comments in regard to the U District Urban Design DEIS:

Recommendations

2
- Retain LR1-2 zones as is on 9th Ave NE to 7th Ave NE, between NE 47th and Blessed Sacrament Church, to include the institution property on 8th Ave NE as **L1** at maximum zoning.
- Action Alternative #1 LR3 zoning is not acceptable zoning for the neighborhood north of NE 47th and west of Roosevelt NE.
- No up-zone changes in the EIS for the *residential* blocks around University Playground Park and University Branch Library, the 4700-5000 blocks.
- Resubmit U District Urban Design DEIS and open a second public comment period.

While we understand that down zoning was not studied in the Draft EIS, we would like to put in front of you some recommendations for down zones that would be congruent with goals identified in the Urban Design Framework (see comments below). These down zones are:

- Down zone of the 4700 and 4800 blocks on the east side of 9th Ave NE to *LR1*.
- Down zone the east and west sides of the 5000 block of 9th Ave NE to *Single Family*.
- Down zone the 4700 and 4800 blocks of the west side of 9th Ave NE to 7th Ave NE to *Single Family*.

Comments – Preservation and Affordability

3 In the Urban Design Framework document, (p. 38), it states this target: "Preservation. Retain existing housing where preservation is a priority, including single family homes in single family-zoned areas, and character-defining historic structures." In addition, Principle 5 (p. 5) encourages us to "Welcome a diversity of residents, [and]… provide [housing] choices for residents of all ages and income levels." We take this to mean that a diverse residential mix, with homes for families, professionals, non-professionals, students and retirees is valued under the Framework. We submit to you that we already have this kind of mix of ages, income levels and ownership types in our neighborhood. We value it and hope to retain it; retaining it depends crucially on maintaining most of the existing housing in our neighborhood.

There are quite a few of the houses around the park and library are shown as inventoried in 2002 University District Historic Survey project in DEIS figure 3.4-4. In actual fact, the *majority* of the working class single family houses around the park and the library were built between 1895 and 1914 (as were the park and the library), the rest were built between 1915 and 1929. (DEIS, Figure 3.4-2) These houses, the park and library are as integral to each other and define a unique, historic neighborhood. The DEIS says "groupings of intact single family residences should be evaluated for potential NRHP, WHR, or Seattle Landmark eligibility as a historic district. (See Figure 3.4–6, Property Analysis.)" Pg. 3.4-20. A large majority of the "park and library blocks" houses show on the Property Analysis map in the moderate to high range. A historic district would be a great opportunity to save these houses, better sooner than later. *At the minimum*, *the city needs to reduce the zoning for these blocks ASAP* in order to save the UCUC's few remaining historic working class single family structures from being demolished and this historic U District neighborhood is lost forever.

It has been our long time goal to preserve our neighborhood's historic character by preserving the old housing stock, which benefits our community in many ways. Existing housing is sought after for a life style preferred by many people, including families, drawn here by close proximity to work and school and have renovated their old homes; including many professional staff and faculty at the University of Washington. They have renovated their old homes and are an integral part of the community. Many old houses in our neighborhood are divided into duplexes or triplexes with rents that are considerably more affordable than smaller units of new construction. For example a newly constructed 450 sq ft studio on 4700 block of 11th was recently advertised for $1400 – the same rent as for a two bedroom apartment with living room and kitchen in an old house on the 5000 block of 9th Ave NE.

Urban Design Framework Principle 2 (p. 5) states that it is important to "Balance regional with local", and to respect the District's unique pattern and flavor. This is what we are seeking to preserve in the neighborhood around University Playground Park and the University Branch Library. There already are diverse housing choices in our neighborhood, choices that exist in harmony with the neighborhood's historic character. The proposed zoning under the DEIS Action Alternatives will decrease housing diversity, housing choices, affordability and have the effect of homogenizing a diverse, interesting place to live.

Comments – Evidence of Inadequacy of Current Zoning

4

L1 Development on 4700 block of 9th Ave NE, 3 units (one seen here) on each of three adjoining lots. House in the photo (north) is now demolished, as is the house to the north of it.

The neighborhood around University Playground Park and the University Branch Library is currently predominantly old single-family homes, some owner occupied, some rented. It is zoned primarily LR1 (LR2 the east side of 9th Ave NE). To date, we have accepted this zoning believing it would adequately protect our old homes. Recently however, three adjoining bungalow houses on 9th Ave NE between 47th and 48th were torn down and a substantial development of three dwelling units per each property are under construction. The long-term renter of one those bungalows made a significant offer to buy his home, but the landlord chose to sell the three properties to a developer instead. Neighbors (including signatories to this letter) receive regular offers from real estate agents (often working with developers) offering to buy our houses for cash, without inspection, with the clear intent of tearing down and building out to maximum lot coverage and units allowed. The diverse mix of rental and owner-occupied houses makes our neighborhood quite vulnerable to this kind of speculation, speculation that will destroy exactly the kind of neighborhood that the Urban Design Framework proclaims to value. This is already underway. Only down zones where possible, and rejection of the upzones proposed in Action Alternative #1, can stop it. Strong action from the City and those claiming to adhere to the principles of the Urban Design Framework is required to preserve this neighborhood.

Comments – Traffic & Parking

5

Collision locations NE 50th to Ravenna (1/1/09 - 1/13/14)

The Seattle Department of Transportation collision map and attached chart shown here shows a high incidence of accidents in the area north of the park. Our concern is that a higher density of residential units will create even more problems on our neighborhood streets. For example, the higher number of pedestrian/car collisions at Brooklyn and NE 50th (zone LR3/NC3-85) may well be indicative of what a higher density of population will bring to our neighborhood streets if zoning is raised to LR3.

The neighborhood streets are narrow and congested. The University Child Development School creates such a high traffic flow on the nearby streets that the School puts out signs to warn drivers not to turn south onto 9th Ave NE during certain hours. In addition, Blessed Sacrament Church is growing in

5 cont membership and has increased the number of weekly masses in addition to other services. The library is also a big draw for the community at large; the parking lot is often full and patrons park on the street. There are also several nearby movie theaters and restaurants, a popular Trader Joe's, the University Playground Park and local businesses that create traffic and parking congestion.

6 We are concerned about the possibility of parking "wars" between residents. A task called out in the report under Principal 5 brings this point forward, "Evaluate changes to parking zones to reduce conflicts between multifamily and single-family residential areas." We strongly urge the city to do this evaluation, and to not only consider conflicts between multifamily and single family residential, but also between midrise, Lowrise 3, Lowrise 2 and Lowrise 1, and include conflicts created by commercial zones on residential blocks.

Comments – Development around Blessed Sacrament Church

7 Neighbors met with BSP on April 30, 2014 to discuss the church's Master Plan and need for an upzone to LR1. BSP signed a letter of intent with the Roosevelt Neighbors' Alliance, representing the neighbors, to proceed through a contract rezone process and to involve the neighbors. As far as we know there was no request to upzone this neighborhood to LR3 as outlined in Action Alternative #1.

Blessed Sacrament made a request to be included in the LR1 zone so they could build a new priory and eventually a parking garage. However, Action Alternative #1 is the sole alternative that incorporates the church in the Lowrise zone, but also upzones the neighborhood to LR3. It includes their property on 8th Ave NE currently zoned Single Family, which is a significant change to that block. The LR3 zoning suggested in Alternative #1 around the church is not required to meet any goal and has the potential to create significant, and completely unnecessary, friction with the surrounding community.

UCUC boundary

8 It is important to have it noted in the FEIS, that a 2014 application is submitted for an amendment to Seattle's Comprehensive Plan to *exclude* the LR blocks around the park and library (east of Roosevelt, west of I-5, between NE 47th and NE 53rd) from the Urban Center boundaries. The neighbors, sponsored by Roosevelt Neighbors' Alliance, and Blessed Sacrament Parish jointly submitted the application. It also requested the *inclusion* of BSP inside the UCUC boundary in order to rezone the west half of their institution property to LR**1**. BSP and RNA signed a letter of intent stating BSP will rezone to LR1 through a contract rezone with neighborhood participation.

DEIS nonconforming to SEPA

10 We wish to underscore the concerns brought forward to you by the Roosevelt Neighbors' Alliance and NE District Council that the U District Urban Design DEIS does not comply SEPA requirements for a DEIS.

9 cont RNA letter, June 23, 2014: "Please also confirm that the FEIS will conform to the SEPA. We request that the issuance of the FEIS be delayed, if necessary, until all of these mitigations are addressed and incorporated into the DEIS."

NEDC letter, June 10, 2014:

10 "The Draft Environmental Impact Statement (DEIS) published by Department of Planning and Development (DPD) on April 24, 2014 provided no mitigation to any of these problems. This document reads as if it provides compliance with laws, regulations, permits and conditions. However it only complies with one of the two levels required for SEPA analysis. Impacts to the environment beyond this limited review need to be addressed."

"It is not enough to state that there are no significant impacts or that if problems arise in the future there 'may' be ways to deal with them. This document must state what mitigation will take place before these proposed massive zoning changes take place. As is, this document stands in error."

"NEDC respectfully requests that this document be resubmitted in a form that provides consideration and mitigation of the above-referenced adverse impacts identified by this neighborhood council and its respective councils. We also request that sufficient time again be allowed for public comment. Further, NEDC opposes any future re-zone until these environmental impacts are addressed by inclusion of specific mitigation measures."

The DEIS does not include sufficient and tangible mitigations for the adverse impacts of more, higher, bigger buildings, both infill and replacement structures, and the tripling or quadrupling of population density. It has few genuine mitigations for open space, police, fire and emergency services, public schools, traffic congestion and parking issues, and other infrastructure systems that are necessary to a successful urban community. This deficiency in the DEIS would have real and serious impacts for the U District community's well-being and quality of life. Therefore we ask that this DEIS is resubmitted followed by a second public comment period.

Conclusion

11 We, neighbors living on the UPG Park and University Branch Library blocks, hope that this letter helps illuminate the effects of some of the changes proposed in the Action Alternatives from the perspective of those who have lived here for many years. Please do not hesitate to contact us if we can clarify our comments in any way.

Sincerely,

(In alphabetical order, continues on following pages.)

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Jane Rowley
Resident 15 years
4711 8th Ave NE, Seattle, WA 98105

Matthew Rowley
Resident 15 years
4711 8th Ave NE, Seattle, WA 98105

Cc. Roosevelt Neighbors' Alliance, Mark Griffin

UDCC, Matt Fox

Seattle City Councilmembers

Letter # 16

From: Anton Babadjanov <antonba@antonba.com>
Sent: Monday, June 23, 2014 3:56 AM
To: LaClergue, Dave
Subject: U District Urban Design

Dear Dave LaClergue,

1 I would like to express my support for Alternative 2 of the Urban Design Alternatives for the U District. For a couple of reasons:

* Availability of housing close to campus for students and staff is key to improving their productivity and quality of life. Nothing can substitute that.

* When Cornish College of the Arts is building a 20-floor residence hall in the Denny Triangle (reference below), limiting the growth of the UW to an arbitrary measure like 16 floors (160 feet of Alt 1) seems extremely short-sighted. The UW is a much larger institution and will likely grow faster in absolute numbers of staffers and students.

* Light rail coming to the neighborhood will open the door for easier commuting to the U District, but at the same time put pressure on other neighborhoods. Absorbing more of this pressure within the U District is a win-win for all (after all, the best commuting is on foot).

I think it's key to ensure that the walkable and urban character of the neighborhood is preserved. The height of buildings is of no concern for me as long as it serves an important function like providing needed housing.

Thank you,
Anton Babadjanov

Reference for Cornish College of the Art residence hall:
http://www.cornish.edu/news/article/cornish_breaks_ground_on_new_residence_hall/

Letter # 17

Jorgen Bader
6536 – 29th Ave. N.E.
Seattle, WA 98115

June 14, 2014

Diane Sugimura
Director of Planning and Development
700 – 5th Avenue # 1900
P.O. Box 34019
Seattle, WA 98124-4019

Attn: Dave LeClergue
Urban Designer

RE: Draft Environmental Impact Statement
University District Urban Design Alternatives
Dated April 24, 2014

Dear Design LeClergue:

The draft environmental impact statement, entitled University District Urban Design Alternatives, dated April 24, 2014, (the "DEIS") needs fundamental revisions in order to comply with the State Environmental Policy Act and serve its purpose. This paragraph outlines several reasons; the rest of the letter explicates them:

1 (1) The proposed action should be the comprehensive program of projects and activities contained in the "University District Urban Design Framework," prepared by the City's Department of Planning and Development, published June 20, 2013. This action plan (called the "Framework Study" for short) was prepared by The City of Seattle (the "City"), the University of Washington, and the Urban Design Working Group in conjunction with the U District Livability Partnership Steering Committee over the course of several years with community input. Instead, the DEIS pulls out the up-zoning and submits that element of the comprehensive program as the sole proposed "action" (DEIS, p. 1-1)

(2) By ripping out just the massive up-zoning alternatives, the DEIS engages in a form of "piecemealing," a practice deplored by the courts. Under DPD's approach, the entire "package" will never be reviewed as a whole. The City will feel free to dismiss the other elements as outside the scope of the proposal in the DEIS or, if it chooses to undertake any particular element, to forego environmental analysis on the basis that it would not be "significant" in and of itself.

2 (3) The DEIS builds on false premises. It assumes the same total growth in employment and housing at the same rate for all three alternatives as if zoning

2 cont

is not a factor influencing economic conduct. It cites no authority for its fundamental assumption. The assumption is nonsense and its use contrary to law. If the assumption is acceptable, no environmental impact statement would ever be required for an up-zoning if the capacity of the existing zoning exceeded the structures currently on the ground.

3 (4) The DEIS, pages 2-18 and 2-20, proposes to up-zone the easterly blocks on the 'Ave from N.E. 55th St. to N.E. Ravenna Boulevard from NC 40' to NC '65. The Document gives no analysis how this benefits either the owners or the community. It does great harm to both and should be deleted entirely.

4 (5) The DEIS section on Open Space is inadequate. It needs to recommend construction of a centrally located park/square approximately one-half acre, in a high volume pedestrian area at the core of the U District by or over Sound Transits U District Square Station.

5 (6) The alternatives in the DEIS are too limited. There are three: No Action, Alternative 1 up-zoning the core area to 125-160', and Alternative 2, up-zoning the core area to taller towers 240-240'. There is no middle range nor modifications, such as setting the zoning with the expectation and intention of securing public amenities through incentive zoning.

6 (7) The DEIS touches on mitigation as a sort of checklist. The descriptions are essentially nominal and the City makes no commitment to any of them.

7 (8) The DEIS shows an indifference to the plight of the vulnerable groups within our society: the handicapped in the University District and scarcely considers the homeless and street youth. Social services ought to be a topic.

8 (9) The DEIS does not address economic impacts, such as consolidation of ownership, displacement of small business, sidewalk frontage available for start-ups, and the likely turnover resulting from the up-zoning.

9 (10) The Transportation discussion of the DEIS presents a conundrum with unsatisfactory guidance for resolving it.

This basic approach of the DEIS brings to mind these lyrics of a hit song of Bring Crosby of the 1940's: "You've got to accentuate the positive/ Eliminate the Negative/ Latch on to the affirmative/ Don't mess with Mister In-Between."

10 Most the DEIS as a whole describes the University District as it exists, its facilities and activities and the proposal. In contrast, WAC 197-11-420 (3) requires that "Most of the text of an environmental impact statement shall discuss and compare the environment impacts and their significance."

11 **(1) University District Urban Design Framework Study**

The Framework Study is the result of a multi-year process of City officials and departments, University of Washington staff and experts, businesses, and citizens meeting regularly, with periodic presentations to the public for comment, at cost into six digits. The Framework Study is available on the internet at www.seattle.gov/dpd/cs/groups/pan@pan/…dpd o22256pdf and at the Seattle Public

11 cont

Library, Central Library, under the call number SEADOC p68.9. The Framework Study comprehends all the elements for a sub-area Growth Management Plan and presents a comprehensive package: it covers up-zoning, and as integral elements, more parks and a public square --- a public square over the Sound Transit station is a pictured alternative); green streets; better METRO transit service; social services for the youth and homeless; affordable housing programs; effective policing to counter drug dealing, car prowling, and other crimes; housing code enforcement against the slum lords; consideration of the needs of and accommodation of special populations; an elementary school and pre-schools to attract families with children; infrastructure improvements; protecting the tree canopy from total lot development; creation of jobs and economic growth; and other elements to secure a high quality of life.

The Growth Management Act requires the City to adopt a comprehensive plan. RCW 36.70A.040. It specifies that the plan must include as elements land use, housing (including government assisted housing, housing for low income families, capital facilities, utilities, public services, transportation and economic development. RCW 36A.70.150 requires that the plan identify lands useful for public purposes, such as recreation, schools, and other public uses and RCW 36A.70.160 adds open space corridors. Zoning and zoning code amendments are to comply with the plan. The Framework Study addresses long range planning for the University District and lays the foundation for amendments to the City's Comprehensive Plan.

The Framework Study constitutes the "package" presented to the community and the proposed approved. The public presentations told the community that its approach is and would remain comprehensive and the actions would be implemented as a "package." The Framework Study describes all items as integral elements --- not just as possibilities that might be considered as mitigation in the by-and-by. The comprehensiveness and definite commitment to the "package" were --- and are --- essential to its public acceptance

12 The Framework Study should be the subject of a program statement. The Study Area and covers the core of the largest urban center in Seattle outside downtown and its immediate periphery of First Hill, Denny Regrade/Belltown, and the west slope of Capitol Hill. The population living in the Study Area of the University District, if tallied separately, would rank among the fifteen most populous cities in Washington.

13 The DEIS's "action" consists exclusively of the up-zoning, i.e. doubling or in some areas tripling height limits over half of the Study area; it sidelines all the other elements of the Framework Study to caption quality references or mitigation possibilities. The DEIS makes no commitment whatever to them. It never discusses the elements as a package and rarely uses the verb form, "should," in its mention of them. In and of itself, this selectivity is a distortion of the "whole package" that the planning process envisioned and sold to the community. Up-zoning without the conditions, mitigation and amenities would be a breach of the promises to the community and to those who funded and/or participated in the University District Urban Design Framework planning. This rip out

13 cont could be a preclude to municipal repudiation of the amenities, limitations, and social and public services that accompany the up-zoning in the Framework Planning proposal.

14 The City's record with neighborhood planning is dismal. In the late 1990's the City embarked on a neighborhood planning process for urban centers. The process called for residents to attend meetings, make proposals, adopt preliminary plans, submit them for City revision and correction, ratify them, and then have the City Council review and adopt them. The University District came first. The Citizen's Steering Committee presented a University Community Urban Center Plan; Mayor Paul Schell personally read it over and wrote in changes. The City condensed the plan to a matrix containing a variety of actions on an array of subjects and related all the maps, charts and exhibits, and text into the status of a preface or introductory commentary. In 1998, the City Council approved the Plan and adopted the matrix. The City promptly up-zoned the area around the planned Sound Transit Station and by I-5 as envisioned by the Plan. It completed two of the proposed improvements, which were already well underway, i.e. the 'Ave Plan for widening sidewalks on University Way and acquisition of University Height School as a center for the community and for a park. A year-and-a-half later, the City adopted design guidelines for new construction, which were prepared by its Department of Construction and Land Use and submitted to the community for review and comment. The City shelved the amenities promised and consigned the DPD design guidelines to the status of supplemental reading material.

While working on the Framework Study in 2012-2013, citizens cited the experience of the massive up-zoning and resultant mid-rise and high rise construction in the Denny Regrade/Belltown and of the Denny Triangle of Seattle; they sought to avoid its errors, particularly, its failure to accompany its explosion in population (prompted by its up-zoning) with more open space, social services and an elementary school, and satisfactory law enforcement to make the streets feel safe at night.

15 Environmental impact statements are to accompany proposals through the review process and decision-making process and used in making implementing plans and decisions. WAC 197-11-655 (1); WAC 197-11-400(4). An agency should "ensure that SEPA's policies are an integral part of the ongoing programs and actions of state and local government." WAC 197-11-400. It should provide an impartial discussion of significant environmental impacts so that agencies and interested citizens may understand, review, and comment on proposed actions, including governmental approval of private projects and their environmental effects and resolve potential concerns and problems. WAC 197-11-400. It should identify subsequent actions as a result of the nonproject proposal, such as transportation and utility systems, WAC 197-11-442 (3), and the range of implementation measures, WAC 197-11-442. WAC 197-11-060 (3)(a)(iii) states that "Agencies are encouraged to describe public or nonproject proposals in terms of objectives rather than preferred solutions." It gives as an example, describing an action as achieving flood control rather than a building dams. Here the Framework Study sets an objective of envisioning a future community and it goes beyond up-zoning. In order to comply with SEPA and the implementing regulations, the environmental impact statement must cover the proposal comprehensively and accurately. The DEIS

15 cont description of the "action" as only the up-zoning "proposal" is not comprehensive as the Framework Study was nor is it an accurate and fair condensation of the Framework Study.

Pulling out the up-zoning from the package program as the sole proposed "action" errs. Either it distorts the proposed action to just the up-zoning and thereby sets up a dishonest bait and switch, or, if the up-zoning be the only proposed action, it fails to do the comprehensive planning that the Growth Management Act requires for zoning proposals that provide for substantial economic development or growth in population.

(2) Piecemealing

16 WAC 197-11-060 (b) requires that proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental document. ... Proposals or parts of proposals are closely related, and they shall be discussed in the same environmental document, if they:

(i) Cannot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them;

(ii) Are interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation."

17 The Framework Study inter-connects at least two elements: increasing density and providing more public parks/square. Adding density without parks diminishes the sense of community and reduces the quality of life. Moreover, parks cost money to acquire and operate. Transfer of development rights offers a means for raising some of the cost; and the proposed business improvement area accompanying the density provides funding for activities and maintenance in the park/square. Up-zoning increases land values and the higher prices impede acquisition needed for a park in the core area. If the park/square is part of the proposal, City officials have guidance to set about acquiring the space, enacting the legislative tools to assist financing, and commencing the design; and the community may react accordingly.

18 "Piecemealing" with public works projects is the practice of conducting review only on current segments and postponing environmental review of later segments until construction begins. Concerned Taxpayers v. Department of Transportation, 90 Wn. App. 225, 231 (1998). The term applies to dividing a proposal into multiple smaller elements, each without or with lesser significance in themselves, in order to (or with the effect) of avoiding the preparation of an environmental impact statement on the whole. Alpine Lakes Protection Society v. Schlapfer, 838 F. Supp. 478 (W.D. WA. 9993) affirmed 518 F.2d 1089 (9th Cir. 1975). Cady v. Morton, 527 F.2d 786, 795 (9th Cir. 1975) applied the concept to preparing an environmental review on a single lease for mining coal on an Indian reservation without first preparing one for the entire program, which involved multiple leases and an expanded area. The same concept applies to preparing an environmental review or impact statement on one element of a program in isolation from the whole and thereby reducing the environmental analysis or allowing later elements to reduce environmental review entirely.

19 WAC 197-11-060 (5) permits phased review when a nonproject document is at an early stage and a narrower document is contemplated when detailed information becomes available, e.g. a nonproject document may address the need and site selection, and a later one take on sensitive design issues. The Framework Study made a definite commitment to more park/open space and to other amenities, e.g.

> The Study Page 34 names "new public and private open space" as a top priority.
>
> The Study at Page 51 states: "Find new locations to provide open space to serve the growing neighborhood, especially at the core." And "Evaluate the site of the light rail station as a location for a public square or arcade, activated through transit ridership, retail or other activities."

The DEIS does not make any commitment to more open space or even state that the DEIS document itself is be part of a phased environmental review process. WAC 197-11-060 (5) (e) requires such a statement for phased review.

20 Moreover, governments engaging in piecemealing have a tendency to implement just the prime action --- here the up-zoning --- and to postpone indefinitely the accompanying elements; and when called to account, their officials claim that their proposed "action" consisted solely of those measures, which the environmental impact statement focused on. It leads to a loss of public confidence in their government and its officialdom.

The preceding section describes how the DEIS pulls out the up-zoning from the "package program" of the Framework Study, and limits mention of the other elements to identification in sentence or phrase as possible mitigation. Those other elements are mentioned in passing, but not discussed although singly or cumulative their impact may be significant. The DEIS thereby engages in piecemealing contrary to the spirit and policy of the United States National Environmental Policy Act and the Washington State Environmental Policy Act, RCW 43.21C.

(3) False Premises

21 Premises ---

The DEIS uses the same population and growth estimates for all three proposed alternatives, e.g.

> Page 1-10 states: "Population and household growth estimates are consistent across the alternatives.
>
> Page 1-10 states: "Employment growth estimates are consistent across the alternatives..."

The graphics and text on p. 1-3 opine that the Study Area will add 3,900 Housing Units and 4,800 jobs[1] whatever the alternative. Accord: DEIS p. 2-4. The same number of

[1] The Framework Study, p. 1, estimated growth in households as 3,500+ and of jobs as 4,100+ . The two numbers are consistent, but may reflect different zoning alternatives.

21 cont people will live and work irrespective of the zoning, building designs, amenities, or mitigation, DPD planners said at a community meeting, because market forces determine construction ('supply") and jobs (think UW and its spin-off enterprises) determine demand. The existing zoning of the University District has a capacity beyond the current housing and office/retail space. The DEIS thereby concludes that the up-zoning has no significant impact.

22 The DEIS also assumes not only that in the end the growth will be the same, but also that the progression of development will be similar. A single tall tower can add as many dwelling spaces and/or office space as a block full of one or two story structures. Common sense and observations suggests that many, smaller improvements by a different interests and owners are more likely to be made in increments spread more evenly over time than tall towers. Timing may be important information for municipal decision-makers, who plan capital budgets. Social services agencies can also more readily accommodate gradual growth in their clientele than spurts that deluge their facilities and staff. Assuming *arguendo* that the gross demographics and timing are equal, the up-zoning may change the demographic characteristics of the population (e.g. families v. singles) and/or the location of the density; and these factors, among others, could have differing impacts.

23 In sub-section (b) immediately preceding the requirement for environmental impact statements, RCW 43.21C.030 requires governmental agencies to "... insure that presently unquantified environmental amenities and values will be given appropriate consideration in decision making along with economic and technical considerations." Sociologists have long observed that people shape their buildings and then the built environment shapes their lives. It makes a difference in the way people behave whether they live close together (such as in tall multi-family structures or in squat ones); whether children have a place to play sports outdoors or do their recreation in alleys; whether "outdoors" is a canyon in shadows or a plaza bathed in sunlight; etc. Individual behavior in aggregate sets communal behavior; and communal behavior patterns in turn both impact individual behavior and control the urban setting and the quality of life. The DEIS quantifies the gross numbers; it needs to consider the differences that the three alternatives may have on "environmental amenities and values" and the quality of living and behavior pattern in the University District.

Errors in Assumptions ---

24 The DEIS cites no authority (treatises, articles, or demographers) to substantiate its twin propositions that the forecast population and employment would come about at the same rate with or without the major up-zoning proposed. The next three paragraphs question its validity.

Over the years, developers have constantly advocated up-zoning in Seattle's Land Use Codes to stimulate growth. During the University Community Urban Center planning fifteen years ago, developers argued for the 65' and 85' up-zones along I-5 and N.E. 45th St. They told the community and City officials that people would like

24 cont

to live and work in the University District --- in their jargon, there is a "latent demand." It was limited by the supply of housing and office space. Developers would create more supply by new construction only if projects would both "pencil out" and development now would be more profitable than waiting for a better opportunity. Up-zoning would supply that incentive. Larger buildings bring efficiencies of scale, and, the more units, the greater the spread of sunk/fixed costs, such as the cost of the land, installing underground utilities, permits and processing, etc. Up-zone and developers will build and the population will come, they said. They decried the current zoning as limiting new construction although the gross zoning capacity then far exceeded buildings in place. With the up-zone, the waiting would be over; the time for building would arrive; and speculators/investors would put their properties on the market. The up-zones would increase property values; the higher assessed values would increase taxes; and the opportunity cost of owning under-developed properties, such as parking lots and single family dwellings would rise. Compare the re-zoned areas now with the structures when the University Community Urban Center plan was adopted fifteen years ago. The developers' forecasts proved true.

We made the decision to build a one story studio at 5512 University Way N.E. based on the down-zone of the site to NC 40'. We financed the construction on our own. Our architect told us that banks would require a proforma revenue flow to make a loan; that only a taller building, with upper story residential would pencil out; and, under the 40' zone, the building would fall short.

A higher height limit increases the range of development possible on a given piece of ground. Developers evaluate a location in comparison to other sites available. The more a developer *can* do with a piece, the more the developer *will* build. Height limits and development constraints affect the market of buyer/seller or lessor/lessee. That in turn influences the amount and timing of construction and the supply of building sites on the ground. As landlords and tenants can attest, the market in a growing area like Seattle is changeable and volatile. The 'latent demand" becomes actual when buyers or renters enter the market. People make their choice on where they want to live or work on a whole gamut of factors, including the quality of life, the available accommodations, closeness to work, etc. The DEIS acknowledges that the series of towers in Alternatives 1 and 2 will offer more capacity than the current zoning. Insofar as zoning capacity influences construction, the mid-rise and high rise alternatives will provide a greater supply. If the area has the amenities envisioned in the Urban Framework Study, more people will come to live and work here; if the City fails, fewer people will be attracted due to the reduced quality of life. The Sound Transit station offers convenient commuting. The planners should try to quantify projections for the immediate and long term future rather than assume that in gross the impacts are identical. The Document's assumption of identical results regardless of the build-out of the University District belies common sense and economic doctrines.

25

Impact of assumption ---

Applying the same growth estimates across the board invalidates the analysis wherever it is applied. Unfortunately it permeates most of the DEIS. Take four

25 cont

examples: parks and open space, schools, police and sewer and water utilities administered by Seattle Public Utilities:

Parks and open space: The DEIS at p. 3.7-7 acknowledges that University District will fall further behind the City's recommended ratio parks to people. The deficit in parks and open space will grow from about 3 acres now to 5 acres. It goes on to say: "because the growing deficiencies in supply and type of open space are the same with or without zoning changes these deficiencies are not considered impacts for purposes of this EIS." The parks/square section of this letter criticizes this omission.

Schools: The DEIS at p. 3.8-13 states that "Because all of the alternatives … assume a consistent amount of growth, the alternatives are unlikely to have an impact on the potential for locating a new school in the Study area … " It prefaces its conclusion at page 3.8-12 that ".. it is not possible to quantitatively estimate the U District study area growth on future school capacity" and at page 3.8-13 "significant impacts associated with the proposal are not anticipated." Urban planner, real estate professionals, and the community would take issue with this analysis; their experience shows that schools, housing, and zoning interact in setting the demographics of a community. There is sometimes a spiraling effect. Schools attract and retain families with school aged children. Long term residents note that young couple, who intend to send their children to public grade schools, move away when their eldest child is about ready for kindergarten; those, whose children attend Blessed Sacrament, stay. Where there's a market for family housing or local zoning so requires, developers build some units in the mix; where are no nearby schools, families with young children settle elsewhere and the developers build smaller units. Rural communities tend to atrophy when their grade school closes and children are bussed away to school in another town. Real estate brokers testify that young couples with children in looking for a home ask whether there are other children in the neighborhood; a Yes is positive; a No, is a definite negative to them. Communities without elementary schools lack the richness and diversity that young parents and their children provide.

Police: The DEIS, p. 3.8-7 and 8 and 3.11-12, identifies no new police facilities or added personnel for the increased population. Pages 3.8-12 anticipates that "the police would have sufficient staffing and facilities" although Page 3.8-8 cautions that "long range plans for police facilities may change." However, sociologists find that higher density brings more crowding, and new construction commonly involves displacement of the less fortunate. If social services are not expanded in a commensurate manner, the combination of crowding, displacement, and commonly loss of recreational space, among other factors, brings on greater tension and young men, unable to cope, often turn to gangs or crime. It's a concern that ought to be discussed. Such information may help the decision-makers to be pro-active rather than reactive too late.

Sewer and water: The DEIS at p.3.9-8 states that water and sanitary sewer use is "equally likely" under all alternatives. Experience in Broadview, Ballard, and other neighborhoods suggest that when taller building replace a street of single story dwellings, new mains are needed. The sewer lines built before World War II planned for homes, duplexes, small business, and an occasional apartment house. When three and four story structures sprout along the length of a street, the usage soars reflecting the increased population. Unless the lines are replaced with larger ones, the side sewers of the homes at the lower elevations can no longer drain efficiently. In time, new larger mains are

25 cont built. Seattle Public Utilities has made extensive infrastructure improvements to keep up with the redevelopment of South Lake Union by Vulcan Enterprises. Likely, the taller towers encouraged by the up-zoning will have such an impact. The DEIS should acknowledge the likely expenditures.

(4) The Up-zone of the 'Ave north of N.E. 55th St.

26 The DEIS, at pages 2-18 and 2-20 and map p. 1-4 and 1-5, proposes to up-zone the easterly blocks on the 'Ave from N.E. 55th St. to N.E. Ravenna Blvd from 40' to 65'. It gives no reasoning for the change nor any analysis of the impacts. It just plops the up-zoning there; when community input was sought during the framework, I spoke against it and those in attendance voted to remove it from the rezoning map. It was not requested by any of the owners in the 5500 block of the north 'Ave.

The University District Community Council opposes the up-zone of the block. There is no precedent for putting a 65' zone directly across from single family zoning as the proposal would do. See map p. 1-4 and 1-5. Elsewhere the DEIS has NC '40 or R-1 across from single family zoning. Ibid. In Alternative 2, the NC 65' would jut out like a spear between the SF 5000 on the west and the LR 3 on the east. The current NC 40' corresponds with the zoning on a similar stretch of Roosevelt Way N.E. left untouched by the proposal. The up-zone belies the DEIS' claim at page 1-7 of compatibility for the up-zoning as a whole; it there states that "abrupt transitions in building height, density and intensity" " would likely be limited in magnitude and duration as the area redevelops." Rather, the block up-zone would make these up-zoned areas of the north 'Ave stand out like a rooster's comb.

27 The half mile walkshed surrounding the transit station stops just north of N.E. 52nd Street on the 'Ave. Framework Study, p. 12. The 5500 Block is north of the boundary.

28 In my 5500 block, there are five ownerships. Four of the five took action based on the downzone to NC 40' from NC 65 in the 1998 University Community Urban Center Plan:

1) The south corner is an apartment house built in the 1920's with an adjacent lot used for tenant parking. It is the sole property that is unchanged.

2) After the downzone, Mr. Denault sold the Historic University Theater at 5508 University Way N.E. The new owners remodeled the premises with historic preservation moneys from government grants and arts funding. It is not a City Landmark, but could be. It should be listed alongside the other properties eligible for historic designation in the Historic Properties Section, Table 3.4-1.

3) Our Vagrant Records Studio at 5512 produces sound recordings for local musicians. The studio was built about a dozen years ago using designs by famed acoustician Richard White. The down-zoning made building higher impractical. It also reduced the assessed value of the land and our property taxes by 15-20%.

28 cont

4) To our north is the Andy Shiga Garden, a P-Patch on a double lot, leased by the City until 2018. The owners in Taiwan had applied for a building permit for a larger apartment house covering both lots. After the downzone they allowed their application to lapse.

5) The north corner is a story wooden apartment house built in the 1920's. Several years ago, a fire from one of the units burned a major section of the structure. The owner had insurance and chose to repair the damage rather than build anew. He reasoned that under the zoning this was the highest and best use of the premises.

Changing the zoning now bushwacks the owners, who acceded to the City University Community Urban Center plan and is very unfair to them.

29

It is also a very bad idea for the public: It will increase property taxes --- our land values went down 15-20% on the downzone fifteen years ago. That puts pressure on the owners to sell.

- The City loses if the Shiga Garden is forced out. The Shiga Garden is part of the City's P-Patch program; it maintains a table and benches for residents to relax under the shade of a madrona tree. The Document does not even acknowledge that the up-zoning will impact the Shiga Garden or **identify any alternate location for it. It needs to do so.**

- It adds tax expense and thereby decreases the life of the Historic University Theater. City policy is to preserve historic buildings. Unfortunately, the DEIS ignored its historicity although front proclaims it.

- The up-zone jeopardizes our studio and the services it provides.

These tax increases are on top of a proposed assessment by a proposed business improvement area that adds expenses to the owners without corresponding benefit.

The University District needs some low-rise structures, like our block, to break the canyon effect of the proposed mid- and high rise buildings and serve as a reminder of what the 'Ave was like and a transition to the residential district further north. Retaining the existing zoning focuses growth around the Sound Transit station, one of the objectives of the Framework Study, and it avoids leap-frogging of spot up-zoning in the peripheral areas north of N.E. 55th St. outside the urban center.

The DEIS needs to drop the up-zoning for the north 'Ave. inasmuch the DEIS sets out no benefits from that particular up-zone. It is far better to avoid doing injury than to try to mitigate the damaging impact afterward.

(5) Parks/University Square

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Interdependence ---

The DEIS makes a massive up-zoning as is sole focus with parks and open space relegated to an ancillary matter discussed because RCW 43.21C.110 (1)(f) and WAC 197-11-444 specifically require the impact to be considered. In contrast, the Framework

30 cont Study made acquisition of parks/square an integral element of the up-zoning. The two go together for the reasons in the following paragraphs, among others:

31 The City began this process asking the community to develop a vision for the University District, and then to work upon the elements of a comprehensive plan to work toward accomplishing that vision. Zoning revision was one of many tools; and changes in land use are to be made to the extent that they further that vision. All the elements are to be worked together as part of an interdependent whole. The Washington Growth Management Act requires municipalities to take such a "wholistic" approach to urban planning. The goals and objectives of the Framework Study and of a broadly stated objective can not be achieved by the up-zoning alone; expanding open space is essential.

Density brings about an urban life style. Vancouver, B.C. and San Francisco are examples; Manhatten in New York is another. Open Space/Squares have been central to building a sense of community --- this was true in classical Rome and Greece, in the Renaisance cities of Italy and Spain, in cities laid out in 19th Century Latin American and in the Eastern United States. Mankind is a social animal; and most people want the festivals and activities that allow them to interact with others. Open space/squares allow people to assemble and express their grievances or support; rallys and the like allow people en mass to learn about important events; watching an event with others often adds enjoyment to a spectator. Open space/squares adds to the quality of life, and some experts say, to assure healthful, productive and esthetically and culturally pleasing surroundings. RCW 43.21C.010(2)(b).

Urban planning needs to provide for the open space/squares at the beginning, before extensive construction. Construction of major buildings takes that parcel out of consideration for open space; and construction of many buildings precludes assembling a substantial piece of property for a park/square. Up-zoning without providing for the square effectively negates creating such a park. Changing the highest and best use to bigger building will increase land values; actual or prospective development increases the contribution value of the improvements; and acquisition costs skyrocket. The surface of the Sound Transit station provides a ready made site. It's now or never for such a park/square in the University District. Unfortunately, the DEIS ignores this reality.

32 Incentive zoning, impact, transfer of development rights and other land use tools provide the financing for the park (cf. DEIS p 1-30 and 3.7-11) and those need to be in place before the mega-development commences. In addition, two of the mitigation measures listed in the DEIS, p. 1-30 and 3.7-11 depend for their implementation on the rezoning ordinance (publicly accessible open space as part of private development on site).

The park/public square influences the design of the nearby buildings. New structures near the park/square may design entrances, loading zones, views, placement on site, gallerias, the amount of open space buildings with reference to the park, ground floor space for businesses catering to park users etc. The proximity to the park/public

32 cont square may affect the amount of open space that the Land Use Code requires individual buildings to supply on site.

An urban park impacts traffic flow. Pine Street by Westlake Park in downtown Seattle has ornamental paving to give an appearance of greater openness to the park. The paving tends to slow traffic and favor pedestrian closing. Sometimes park activities sprawl into Pine St. Avenue A public square in the University District would similarly impact traffic on an abutting street or alley.

33 The DEIS treatment ---

The DEIS in Tables 1-3 (p. 1-31) and 3.7-1 (p.3.7-8), --- each entitled "Comprehensive Open Space and Recreation Facility Goals for U District" --- inventories the existing parks and open space and notes the shortage. Pages 1-30 and 3.7-11 lists the same eight measures taken from earlier City documents as "actions [that] *could* help provide more open spaces and recreational opportunities." "Could" (italicized) becomes "would" in the next section: Pages 1-31 and 3.7-11 state: "The proposed mitigation *packages would* reduce the magnitude of all identified impacts of the rezone alternatives to a less than significant level." The plural "packages" seems to imply that each of the eight measures area aggregates of actions although several are at a single site. Page 3-7.9 notes that differences in the distribution of development would affect "ease of access for future residents to get to open space."

34 The DEIS does not the plaza proposal its due. Its key paragraph appears on page 3.7-6:

> "The U District Design Framework … re-affirmed community support for a centrally located open space on or near the Sound Transit light rail station planned at N.E. 43rd St. and Brooklyn Avenue N.E. However, this process also highlighted concerns from business owners and some residents about safety and behavior problems in the U District's existing open spaces. While many participants in the planning process support a new central open space, others have concerns about how that space would be maintained and managed to avoid creating problems"

The over whelming majority at the public meetings favored a public square in the University District. University District planning in the 1970's recommended a public square south of N.E. 45th St. between Brooklyn Ave. N.E. and the alley through the block between the 'Ave and Brooklyn Ave. N.E. It was then a parking lot. A 2005 plan noted in the DEIS made it the highest priority, and the Framework Study recommended very favorable. The quoted paragraph ought to note that the fourth element in the "mitigation packages" listed on pages 1-31 and 3.7-11 is "Public/private partnerships to develop, manage, and program public open spaces."[2] That would address the aforesaid "concerns from business owners and some residents."

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[2] The partnership is proposed solely for the public square. It is not suggested for any other park or for privately owned, publicly accessible open space.

35 The DEIS justifies its superficial analysis by declaring that the deficiency will be the same "with or without zoning changes." Assuming for the sake of analysis that the deficiency may be the same, nonetheless the up-zoning proposals impact the City's ability to remedy the situation.

36 Impact of up-zoning on park/plaza plan ---

The construction of the Sound Transit station on the eastside of the block between N.E. 43rd St. and N.E. 45th St. and has opened a short window of opportunity to build a public square. The station demolished the structures that were in place: a bank at the corner and is parking garage. The light rail station will bring an estimated 24,000 people to the site every day. Except for modest sized portal buildings, the surface is bare. It is in the very heart of the University District. The tract is the largest assemblage of unimproved properties in a single ownership in the Study area. No other equivalent site has been proposed or exists. The Sound Transit site is ideal for a public square and has captured the imagination of the public.

An up-zoning that fails to provide for such open space will effectively end the possibility of developing that site. The University of Washington acquired the site from Sound Transit for the purpose of building a structure within the existing 85' zoning in a few year; it has made no commitment yet and is keeping its options open. It is willing to entertain a proposal by the City to acquire the site for a public square if the City will pay for the site. To raise the needed the moneys, the City needs to rely on its zoning tools identified in the fifth paragraph of the next section on page 15 of this letter. The up-zoning also will raise property values and increase costs. The higher values will put properties off limits.

The impacts of an up-zoning on the Sound Transit station site apply more fully to developing a substantial park elsewhere in the University District.

The DEIS needs to explain this unique window of opportunity and how the up-zoning impairs it.

(6) Alternatives too limited

37 RCW 43.21C.030(c)(3) requires that an environmental impact statement present "alternatives to the proposed action. " WAC 197-11-442 (2) fleshes it out for nonproject proposals, in part, as follows:

> "(2) The lead agency shall discuss impacts and alternatives in the level of detail appropriate to the scope of the non-project proposal and to the level of planning for the proposal. Alternatives should be emphasized. In particular, agencies are encouraged to describe he proposal in terms of alternative means of accomplishing a stated objective (see WAC 197-11-060(3)). Alternatives including the proposed action should be analyzed at a roughly comparable level. "

37 cont WAC 197-11-655 (3)(a) states that (a) "The alternatives in the relevant environmental documents shall be considered." The "range of alternatives" in the Final Environmental Impact Statement confines the course of implementing action by the decision makers. WAC 197-11-655 (3)(b).

The DEIS, p. 1-3 through 1-5, sets out three stark choices: (1) Alternative 1 with height limits in the core area of 125-160' (sometimes called "medium towers"); (2) Alternative 2 with height limits of 240-340' (called sometimes euphemistically, "taller towers."); and (3) The "no action" alternative required by statute. The current height limits of 65' to 85' in the core area. "Medium towers" would likely be thirteen to sixteen stories; and "taller towers" would be twenty-four to thirty four stories. The City's Land Use Code offers a variety of bonuses and lets developers add roof top equipment and antennae by excluding them from the maximum height limits..

38 The DEIS p. 3.3-16 through 3.21 gives a computer generated perspective as a migrating bird might see the Study Area in thirty years. Alternative 1 shows about 25 building at 2/3rd the height of the University of Washington Tower scattered about; Alternative 2 shows 3 new building with the size and bulk of the University of Washington Tower and almost a score of the mid-rise buildings. The scattering seems random in the Study Area. [Note: tThe DEIS ought perhaps to explain this distribution; taller buildings historically tend to cluster in urban centers.]

The alternatives leave no middle ground --- no "Goldilocks alternative" (not too hot, not too cold, and just right). There are a whole array of heights in the range below 125' that should be set out and considered.

39 State law empowers cities with various discretionary tools to achieve land use goals and/or ameliorate the impact of structures, e.g.

Transfer of development rights;
Contract zoning;
Height and bulk bonuses for features in the public interest;
Variances and conditional uses;
Overlays such as for pedestrian oriented streets;
Fee waivers or exemptions; and
Expedited permitting.[3]

The DEIS at p. 1-3 also states that a "…incentive zoning provisions may be incorporated in future decision-making" but further data is needed. It should say what kind of data is lacking, WAC 197-11-080(1), but it does not do so. The Land Use Code could, but fails to, provide other tools, such as development or environmental impact fees, inclusive zoning, and rates for municipal services. It ought also to explain lower height limits and smaller bulk limits increase the effectiveness of these tools and it should evaluate the several remedies under the several alternatives.

[3] See RCW 36.70A.540

40 At an evening public meeting on the Framework Study at the Deca Hotel, an experienced architect spoke of up-zoning for tall buildings and good design standards as going together for a quality neighborhood much like bricks and mortar for a building. Vancouver, British Columbia, shows how important good building design is in creating livability in dense urban areas. Good design can ameliorate the effect of height. He compared the impact of (a) a tall building with a pleasing appearance, parking, large set backs, landscaping and trees in the parking strip and other features helping it fit within its setting with (b) structures that look like bulky up-ended rectangular boxes, (whose designs seem inspired by a waxy milk carton), skirted by paving to the property line and no landscaping worth mentioning. The latter are mainly a place where people bunk and leave for most of their leisure. They're products of a developer out for the quick buck, satisfactory for housing for people, who'll live there only for a short interval of their lives. Good design is hard to legislate, but it can be done through a meaningful dialogue between developers, design professionals, public officials, and the community. The dialogue must occur now before the up-zoning. If up-zoning occurs first, development rights vest and the development community will resist any limits on their discretion in design. Seattle's design guidelines must be strengthened and the design review process changed. Design standards in Vancouver, B.C. cover bulk, size, placement on the property, parking, etc. The DEIS needs to take up his recommendation as an amelioration and as mitigation. The Framework Study at page 49 of its matrix under the caption "Planning next steps" states " Update zoning and design guidelines to shape development and address constituent's priority. 2013-2015." As explained in Section 8 below, the City also needs the power to compel inclusive features for the handicapped and other special populations.

WAC 197-11-441(6)(e) states that the discussion of significant impacts shall include "the cost of and effects on public services, such as utilities, roads, fire; and police protection, that may result from a proposal." The DEIS barely touches the surface.

41 With fire protection, the DEIS at p. 3.8-1 through 3.8-5 and 3.8-10 and 3.8-11, cites the Comprehensive Plan Appendix (2005) that more facilities are needed in South Lake Union and Northgate, but makes no forecast for the University District. Fire engines are now much larger with longer ladders than a decade ago; the newer, bigger equipment is needed to reach the floors of mid-rise buildings. Some back east fire departments have invested in large inflatable pads as a last resort escape for people beyond the reach of ladders. Some major cities reportedly have explored roof top evacuation by helicopters and made retainer contracts with aviation companies for standby emergency service. Does the up-zoning made such added investments neeed here?

42 The DEIS anticipates an increase in demand for electrical energy. But, it opines at Pages 3.3-16 and 3.3-17 that "The existing substation and transmission infrastructure may be adequate to meet future needs. Further studies are required to determine whether major upgrades to the substation infra structure will be required." In short, the DEIS says "Maybe No, Maybe Yes, We don't know." That is not very useful.

43 Where substantial uncertainty exists about information relevant to adverse impacts and may affect a reasoned choice among alternatives, but is unknown, WAC 197-11-070 requires agencies to obtain the information if the costs of obtaining it are

43 cont reasonable. If the agency proceeds in the face of uncertainty, the DEIS should generally indicate … its worst case analysis and the likelihood of its occurance.

44 The City has a major concern about affordable housing. What are the likely rents for units in the new construction under the various alternatives. How do they compare with the prevailing payments? What about the quality of the housing? Are the new units likely to be compact cubicles in apodments? Will the population mix change? The DEIS soars over these concerns. The variant alternatives may produce different answers. The public and decision makers ought to know.

(7) Mitigation

45 RCW 43.21C.060 empowers a municipality to condition or deny an action based on policies identified in codes or regulations designated by the agency and to mitigate "specific adverse environmental impacts which are identified in the environmental documents." WAC 197-11-441(6)(c)(iii) and (iv) require the environmental impact statement to:

> (iii) Clearly indicate those mitigation measures…, if any that could be implemented or might be required, as well as those, if any, that agencies or applicants are committed to implement.
>
> (iv) indicate what the intended environmental benefits of mitigation measures are for significant impacts…

WAC 197-11-660 states:

> "(1)(b) Mitigation measures shall be related to specific adverse environmental impacts clearly identified in an environmental document on the proposal and shall be stated in writing by the decision maker. ….
>
> (1) (d) Responsibility for implementing mitigation measures may be imposed upon an applicant only to the extent attributable to the identified adverse impacts of is proposal. …
>
> (2) … EIS's should briefly indicate the intended environmental benefits of mitigation measures for significant impacts (WAC 197-11-440(6))…"

Area-wide measures need to be considered and discussed at this program stage rather than in the environmental review of a particular application for a permit. This applies to the factors in WAC 197-11-440(6) ("costs and effect on public services, such as utilities, roads, fire and police protection"…. "housing, physical blight and environmental resources"); meeting public open space requirements to accommodate the projected population; and the implementing tools recommended in Part 6, Alternatives, among other concerns in this letter.

Just naming a subject in checklist fashion as a possibility does not "clearly indicate those measures", describe the reason they are needed to offset specific adverse impacts, or explain their benefits as required by the foregoing statute and regulations. A full description commits the City to taking the measures called out for its own action and enables the City to require action by developers. It lets the City adopt its analysis in later environmental project reviews. Mitigation invariably costs money and takes extra effort. The law and the courts therefore rightly require a written explanation that makes the

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expenditures reasonable, related, and capable of being accomplished. The DEIS's brief mention fails to inform the public and the decision-makers; it makes no commitment --- the verbs are all "could", "might", and "may" --- ; and is too cryptic weak a thread to carry the weight of implementing any of the named possible measures.

(8) Indifference to Disadvantaged People

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WAC 197-11-148 states that the EIS process contemplates that the "general welfare, social, economic and other requirements and essential consideration of state policy will be taken into account. Socio-economic impacts need not be considered as a separate topic, but are relevant within the scope of the mandatory subjects. RCW 43.21C.020(3) declares that "... each person has a fundamental and inalienable right to a healthful environment."

The up-zoning will greatly expand the population in the University District, adding new units for those, who can afford them; however, as proposed, it will harm three discrete sets of people: (a) the handicapped, who need cars to get around; (b) youth who rely on social services furnished through churches and charities; and (c) the homeless. The DEIS needs to address all three. Otherwise, it will fail its objective of providing "for a more diverse neighborhood character by providing a mix of housing types" (DEIS p. 1-2 and 2-3) and "supporting equitable communities" (DEIS p. 1-2 and 2-3).

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The up-zone will displace the existing older buildings in the blocks being up-zoned for greater density. Almost all offer much lower rents than the new dwellings will do. Many of them have parking. Most rent to youth; and in many of them, the tenants allow youth to stay over night, sleep on the porch, or in their cars parked on the premises. Almost every early morning, youth sleep in bedrolls or sleeping bags under the marques or in doorways, especially of the churches. By comparison, the new construction will raise rents beyond the means of most of these people and electronic security of the new structures will fence the setbacks and entranceways and lock out the folks, who sleep in bedrolls or sleeping bags on covered payment.

The DEIS, p. 1-10, anticipates that Alternative 1 will demolish 40 units of housing and Alternative 2 will demolish 60. That figure needs further study. If the up-zone resulted in demolishing just two buildings, which are three stories or more, the numbers displaced would equal or exceed the estimate. Make a quick survey of the entries in a Polk Address Directory at the Seattle Central Library of the blocks being up-zoned; exclude the entries for buildings already closed, for buildings like the Wilsonian which seem permanent, and those for businesses; and count the remainder as nominees for demolition. The resultant tally numbers several times the DEIS estimate.

Impact on the Handicapped ----

48

The City's Land Use Code will effectively exclude persons who depend upon cars for mobility. Section 23.54.015 in Sub-sections L and M removes all requirements for

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any parking in any multi-family structure (a) within urban centers; (b) within station overlay districts; and (c) within urban villages located within 1,320 feet of a street with "frequent transit service" as measured from the lot line of the building to the nearest bus stop.

Any multi-family structure without any parking space at all for the disabled by its very nature erects an effective barrier that excludes people who are dependent upon motor vehicles to get around. This population includes wounded veterans and young people born with birth defects. State law (RCW Chapter 70.92) requires that new buildings make special provisions for elderly or handicapped persons. and requires that administrative rules set minimum standards for the provision of facilities in buildings and structures to accommodate the elderly, as well as physically disabled persons" on sixteen named elements, which include "parking facilities."

The staff of the City's Department of Planning and Development defend the exclusion by saying buses will supply the transportation needs of the mobility impaired. Not so. Buses only run during certain hours; some buses come only every half hour and are often late and the stops are exposed to rain and the elements --- waiting for the buses can be burdensome, especially in parts of the district at night. Bus routes change and new bus schedules may greatly reduce service. Many areas of King County can not be reached by bus. Instead of being inclusive, the new housing would be exclusive as to those folks.

The DEIS needs to be attentive to their special needs and recommend that in the University District, new buildings must contain adequate provision for parking spaces for persons, who are mobility impaired.

49

Impact on Social Services ---

The Framework Study recommended that City government foster activities and facilities for social service agencies, churches and charitable in meeting the needs of the disadvantaged and include such services a key part of its comprehensive land use planning, e.g.

> "Social services meet needs of kids, homeless youth and adults, extremely low income residents, and services support these institutions and organizations to better met the needs of the community and increase capacity for future need. (p. 40)
>
> "Expanded Social Services.
>
> [The U District] ".. is home to many faith communities and social service providers who provide assistance to the homeless, seniors, immigrants, and other vulnerable populations. But more is needed." (p. 47)

The Framework Study seeks affordable space for these uses and also possible support for sanitary stations. The University District Strategic Plan, p. 42, Project 5A earlier strongly supported social service agencies and their activities. At the Open House in Alder Hall in January 2013 and at the Greater University Chamber of Commerce Luncheon on February 18, 2013, Ms. Kristine Cunningham, Executive Director of ROOTS, described the clientele served by social service agencies, explained how the agencies are an integral

49 cont

and accepted part of our community, and that multiple agencies working together within walking distance provides a synergy in serving the needs of clients and benefits them; and that it serves the best interest of Seattle as a whole. Most of those served are youth who are still seeking their way in life, and timely intervention lets them lead productive lives. The DEIS should address how these facilities can continue to serve under the changed circumstances resulting from the up-zoning, such as higher rents; the hostility up-scale mid-rise residential areas have traditional shown to the least fortunate among us; and the tendency of policies and practices in big cities push vulnerable populations into ghettos.

The Denny Regrade illustrates displacement accompanying up-scale zoning. Before the mid-rise and high-rise zoning, this neighborhood had low income housing in multi-story buildings constructed before World War I; it had social services offices, such as the Washington Department of Employment Security; union halls for those seeking work, pool halls for recreation, and lobbies of residence hotels for passing time. Up to thirty years ago, a Christian revival center and two missions (one Catholic and one Protestant) offered food and shelter for the body and light for the soul. Mid-rises removed the old housing, the store fronts that social service agencies had used, and the revival enter; higher rents and selectivity by owners in choosing tenants to enhance the building's image also pushed or kept them out. Those institutions that remain own their own property: the Millionair Charity Club, the Catholic Seamen's Club, and the Labor Temple. Without their former housing or support services, the former habitués now congregate at Victor Steinbrueck Park or shifted south to the Skid Row/Pioneer Square. If the social services provided in University District are no longer available, where will the clientele now served go?

The homeless ---

Scripture says that "…. ye have the poor always with you.." (Mt. 26:11). Accepting this truth, government has a moral duty to provide necessary support for the poor and infirm. Gethsemane Lutheran Church (766 John St.) took this to heart and rebuilt its chapel and dedicated the upper floors for housing low and moderate income residents. The Low Income Housing Institute ("LIHI") is raising funds for a new building on Roosevelt Way at N.E 52nd St. to house social services on the ground floor and low income and affordable dwellings above. The DEIS should think through and set out methods for the City to assist such arrangements and others to care for the homeless within the area and reduce the adverse impact of the rezone-induced growth upon them. Otherwise, the upscale redevelopment may displace the most vulnerable population much as it did in the Denny Regrade/Belltown.

The Framework Study, p. 52, contains this work item: "Invest in low income housing and services. The DEIS, Pages 1-11 and 1-12, notes that "potential *affordable* housing … could be created through incentive zoning…" (emphasis supplied). "Affordable housing" covers lower, middle income wage-earners. It is not confined to low income people below or near the federal poverty line. The Housing Authorities Law (RCW 35.82) enables creation of housing authorities to provide persons of low income with "decent, safe and sanitary dwellings, without overcrowding." The Housing

49 cont Cooperation Law (RCW Chapter 35.83) encourages municipalities to aid housing authorities toward achieving their purpose. These statutes declare assistance to providing person of low income to be a public purpose and an "essential governmental function." The DEIS, p.3.2-12 and 13, discusses current programs and facilities. It should pull out impacts on and discuss remedies for "persons of low income" as a population that also requires special consideration.

(9) Economic Impacts

50 The DEIS should discuss the impact of the up-zoning on the business community and the economic opportunity now afforded. It should provide guidance on economic impacts, such as consolidation of ownership, displacement of small business, sidewalk frontage available for start-ups, and the likely turnover resulting from the up-zoning.

The Framework Study sought to preserve the 'Ave as a neighborhood business district with its own unique features: many small business, each with its special character; an orientation to the University community with their limited resources; a range of goods and services that offer diversity and a flair for the unusual; a caring community with churches and charities; and a culture that favors education, the arts, and, of course, the Huskies. Page 35 identifies the wishes of the community:

> " Stakeholders want to maintain the existing character, with small storefronts primarily serving the student population"

Principle 2 at Page 50 of the Framework Study states:

> "Develop zoning and development guidelines that respect the U District's unique character and the aspirations of the community."

The 'Ave is a funky neighborhood with many small businesses, family restaurants, taverns, clothing stores that cater to youthful fashions, and specialty shops, such as tattoo parlors. It's one or two story buildings have a human scale. The diversity of ownerships gives it a kaleidoscopic pattern of individual pieces that create a colorful harmony. flavor. A stroll along the 'Ave gives a flavor and diversity not found anywhere else in Seattle. The up-zoning threatens to change all that. What should be done?

In Rainier Valley, the up-zoning and condemnations for Sound Transit along Martin Luther King Jr. Way displaced the small businesses. The up-zones led to sales of adjoining lots into consolidated ownerships. The new, larger buildings require financing in eight digits or more, That is beyond the means of family businesses and single proprietorships. The new construction first displaced the businesses and the higher rents demanded kept them away. Some proprietors relocated; some retired. It was a tragedy for them and the community. The DEIS ought to tell decision-makers about this likelihood.

Urban renewal projects tear down an often seemingly chaotic community that has grown up with established roots. The replacement is planned, well-ordered sterility. See, for example, *Wrestling with Moses*, by Anthony Flint. It's like clear cutting an established forest to make a tree farm. A up-zoning can have the same effect as a

50 cont government orchestrated urban renewal: owners let their buildings run down waiting for leases to expire or they may make an early demolition in favor of a parking lot. New capital invited by the opportunities afforded by the up-zoning can make a wholesale displacement. Take University Village: it used to have grocery stores, a traditional hardware story and a plant nursery, a barber shop, a small book store, a laundry, a gasoline service station, a department store, a savings bank, a cheese shop, a bakery, a furniture store and a contract post office, and other businesses that catered to the immediate neighborhood; now, it bills itself as an upscale regional shopping center and the businesses named are all gone. Will the 'Ave and its periphery wind up with office buildings for research and technology spin-offs from the University, professional offices attracted by Sound Transit's convenient access to downtown and Sea-Tac International Airport, and the like? or another South Lake Union?

Businesses and storefront charities will also face this triple whammy:

- The up-zones will increase property taxes by increasing the value of the underlying land. The increase in land value will more than offset the decline in the contribution value of the building. Most leases require the tenants to pay the property taxes. The tax will impact those business owners, who own their land and building, directly and it will hit the tenants of properties owned by others. The tax burden can be substantial.
- The Framework Study calls for extending the business improvement area and its assessments. The assessments will be an added cost north of N.E. 50th St.
- Construction prompted by the up-zone will close streets and sidewalks. Closing a sidewalk puts a stub end, diverting pedestrians to the other side of the street. It reduces walk-in traffic, which is important to pedestrians. It also takes away on-street parking. The construction of the Lothlorien Apartments at 4730 University Way N.E. closed the sidewalk on that side of the street for a year-and-half. The Murial's Landing Apartments in the 5200 block of University Way N.E. closed the sidewalk for a year.

51 The DEIS, p. 1-11, warns that Alternatives 1 and 2 may lead to a high number of income-eligible units created through the MFTE (Multi-Family Tax Exemption) Program compared to the no action alternative. The Multi-Family Tax Exemption Program shifts the burden of property taxes from the favored project to the other taxpayers of he jurisdiction. It exempts an entire structure if a small part provides "affordable housing." The value of the newly built structure adds to the base for computing the gross revenue limit that a municipality may collect from its tax levy. Seattle is and has been at its upper revenue limit for decades. The city government gets the same gross revenue that it would receive as if no tax exemption were approved. The other properties in the taxing jurisdiction pay more to make up for the property taxes, which the exempt property does not pay. It adds to their property tax burden.

52 The up-zone also needs to assure that the ground floor frontage in fact becomes commercial. The existing zoning code calls for mixed-use in theory; in practice, a "live work" exception permits ground floor configurations that are in reality residential uses. For example, lower Stoneway Ave. No. and North 34th St. in south Wallingford have newly proposed projects with no commercial ground floor spaces. The spaces are "live-

52 cont work" configurations., The occupants do not cater to customers, lack display windows, and have no signs of commercial activity. The DEIS should exclude "live-work" configurations in any rezoned areas.

(10) Transportation

53 The DEIS section on transportation poses a puzzle. The streets are already at carrying capacity. The increased population brings more cars and vehicles. The City won't build more roadway. Query: How can it squeeze more motor vehicle traffic through efficiently?

A common response of traffic engineers involves converting on-street parking lanes into moving lanes. That response is not considered. Instead the DEIS turns to City Master Plans that focus on assisting a single mode of travel.

54 Roosevelt Way N.E. and 11th Avenue N.E. illustrate its response and its inadequacy. Roosevelt Way N.E. and 11th Avenue N.E. are one way couplets that carry large volumes of north-south traffic between downtown, South Lake Union and the Seattle Center, and Eastlake and Northgate and north Seattle. DEIS, Figure 35-13. These arterials go west of the main business district and the communities further north. Each of these two arterials in the University District now is a one-way street and each has two moving lanes for vehicular traffic. This couplet, I-5, Montlake Boulevard, Aurora, and Elliott Ave-15th Ave. N.E. are the main north-south crossings of the Lake Washington Ship Canal. The City proposes taking general purpose lanes from the couplet for three different uses:

1) To reduce congestion likely from the influx of more people, the DEIS, at pages 3.5-6, 3.5-6.3, 3.5-20 and -.21, 3.5.6-62, and 3.5-69, cites the recently approved Bicycle Master Plan and its proposed up-grading of the bicycle lanes on 12th Avenue N.E. and Roosevelt Way N.E. into a cycle track and it regards implementing this feature of the plan as mitigation. Cycle tracks erect a barrier, commonly three wide, to separate motor vehicles from cyclists, e.g. a Jersey barrier stands on N.E. 65th St between the Burke-Gilman Trail and Sand Point Way N.E.

2) The City also adopted a Streetcar Master Plan. The Streetcar Master Plan would extend the South Lake Union Street Tram ("SLUT") and imbed its rails to N.E. 65th St. using these same two arterials. The DEIS maps should show the rail proposal.

3) In addition, the DEIS, p. 1-24, 3.5-65, and 3.5-6.8 cite the Transit Master Plan ("TMP"). The TMP urges dedicated transit lanes. METRO currently runs buses on Roosevelt Way N.E. and express buses on 11th Ave. N.E. Are the three set asides of the street corridor for a single usage cumulative? The DEIS should set out configurations of these arterials to assist public understanding of the proposals both singly and cumulatively. It ought to explain that the bike lanes and streetcar lanes, together, would choke vehicular traffic, or better yet, recommend as mitigation that the ill-considered scheme to extend the SLUT be deleted. The University

54 cont District Community Council opposes the streetcar extension as duplication of the Sound Transit service.

55 Turning to pedestrians, the DEIS, p. 1-4, states that Alternates 1 and 2 would "widened sidewalks on N.E. 45th St. and N.E. 50th St." Figure 3.5-22, captioned "Pedestrian and Bicycle Potential Mitigation Measures" identifies no specific project; Table 3.5-15, "Pedestrian an Bicycle Potential Measures" cites The 2008 University Area Transportation Strategy with the notation "Expand width of N.E. 45th St. Crossing over I-5." What about getting around on N.E. 45th St on the eastside of I-5? Or in the areas of greatest density by the Sound Transit Station? Between Brooklyn and 15th Avenue N.E., substantial buildings stand at the property line. Will traveled lanes that carry buses be cut back?

56 The DEIS, p.3.5-67, recommends "Transportation Management Plans for large buildings." Such plans may include discounted or free transit passes. To avoid invidious discrimination, those plans needs to accommodate those people who physically have to depend upon motor vehicles to get about.

Conclusion

57 The DEIS should identify the impediments to transportation mobility as another of the various adverse impacts that cannot or will not be mitigated, WAC 197-11-440(c)(v); the DEIS should identify the change likely in the environmental setting and character of living and working in the University District; it should forecast that the up-zoning is likely to bring on a life style associated with denser urban living (such as certain sections of San Francisco; Vancouver, B.C.; and lakefront Chicago); and taking its cue from the Framework Study, the DEIS should conclude that only a comprehensive approach will preserve and protect a quality of life like that enjoyed now. An integral element of any comprehensive planning and major revision of Land Use Code for the Study Area is a park/square in the heart of the University District as illustrated by the model on page 24 of the Framework Study developed by the late Professor Phil Thiel.

Yours truly

Jorgen Bader

Jorgen Bader
6536 – 29th Ave. N.E.
Seattle, WA 98115

June 16, 2014

Diane Sugimura
Director of Planning and Development
700 – 5th Avenue # 1900
P.O. Box 34019
Seattle, WA 98124-4019

Attn: Dave LeClergue
Urban Designer

RE: Draft Environmental Impact Statement
University District Urban Design Alternatives
Dated April 24, 2014

Dear Designer LeClergue:

My comment on the draft environmental impact statement has a number of errata as follows:

Page 1: "Design" in the salutation should be "Designer."

Page 2: The fourth line of (5) should be "Sound Transit's U District Station."

Page 3: The close parenthesis should be deleted from the fourth line after "alternative."

Page 5: Quotation marks should be inserted between "that" and "proposals" in the first line of the second full paragraph. "Escape" should replace "reduce" in the last line of the page.

Page 6: The article "a" should follow the preposition "in" and preceded the noun "sentence" in the third line f the third full paragraph.

Page 9: "Couple" should be the plural "couples" in the 11th line of the second paragraph and the word "there" should be inserted after "where" and before "are" after the semicolon in the next sentence.

Page 11: "Is" should be "its" in the first line of the last paragraph.

Page 13: "Give" should be inserted after "not" and before "the plaza" in the first line of the third full paragraph.

Page 15: The lower case "t" should be stricken from the note in brackets in the last line of the second full paragraph.

Page 16: "made" should become "make" in the last line of the third paragraph.

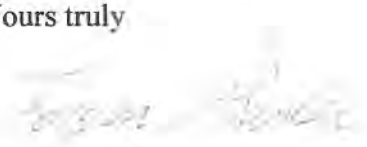
Page 18 "and" should be inserted between "cryptic" and "weak" in the last sentence of the carry-over paragraph.

Page 20: "enter" should be "center" in "revival center" in the third sentence of the first full paragraph.

Page 21: "It's" should be "Its" without an apostrophe in the third full paragraph, and the word "flavor" that stands by itself between periods should be deleted.

Thank you for your consideration in noting these corrections.

Yours truly



Jorgen Bader

Letter # 18

From: Chris Bajuk <chrisbajuk@gmail.com>
Sent: Sunday, June 22, 2014 7:26 PM
To: LaClergue, Dave
Subject: Feedback on U-District up zone

Hi Dave,

1 Thank you for all of you hard work on this project. I support option #2, which offers the greatest potential to fit more people and jobs proximate to the future light rail station. It is possible that a future Ballard-UW line would also run through that area, so we should maximize the use of the land in the area.

Thanks,

Chris

Letter # 19

FW: Endorsement for Alternative 2 in the U District

Deborah Munkberg <deborah@inovapcd.com> Wed, Jul 16, 2014 at 10:40 AM
To: Jessica Hartmann <jessie@inovapcd.com>

A trailing U District comment

----Original Message-----
From: LaClergue, Dave [mailto:Dave.LaClergue@seattle.gov]
Sent: Wednesday, July 16, 2014 8:39 AM
To: Deborah Munkberg
Subject: FW: Endorsement for Alternative 2 in the U District

Just found a comment that I missed previously. Thanks, D

Dave LaClergue
Area Planning Manager
City of Seattle Department of Planning and Development P.O. Box 34019,
Seattle, WA 98124-4019
O: 206.733.9668 I F: 206.233.7883 I dave.laclergue@seattle.gov

----Original Message-----
From: Ian Barrere [mailto:ian.barrere@gmail.com]
Sent: Thursday, June 19, 2014 5:15 AM
To: LaClergue, Dave
Subject: Endorsement for Alternative 2 in the U District

Hello Dave,

1 I just wanted to let you know of my support for Alternative 2 for the upzoning in the U District. I am in favor of increasing sustainable living and density in Seattle, and as an upcoming major transit destination, the U District has so much potential to be a vibrant and walkable neighborhood. The more height allowed the better, in my opinion. The huge benefits of increased density outweigh any of the potential aesthetic complaints, such as blocked views. As such, Alternative 2 is the best option we have; it allows for more residences and more jobs in a decreased physical footprint.

Considering the massive growth projected in the Seattle area in the near future it would be simply irresponsible for us to (a) squander the major transit investment of U Link, and (b) cripple walkability and the option of car-free living by advocating excessive zoning.

Thank you very much for your time and consideration, Ian Barrere

Letter # 20

JOHN E. BENNETT, AIA
6512 6TH AVE NE
SEATTLE, WA 98115
JEB.EDWARD2@GMAIL.COM
(206) 617-1963

May 16, 2014

City of Seattle Department of Planning and Development
Attn: Dave LaClergue
700 5th Ave., Suite 2000
Seattle WA98124-4019

Dear Dave,

I was very disappointed in the draft E.I.S document that was recently made available for public review. Besides being very long and rambling and quite frankly difficult to understand in many parts, it seems odd that over-and-over it keeps saying that none of the 3 targeted zoning options would have any significant differences in impacts to the area. Considering the great potential differences in density of buildings and populations there from, this analysis is just plain wrong! The DEIS indicates that, because there is little or no difference in projections for community needs for things like public open space among the 3 options, there is little need for these things to be considered in the EIS. It further appears to make the point that there are at least 3 public park spaces that will well serve the area no matter which option is selected. None of these parks is very close to the epicenter of the light rail station and its resultant densification.

1

2

Is open space in close proximity to the light rail station not important to the City?! Is surge space for the station not going to be any different with 360 foot high buildings or 65 foot buildings? This seems to me to be a major flaw in the whole rationale of the EIS. The potential upzone WILL have majorly different impacts on the area than if it is basically left as-is!

Unless the EIS can realistically show how zoning will be able to mitigate in some effective manner the different needs for light, space, surge space (for the station), educational facilities etc. for the 3 options, I as a citizen will not support the conclusions and goals of this document. The EIS should be revamped in a way that will effectively and realistically address the needs of the University District community with quality, people-oriented development along with any potential upzone. This is our future!

3

Sincerely yours,

John Bennett

Letter No. 12 ACORN, JEFF

1. **NE Roosevelt Way/11th Ave NE.** The comment is noted. Pages 3.5-49 and 3.5-52 of the Draft EIS define the impact threshold for a significant impact, and results are provided in Table 3.5-13 for autos and Table 3.5-14 for transit. The Draft EIS finds no significant impact to transit, auto, or freight on Roosevelt Way & 11th Avenue NE. SDOT may revise the one-way street configuration in the future, but this is not associated with any impacts or mitigations noted in the EIS.

Letter No. 13 ALDEN, N. SUE

1. **Background comments.** The comments are noted.
2. **Interior impacts.** The proposal does not include any proposed changes that would impact interior building character.
3. **On-site parking.** The comment is noted. Please see the discussion of potential parking impacts and mitigation measures in Draft EIS Section 3.5.
4. **Support Alternative 3.** The comment is noted. Regarding the issue of where development would occur, please see the discussion in Draft EIS Section 2.3.
5. **Need for on-site parking.** The comment is noted.

Letter No. 14 ALEXANDER, TYSON

1. **Zoning preference.** The comment is noted.

Letter No. 15 ANDERSON, RICHARD

1. **Roosevelt Neighbors' Alliance comments.** The comment is noted. Please see the responses to comments in Letter No. 4 from the Roosevelt Neighbors' Alliance.
2. **Zoning recommendations.** The comments are noted.
3. **Single family housing.** The comments regarding single family housing around the University Playground Park and University Branch Library are noted.
4. **Downzone single family area.** The comment is noted.
5. **Traffic safety.** The threshold for the safety impact, as described on Draft EIS pg. 3.5-57, is to have an increase in vehicle, pedestrian or bicycle volumes at a High Accident Location compared to the No Action Alternative. A High Accident Location is defined as an average of ten

or more collisions per year at a signalized intersection, or an average of five or more collisions per year at an unsignalized intersection. No High Accident Locations were identified near the University Playground Park. It should be noted that the overall vehicle traffic under the action alternatives is expected to be lower than under the No Action Alternative.

6. **Parking.** The Draft EIS identified that on-street parking is likely to be more scarce in the future, and consistent with the commenters suggestions, recommends potential modifications to SDOT's RPZ program. The ideas the commenter suggests about the task in the Urban Design Framework are more specific than what is covered in this programmatic EIS. However, these ideas are generally consistent with the recommended mitigation and could be pursued by the City.
7. **Blessed Sacrament Church.** The comments are noted.
8. **UCUC boundary.** The comment is noted.
9. **SEPA compliance.** The proposal is a non-project action and the level of analysis contained in the EIS is consistent with SEPA's requirements for a non-project EIS; please refer to WAC 197-11-442(4) and the responses to comments in Letter No. 4.
10. **Mitigation.** The comments are noted. Please see the responses to Letter No. 3, Northeast District Council.
11. **Closing comments.** The comment is noted.

Letter No. 16 BABADJANOV, ANTON

1. **Support Alternative 2.** The comment is noted.

Letter No. 17 BADER, JORGEN

1. **Alternatives.** Please see response to Letter No. 10, Comment No. 2.
2. **Growth assumptions.** The housing and employment estimates were held constant under the alternatives for two reasons: (1) because they are consistent with the estimates that are being used for the U District in the Comprehensive Plan update, and will therefore be consistent with the assumptions in the Comprehensive Plan; and (2) by holding the amount of growth constant, the analysis can more easily isolate the impacts of different zoning configurations, development and design standards, which are the essence of the proposed action. Comparisons among alternatives are more difficult to discern when there are multiple variables to take into account.

Note that the Final EIS includes two new alternatives which evaluate potential impacts of an increased level of growth. See Final EIS Chapter 2 and Section 3.1.

3. **Upzones.** The comment references proposed upzones included in the action alternatives. The No Action alternative does not include any upzones, including those referenced in the comment.
4. **Open space mitigation.** All mitigation in the EIS is presented as presented as a possible measure that could be adopted by the City. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.
5. **Alternatives.** The range of alternatives is intended to bracket that possible range of actions. The EIS does not limit or preclude future City action to adopt a middle range or to modify the action within the range of alternatives considered in the EIS.
6. **Mitigation.** Please see the response to Comment No. 4, this letter.
7. **Social services.** As described in WAC 197-11-448, SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible considerations of a decision. Rather it focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.
8. **Economic impacts.** As described in the Scoping Summary, the EIS does not include an economic analysis of the alternatives. SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible considerations of a decision (WAC 197-11-448). Rather it focuses on environmental impacts and

is expected to be used by decision-makers in conjunction with other relevant considerations and documents.

9. **Transportation analysis.** Please see the responses to Comments No. 65 through 68, this letter.
10. **Environmental analysis.** As required in WAC 197-11-440, the EIS contains a description of the affected environment, significant impacts and mitigation measures.
11. **U District Urban Design Framework.** The comments are acknowledged. The Draft EIS describes the U District Urban Design Framework (UDF) in Chapter 2 of the Draft EIS and references the UDF in applicable elements of the environment. The proposed action considered by the EIS is not implementation of the UDF, but rather alternatives for text and map amendments to the Seattle Comprehensive Plan and Land Use Code to allow greater height and density in the U District Study Area. Please see the response to Letter No. 10, Comment No. 2.
12. **EIS use of UDF.** As noted in the response to Comment No. 11, above, the Draft EIS describes the U District Urban Design Framework (UDF) in Chapter 2 and incorporates UDF recommendations as part of mitigation for applicable elements of the environment; for example, see Draft EIS Section 3.3.2, Aesthetics.
13. **EIS proposal.** Regarding the characterization of the proposal, please see the response to Comment No. 1, this letter. Regarding mitigation, please see the response to Comment No. 4, this letter.
14. **Neighborhood planning.** The commenter's opinion about prior neighborhood planning process is noted.
15. **Alternatives and SEPA review.** Please see the responses to Comments No. 1 and 4, this letter.
16. **Piecemealing.** As described in the response to Comment No. 1, this letter, the term "piecemealing" is used in SEPA to refer to actions that are parts of a whole but which are inappropriately divided into smaller pieces so as to avoid environmental review of some or all of the pieces. That is not the case here. The proposal is an independent action and could proceed without the Urban Design Framework.
17. **UDF/Open space/density.** The comment is noted.
18. **Piecemealing.** Please see the response to Comment No. 16, this letter.
19. **Commitment to open space.** Please see the response to Comment No. 4, this letter.

20. **Piecemealing.** Please see the response to Comment No. 16, this letter. Note also that the proposal and the EIS are subject only to the State Environmental Policy Act (SEPA).

21. **Growth estimates.** Please see the response to Comment No. 2, this letter. It is not accurate to state that the Draft EIS concludes that up-zoning has no significant impact. The level of impact varies depending on the element of the environment, as described in Draft EIS Chapter 3 and potential mitigating measures are identified for all elements of the environment. It is acknowledged that many environmental impacts identified in the U District EIS—such as for parks and public services, for example - are driven by population and, therefore, are related to the amount of growth assumed in the alternatives, rather than to building height, intensity or design. This is a fact which corresponds to how some levels of service are established and how impacts are typically measured in EIS analysis.

22. **Cumulative growth.** This programmatic EIS considers potential impacts from a cumulative perspective. It is acknowledged that growth may happen quickly or slowly under any of the alternatives. The rate of growth is dependent on a variety of factors, including property owner interests, economic conditions, and others. Predictions about these factors would be speculative and beyond the scope of the EIS.

23. **Individual and communal behavior patterns.** As described in WAC 197-11-448, SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible considerations of a decision. Rather it focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.

24. **Growth estimates.** The growth estimates used in the EIS are consistent with the growth estimates assumed for the U District in the 2035 Comprehensive Plan update; it is reasonable to use them for the proposed action. That increment of growth, therefore, is considered to be a function of the 2035 planning estimates for the U District, and not a result of rezoning. Note that the Final EIS includes two new alternatives which evaluate potential impacts of an increased level of growth. See Final EIS Chapter 2 and Section 3.1.

25. **Growth assumptions and impacts.** It is acknowledged that many environmental impacts identified in the U District EIS—such as for parks and public services, for example - are driven by population and, therefore, are related to the amount of growth assumed in the

alternatives, rather than to building height, intensity or design. This is a fact which corresponds to how some levels of service are established and how impacts are typically measured in EIS analysis.

26. **North study area upzones.** The comments are noted. Draft EIS Section 3.1.2 discusses the potential impacts of this change in zoning, stating:

    In the North Study Area, new or expanded LR (Lowrise)2, LR3, MR (Midrise) and NCP (Neighborhood Commercial) 65–85 zones would be established. The proposed rezones would not introduce any new permitted uses to the area, but would increase the permitted intensity in uses already found in the area. The new NC zones are focused on the Roosevelt Way NE and University Way NE commercial corridors, but would adjoin existing single family areas. Similarly, some of the new LR2 and LR3 zones would adjoin existing single family areas. Although an increase in intensity, the LR and NC zones are relatively low intensity multifamily and commercial zones intended to fit compatibly in residential areas. In addition, City of Seattle development standards, including setbacks and separations, landscaping and screening standards, building façade limits, and noise, light and glare standards, should adequately address potential impacts and minimize the potential for significant impacts.

27. **Half-mile walkshed.** The comment is acknowledged.
28. **Prior downzone.** The comment is noted.
29. **Opposed to upzone.** The comments are noted.
30. **Open space and upzone.** The comment is noted. Please see the response to Comment No. 1, this letter.
31. **Open space need.** The comments are noted. The EIS identifies possible mitigating measures for open space impacts. Please see the response to Comment No. 4, this letter.
32. **Open space mitigation.** The comment is noted. Please see the response to Comment No. 4, this letter.
33. **Draft EIS open space discussion.** The comment is noted. Please see the response to Comment No. 4, this letter.
34. **Open space plaza.** The comments are noted.
35. **Open space deficits.** The comment is noted.
36. **Sound Transit station plaza.** Please see the response to Comment No. 34, this letter.

37. **Range of alternatives.** SEPA requires that an EIS consider a "reasonable" range of alternatives, to permit decision makers to compare the impacts of different courses of action (WAC 197-11-440(5). For non-project proposals, such as area-wide rezoning, the SEPA rules require a general discussion of alternative designations; all possible designations do not need to be examined (WAC 197-11-442(4)). Identifying the "best" alternative is a question of judgment and opinion, and is ultimately a legislative decision that will be made by the City Council.

    The range of alternatives considered in the Draft EIS allows decision makers to see the trade-offs and to identify mitigation measures related to density, height and design; those zoning issues are the focus of the EIS. Different measures to avoid, reduce or minimize impacts are incorporated in the alternatives.

    The range of alternatives brackets the possible range of actions. The EIS does not limit or preclude future City action to adopt a middle range or to modify the action within the range of alternatives considered in the EIS.

    Note that the Final EIS includes two new alternatives which evaluate potential impacts of an increased level of growth. See Final EIS Chapter 2 and Section 3.1.

38. **Views of development.** The aerial views of the study area are intended to provide a big picture sense of the different development patterns that could be expected from the different alternatives. The four aerial perspectives are: (1) looking south from Roosevelt Way NE; (2) looking west from 17th Avenue NE along NE 45th Street (3) looking east from I-5 at NE 45th Street; and (4) looking northeast from I-5 at the University Bridge.

    In addition, five street-level perspectives are provided. These include: (1) University Way NE, looking north from NE 41st Street; (2) University Way NE, looking south from NE 47th Street; (3) NE 45th Street, looking east from 7th Avenue NE; (4) NE 45th Street, looking west from 15th Avenue NE; and (5) Brooklyn Avenue NE, looking north from NE 40th Street. These perspectives were selected based on a review of preliminary model findings, which showed that views from these locations showed the greatest impact and difference between the alternatives.

    The distribution of growth is based on assumptions described in Draft EIS sections 2.3 and 3.3.2

    Please see also the response to Comment No. 37, this letter.

39. **Zoning tools.** It is acknowledged that the City has a range of discretionary tools to address potential land use impacts. Draft EIS Section 2.3 describes

potential incentive zoning measures, including a list of possible incentive zoning measures identified in the U District Urban Design Framework. As noted in the Draft EIS, in a separate action the City is reviewing incentive zoning which may lead to future change in the program. Incentive zoning may be an element of a range of possible mitigating measures that could be used to address impacts of the proposed action, if adopted.

40. **Design guidelines.** The comment is noted.

41. **Fire protection.** The Draft EIS states that an increased number of residents and workers would likely result in a proportional increase in calls. Depending on the rate and amount of new development, additional staffing may be required to maintain performance levels. While the height of buildings is one factor; the overall amount and density of development are the most significant factors in determining future demand for service. Given the presence of high-rise buildings in many locations in Seattle, it is reasonable to conclude that the Fire Department is prepared and equipped to handle emergencies in tall buildings.

42. **Electrical energy.** As described in the Draft EIS, electrical energy is supplied to the study area through three different systems; a network distribution system, a looped radial system and the University of Washington system. These systems cannot be inter-connected and the distribution capacity to serve new development is varied between systems, with the network distribution system being the most constrained. For these reasons, the capacity to serve new development is very site and use specific. Impacts could result under any alternative, including No Action. Accordingly, the EIS recommends a collaborative planning process between DPD and City Light to evaluate future service system needs in this area.

43. **Adverse impacts.** As noted in the Draft EIS, potential impacts to the electrical system are specific to location and type of use and could occur under any alternative, including No Action.

44. **Affordable housing.** The Draft EIS concludes that housing affordability is a significant challenge in the University District and will continue to be under all alternatives. A menu of land use code and programmatic strategies for addressing housing affordability are included in Draft EIS Section 3.2.5.

45. **Mitigation.** Please see the response to Comment No. 4, this letter. The reference to WAC 197-11-660 accurately describes the responsibility of the agency in imposing/implementing potential mitigating measures identified in an EIS. It does not state or suggest that an EIS should not identify a range of possible mitigating measures, as described in the

response to Comment No. 4, for further review and decision by the responsible agency.

46. **Socio-economic impacts.** As described in WAC 197-11-448, SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible considerations of a decision. Rather it focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.

    Regarding the assertion that the upzoning will greatly expand the U District population, the growth estimates used in the EIS are consistent with the growth estimates assumed for the U District in the 2035 Comprehensive Plan Update and are the same for the action and no action alternatives. That increment of growth is considered to be a function of the 2035 planning estimates/targets for the U District, and is not a result of rezoning.

47. **Housing demolition.** The estimate of housing units demolished was based on King County Assessor's data for the re-developable sites defined for each alternative, as described in Draft EIS Chapter 2 and Section 3.3.2. The authors identified the most likely redevelopment sites based on ratios of improvement value to land value, as well as existing land uses (i.e., large sites with surface parking lots or older, low-rise buildings were identified as most likely to redevelop). After selecting, the authors analyzed a range of impacts based on redevelopment of those sites. For each alternative, King County Assessor's data was consulted to identify existing housing units on each site. The total estimated housing displacement under each alternative is based on this information. While development could occur on any site under any of the three alternatives, it would be speculative to model the impacts of redevelopment on less likely development sites.

    As noted in the Draft EIS, this analysis is not a projection of housing demolition, but seeks to stress how Alternatives 1 and 2 envision flexibility for a more efficient use of land, allowing for higher concentrations of housing. The implication of this framework is the need for less land (and the potential demolition of lower cost housing) to meet the future growth estimate.

    Also, because the action alternatives would concentrate new development in the core of the neighborhood, which has a high concentration of low-rise commercial buildings and surface parking, it is reasonable to assume that housing development in those scenarios

would lead to a lower rate of demolition per unit built than what would occur in a more distributed growth pattern. Between 1995 and 2014, redevelopment in that commercial core has produced or permitted 1,803 housing units while resulting in 36 units demolished.

48. **Special needs and parking.** Please see the response to Comment No. 46, this letter. The City is not proposing to change standards for handicapped parking as part of this action. If a building includes parking, a portion of that parking must be set aside as ADA accessible stalls. Further, the proposal does not include a prohibition on parking. The commenter may be referring to the City's policy of not requiring a parking minimum in urban centers—under this policy, many developments still elect to provide parking.

49. **Social services.** The comments regarding social services are acknowledged. As noted previously, an EIS is not a plan or policy guidance document. Rather, it focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.

50. **Economic analysis.** The comments, including opinions and assertions about possible impacts, are noted. As described in the Scoping Summary, the EIS does not include an economic analysis of the alternatives. SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible considerations of a decision (WAC 197-11-448). Rather it focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.

51. **Multi-family tax exemption.** MFTE is mentioned in the Draft EIS only as a potential mitigation option to increase the supply of affordable housing in the study area.

52. **Ground floor commercial.** The comment is noted.

53. **Transportation impacts.** The purpose of the EIS is to determine the impacts of Alternative 1 or 2 compared to the No Action Alternative, not to identify improvements that address growth in traffic between existing conditions and the No Action alternative. The commenter correctly notes that removing parking lanes is not considered in the analysis as this is not part of any of the City's master plans. At another time SDOT could remove a parking lane or remove parking on a time of day basis, but this would only exacerbate parking impacts identified in the Draft EIS.

54. **Roosevelt Way/11th Avenue NE.** The proposed high capacity transit on Roosevelt Way and 11th Avenue NE is identified in Draft EIS Figure 3.5-23 on pg. 3.5-64. The Transit Master Plan states that high capacity transit could operate in mix or dedicated lanes on Roosevelt Way and 11th Avenue NE, so it does not necessarily require removing a general purpose lane. In addition the Bicycle Master Plan is a conceptual planning document, and may not require removing lanes either since the proposed bicycle facilities may have to be located on an adjacent street out of consideration to traffic and parking impacts. The City is currently preparing high capacity transit (HCT) study on Roosevelt Way and 11th Avenue NE corridor, which will include an evaluation of both the space required for future HCT (which could include bus rapid transit or streetcar) and bicycle facilities. Potential cross-sections will be identified as part of that study.
55. **Pedestrian circulation.** The widened sidewalks on NE 45th Street and NE 50th Street would be achieved through increased setback based on the mixed-use development standards identified in Draft EIS Table 2-2 on pg. 2-21. There are no plans for removing vehicle lanes on NE 45th Street east of I-5.
56. **Travel demand management.** Travel demand management strategies do not preclude any accommodations for physically disabled people. All specific building access and transportation management programs must comply with federal ADA regulations.
57. **Conclusion.** The comments are noted. For specific issues, please see responses to comments in this letter.

Letter No. 18 BAJUK, CHRIS

1. **Support Alternative 2.** The comment is noted.

Letter No. 19 BARRERE, IAN

1. **Support Alternative 2.** The comment is noted.

Letter No. 20 BENNETT, JOHN E.

1. **Differences between alternatives.** The Draft EIS impact analyses include discussions of the differences between alternatives where applicable. However, as described in Draft EIS Chapter 2, the alternatives all assume a consistent planning estimate for growth. Therefore, in cases where impacts are calculated based on population and employment growth, such as open space, impacts under each alternative are comparable. Note that the Final EIS includes two new alternatives which evaluate potential impacts of an increased level of growth. See Final EIS Chapter 2 and Section 3.1.
2. **Open space.** The Draft EIS concludes that the U District does not meet some of the open space standards established by the Comprehensive Plan and that the deficit may increase as the neighborhood grows. However, because the EIS considers the impacts of different distribution of a constant amount of growth, the deficit is not an impact of the proposal. This is not intended to suggest that the open space deficit is not a concern for the study area. As stated in the Draft EIS, "…existing and projected deficiencies clearly support the acquisition and development of additional open space and recreational facilities to serve the study area." Please see the discussion of open space and recreation in Draft EIS Section 3.7.
3. **Impacts and mitigation.** Regarding impacts, please see the response to Comment No. 1, this letter. Regarding mitigation, note that all mitigation in the EIS is presented as presented as a possible measure that could be adopted by the City. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.

Citizen Comment Letters 21-30

Letter Number	Name (Last, First)	Agency/Organization
21	Bennett, John E., AIA	
22	Benson, Arielle	
23	Bond, Charles	
24	Bonjukian, Scott	
25	Broesamle, Ben	
26	Campbell, Doug	Bulldog News
27	Chaddock, Colin	
28	Countryman, Ryan	
29	Crocker, Cory	U District Advocates
30	Cullen, Kathryn and Thomas	

Letter # 21

JOHN E. BENNETT, AIA
8512 8TH AVE NE
SEATTLE, WA 98115
JEB.EDWARD2@GMAIL.COM

June 19, 2014

City of Seattle Department of Planning and Development
Attn: Dave LaClergue
700 5th Ave., Suite 2000
Seattle WA 98124-4019

Dear Dave,

I am writing this to augment my letter to you from May 16, 2014 regarding the draft E.I.S. for the potential upzone for the University District. (adjunct to the planned light rail station at Brooklyn and 43rd)

1 While the DEIS addresses the need for different types of public open space, it fails to mention the importance of location relative to a particular type of public space. Obviously greater building zoning density dictates a greater need for "village" (urban) open space but beyond that there is the specific "density" generated by the station itself. This is almost totally ignored in the DEIS! Are the UW and

2 Sound Transit the sole arbiters of what happens at the station itself? Why can't the Seattle DPD have a say in what makes sense for the U-District community and for Seattle as a whole? Why is there only passing mention in the DEIS of what might or should happen above the station itself, especially for the two upzone alternatives?

3 The current plans indicate a design that downloads (and uploads) 12,000 people each day almost directly to and from the existing streetscape, which was never intended to handle such surges in pedestrians and associated vehicles. With just a large building overlaying the mezzanine area of the station below there is virtually no opportunity to introduce natural light into the congested below-grade environment. Providing an open plaza above the station (with effective administrative control, as has worked well in other major urban areas around the country) would have multiple benefits:

A) Providing effective surge space for crowd influx to and from the station;

B) Providing much needed multi-use open space that can attract the highest possible usership as well as the most diverse public functions in the urban village

C) Providing a lid over the station that could offer the design potential for large skylights to help energize the important mezzanine space below grade, and

D) Provide an important identity-defining focal point for the U-District's many stakeholders.

This would have a huge impact on the environment directly adjacent to the station as well as for the U-District as a whole! Why isn't the impact of the station even mentioned relative to the impacts of desified zoning? Why isn't at-grade surge space a mitigating element to be considered with an upzone? There is an "elephant in the living room" that the DEIS is ignoring. It appears that the station design got way too far along before density got factored into the mix and now something needs to be done to fix it before it is too late and we're stuck with a short-sighted mistake for generations!

Sincerely yours,

John E. Bennett

(206) 617-1963

Letter # 22

Arielle Benson
523 N 60th St
Seattle WA, 98103
602-570-8775
arielle.benson@gmail.com

Hello,

1 As a member of the University District and larger Seattle Community, I appreciate the opportunity to express my thoughts on the UDistrict zoning DEIS. After reading this statement, I am confused how under each area examined there would be no significant impacts within the scope of this document. Fundamentally I think this report is based on a flawed supposition, that the growth in this area would be in the same timeline with the same number of people under all three alternatives, though distributed differently through the study area. The document itself was extremely long, obtuse, and overly referential to alternate planning commissions and intentions for the area, without effectively speaking to how those intentions will become reality in this plan, and what the impacts would be if they were, or were not to happen.

2 The supposition that growth would be the same, and in the same timeline, allows for the author to negate a lot of what otherwise would be significant impact. A small example is the Open Spaces section, in which it is stated that the existing deficit of green and breathing spaces that exists under the current growth estimates, as well as deficits in possible new locations, and spaces, would simply be continuous under all 3 alternatives, and therefore has no bearing on this DEIS. With increased density, comes the need for more open spaces, and intentional parks, especially as we have the opportunity to build it into a framework of spaces that compels folks to move throughout the neighborhood on foot and bike. Bringing in all of this new population, with property value increasing from the rezoning and the development potential (which lowers the opportunity of purchasing additional park land), **will have an impact** on every open and green space nearby – especially Cowen & Ravenna park to the North, which are already heavily utilized.

3 This DEIS displaces all of its impact, through extrapolating current deficits in city plans, and intentions with infrastructure, to the fact that some of these things could be improved with new development, with setbacks, and incentive zoning among others. However, this DEIS does not preclude those actions, and determining that there are actions that could be taken, does not in any way guarantee they must be, unless clear language is included. We must create the incentive language first, after careful discussion around the neighborhood's needs, before we allow blanket zoning changes.

With the UDP, neighborhood intention, and partnership with the City Planning Commission, there is no reason why we cannot create a framework that developers must build into. A real plan, in terms of the businesses and resident experiences, connected green ways and parklets, social services and low-income housing, safe avenues for bike and pedestrian traffic, while also creating a compelling innovation district that fosters partnership with the UW, should not be out of our reach as a community. Simply allowing for the upzone, and then sorting out all of those details later, in terms of what we will require folks to do to build is too late. Developers will have an effectively blank slate to create what they

3 cont will, and change the face of the District, rather than having to engage in the equitable give and take of negotiating with the community.

4 The upzone must be mitigated 1st, we must have guarantees as a community that we will not simply be getting the short end of the stick, left with not only a higher cost of living and doing business, but also much more people, with the same number of public spaces, more pedestrian traffic and cars, historic buildings lost, no environmental incentives with living roofs or energy efficiency standards, and a much different set of property owners. Thoughtful discussion, and intentional creation, as well as a real assessment of what the impacts of these alternatives would be, without looking at existing deficits as a blank slate, must come prior to this rezoning. Thank you so much for your time, I truly hope we can create an amazing district without sacrificing who we are as a community, and even building something that is even more compelling and unified for all who live, and visit here.

Arielle Benson
5/20/2014

Letter # 23

From: Charles Bond <charles.w.g.bond@gmail.com>
Sent: Thursday, June 19, 2014 7:18 AM
To: LaClergue, Dave
Subject: U-District rezone comment

Hello,

1 I just went through the documents for the UDistrict rezone, and I would like to vote in favor of option two. We need to maximize the value of these massive trasit investments by focusing density around them.

Thanks,

Charles Bond

Letter # 24

From: Scott Bonjukian <scott.bonjukian@hotmail.com>
Sent: Monday, June 23, 2014 4:43 PM
To: LaClergue, Dave
Subject: U-District EIS Comments

1 I am supportive of Alternative 1 rezoning for the U-District. This is because a more dispersed pattern of development could help creative a more cohesive neighborhood, rather than concentrating new activity in only a small area and giving redevelopment potential power to only a few land owners.

2 I agree with the point that with taller buildings comes the need for preserving a human-scale street experience. Significant setbacks should be required after three stories for buildings above six stories, especially on narrow right-of-ways like The Ave.

3 I support the need for increased public space in the U-District. Though not directly addressed, using the surface level of the new light rail station as a public open space would be an appropriate location. Otherwise, acquiring parcels for public use in the core area is a possibility.

4 I also agree that parking maximums must be implemented with any zoning change, especially in the core area around the light rail station. True transit-oriented-development has very little, if any, parking and is fully supportive of non-motorized modes.

5 Alternative 1 will probably also have less of an impact on transportation; light rail is not the only consideration, and with upcoming service cuts there is likely to be reduced bus service in and out of the U-District. Additionally, by spreading out increased development that is an incentive to provide more pedestrian and bicycle facilities to the entire neighborhood rather than just the core area.

6 Finally, I support the need to require or incentive the pursuit of sustainable building strategies (LEED, etc.) to reduce impacts on utilities and greenhouse gas emissions.

Thanks,

Scott Bonjukian
Assoc. AIA, LEED Green Associate
Master of Urban Planning 2015, University of Washington
northwesturbanist.wordpress.com

Letter # 25

From: Ben Broesamle <bbroesamle@gmail.com>
Sent: Thursday, June 19, 2014 8:55 AM
To: LaClergue, Dave
Subject: Comment on U District Urban Design Draft EIS

Mr. Laclergue,

As a University of Washington Graduate Student through Spring of 2016, I feel I am a stakeholder in this discussion.

1 I strongly desire that the planning group see that Alternative 2 be brought forward as the recommended preferred alternative. By both building more units and potential jobs in a smaller footprint we begin to solve the problems of affordability in our community and increase mobility by providing a walkable lifestyle within a very short walk of rapid transit. Additionally, the smaller development footprint allows for other decisions for the remainder of the community to be made later. We need as many housing units and as much employment potential as possible to be developed. Alternative 2 provides that within the most compact rapid transit station area further incentivizing the community to make sustainable mobility decisions.

Thanks,
Ben

UW Graduate School, Class of 2016.

Ben Broesamle | bbroesamle@gmail.com | 310.562.2759 (Cell)

DEIS INPUT

U District DRAFT EIS

From: Douglas Campbell, owner Bulldog News

JUNE 23, 2014

RE: DEIS Growth Assumptions in relation new Development Capacity Created by Options #1 and #2

1 The most bold and unquestioned assumption in the Draft EIS for U-District Urban Design Alternatives is an assumption regarding neighborhood growth. For all three design alternatives growth is assumed at 3900 Housing Units and 4800 jobs. Growth is assumed to be an exogenous factor, for all three alternatives, despite the fact that capacity for the development of addition housing units or job hosting office space is dramatically increased by both neighborhood up-zone proposals. A cursory examination of this assumption will be enough to show how questionable it is.

2 First, growth is inherently difficult to predict. The university district already has grown to 94% of its 2024 growth target, and this growth is speeding up in recent years not slowing down. Current zoning allows plenty capacity for continuing to accommodate additional growth, so one might think that capacity would not be an issue in the amount of growth which the neighborhood will receive in the future, but in order to examine how the U-District's up-zoned capacity affects total neighborhood growth we must look at capacity in its component parts.

It is the <u>type of capacity</u> created by an up-zone, which will spur neighborhood growth far beyond what would have been possible without an up-zone.

3 The University currently has almost no class "A" office space available to lease, and yet this type of space is not being built at high volumes under current zoning. May we then assume that current zoning is in some manner an impediment to the development of this class "A" office space? Creation of office towers would immediately create an inventory of class "A" space. This would make the neighborhood attractive to corporate businesses which would otherwise not consider locating here. Still, while having a whole new category of office space available to attract a new category of tenants, development of lesser classes of office and retail space would continue to serve our existing classes neighborhood employers. The potential for new types of office space does nothing to reduce the need for the class of space we currently develop. We end up with both categories of space being developed. Adding a new <u>type</u> of office space adds to total office space growth, blowing through the baseline growth assumption.

4 A similar argument is very much available to assumptions regarding housing. Yes, with current trend the neighborhood may develop another 3900 housing units serving the kind of single person transient households that the neighborhood currently serves. ~~But wh~~at if a whole new class of housing unit becomes available with stunning views of the Olympics and Mount Rainier? These units would likely be expensive and attract a new category of neighborhood resident, a resident who would not consider living in the U District at present. These new residents will not be here <u>instead</u> of the residents who would have moved into the neighborhood given the organic growth of current neighborhood housing

categories. They are here in addition to those residents. This creates new growth, totally attributable to the up-zone itself.

5 We already hear word of a proposed 32 story hotel, which would not be proposed, and could not be built, were it not for the expectation of the up-zoned capacity for development. This is development that would not occur otherwise, and these hotel rooms will attract visitors to the neighborhood that would otherwise stay at downtown high-rise hotels.

6 None of what I'm saying here argues that tall hotels, office buildings, and a high rise residential community is undesirable. Done right, all of these types of expansion of housing and workplaces in the neighborhood could be desirable. I am simply arguing here that to expect the same neighborhood growth with zoning which allows 340 ft structures, as that which allow 6 story structures makes little sense and is overly accommodating to the interests of property owners.

7 We hear throughout the DEIS that there is minimal environmental impact to the up-zone in category after category: open space, traffic, low income housing, even while the draft acknowledges that challenges exist for the neighborhood in all these areas. **Why is there no or minimal impact from the up-zone? Because growth is presumed to be the same for all three proposals**. If, according to the DEIS the impact of the up-zone is defined as minimal (based upon the equal growth assumption) the neighborhood mitigation for the up-zone can also be expected to be minimal.

8 **Neighborhood capacity increases inherent in the up-zone proposal make massive additional neighborhood growth possible under the new zoning, but no remediation measures are contemplated if growth far exceeds the equal baseline growth presumption of the DEIS.**

9 The irony of this unhelpful growth presumption is that many in the neighborhood are willing to welcome additional growth, including this writer. But let's acknowledge that this growth will come with demands placed upon the neighborhood's infrastructure and institutions, and not put our head in the sand when it comes to meeting these needs. Through the up-zone process we are transferring a public asset: our air, our sky, our room to breathe in this neighborhood to private property owners whose land will multiply in value. Some portion of this bargain should involve creating public owned assets in balance to the private gains we will be creating. Our neighborhood is acknowledged to be short on necessary public facilities (an elementary school, a public square, parks, a gym) to serve its community. This shortage will only become worse as we shoot through the understated growth presumptions in the DEIS.

10 Again ironically the DEIS states that we should up-zone now rather than later because by doing so we will "reduce the likelihood of improvements based upon development impacts that may be experienced as a result of development standards and incentive zoning." In other words, if we make a big gift to property owners and developers now, in advance and with few conditions, there could be a few crumbs left on our community's table. Rather than accept a few crumbs, yet to be determined, let me suggest that this up zone proposal is inappropriately timed until the city puts in place mechanisms to provide for substantial pubic neighborhood asset development, to occur in proportion to private wealth created by

the neighborhood up-zone and also in proportion to the growth that actually manifests itself in the district, rather than to the DIES's unreasonably low ball projections.

Thanks for your attention to these issues in the upcoming Final Version of the EIS.

Letter # 27

From: colin chaddock <cchaddock@gmail.com>
Sent: Thursday, June 19, 2014 9:29 AM
To: LaClergue, Dave
Subject: U-District Zoning Revisions

Dave,

I am a Seattle resident and I would like to voice my support for the up zoning of the University
1 District. Alternative 1 or Alternative 2 would both be preferable to doing nothing (Alt 3), but I prefer Alternative 2 most of all. #2 seems to give the most density improvement, while leaving adjacent areas fallow for possible future improvement. Option 1 would be fine as well, but impacts a larger area and gets less bang for your buck. Option 2 also seems like it will attract the most developers.

Cheers,
Colin Chaddock
414 NE 82nd St.
Seattle.

Letter # 28

From: Ryan Countryman <ryanplaysbass@hotmail.com>
Sent: Sunday, June 22, 2014 8:19 PM
To: LaClergue, Dave
Subject: U-District Options

Hi Dave,

1 I understand that you are the project planner for updating the U-District plan and am writing to encourage you and the city to make the most of the light rail expansion by maximizing density in the district. Since the rail system is a separate infrastructure from congested roadways, it is important to create the greatest potential for new riders. This will divert the impact from new growth away from the street grid and onto the rail system.

2 As a former district resident, I know the area and think that more high-rise development is the best option. The best plan that I have seen so far is the so called "Alternative 4" proposed by the Urbanist, http://www.theurbanist.org/2014/06/19/choose-alternative-4-for-the-university-district/. If the options are those already under consideration by the city, then I would support Alternative 2.

Thank you!

Ryan Countryman
UW Class of 1997
425-780-0290

Letter # 29

June 23, 2014

Dave LaClergue
Department of Planning and Development
City of Seattle
700 5th Avenue, Suite 2000
Seattle, WA 98124-4019

Dear Mr. LaClergue,

The U District Advocates is a nonprofit advocacy group for the University District community that was formed with the primary goal of establishing a central civic square above or adjacent to the U District Station of the Sound Transit North Link Light Rail System.

1 Considering the present open space needs in our community, and the 5.1 acre deficit of public open space projected by 2035, the Draft Environmental Impact Statement (DEIS) fails to adequately address this essential contributor to overall urban livability. Instead, the document relegates it with the convenient claim that: "No significant unavoidable adverse impacts are anticipated," and determines that the consideration of open space in each of the three alternatives is comparable.

2 We contest this assertion in that any up zone will inevitably increase capacity, and thus create a path of least resistance to encourage the greater densities in alternatives 1 and 2 than in the no action alternative. With additional development density comes an even greater need to reserve the breathing room that would be provided by public open space.

3 The need for open space in our community has been identified and prioritized in a number of binding guidelines: the Growth Management Act, the University Community Urban Center Neighborhood Plan, the Seattle Comprehensive Plan, the U District Urban Design Framework, and the University District Park Plan. In fact, one of the stated objectives of the DEIS is to "provide for consistency between the comprehensive plan and land use code."

4 In analysis and mitigation, the DEIS fails to recognize or evaluate this once-in-a-lifetime opportunity to create central square in the University District, a project that has been on and off the drawing board since the 1950s. Though this document recognizes the growing deficit of open space in the neighborhood, it fails to identify or propose a strategy to mitigate this repeatedly-identified problem.

5 In an excellent article in The Nation (http://www.thenation.com/article/177628/fungibility-air), Michael Sorkin talks about how "real estate has become an extractive industry, mining the air," and how that air is actually an asset of the people to relinquish only in exchange for amenities worthy of that loss. One such amenity is the need for public open space and the City should lead with a strategy to secure the necessary property before any up zone, when costs will only increase.

6 The City is in control of the sequence of events. Without proposing a new, fourth alternative, one of a conditional up zone extracting the previously-identified community amenities from development projects in exchange for heights piercing the height limits of alternative 3, we oppose anything more than that no action alternative.

6 cont | The resulting EIS distilled from this document will become law when the City Council votes on the zoning changes proposed - proposed changes with no mitigation. If this is a city that can pass laws it should be a city that can pass needed zoning and infrastructure legislation to intelligently guide growth in this neighborhood.

7 | We respectfully request that the concerns of our community regarding public open space be reflected and addressed more effectively by your coordinated efforts and we thank you for those efforts.

Regards,

Cory Crocker
President

Letter # 30

From: Kathy Cullen <Cullen2@comcast.net>
Sent: Sunday, June 8, 2014 4:06 PM
To: LaClergue, Dave
Subject: U. District Rezone

Dear Mr. Laclergue,

1 We would like to go on record as supporting Alternative #3, No Action, on the U. District rezone. Since the density forecasts can be met under the existing plan a rezone is not necessary. What is necessary is enforcement of the existing code. The District has a recognizable identity, but the push to turn it into a clone of South Lake Union means it will lose its soul. Higher buildings mean dark and windy canyons will replace light. Traffic on NE 45th will worsen, causing drivers to try "short-cuts" on neighborhood streets. We are permanent residents who would hate to see powerful interests take precedent over those who are committed to trying to maintain a community under worsening circumstances. Again, we support Alternative #3, No Action.

Sincerely,

Thomas and Kathryn Cullen
4540 8th Ave NE # 1806
Seattle, WA 98105

Letter No. 21 BENNETT, JOHN E

1. **Location of open space.** The Draft EIS analysis of open space is based on open space goals established in the City's Comprehensive Plan. These goals include both standards for amount of open space and geographic distribution of open space. Draft EIS table 3.7-3 shows the existing and projected deficits in total amount of open space; see also revisions to Table 3.7-3 in Section 3.2 of this Final EIS. Draft EIS Figure 3.7-2 shows the gaps in geographic distribution of open space.
2. **Transit station.** The proposal is a non-project action that is considering alternatives for an area-wide rezone, development standards and comprehensive plan amendment. A plaza over the future light rail station is not part of the proposal and a non-project EIS is not required to evaluate individual projects or individual sites that could be proposed for some type of redevelopment (WAC 197-11-442(3)). Future project proposals for specific sites by individuals or other agencies, such as an open space over the planned light rail station or in another location, would be subject to project-specific SEPA review when such an action is planned or proposed.
3. **Transit station impacts.** Please see the response to Comment No. 2, this letter.

Letter No. 22 BENSON, ARIELLE

1. **Growth assumptions.** The housing and employment estimates were held constant under the alternatives for two reasons: (1) because they are consistent with the estimates that are being used for the U District in the Comprehensive Plan update, and will therefore be consistent with the assumptions in the Comprehensive Plan; and (2) by holding the amount of growth constant, the analysis can more easily isolate the impacts of different zoning configurations, development and design standards, which are the essence of the proposed action. Comparisons among alternatives are more difficult to discern when there are multiple variables to take into account. Note that the Final EIS includes two new alternatives which evaluate potential impacts of an increased level of growth. See Final EIS Chapter 2 and Section 3.1.
2. **Impacts.** It is acknowledged that many environmental impacts identified in the U District EIS–such as for parks and public services, for example–are driven by population and, therefore, are related to the amount of growth assumed in the alternatives, rather than to building height, intensity or

design. This is a fact which corresponds to how some levels of service are established and how impacts are typically measured in EIS analysis.

3. **Mitigating measures.** All mitigation in the EIS is presented as presented as a possible measure that could be adopted by the City. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.
4. **Mitigation.** The comment is noted. Please see the response to Comment No. 3, this letter.

Letter No. 23 BOND, CHARLES

1. **Support Alternative 2.** The comment is noted.

Letter No. 24 BONJUKIAN, SCOTT

1. **Support Alternative 1.** The comment is noted.
2. **Require setbacks.** The comment is noted.
3. **Increased public space.** The comment is noted.
4. **Implement parking maximums.** The comment is noted.
5. **Support Alternative 1.** The comment is noted.
6. **Support sustainable building strategies.** The comment is noted.

Letter No. 25 BROESAME, BEN

1. **Support Alternative 2.** The comment is noted.

Letter No. 26 CAMPBELL, DOUG

1. **Neighborhood growth.** The housing and employment estimates were held constant under the alternatives for two reasons: (1) because they are consistent with the estimates that are being used for the U District in the Comprehensive Plan update, and will therefore be consistent with the assumptions in the Comprehensive Plan; and (2) by holding the amount of growth constant, the analysis can more easily isolate the impacts of different zoning configurations, development and design standards, which are the essence of the proposed action. Comparisons among alternatives are more difficult to discern when there are multiple variables to take into account.

   Note that the Final EIS includes two new alternatives which evaluate potential impacts of an increased level of growth. See Final EIS Chapter 2 and Section 3.1.

2. **Neighborhood growth.** The comment is noted.

3. **Office growth.** The comment is noted. Please see the response to Comment No. 1, this letter. The increment of growth assumed in the EIS is considered to be a function of the 2035 planning estimates for the U District, and not a result of rezoning. There is no available data to support the assertion that the offices developed under any of the alternatives would increase overall demand.

4. **Housing growth.** The comment is noted. Please see the response to Comment No. 1, this letter. The increment of growth assumed in the EIS is considered to be a function of the 2035 planning estimates for the U District, and not a result of rezoning. There is no available data to support the assertion that housing developed under any of the alternatives would increase overall demand.

5. **Proposed hotel.** The EIS does not contemplate any specific development proposals.

6. **Neighborhood growth.** The comment is noted; please see the responses to Comments No. 1, 3 and 4, this letter.

7. **Impacts.** It is acknowledged that many environmental impacts identified in the U District EIS—such as for parks and public services, for example - are driven by population and, therefore, are related to the amount of growth assumed in the alternatives, rather than to building height, intensity or design. This is a fact which corresponds to how some levels of service are established and how impacts are typically measured in EIS analysis. The growth estimates used in the EIS are consistent with the growth estimates assumed for the U District in the 2035 Comprehensive

Plan Update; it is reasonable to use them for the proposed action. That increment of growth, therefore, is considered to be a function of the 2035 planning estimates/targets for the U District, and is not a result of rezoning. As noted in the previous paragraph, holding growth constant across the alternatives also helps to focus on the specific elements of the zoning proposals. It would not be reasonable to assume different amounts of growth merely to produce different impacts. Note that the Final EIS includes two new alternatives which evaluate potential impacts of an increased level of growth. See Final EIS Chapter 2 and Section 3.1.

8. **Sensitivity to growth.** The rezone alternatives are planning for a twenty-year increment of housing and employment growth, and are evaluating how that growth could be accommodated in different spatial patterns and building forms.

   In response to this and similar comments, the Final EIS identifies two additional alternatives which consider slightly higher levels of growth compared to what was considered in the Draft EIS; see Chapter 2 and Section 3.1 of this Final EIS.

9. **Impacts of growth.** The comment is noted. The EIS does not make any assumptions about attitudes toward future growth and addresses potential impacts associated with each element of the environment in the document. Please see the responses to Comments No. 1, 3 and 4, this letter.

10. **Benefits and disadvantages of delaying the proposed action.** The comment appears to be addressing Draft EIS Section 2.5, "Benefits and Disadvantages of Delaying the Proposed Action." The paragraph in Section 2.5 is intended to state that future mitigating measures associated with the proposal and identified in the Draft EIS could increase the likelihood that improvements and amenities would be developed under the action alternatives. If and when such standards are adopted in the Land Use Code, they would mitigate impacts that would otherwise occur in the absence of such standards.

Letter No. 27 CHADDOCK, COLIN

1. **Support Alternative 2.** The comment preferring Alternative 2, followed by Alternative 1 is noted.

Letter No. 28 COUNTRYMAN, RYAN

1. **Maximize density in the U District.** The comment is noted.

2. **Support Alternative 4.** The comment is noted. The EIS does not describe or evaluate a fourth alternative. The term "Alternative 4" was coined in a June 19, 2104 article in The Urbanist (see Appendix C). Alternative 4 is generally described as including the high rise core of EIS of Alternative 2 and the distributed mid-rise and increased densities described in EIS Alternative 1. However, no formal description of Alternative 4 has been prepared.

Letter No. 29 CROCKER, CORY

1. **Open space.** The Draft EIS concludes that the U District does not meet some of the open space standards established by the Comprehensive Plan and that the deficit may increase as the neighborhood grows. However, because the EIS considers the impacts of different distribution of a constant amount of growth, the deficit is not an impact of the proposal. This is not intended to suggest that the open space deficit is not a concern for the study area. As stated in the Draft EIS, "…existing and projected deficiencies clearly support the acquisition and development of additional open space and recreational facilities to serve the study area." Please see the discussion of open space and recreation in Draft EIS Section 3.7.
2. **Increased development capacity.** The EIS acknowledges and discloses that the action alternatives would increase development capacity. Please see Draft EIS Section 2.2. The growth estimates used in the EIS are consistent with the growth estimates assumed for the U District in the 2035 Comprehensive Plan Update; it is reasonable to use them for the proposed action. That increment of growth, therefore, is considered to be a function of the 2035 planning estimates/targets for the U District, and is not a result of rezoning.
3. **Open space need.** The comment is noted. Draft EIS section 3.7 describes the adopted policy guidance for open space in the study area.
4. **Open space mitigation.** All mitigation in the EIS is presented as presented as a possible measure that could be adopted by the City. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but

does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.

5. **Open space mitigation.** The comment is noted.
6. **Oppose action alternatives.** The comment is noted. Regarding mitigation, please see the response to Comment No. 3, this letter.
7. **Address open space needs.** The comment is noted.

Letter No. 30

CULLEN, KATHRYN, AND THOMAS

1. **Support Alternative 3.** The comment is noted.

Citizen Comment Letters 31-40

Letter Number	Name (Last, First)	Agency/Organization
31	Dampier, Cathy	Malloy Apartments
32	Dejneka, Alex	
33	deMaagd, Chris	
34	DiLeva, Mary Pat	
35	Dubman, Jonathan	
36	Duke, Martin	
37	Espelund, Leif	
38	Fesler, Stephen A.	
39	Fischlin, Segue	
40	Futhey, Kevin	

Letter # 31

From: Malloy <malloy@epicasset.com>
Sent: Monday, June 23, 2014 2:56 PM
To: LaClergue, Dave
Subject: U-District
Attachments: new construction in U-District.JPG

Hi Dave,

1 I am writing in regard to the considered possible upzone in the U-District. If 340' towers are allowed to be built in the University District, it will blot out what precious little bit of sunlight we ever get here in the Emerald City. If these towers are allowed to be built, we won't know why this is called the Emerald City at all, because we won't be able to see any trees, if there are any left.

2 The University District is a quaint, charming neighborhood, and should be made an historical district, not be usurped by greedy out of town developers. The neighborhood is richly woven w/ a diverse blend of new & historical architecture and this historic nature should be celebrated and respected. If such monstrosities are allowed to be constructed and litter our beautiful skyline, it would put a blight on our neighborhood and cover us in perpetual gloom.

We have already experienced a huge influx of building the last several years here in the University District. There has been already a surge of building around the future light rail station - I am attaching a photo from the roof of our building, so you can see all the new buildings just within a few blocks of us. I invite you to come over and see it in person, if you like.

3 I am curious if the electrical grid and aged water supply/system could handle such a string of monstrous buildings. Please, please consider very seriously the human ramifications of your decision and help save the very fabric of this unique and historic neighborhood.

Thank you for your time and consideration,

Cathy Dampier
Property Manager
Malloy Apartments
phone: 206-632-0278
fax: 206-632-3587
malloy@epicasset.com
www.malloyapts.com


KeyBank

Letter # 32

U DISTRICT URBAN DESIGN
Draft EIS Public Hearing May 20, 2014

City of Seattle
Department of Planning & Development

Draft EIS comments are due by June 9, 2014

Please let us know your comments about the Draft EIS:

1

TO WHOM IT MAY CONCERN:

I WOULD LIKE THE DECISION MAKERS TO CONSIDER UNDOING AN IRRATIONAL REALITY AT THE VERY NORTH END OF UNIVERSITY WAY NE.

A COUPLE OF DECADES AGO, DURING A BOUT OF DOWNZONING, ONLY THE EAST SIDE OF THE VERY LAST NORTHERN BLOCK OF THE AVE WAS DOWNZONED FROM NC40 TO LR3. ACROSS THE STREET, ON THE WEST SIDE OF THE AVE, NC40 WAS LEFT INTACT.

HOWEVER, THE REALITY ON THE EAST SIDE OF THE LAST BLOCK OF THE AVE IS THAT IT CONTINUES TO BE USED AS IF IT WERE NC40. THERE IS A GRANDFATHERED RESTAURANT IN OPERATION, THERE ARE BUILDINGS WHICH WERE BUILT UNDER THE OLD STANDARDS ABUTTING ALL THE WAY TO THE SIDE WALK, SIDE YARD AND ALLEY PROPERTY LINES.

Please fill in your contact information below.

☐ Please add me to project e-mail list.

Name ALEX DEJNEKA

Phone 206 601-8318

E-mail ADEJNEKA@HOTMAIL.COM

Address 1020 NE 70TH
SEATTLE, WA 98115

Alternate formats provided upon request: 206-684-4466, **TTY Relay: 711**

I AM REQUESTING THAT BOTH SIDES OF THE 5600 BLOCK OF UNIVERSITY WAY N.E. BE ZONED THE SAME WAY.

THANK YOU

U DISTRICT URBAN DESIGN
Draft EIS Public Hearing May 20, 2014

City of Seattle
Department of Planning & Development

Public Comment Form

The City of Seattle invites your comment on the U District Urban Design Draft Environmental Impact Statement (EIS). This Draft EIS evaluates potential map and text amendments to the Comprehensive Plan and Land Use Code (Seattle Municipal Code Title 23) to allow greater height and density in the U District study area. Zoning changes would be accompanied by an affordable housing incentive program, incentives for open space and other neighborhood amenities, and by development standards regulating setbacks, tower separation, and street frontage.

The Draft EIS was issued on April 24, 2014. **Public comments for the Draft EIS are due by June 9, 2014.** Submit your comments by:

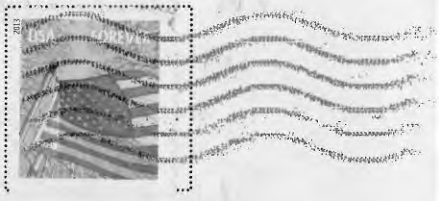
- Completing this comment form and handing it to City staff at the May 20 Public Hearing
- Submitting your comments via email: dave.laclergue@seattle.gov
- Sending this completed comment form or a letter to the address below

A Final EIS will be prepared that addresses written comments and public testimony received during the Draft EIS public comment period.

Ms. Martha May
1020 NE 70th St.
Seattle, WA 98115-5625

SEATTLE WA 981

JUN 2014 PM 3 T



City of Seattle
Department of Planning & Development
700 5th Ave, Suite 2000
PO Box 34019
Seattle, WA 98124

Attn: Dave LeClergue

Letter # 33

From: Chris deMaagd <cedemaagd@outlook.com>
Sent: Monday, June 23, 2014 8:52 PM
To: LaClergue, Dave
Subject: My pref for U-Dist rezone: Alt 1 but w/ higher heights, historic bldgs

Hello Mr. La Clergue,

Don't have time for a lengthy write-up supporting my position (b/c I need to get my kids to bed and then fold laundry and then do 1,000 other things!) but since you're soliciting public feedback about the U-District Rezone thing I wanted to make my preferences known and they are for an amended "Alternative 1" that allows for higher height limits than it currently proposes, b/c those proposed in Alternative 2, while nice, wouldn't I don't think apply to many actually available parcels & therefore wouldn't do all that much good. Maybe in Alternative 1 you could increase heights around stations to 250 (halfway between 160 [current Alt 1] and 340 [Alt 2]), heights between 47th-50th to 200 and all others as high as 125. I think that'd be better for the entire area--increased density, increased jobs. 1

Oh and as for historic preservation/protection of the several gorgeous old brick apartment buildings in the neighborhood--basically I think they should ALL be preserved/protected unless they're falling apart. And I don't think those who own them should be allowed to let them sit until they DO fall apart. Seems to me that Seattle is unable to replace anything old and beautiful with something new and beautiful--it just doesn't happen here, not anywhere that I've seen. It's already a shitty town for architecture, don't make it even shittier--let the beautiful old buildings say--take proactive steps to make sure that they do. 2

Thanks,

Chris deMaagd

Letter # 34

From: Mary Pat DiLeva <catlady1@q.com>
Sent: Sunday, June 22, 2014 9:41 PM
To: LaClergue, Dave
Subject: Comments - U District Urban Design Draft Environmental Impact Statement

1 Here are my comments on the U District Urban Design DEIS: The subject DEIS fraudulently downplays the land use and housing impacts accompanying such a disparity between current uses and the proposed zoning. Instead of objectively analyzing the increased vulnerability of affordable lower density apartments and displacement of seniors, students, low income and working people, the DEIS waxes on about the marvels of "filtering" – a glorified version of trickle-down economics.

2 The proposed 340-foot towers would rise another 15 feet above the neighborhood's current tallest building, the UW Plaza Tower (for years called Safeco Tower), and about 150 feet above the 16-story Hotel Deca (formerly the Meany Hotel) directly to its north. Currently this area is zoned for lower density residential and commercial uses with the vast majority of buildings no more than 20 to 35 feet in height; it is important to consider the human impacts on buildings this out of scale. Consider the recent study that showed the negative impact on communities that have experienced increases in height.

3 The DEIS needs to consider the U-District's unique historic mix of affordable homes, townhomes, 3-story apartments, and its rich social, racial and economic diversity and the impacts the proposed development would have on it. The impacts on small businesses that line the Ave -- many owned by first generation immigrants—needs to be studied to ensure that the probability that the upzones would push their lower income customers out and their storefront rents sky high is understood and mitigated. We do not need another unaffordable high tech hub.

4 The U-District is already "overzoned" with more than enough zoned capacity to accommodate their share of the region's growth assigned by the Growth Management Act through 2035. Seattle has been called on to accommodate another 70,000 housing units by then but is zoned for another 188,000 units.

The U-District's 2035 share, according to city planners, is another 3900 units and roughly twice that amount in jobs. Yet its current zoning has capacity to accommodate about 7000 new units and more than ample office space, well above anything this neighborhood could reasonably expect for many decades. In sum, there are no rational grounds to push for upzones and high-rise development in the U-District.

5 The U-District now is at 94 percent of its 2024 growth target and Seattle has reached 104 percent of its target. Most of that growth has occurred since 2009, reaching record levels citywide and in the District. Rather than causing rents to fall, we've seen record rent increases--up 8 percent in the last year.

6 Instead of giving the green light for still more development, what we really need are regulatory measures to better manage the growth we now have in the District, even including selective downzones to preserve the existing affordable stock. A 2002 study identified over 120 historically significant or potentially significant buildings, many located within
7 the proposed high-rise zone. The report recommended creation of a historic conservation district across the neighborhood. Let's implement that.

8 The EIS needs to require developers to replace housing they remove. We also need developer impact fees so that developers cover the backlog of infrastructure needs created by their projects.

Please include my comments in the public record for this project.

Mary Pat DiLeva
712 15th Ave
Seattle, WA 98122

You've got to judge a country by whether its needs are met, and not just by whether some people make a profit. I've never met Mr. Dow Jones, and I'm sure he works very, very hard with his averages—we get them every hour—but I don't think the happiness of a nation is decided by the share values in Wall Street. Tony Benn

Letter # 35

From: jdubman@gmail.com on behalf of Jonathan Dubman <jon@dubman.com>
Sent: Tuesday, June 24, 2014 12:00 AM
To: LaClergue, Dave
Subject: Feedback on U District Urban Design EIS

This email is sent from the address I intended to use. Thank you.

*

1 I am writing to support Alternative 2 with 340 foot heights in the vicinity of the forthcoming U District light rail station, or something much like it. To the extent there is a market for high-rise development, over time, in the U District, I can't think of a better place for it besides downtown Seattle (and Northgate). The existing high-rise towers in the U District have had no significant negative effects for decades. Seattle is far too timid about large scale development; Vancouver, BC, our neighbor to the north, has actually seen traffic counts at various screen lines go down and stay down with more intense urban development.

2 I also favor historic preservation of what there is of value in the U District. The Ave in particular is a special place, a great urban experience, with a unique place in Seattle and UW history. It should not be turned into a canyon of high-rises and should keep its funky character to the greatest extent possible. In Chicago for example, or in other Seattle neighborhoods, the small and historic co-exist with the new and grand quite well, and the U District could be and should be such a place.

thank you,
Jonathan Dubman
2014 E Calhoun St.
Seattle, WA 98112

Letter # 36

From: Martin Duke <martin.h.duke@gmail.com>
Sent: Thursday, June 19, 2014 10:52 AM
To: LaClergue, Dave
Subject: University District Zoning

1 I support Alternative 2. The most important thing is the number of units around the light rail station, and Alternative 2 maximizes that. Transit utilization in the most distant blocks will be lower, so upzoning there would be less effective in meeting the city's goals.

Of course, additional density brings benefits regardless of the presence of rail. In a perfect world Seattle would create an alternative that was the most intensive of either alternative 1 or alternative 2 in any particular parcel.

Letter # 37

From: Leif Espelund <leif.espelund@gmail.com>
Sent: Monday, June 23, 2014 10:48 AM
To: LaClergue, Dave
Subject: U-District Urban Design comments

Dave,

1 I've recently reviewed the alternatives proposed for changing the zoning in the U-District. I'm writing to express my support for greatly increasing the allowable density in this neighborhood. Neither alternative 1 nor 2 really achieves what was should be aiming for, which is to get the absolute most possible return on the huge investments we are making with the Link Light Rail system. However, both are better than the third "alternative" which is to do nothing.

A blend of the the first two alternatives, with max heights increased greatly right around the Brooklyn station as identified in alternative 2 and then tapering down for the rest of the study area as identified in alternative 1 would allow for more housing units and jobs in the area.

2 Additionally, I'm concerned with the amount of "open space" that is being advocated for. While open space sounds nice, having lots of wide open area actually makes the neighborhood less appealing to pedestrians because it increases the distances between destinations. Instead, the focus for the urban landscape should be on increasing sidewalk widths, adding curb bulbs to make walking safer and more friendly, improving bicycling facilities, and adding greenery into all of these elements instead of trying to artificially clump it into open spaces which will inevitably sit vacant most of the time. The existing open spaces in the neighborhood should be revitalized as part of this process, with an emphasis on finding ways to activate the spaces to attract year round activity.

Thanks!

--
Leif
(206) 334-8890
"People are broad-minded. They'll accept the fact that a person can be an alcoholic, a dope fiend, a wife beater and even a newspaperman, but if a man doesn't drive, there's something wrong with him."
- Art Buchwald

Letter # 38

From: Stephen A. Fesler <safesler@gmail.com>
Sent: Sunday, June 22, 2014 10:26 PM
To: LaClergue, Dave
Subject: Public Comment on University District Urban Design Framework Alternatives
Attachments: Alternative 4 - High Res.png

Hello Mr. LaClergue,

The following are my formal comments on this project, although you can also append what co-penned in The Urbanist's article last week as well to the below.

Rezoning

1 I would like to state my support for an *alternative* Alternative, that being what we wrote over at The Urbanist. I stand by an option that maximises the rezoning effort in the University District rather than either choosing a modest areawide rezoning (Alternative 1) or dense core-only rezoning (Alternative 2) effort. I think both of these approaches have strong merit and when put together, they're exactly what the University District needs to sustain the kind of growth going forward.

It would be a shame to under-zone the core (like in Alternative 1) and lock in small mid-rises at most when we could draw in much taller structures. I think these will certainly be the exception, even if we have Alternative 2 type zoning in the core, but at least the potential is there. It's conceivable that the University District could become an even more and diversified employment centre like Downtown, the Denny Triangle, and SLU, especially in light of key High Capacity Transit infrastructure coming on line in a few short years.

Of course, the University District is more than just employment and educational in nature. It's also residential and residential-service oriented. We need zoning that helps reflect that and can provide much more housing than under current zoning. There are plenty of lots ready for redevelopment--many of which already have applications on them--and many that are blighting and will soon be ready as well. We should be giving them much more incentive to provide a lot more units so as to keep the neighbourhood affordable while also wisely using the amazing infrastructure that the neighbourhood has to support the resulting density.

Historic Preservation

2 I know many have voiced concerns about The Ave--and to be clear, there's a lot to like about the avenue. The buildings are unique and have a strong character that represent the neighbourhood. They have small ground floor spaces that generate a lot of foot traffic. It's a historic building typology that we don't see much anymore, and that's worth saving because the density of spaces creates activity. But I think a lot of this is misplaced concern by neighbours because of ageing buildings that need reinvestment. There's concern that as a result of their age, upkeep, and redevelopment potential, they'll simply be knocked.

2 cont. I think it's reasonable to focus on a conservation district effort--like Capitol Hill's Pike/Pine--to save these wonderful buildings. It's probably worth designating the block as special with particular requirements for protection of facades and ground floor spaces while allowing redevelopment setback above the structures. I think conservation and redevelopment are complimentary goals. Of course, this is only one area. There are plenty of other worthy buildings, too, that I could personally identify--even my own apartment at Campus Apartments (4210 Brooklyn Ave NE)--despite the property owner making poor modification choices recently--deserve some level of protection.

Green Space / Open Space

3 I know that the EIS notes that park space will be below targets for the neighbourhood under any plan. I'm not so concerned about this as it really doesn't take account for how much green space the neighbourhood already has. The University of Washington and waterfront spaces really do contribute a ton to the needs and many of the spaces are already under-utilised. So, I just see this as a metric that's flexible.

But, it may be worthwhile turning the parking lot at University Heights into some mixed green space and market space and even some housing. I think that could be a dynamic space that the neighbourhood could unite around--as opposed to the University Station Plaza (which I vehemently oppose--this should absolutely house a high-rise). Pocket parks are also something that the DPR should focus on. People don't need that much space, but small, targeted ones with high visibility and uniqueness might help achieve the open space goals. University Heights again could be a place for DPR to focus a multi-use recreation facility--it's the perfect location and could use the investment to save the structure. Otherwise, it really comes down to individual developments providing rooftop gardens and courtyards under the land use code.

4 I would strongly advise against any Privately Owned Public Spaces. Most examples of these are total failures and DPD should avoid this as an avenue for open space unless the Department intends to be an active partner the spaces secured--including the actual planning and programming of them.

Design

5 As to design of structures, I do think it's important to get massing right as buildings go up. People don't want walls and I know that staff have generally addressed this well. I just want to go down as in support of performance standards that are reasonable--not excessive--to achieving comfortable taller buildings and low-to-mid-rise developments. I do feel the design review code is under achieving though, but I'm not sure that this EIS is the right place to address that.

For instance, when developments occur, modulation of the facade isn't enough. It would be more appropriately to physically differentiate structures that are a half block or a full block (see AVA on 11th Ave NE and 12th Ave NE as bad examples). Modulation isn't enough, it's got to be fully different designs or at least feel like there's a point where a new building is, even if it still physically attached to the same structure. Another door entry, different colour palette, etc. could help make it feel different, interesting, and more organic as opposed to monolithic and tried.

Transportation

Transportation is an important area that needs to be addressed and a subway isn't just where the conversation ends. I think a menu of options should be on the table, which
6 means making space exclusive or oriented toward buses and bikes. The greenway for bikes along 12th Ave NE needs completion as cycling contributes to a huge portion of trips in the neighbourhood (repavement of the street is a high priority if that's to be successful). And full cycle lane separation should be focused on the Roosevelt/11 Ave NE couplet. Emphasis on the Burke-Gilman for a separation of pedestrians and cyclists, finishing out NE 40th St for cyclists, and finding other east-west alternatives for the neighbourhood. I'm not sure what the solution is NE 45th St and/or NE 50th St, but that needs some serious consideration to further induce cycling.

7 Meanwhile, buses are an important part of the U District and radical action should be taken to make reliability better for them. One idea might be to make 15th Ave NE bus-only during weekdays from Pacific to NE 50th St and possibly consolidating all routes northbound (except for the 66/67) to 15th Ave NE as opposed to University Way. University Way could also become bus-only and modify it to a woonerf/pedestrian boulevard. The street needs more space pedestrians, and as designed, it can't comfortably provide for cars, cyclists, buses, parked vehicles, and pedestrians.
8 Something has to give, and that should be the cars. NE 45th St is already fairly unreliable, and this has everything to do with car congestion. We just need to remove the cars, and we can do this by restricting them to one lane in each direction. People's habits will naturally respond. One lane in both directions should be converted to bus-only at the peak hours *all* days.

Affordability

9 I don't have much to say on this. Obviously Alternative 4 would provide the most affordable required units through code. But mostly, I don't have much to say on this because I don't think zoning in and of itself can really address this beyond allowing as much development as possible. To really get affordability issues, we simply need more public housing, cooperatives, Baugruppen, etc., which aren't typically dealt with through zoning, and probably note even this EIS as that's a citywide issue.

Future Planning

10 For future planning efforts, I think that DPD will have to explore IB, IC, NC2-40, MR, and LR2 changes within the next 10 to 15 years. These zoning types are really failing at their intended development goals. And, there's probably a series of reasons for that, but DPD should really consider looking at those further. For instance, Roosevelt north of 50th is pretty deplorable and in need of redevelopment and that just isn't happening, meanwhile, IB/IC zones along Pacific St and Northlake Way have tons of building capacity and yet no new development (generally) to speak of. It's untapped opportunity for new jobs and industry (or maybe even different industries). Perhaps this area is discouraged by Shoreline Jurisdiction rules, I'm not sure. But in any case, it's food for thought.

Parting Notes

As a personal side note, I want to thank DPD staff for getting to this point in this project. I know it's been a tough process, but your work is appreciated and I encourage you to push the envelope despite opposition from a loud minority. I know I speak for many when I say that we want the best for this neighbourhood--a diverse, growing, and dense one!

Please make me a party-of-record.

Stephen Fesler
University District Resident
4210 Brooklyn Ave NE, Apt. 107
Seattle, WA 98105

--
Stephen A. Fesler *Planning + Urban Design + Sustainability*
206.909.2984 | safesler | theurbanist.org

Alternative 4

Letter # 39

From: Segue Fischlin <seguef@gmail.com> on behalf of Segue Fischlin <segue@nzn.com>
Sent: Tuesday, April 29, 2014 10:28 AM
To: LaClergue, Dave
Subject: Re: U-District Draft EIS

Dave,

1 I feel that the ENTIRE neighborhood (or a specific core portion of it) needs to be designated as an historic zone. Is there any process available for that?

It doesn't help at all to preserve historic character if one historic building on University Way is saved, then next to it, a 10 story building is built. That doesn't preserve historic character.

The fact that the oldest church in the neighborhood was recently demolished is already an embarrassement, and displaced 2 of the best yoga teachers in the U.S. (they have a new location on the Ave, but it is always too packed with practitioners to hardly move).

And every house built before 1940 there was built from old-growth wood. Not a single one of them can be replaced after they are demolished because no wood of this quality exists any more in the U.S. The new faceless apartment buildings replacing them will not last as long as the house they have replaced. It is a future without a past. The new buildings, both in the commercial zone and in the residential areas, for the most part, have no sense of place. They do NOT work within the context of the architectural character of the neighborhood. They do NOT build community; they foster anonymity and isolation, and with anonymity and isolation comes crime, and increased policing and increased costs from crime. This has been going on for awhile maybe, be never has it been so sudden and horrifying as in the last 10 years.

The new residences have no front porch, no yard. There's no transitional zone from public to semi-public. There's no place to meet the neighbors. Where's my community?

Segue

From: "LaClergue, Dave" <Dave.LaClergue@seattle.gov>
Date: Tue, 29 Apr 2014 09:53:48 -0700
To: Segue Fischlin <segue@nzn.com>
Subject: RE: U-District Draft EIS

Thank you, Segue – I've received and recorded your comments. There will be a formal response in the FEIS, but here are a couple of quick observations in response to your concerns…

1) We've heard clear support for a more aggressive transfer of development rights (TDR) program to support preservation of designated landmarks in the neighborhood – that's likely to be part of our recommendations going forward.

2) There are lots of landmarks-eligible properties in the neighborhood, but only a handful that have gone through the full designation process – that's a significant difference between the U District and Pioneer Square. See the "historic resources" section of the DEIS for more information. This is one front where the community could do a lot for preservation, working with the Dept. of Neighborhoods.

Best wishes, and I'm sure we'll get a chance to talk about all this at some point (May 20 open house?)

-D

Dave LaClergue
Urban Designer
City of Seattle Department of Planning and Development <http://www.seattle.gov/dpd/>
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O: 206.733.9668 I F: 206.233.7883 I dave.laclergue@seattle.gov <mailto:dave.laclergue@seattle.gov>
<https://www.facebook.com/seattledpd> <https://twitter.com/seattledpd> <http://buildingconnections.seattle.gov/>

From: Segue Fischlin [mailto:seguef@gmail.com] **On Behalf Of** Segue Fischlin
Sent: Monday, April 28, 2014 4:25 PM
To: LaClergue, Dave
Subject: RE: U-District Draft EIS

Mr LaClergue and DPD,

3 Based upon the options presented, I recommend "No Action," though, in reality, action to lower the height limits of the buildings on narrow streets such as University Way would be highly recommended. It is clear based upon changes witnessed in the University District in the past 15 years that the Zoning regulations for the University District are based in short-sightedness and greed, not with an intelligent, design-oriented, long-term interest in preserving the historic character of one of the oldest neighborhoods in Seattle.

The damage is extensive. Residents of the University District have been fleeing by the thousands. I hear new reports every week of someone else who is fed up with the "raze the neighborhood and put up another faceless high-rise" and is leaving. These are people who have been an active part of the community for decades, including shop and restaurant owners, artists, musicians, and so on.

4 DPD has done a very poor job at preserving the unique historic character of this neighborhood, probably a worse job at it than in any other district or neighborhood in Seattle.

There seems to be a general ignorance as to what the University District offers—and has offered—the City of Seattle over the past 160 years. This very special cultural microcosm—unique worldwide--ought to be designated as a Historic District (similar to Pioneer Square). Old buildings ought to be preserved and protected along certain corridors and more restrictive height limits established that are in keeping with the character of the neighborhood.

This is in the interest of both the temporary and permanent residents of the University District. The City of Seattle would be wiser to preserve the historic character in the interests of both the health of this troubled neighborhood and in the interests of the tourist potential that this neighborhood embodies.

Destroy the tourist potential and you've destroyed a certain flow of income for the City forever. Rome wasn't built in a day, but because the Italians have smartly preserved what is great about it, they are still reaping the benefits daily of those old buildings and the character that comes with it.

So, rather than allow the property owners (most of whom don't even live in the U.S. let alone in Seattle) to bend your ear over their selfish and short-sighted demands, think more about the long term economic and quality-of-life benefits that will come from preserving and intelligently-managing this precious gem of a place.

Thanks for listening,

Segue Fischlin
20 year resident of the University District

Letter # 40

From: Kevin Futhey <kevinfuthey@gmail.com>
Sent: Thursday, June 19, 2014 8:48 AM
To: LaClergue, Dave
Subject: University District Rezone comments

Hello,

1 I'd like to comment on the proposed alternatives for the U-Dist rezone. I strongly prefer alternative 2 as I support dense, walkable neighborhoods with great transit access. This is already a great neighborhood that will only become more lively as more businesses, residents, students, and shoppers move in to the area.

Thanks,
Kevin Futhey

Letter No. 31 DAMPIER, CATHY

1. **Towers and sunlight.** The comment is noted. Please see the shadow analysis in Draft EIS Section 3.3.
2. **Historic character.** The comment is noted. Please see the historic resources analysis in Draft EIS Section 3.4.
3. **Utilities.** Please see the discussion of potential impacts of the alternatives on water supply and the electrical power system in Draft EIS Section 3.9.

Letter No. 32 DEJNEKA, ALEX

1. **University Way zoning.** Under Alternative 1, the west side of University Way NE would be zoned NC3P 65 on the blocks to the north and south of NE 56th Street. The east side of University Way NE would be zoned MR north of NE 56th Street and NC3P 65 south of NE 56th Street. Under Alternative 2, the west side of University Way NE would be zoned NC3P 65 north and south of NE 56th Street. The east side of University Way NE would be zoned NC3P 65 south of NE 56th Street and the LR3 zoning would remain unchanged north of NE 56th Street. Under Alternative 3, there would be no changes to existing zoning. Please see Draft EIS Chapter 2 for a complete description of the alternatives.

Letter No. 33 DEMAAGD, CHRIS

1. **Prefer amended Alternative 1.** The comment is noted.
2. **Historic preservation.** The comment is noted.

Letter No. 34 DILEVA, MARY PAT

1. **Housing affordability.** As described in the Draft EIS, housing affordability is a complex issue influenced by a number of factors including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the number of affordable units developed in the study area.

With respect to potential impacts of the proposed action, the area-wide analysis in this EIS focuses on two key questions: (1) does the existing regulatory framework (Alternative 3, no action) or the proposed new regulatory framework (Alternatives 1 and 2) expand the potential supply of housing above the likely market demand; and (2) does the existing regulatory framework Alternative 3, no action) or the proposed new regulatory framework (Alternatives 1 and 2) expand the potential use of housing affordability tools. The discussion concludes that all three alternatives accommodate a supply of housing above the growth estimates established by the City and that the excess supply should help reduce the upward pressure on rents. Use of incentive zoning to create affordable housing units is contemplated under the action alternatives and expansion of other strategies, such as the MFTE program, could further address the housing affordability challenge.

Regarding the concept of filtering, please see the response to Letter No. 6, Comment No. 16.

2. **Increased height.** The comment is noted.
3. **Small businesses.** The comments are noted. Please see the discussion of potential employment impacts in Draft EIS Section 3.2.
4. **Land use capacity.** The comment is noted. Development capacity is documented in Draft EIS Chapter 2.
5. **Housing targets and affordability.** The comment is noted.
6. **Downzones and affordability.** As part of a separate action, the City is examining affordable housing measures to address the need for more affordable housing in the city. It is likely that downzoning (without other affordability measures) would have unintentional effect of limiting the housing supply and potentially exacerbate housing cost increases.
7. **Historic district.** The comment is noted. Please see the discussion of historic resources in Draft EIS Section 3.4.
8. **Developer contributions.** The comment is noted. Under the action alternatives, it is likely that new development would increase the overall housing inventory in the study area. Developer contributions to mitigate impacts to infrastructure are addressed through the City's development standards.

Letter No. 35 DUBMAN, JONATHAN

1. **Support Alternative 2.** The comment is noted.
2. **Historic preservation.** The comment is noted. Please see the discussion of historic resources in Draft EIS Section 3.4.

Letter No. 36 DUKE, MARTIN

1. **Support Alternative 2.** The comment is noted.

Letter No. 37 ESPELUND, LEIF

1. **Support blend of Alternatives 1 and 2.** The comment is noted.
2. **Open space.** The comment is noted.

Letter No. 38 FESLER, STEPHEN A.

1. **Maximize rezone alternatives.** The comment is noted.
2. **Historic resources.** The comments are noted.
3. **Open space.** The comments are noted.
4. **Private owned open spaces.** The comments are noted.
5. **Design standards.** The comments are noted.
6. **Bicycle improvements.** The comments are noted. Options described in the comment letter are not consistent with the Seattle Bicycle Master Plan. The Bicycle Master Plan with proposed future bicycle facilities in the area is in Figure 3.5-9 on pg. 3.5-21. A better east/west bicycle connection is a proposed bicycle/pedestrian bridge over I-5 on NE 47th Street.

7. **Transit.** The comment is noted. Restricting 15th Avenue NE to bus only could substantially increase traffic impacts and was not considered as a viable mitigation option.
8. **NE 45th Street.** The comment proposes restricting general purpose lanes to one lane in each direction on NE 45th St and adding bus only lanes during the peak hours on all days. Restricting NE 45th Street could result in substantial increase in traffic congestion and is not consistent with any SDOT plans; therefore it was not considered as a viable
9. **Housing affordability.** The comments are noted. The EIS does not evaluate a fourth alternative.
10. **Future planning.** The comments are noted.

Letter No. 39 FISCHLIN, SEGUE

1. **Historic zone.** The comments are noted. Please see the discussion of historic resources in Draft EIS Section 3.4., which includes recommended actions to avoid and mitigate potential character loss.
2. **Support No Action.** The comments are noted.
3. **Historic character.** The comments are noted.

Letter No. 40 FUTHEY, KEVIN

1. **Support Alternative 2.** The comment is noted.

Citizen Comment Letters 41-50

Letter Number	Name (Last, First)	Agency/Organization
41	Futterman, Alan	
42	Gangemi, Matt	
43	Grafious, Mary S.	
44	Grafious, Mary S.	
45	Griffin, Mark	
46	Hansen, Justin	
47	Hernandez, Ian	
48	Hopkins, Jonathan J.	
49	Hurrle, J.	
50	Islam, Aminul	

Letter # 41

From: lfalan@comcast.net
Sent: Monday, June 16, 2014 2:32 PM
To: LaClergue, Dave
Subject: Re: U District Urban Design Public Comment

You are correct.
The restaurant is the only business on this block.
However, there is a huge apartment building next to us and we would like to be able to increase the number of units on our property as well.
Thanks,
Alan

From: "Dave LaClergue" <Dave.LaClergue@seattle.gov>
To: "ALF" <lfalan@comcast.net>
Sent: Monday, June 16, 2014 1:45:59 PM
Subject: RE: U District Urban Design Public Comment

Got it, thanks. Do you have a commercial use at that address? I only remember seeing Alex's restaurant, otherwise I thought everything along that block was apartments. Are there other businesses I'm not aware of? Thanks, D

Dave LaClergue
Urban Designer
City of Seattle Department of Planning and Development
P.O. Box 34019, Seattle, WA 98124-4019
O: 206.733.9668 I F: 206.233.7883 I dave.laclergue@seattle.gov

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From: lfalan@comcast.net [mailto:lfalan@comcast.net]
Sent: Monday, June 16, 2014 1:41 PM
To: LaClergue, Dave
Subject: Re: U District Urban Design Public Comment

Sorry. I was not thinking clearly.
Yes, we are on the East side of the Northernmost block of University Way.
Thanks,
Alan

From: "Dave LaClergue" <Dave.LaClergue@seattle.gov>
To: "ALF" <lfalan@comcast.net>
Sent: Monday, June 16, 2014 1:20:56 PM
Subject: RE: U District Urban Design Public Comment

Do you mean the east side? The west side is commercial – when I checked your address it looks like you're midblock on the west…?

Dave LaClergue
Urban Designer
City of Seattle Department of Planning and Development
P.O. Box 34019, Seattle, WA 98124-4019
O: 206.733.9668 I F: 206.233.7883 I dave.laclergue@seattle.gov

From: lfalan [mailto:lfalan@comcast.net]
Sent: Monday, June 16, 2014 1:22 PM
To: LaClergue, Dave
Subject: RE: U District Urban Design Public Comment

Hello Dave,
Unfortunately I am also on the West side.
5628 University Way
Thanks,
Alan Futterman

Sent via the Samsung Galaxy S™ III, an AT&T 4G LTE smartphone

-------- Original message --------
From: "LaClergue, Dave" <Dave.LaClergue@seattle.gov>
Date:
To: lfalan@comcast.net
Cc: Alex Dejneka <adejneka@hotmail.com>
Subject: RE: U District Urban Design Public Comment

Hi Alan, thanks for your comment – the good news is that your side of the street is already NC2-40! The east side of the street, which is residential except for Alex's business (so far as I know?), is zoned LR3 (lowrise multifamily residential, i.e., rowhouses or apartments). In any case, comment received and filed.

-D

Dave LaClergue
Urban Designer
City of Seattle Department of Planning and Development
P.O. Box 34019, Seattle, WA 98124-4019

O: 206.733.9668 I F: 206.233.7883 I dave.laclergue@seattle.gov

From: lfalan@comcast.net [mailto:lfalan@comcast.net]
Sent: Sunday, June 08, 2014 10:44 PM
To: LaClergue, Dave
Cc: Alex Dejneka
Subject: U District Urban Design Public Comment

Dear Mr. LaClergue,

1 I am one of the owners of 5628 University Way NE.

The current zoning for our block of University Way is SINGLE FAMILY RESIDENTIAL.

However, there has been nothing even remotely resembling single family usage on University Way for at least several decades. Apartment buildings and businesses surround us.

It is way past time to change the zoning to Commercial NC-40 or even better, to NC-65.

Thank you so much,

Alan Futterman

206-409-9065

LFALAN@comcast.net

Letter # 42

From: Matt Gangemi <mgangemi@gmail.com>
Sent: Thursday, June 19, 2014 9:32 AM
To: LaClergue, Dave
Subject: U District Urban Design

1 First, I'd like to add support to option 2. We should be upzoning as much as possible near our new stations. I'd love to have this area have an almost downtown feel, and it would benefit the university and the area to have a large number of housing units next to both the university and transit.

2 Second, I don't think you've gone far enough. If the *business as usual* zoning Option 3 potentially brings us 6,600 new housing units (I assume by bulldozing the entire area and building up to envelope maximums), then adding just 3,200 units on top of this doesn't seem like very much. Maybe you could go with a combination of 1 and 2, with a larger area of midrise?

3 Third, please be careful with the green streets idea. The largest problem in my mind with Seattle's zoning rules is our excessive setbacks. I want as little setback as possible, to bring storefronts right up to the sidewalk with a comfortable streetwall feel both at ground level and a few floors above. The best cities in the world have narrow streets, wide sidewalks, and streetwalls, not planter boxes.

Thank you,
-Matt Gangemi

Letter # 43

5-20-14
~~Mary S.~~ G RAFIOUS #2402
4540 8th Ave. NE Un. Plaza
Seattle WA 98105 Condominium

☆

1 I thank the DPD Planners for removing the monstrous high towers from all Alternatives, but they are obviously completely out of touch with Seattle's Evergreen heritage of unique Neighborhoods and has more or less started from scratch in developing a Comprehensive plan that has attracted profit seeking Developers from the East to buy up Seatte neighborhoods and ~~reco~~ redesign them* to high density.

These are the Neighborhoods ~~that has~~ and the schools that have produced the amazing plethora of profitable entrepeneural and technical enterprises that this area is blessed with. We don't want become a transplanted Manhattan that was largely responsible for bringing on our recent recession.

Cultural and physical environments are key to productivity and maintaining a strong middle class. Yes, we need more housing. Everyone in the Country

*- Note [illegible]

2) Seems to want to come to Seattle;
The shortage of single family homes to
be replaced by higher density has driven
up prices and is pushing families out of
Seattle to the suburbs. South Seattle
has had to close schools and it could happen here.
University Playfield w. ~~hich~~ was developed
from a neglected mud patch by the hard-
work of the Roosevelt Neighbors Assoc-
iation for neighborhood families has bec-
come adult oriented. The SF neighborhood
adjacent to the Park on the South
is in turmoil ~~by~~ because of the
~~intrusion of~~ construction of
property-line-line town houses, re-
placing SF Craftsman houses.

1 cont

2 The DEIS finds no adverse impacts,
but Families cannot live in the new, higher
density ~~housing~~ housing being constructed.
They must have a car and off-street
parking. They, the growing children,
need the clean air generated by
the little ecosytem around each SF house.

3) Projected park developments along Portage Bay will benefit the many U.W students in the SW quadrant. Professionals list an all over shortage of Open Space for U.D.(1).

3

4

1.3 Objectives of the Proposal lists enhancement of the pedestrian experience at street level. Setbacks, landscaping and trees - existing, mature trees - are not included. These three are life and breath for Seattleites and actually.

Until now DPD has exhibited no respect for this. The removal of 200+50 mature trees from 11th Ave NE btween NE 47th and NE 45 and from NE 47th between Roosevelt Way and 12 Ave NE is an unforgivable tragedy. Also, all mature trees and other greenery has been removed around the new town houses.

(1) City-Wide Parks and Rec Report on Open Space for pg 3

4) UC-P17 [150] calls for creation of a "highly
5 diverse spine" to service the residen-
tial neighborhoods north and south
of NE 50th. This seems to anticipate
the destruction of the few remaining
SF houses on 50th unless they can be
'converted' to a service role. this is a
common practice in UD.

6 What concerns me terribly is the Pres-
ervation of many wonderf mature
trees, some of which are on private
property [see attached photoes]
The Tragedy on 41st and 47th must
not be repeated. A w can and must
be found be found to preserve all
The UTILITY Dep't is installing tall
poles to avoid pruning the heart out
of street trees

ALL MATURE TREES MUST BE
PRESERVED for CARBON ABORPTION
and ENJOYMENT

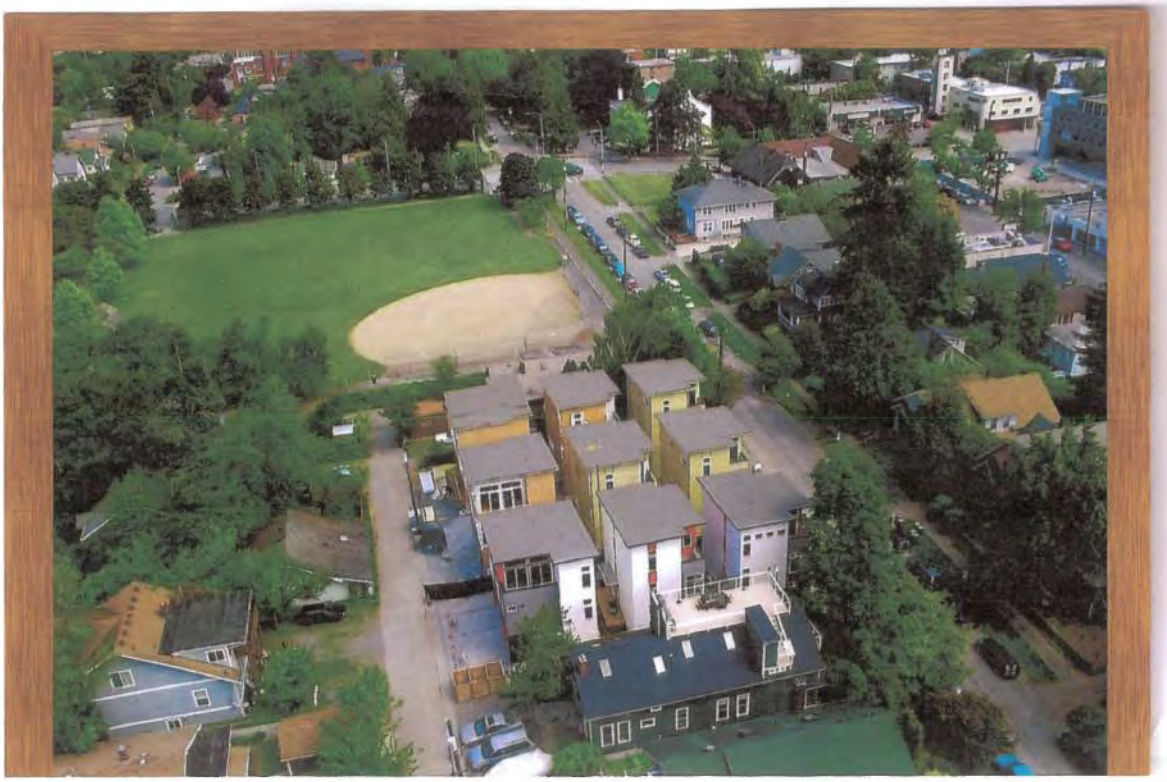
Marvin [illegible]

Duncan Place Condoes

Corner 8th Ave NE NE 47 St

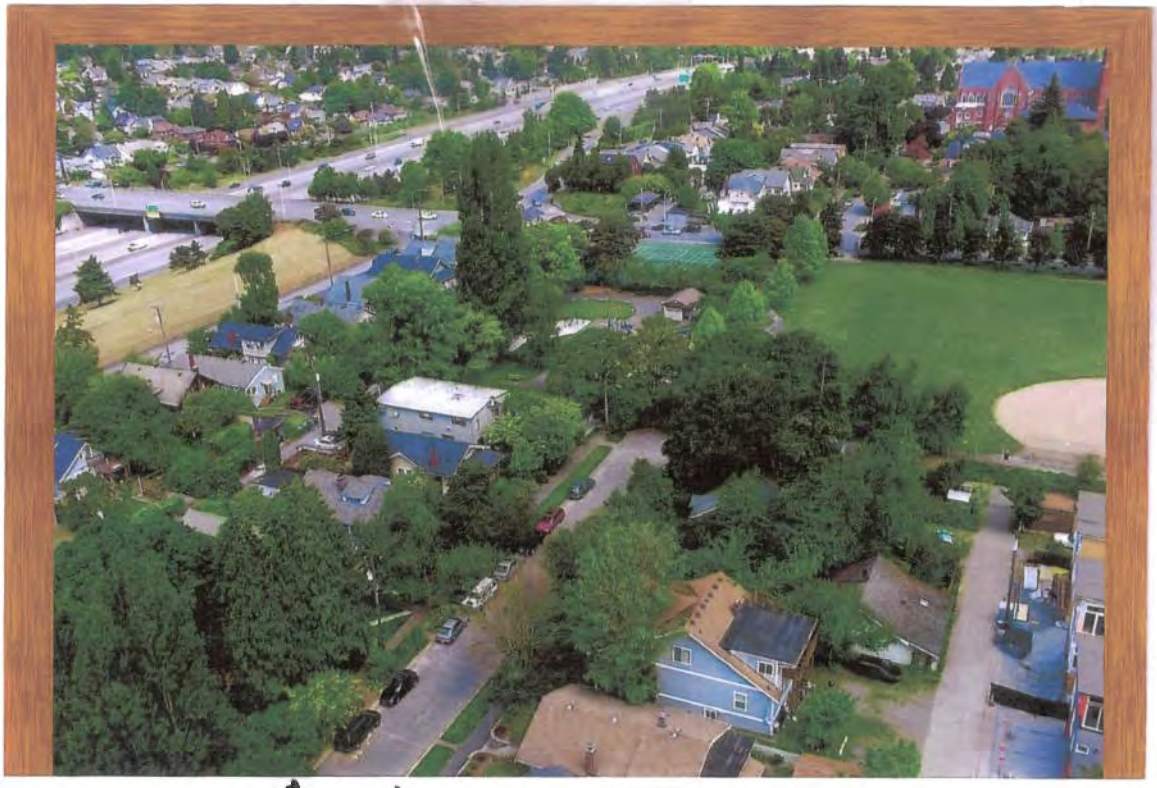
Corner NE 45th + 8th Ave NE

These trees were saved, altho sidewalk was not widened into commercial space as it should have been

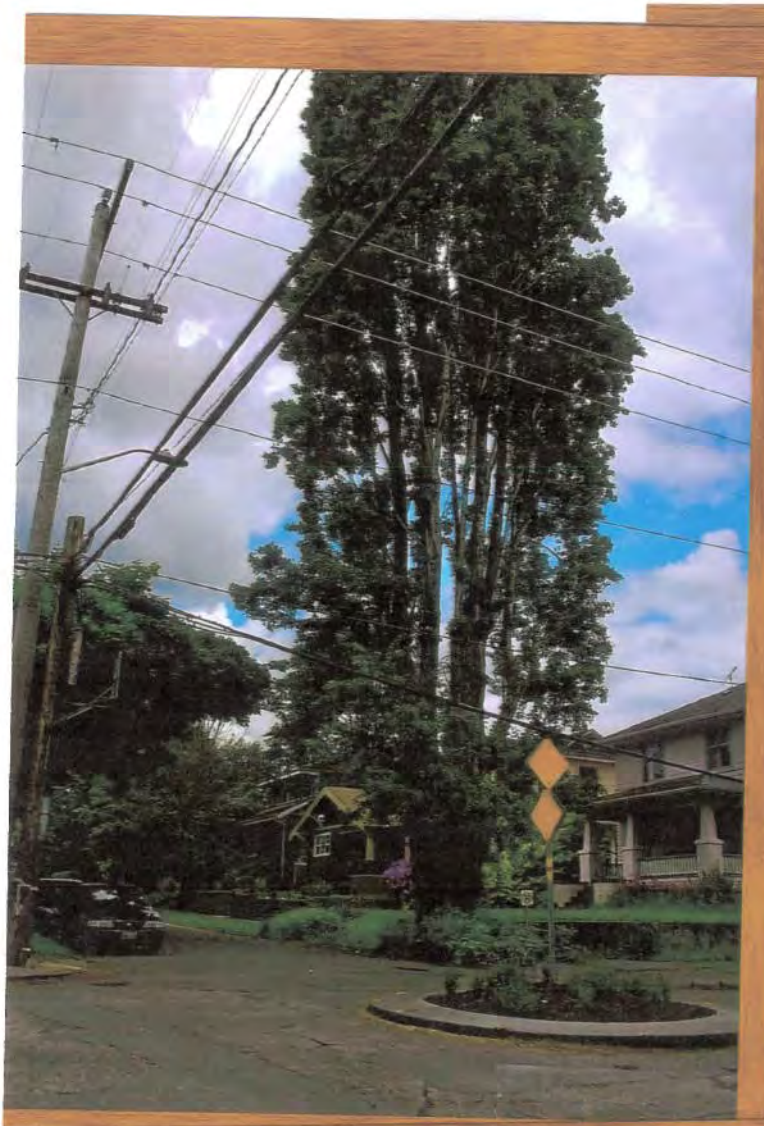


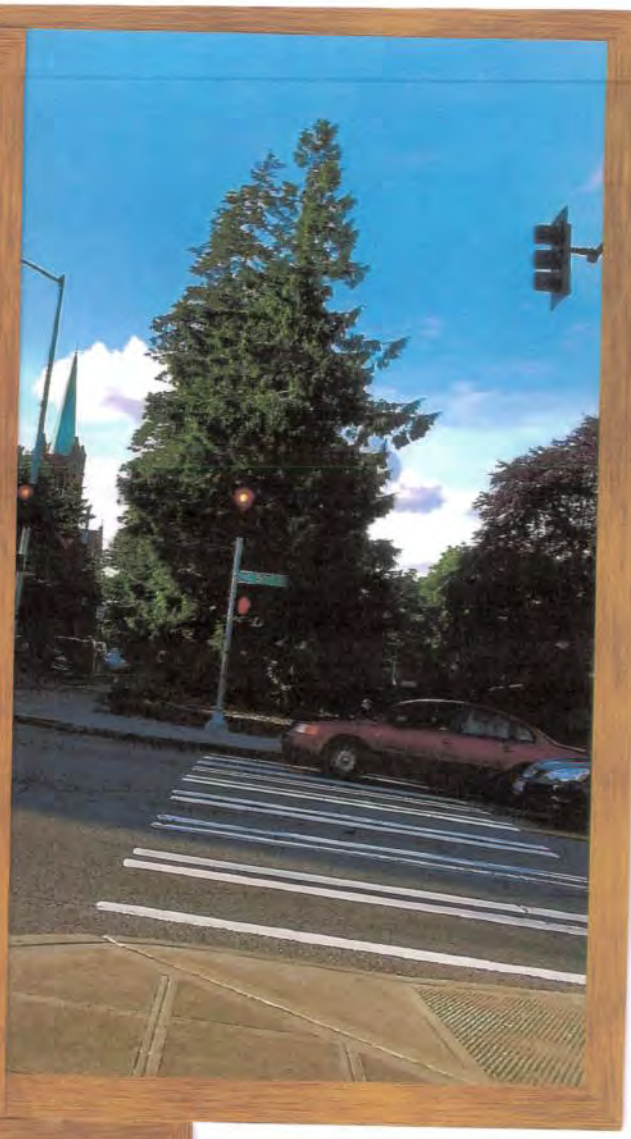
8th Ave. NE

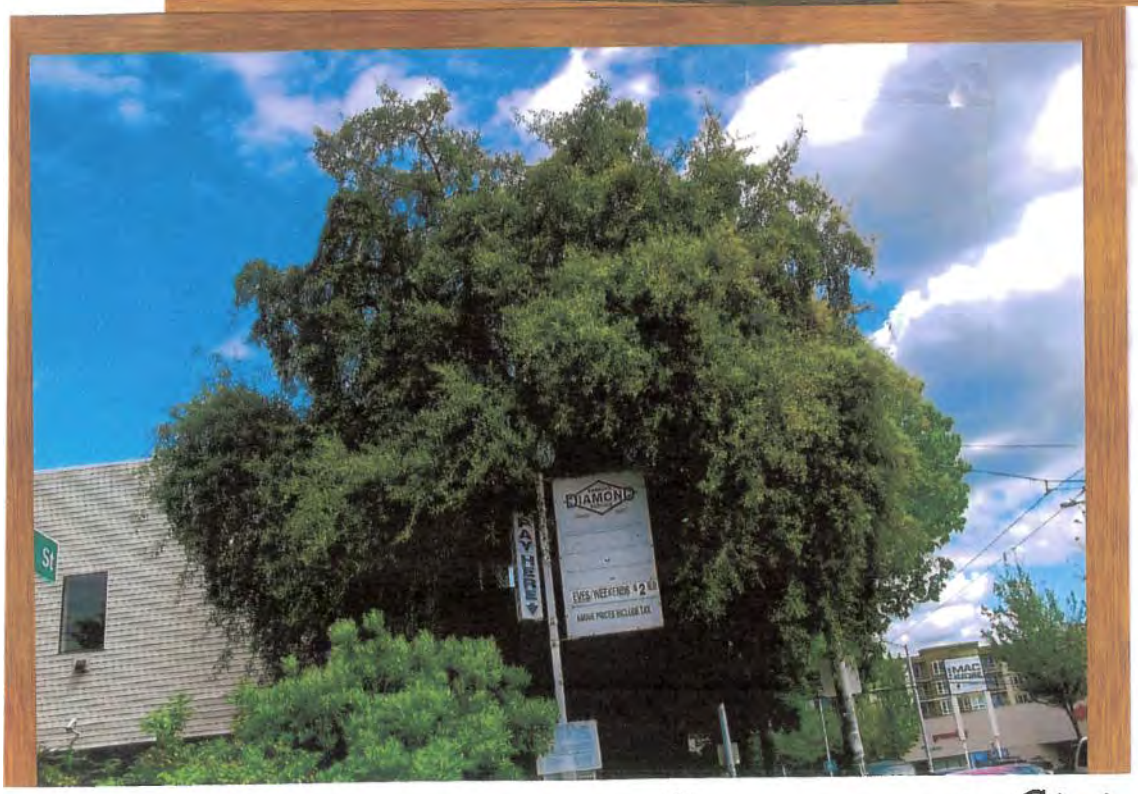
9 Ave NE



8th, Mt, I5





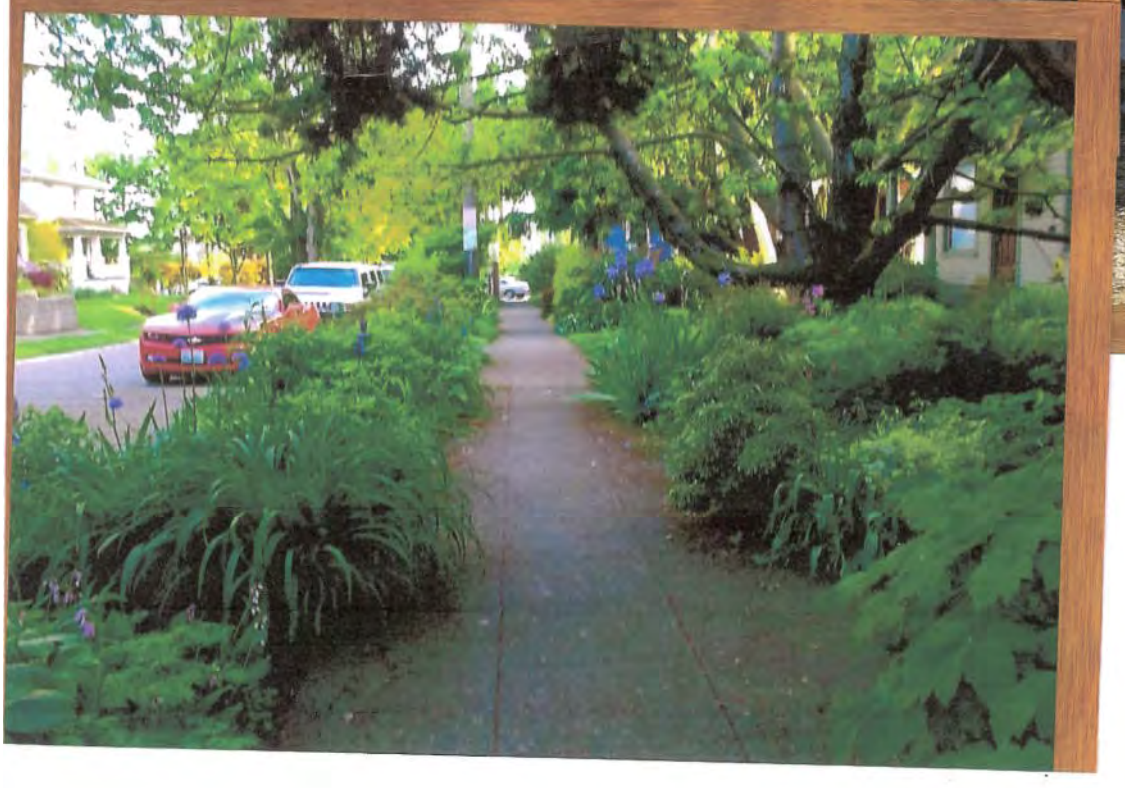


A Few
"Trophy"
Trees

Corner 45th & 7th

More "Trophy" Trees

Tho not native, These were obviously
chosem w care and love




NO
FROM

Letter # 44

From: Mary S Grafious
4540 Eighth Ave. NE Unit 2402
Seattlt, WA 98105 6-22-14

To: Seattle Department od Planning ans Development
Att
Att: David LaClergue
700 Fifth Ave, Suite 1900
PO Box 34o19
Seattle WA 98124

Thank you for extending the comment period; I hope it means that the comments will be carefully considered.

1 I have been a homeowner in the University District since 1976. 23 years on 19th ave Ne and 14years at University Plaza Concomium at 4540 Eighth Ave NE. I have have been active in all the Community Groups and Mayor Rice's Urban Village Project. I am ver knowledgeable about the UD. And I am ver concerned abput about the changes . some of them, that are taking place and those that have been proposed. As a member of UPOA Civic Affairs Committee, I have particularly researched the lack of consider-eration for amenities. The emphasis has so far been almost entirely FOR Development.

2 1.3 Under Objectives of the Proposal1.2 states Enhance the pedestrian experience by providing amenities Althoweighted towar commerdial, some may be desirable. . the No 1 desired and valued in Seattle neighborhoods, is not mentioned---TREES!. Development permitted by this Dep. so far has no value placed on setbacks, landscaping, and gerations of mature carbon absorbing shade trees are routinely cut. Seattle ,~~ist~~ continue must continue it's policy of preserving our irreplaceapple~~for~~ Trees more generations of our canopy.

3 Parks and Open Space arelisted ~~and~~ as adequate, even tho other city professionals have them to be severely lacking: see pg. 22 Park and Recreation Citywide Open Space Gap Report.

4 FutureUC-P17 150 describes development of NE50th St that makes no mention of the may carbon absorbing, and beau-tiful trees, some on private property.THESE TREES MUST BE SAVED.

5 The Deis, except for Alternative The entire DEIS demonstrates a complete lack of planning for FANILIES, which are being forced out of the city at a rapid rate. University Playfield which has bee developed by Rna for families, is now being for adults. I MUST VOTE FOR ALTERNATIE ~~E~~ Three and start over with real input.

I hope hope thisis legible. I apologize. My vision is severely ~~limited.~~ limited.

Marcy S Grafious
BA URbat Reg Planning, MSW

Letter # 45

U DISTRICT URBAN DESIGN
Draft EIS Public Hearing May 20, 2014

City of Seattle
Department of Planning & Development

Draft EIS comments are due by June 9, 2014

Please let us know your comments about the Draft EIS:

1 - Increased density is important, especially high rise development to attract condos & non-chain businesses. However it should be balanced by focusing around the transit station and south of 50th (but not around the Playground, which should stay the same).
- I don't believe the density should stay as it is given the growth of the city and the sustainability of using mass transit / light rail.

2 - Incentivize family housing in mid rise & high rise development.

3 - Higher heights for greater cross block pedestrian access

4 - Split out the zone parking into 2 different zones. One for ~~LR3~~ and higher and one for LR2 and lower.

5 - We need to supplement the parks space w/ a Lid over I5. between 45th & 50th

6 - Supportive of option 2

Please fill in your contact information below. ☐ Please add me to project e-mail list.

Name Mark Griffin Phone (206) 990-5895

E-mail

Address 5395 8th Ave NE
Seattle WA 98105

Alternate formats provided upon request: 206-684-4466, **TTY Relay: 711**

Letter # 46

From: Justin Hansen <justin.vagabond@gmail.com>
Sent: Thursday, June 19, 2014 1:52 PM
To: LaClergue, Dave
Subject: U-District Urban design

Hello,

I wanted to submit my comments on the U-District Urban design. I submit them as a homeowner near 5th Ave NE and NE 58th St in the adjacent Wallingford Neighborhood.

1 | My main concern is to maximize TOD potential around the new Link stations.

Alternative #2 is my preference with Alternative #1 a close second.

2 | Alternative #3 is not an option for me. We'd be missing a big opportunity if this alternative is chosen.

Thanks,

Justin Hansen
Freeway Estates Community Orchard
FreewayEstates.org

Letter # 47

From: Ian Hernandez <ian.c.hernandez@gmail.com>
Sent: Thursday, June 19, 2014 3:06 PM
To: LaClergue, Dave
Subject: U-District Urban Design Draft EIS Comments

1 I am writing to express my support of Alternative 2, which I believe will maximize the benefits of the forthcoming light rail station.

Thank you,
Ian Hernandez

Letter # 48

From: Jonathan Hopkins <mortonjhop@gmail.com>
Sent: Thursday, June 19, 2014 10:29 AM
To: LaClergue, Dave
Subject: University District Altervatives

Dave,

1 I wanted to express my support for Alternative 2.

I am a Seattleite, but due to military service have spent time in places like DC and NYC. It is ***incredibly important*** for us to maximize people's ability to live and work at the closest possible distance to the U District light rail station. As housing and office rates show in the other cities, rates increase incredibly with each block closer to the mass transit station you are. By making a very large amount of housing and workspace available most close to the station, this relieves the cost pressures to the greatest degree possible, making affordable housing more likely in our city, and per person transport commute times lower. Ultimately, this improves quality of life for everyone.

Additionally, Alternative 2 allows redevelopment now close to the station, but while reducing disturbing areas further from the station so they can remain as is. It also leaves room to the future, should housing and workspaces within the rezone become inundated with demand, that areas further from the station could also be up zoned if the community and the city so desired. It leaves that choice to the future while minimizing commutes, maximizing jobs, and maximizing use of the multi-billion dollar resource of our mass transit system being built by Sound Transit. This is critical both now and long into the future of our city.

—Jonathan

Jonathan J. Hopkins
Seattle, Washington
360-957-5468

Letter # 49

U DISTRICT URBAN DESIGN
Draft EIS Public Hearing May 20, 2014

City of Seattle
Department of Planning & Development

Draft EIS comments are due by June 9, 2014

Please let us know your comments about the Draft EIS:

1 OPTION #3

YOU NEED TO ADDRESS PARKING (UNDERGROUND), OPEN SPACES, DESTROYING SENIORS / VETERANS / ELDER HOUSING. SOMETHING THAT WASN'T TOUCHED ON IS THE SHEER UGLINESS OF YOUR BUILDING TROPSALS. BEAUTY ISN'T JUST IN THE EYE OF THE BEHOLDER, TAKE A WALK DOWN SOUTH LAKE UNION AND SEE IF IT INSPIRES YOU TO MOVE TO THAT NEIGHBORHOOD.

Please fill in your contact information below. ☐ Please add me to project e-mail list.

Name J. HURRLE Phone

E-mail X

Address 11748 LAKESIDE AVE NE
SEATTLE, WA 98125

Alternate formats provided upon request: 206-684-4466, **TTY Relay: 711**

Letter # 50

From: Aminul Islam <islama44@yahoo.com>
Sent: Thursday, June 19, 2014 4:43 PM
To: LaClergue, Dave
Subject: Support for the proposed Alternative 1 of the Draft EIS 2014
Attachments: scan0001.pdf

Attn: Dave LaClergue
Associate ASLA
Department of Planning and Development
700 5th Ave. Suite #2000
P.O. Box 34019
Seattle, WA 98124
Tel: (206)-733-9668

Dear Sir:

Thank you for the extension of the comments under the captioned subject above.
Attached in my comments for your kind perusal and necessary consideration.
I have 6 properties in this study area are as follows:
(i): 5007 Brooklyn Ave. NE
(ii):5514 Brooklyn Ave. N.E., (iii): 4729 Roosevelt WAy NE, (iv): 4700 7th Ave. NE,
(v): 705 NE 50th Street, and (vi): 4754 7th Ave. NE, Seattle, WA 98105

With best regards
Sincerely
Dr. Aminul Islam
4754 7th Ave. NE
Seattle, WA 98105

Date: June 20, 2014

Attn: Dave LaClergue
Associate ASLA
Urban Designer
DaveLaClergue@Seattle.Gov
Department of Planning and Development
700 5th Ave. Suite # 2000
P.O. Box 34019
Seattle, WA 98124
Tel: (206)-733-9668

VIA: E-mail

Subject: Support for the proposed *Alternative 1* of the Draft EIS, 2014

Dear Sir:

Greetings.

1 I am one of the interested parties of the Draft EIS of 2014. I have 6 properties in this University District study area.
I strongly support the proposed ***Alternative 1, NC3 - 65*** of the area extending north of the NE50th Street.
My one property 5007 Brooklyn Ave. NE is in this proposed zoning, and I am extremely interested for this zoning **NC3-65** of this property.

With best regards
Sincerely

Dr. Aminul Islam
4754 7th Ave. NE
Seattle, WA 98105
Tel: (206)-523-4257
Cell: (206)-261-1570
E-mail: islama44@yahoo.com

Letter No. 41 FUTTERMAN, ALAN

1. **University Way zoning.** The referenced address appears to be located on the east side of University Way NE, currently zoned LR3. Under Alternative 1, the zoning would be MR and under Alternative 2, LR3.

Letter No. 42 GANGEMI, MATT

1. **Support Alternative 2.** The comment is noted.
2. **Larger midrise area.** The comment is noted. The comment is noted.

Letter No. 43 GRAFIOUS, MARY S.

1. **Neighborhood character.** The comments are noted. The building heights permitted under Alternatives 1 and 2 would allow towers.
2. **Housing affordability.** The EIS concludes that the proposal would not result in significant adverse impacts. However, it is acknowledged that housing affordability is a concern in Seattle, including the U District. The discussion in Draft EIS Section 3.2.4 concludes that the affordability challenge facing the study area is large, that housing costs are consuming a greater portion of household incomes and the lowest income households are at most risk of being extremely cost burdened.
3. **Parks along Portage Bay.** The comment is noted.
4. **Setbacks and tree retention.** The comments are noted. Please see Draft EIS Table 2-2, which describes ground-level setbacks under the action alternatives. Also see Draft EIS Section 3.3, which discusses designated Neighborhood Green Streets in the study area. Today's regulatory protection for street trees and exceptional trees would continue under the proposed action. Further, it should be noted that much of the U District does not comply with today's standards for street trees or landscaping on private property. Redevelopment under any scenario would provide more trees and landscaping than are present today.
5. **Policy UC-P17.** The intent of this policy is provide services to support the surrounding residential area.
6. **Tree retention.** The comments are noted.

Letter No. 44 GRAFIOUS, MARY S.

1. **U District changes.** The comment is noted.
2. **Tree retention.** Please see the response to Letter No. 43, Comment No. 4.
3. **Open space.** The Draft EIS concludes that the U District does not meet some of the open space standards established by the Comprehensive

Plan and that the deficit may increase as the neighborhood grows. However, because the EIS considers the impacts of different distribution of a constant amount of growth, the deficit is not an impact of the proposal. This is not intended to suggest that the open space deficit is not a concern for the study area. As stated in the Draft EIS, "…existing and projected deficiencies clearly support the acquisition and development of additional open space and recreational facilities to serve the study area." Please see the discussion of open space and recreation in Draft EIS Section 3.7.

4. **Policy UC-P17.** Please see the response to Letter No. 43, Comment No. 5.
5. **Support Alternative 3.** The comment is noted.

Letter No. 45 GRIFFIN, MARK

1. **Increased density.** The comments are noted.
2. **Family housing.** The comment is noted.
3. **Cross block pedestrian access.** The comment is noted.
4. **Parking zones.** The comment is noted.
5. **Lid over I-5.** The comment is noted.
6. **Support Alternative 2.** The comment is noted.

Letter No. 46 HANSEN, JUSTIN

1. **Support Alternative 2.** The comment is noted.
2. **Do not support Alternative 3.** The comment is noted.

Letter No. 47 HERNANDEZ, IAN

1. **Support Alternative 2.** The comment is noted.

Letter No. 48 HOPKINS, JONATHAN

1. **Support Alternative 2.** The comments are noted.

Letter No. 49 HURRIE, J.

1. **Support Alternative 3.** The comments are noted.

Letter No. 50 ISLAM, AMINUL

1. **Support Alternative 1.** The comments are noted.

Citizen Comment Letters 51-60

Letter Number	Name (Last, First)	Agency/Organization
51	Jensen, John	
52	Jergins, JP	
53	John, David	
54	Johnson, Iskra	
55	Johnson, Matt	
56	Johnson, Rebeckah	
57	Joseph, Gabriel	
58	Kostka, Donna	
59	Kyle, Keith	
60	Laird, Charles	

Letter # 51

From: John Jensen <johnjensenish@gmail.com>
Sent: Thursday, June 19, 2014 9:26 AM
To: LaClergue, Dave
Subject: U-District Rezone Comments

1 I want to say that I'd prefer Alternative 1 first, and Alternative 2 as a backup. I think the neighborhood would benefit from density.

Letter # 52

From: Jp <jergins@gmail.com>
Sent: Thursday, June 19, 2014 10:49 AM
To: LaClergue, Dave
Subject: u district option 2 please

1 | let's maximize around the new train station thanks

Letter # 53

From: John, David <johndj@amazon.com>
Sent: Thursday, June 19, 2014 5:33 PM
To: LaClergue, Dave
Subject: U-District Urban design

1 As a longtime resident of Seattle, I fully support the Up- Zoning as presented in Alternate 2 (http://www.seattle.gov/dpd/cityplanning/completeprojectslist/universitydistrict/documents/default.htm). It gives the U-District more badly needed housing and economic activity and it provides the biggest bang for the buck for the new light-rail stations.

-David John
4210 Spencer St.
Seattle WA 98118

Letter # 54

From: iskra <iskra@seanet.com>
Sent: Thursday, June 19, 2014 8:18 AM
To: LaClergue, Dave
Subject: comment on draft EIS U District Urban Design

Dear Mr. LaClergue,

1 I have read through the proposed changes to the zoning of the University District and I am, to put it mildly, horrified. Every day I pass through what used to be one of my favorite neighborhoods and am bludgeoned by the sight of blocks of out-of-scale monoliths erasing diversity and existing affordable housing. The University District is looking like a miniature China, construction run amok, and all sense of place and charm being erased. This is a travesty.

I oppose any upzoning of this neighborhood, and in fact encourage the opposite: strategic downzoning to preserve what is left of its character. The U District Urban Design is described as "The U District is a thriving neighborhood with 14,000 residents, hundreds of independent businesses, and its own unique flavor." -- yet everything in the upzoning seems calculated to make this neighborhood completely sterile and without any unique character whatsoever. We need a historic conservation district across the neighborhood to preserve existing low-rise, affordable and historically unique buildings, many of which are in the scheduled upzone area.

2 The claim that density creates affordability is thoroughly suspect. In just the past year, even with the huge amount of apartment construction going on in Seattle, rents have skyrocketed 8%. In the years since the inception of the Growth Management Act's densification mandate, rents have gone nowhere but up. The University District is already at 94% of its mandated 2024 growth target, and Seattle overall has already exceeded it, at 104%. It is time to put on the brakes and manage the growth we already have and preserve the valuable sense of place that makes people want to live in Seattle.

Sincerely,

Iskra Johnson
Seattle Resident
14419 Greenwood Ave. N. Suite A-345, Seattle, 98133

Letter # 55

From: Matt Johnson <matthew.james.johnson@gmail.com>
Sent: Thursday, June 19, 2014 8:37 AM
To: LaClergue, Dave
Subject: U-Dist Rezone.

Hello!

1 Of the options available I prefer Option 2. The region is making significant investments in transportation infastructure and we need to leverage those investments to the greatest extent possible. As such I would encourage you to keep the center sections of Option 2, but in the outer areas to ALSO to the Option 1 upzones.

The U-District is a great neighborhood and we shouldn't be placing caps on how many people are allowed to live there and near great transit.

Letter # 56

From: Rebeckah Johnson (PSP) <rebjohns@starbucks.com>
Sent: Monday, June 23, 2014 12:55 PM
To: LaClergue, Dave
Subject: University District upzone

Hello,

As a (non-student) resident of the University District, I wanted to express my support for the proposed upzone. I'm excited for my neighborhood to grow! Although both Alternative 1 and 2 are acceptable, I would prefer a more dramatic upzone that marries the neighborhood-wide rezone of Alternative 1 with Alternative 2's high-density core. My concern is that restricting growth might lead to the destruction of historic buildings on the Ave, which have unique characteristics and define the neighborhood. 1

In addition, as a pedestrian I appreciate wide sidewalks – but would rather see the width come by extending the sidewalks into the road, instead of forcing building setbacks. For example, Brooklyn is being designated as a green street, with landscaped setbacks. Brooklyn is currently far too wide for its low traffic, and forcing buildings even further away from the sidewalk will make it seem even wider. This will encourage speeding and lead to a hostile walking environment despite any attractive landscaping. 2

Thank you so much for the work you do!

Rebeckah Johnson

Letter # 57

From: Gabriel Joseph <gabej@hotmail.com>
Sent: Sunday, June 22, 2014 12:18 PM
To: LaClergue, Dave
Subject: University District Upzone

Hi Dave,

I have been reading about the U District upzone proposals on the Seattle Transit Blog, and they said you were the person to which we should send feedback. I would like to express my endorsement for alternative proposal #2. My opinion is the higher we can build, the better off we will be. 1

I am a long-time Seattle resident, and I have spent a lot of time in Vancouver, BC. I have seen what smart (upward) growth can do for a city vs. dumb (outward) growth can do. For far too long, Seattle has restricted building heights, and as a result we have built block after block of four to six floor mixed use megablocks. We then, via design review boards, make developers "break up" the bulk of these buildings by adding funny angles and weird building finish texture requirements. This is just dumb. In Vancouver, they let people build really tall, and not just in downtown, with a focus on building near SkyTrain stations. But then they require setbacks that allow for more open space at ground level. It strikes me as odd that a nearby Canadian city is far less restrictive to tall development than we are. As a result, they have built a city that is incredibly friendly to getting around without needing a car, whereas in Seattle it is almost a requirement to own a vehicle.

While I do not live in the University district, my family has lived in Ravenna, and my parents currently live there, so we have a stake in the future of the U District. I live on Capitol Hill, and I am seeing what building height restrictions are doing to my neighborhood. They are causing developers to buy up any property they can and build to the maximum 65' height. If developers could build to 250 or even 400 with incentives, like with the special zoning in SLU, one tower block of towers would give the equivalent amount of housing as four to six blocks of SM65.

I honestly don't understand what objection people have to tall buildings, and why only those people show up at planning meetings. Perhaps people want to preserve the single-family Seattle of yesteryear. I understand that sentiment. But that sentiment, which limits heights, makes the situation worse, putting pressure on developers to build outward, in the least transit-friendly manner.

Growth will happen regardless. I see three ways we can handle it: 2

1.) Embrace growth, facing it head on. Allow our city to grow as a city, not as a suburb, by allowing tall development in our urban villages. Don't restrict building heights to 65 or even 125 when there is already a 325' tower there. Make best use of the transit system we have and are building. This is rezone alternative #2.

2.) Temper growth, allowing it but severely restricting how it happens. Allow our city to grow, but try to prevent the character from changing by limiting heights, and therefore pushing the growth further out to single family Seattle neighborhoods and to the suburbs, resulting in more row houses, inducing more demand for automobile usage. This is alternative #1.

2 cont.

3.) Ban it. Don't allow for development, like San Francisco. We will preserve our city as-is, but only the richest people will be able to live in Seattle. Get ready to pay a minimum of $2000+/month for a studio apartment. This is alternative #3.

Thanks for your time!

Gabe Joseph

Letter # 58

From: Donna Kostka <donna4510@comcast.net>
Sent: Tuesday, April 29, 2014 2:22 PM
To: LaClergue, Dave
Subject: RE: U District DEIS FW:

1 I am an artist, and as such am aware of flooding affecting the Kirsten Gallery at 5320 Roosevelt Way NE. Call them at 206.522-2011 for more info.

From: LaClergue, Dave [mailto:Dave.LaClergue@seattle.gov]
Sent: Tuesday, April 29, 2014 9:47 AM
To: donna4510@comcast.net
Subject: RE: U District DEIS FW:

Hi Donna, thanks for your interest. I received and recorded your comments. Can you be more specific about where you've seen flooding issues? Would be interested to follow up with Seattle Public Utilities about that.

-Dave

Dave LaClergue
Urban Designer
City of Seattle Department of Planning and Development
P.O. Box 34019, Seattle, WA 98124-4019
O: 206.733.9668 I F: 206.233.7883 I dave.laclergue@seattle.gov

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From: Donna Kostka [mailto:donna4510@comcast.net]
Sent: Friday, April 25, 2014 11:15 AM
To: WebTeam, DPD
Subject:

DPD – Please add my comments to the official record for the U District Draft EIS. I am concerned that the DEIS include analysis of:

1 cont. **1. Street drainage. There has been flooding at various times along Roosevelt Ave.**

2 **2. Bus routes. They need to be routed through the U District to allow pedestrians ro have bus stops with seats and rain shelter – also to have the buses CONNECT with the new light rail stations at Husky Stadium, the U District, and the Roosevelt/65th St. NE station.**

Thank you for this opportunity to comment. Madonna (Donna) L. Kostka

Donna Kostka
6516A 24th Ave. NE
Seattle, WA 98115
(206) 283-7805
donna4510@comcast.net

Letter # 59

From: Keith <keithbkyle@gmail.com>
Sent: Thursday, June 19, 2014 11:42 AM
To: LaClergue, Dave
Subject: U-District Rezone

Hi Dave,

1 I'm writing you in support of alternative 2 for the U-District rezone. We should be maximizing the utility of the multi-billion dollar rail line that will have a stop at 45th and Brooklyn (and an E/W subway connection from that same location in the slightly more distant future.). Alternative 2 is the best option for this purpose.

2 I also support a review of the setbacks in the code and their impact on the walkability/street permeability. A walkable urban street scape with accessible building entrances should be the goal.

Thanks,
Keith Kyle

Letter # 60

From: Charles Laird <cdlaird@u.washington.edu>
Sent: Thursday, April 24, 2014 3:35 PM
To: LaClergue, Dave
Subject: prefer alternative 3 -- current zoning -- no to higher buildings

Dave,

1 I could not find a place to express my opinion . I definitely prefer alternative 3 -- current zoning -- to the alternatives that permit higher buildings in the U district.

Many thanks,

Charles Laird

Charles D. Laird
Department of Biology
Box 351800
University of Washington
Seattle WA 98195

206 616-6267 cdlaird@u.washington.edu

Letter No. 51 JENSEN, JOHN

1. **Support Alternative 1.** The comment is noted.

Letter No. 52 JERGINS, JP

1. **Support Alternative 2.** The comment is noted.

Letter No. 53 JOHN, DAVID

1. **Support Alternative 2.** The comment is noted.

Letter No. 54 JOHNSON, ISKRA

1. **Opposed to upzone.** The comments are noted.
2. **Affordability.** The comments are noted. The Draft EIS assumes the same amount of growth under each alternative and focuses on different patterns of development. Please see the discussion of housing affordability in Draft EIS Section3.2.5.

Letter No. 55 JOHNSON, MATT

1. **Support Alternative 2.** The comment is noted.

Letter No. 56 JOHNSON, REBECKAH

1. **Support Alternatives 1 or 2.** The comment is noted.
2. **Widened sidewalks.** The comment is noted.

Letter No. 57 JOSEPH, GABRIEL

1. **Support Alternative 2.** The comment is noted.
2. **Growth.** The comments are noted.

Letter No. 58 KOSTKA, DONNA

1. **Stormwater drainage.** The comments are noted. Please see the discussion of stormwater drainage in Draft EIS Section 3.8.
2. **Transit service.** The comments are noted. Please see the discussion of transit in Draft EIS Section 3.5.

Letter No. 59 KYLE, KEITH

1. **Support Alternative 2.** The comment is noted.
2. **Walkable streetscape.** The comment is noted.

Letter No. 60 LAIRD, CHARLES

1. **Support Alternative 3.** The comment is noted.

Citizen Comment Letters 61-70

Letter Number	Name (Last, First)	Agency/Organization
61	Langhans, Aila, Aileen, Wendy and Katherine	
62	Lewis, Penny	
63	Lin, Anson	
64	Lukoff, Benjamin	
65	MacDermid, Todd	
66	Machida, N.	
67	Martin, Andrew	
68	McMasters, Andrew	Jet City Improv
69	Nigh, Peter	
70	Nixon, Shirley	

Letter # 61

From: aileen langhans <aileenmargaret@yahoo.com>
Sent: Tuesday, June 17, 2014 10:49 PM
To: LaClergue, Dave
Cc: aileen langhans
Subject: Draft U-District EDIS - our family's response
Attachments: city DEIS response -final version.docx

Dear Mr. LaClergue:

I mailed you the formal letter of response from the Langhans family, residents of the University Park Addition Neighborhood since 1955. I hope you have received it and are able to understand our various points. I just thought you might like an electronic copy, so I am attaching the same letter to this e-mail.

Please appreciate the fact that our family has seen a deluge of inappropriate changes around us, through the Beatniks, the Hippies, the Anti-war fanatics, the Drug generation, etc. Throughout those onslaughts our neighborhood has been striving to retain a community feeling that attracts permanent neighbors, including professionals, teachers, students, senior citizens, and families. So, in order for us to 'buy' into these proposed dramatic changes, in which the increased density is accompanied by a myriad of many unavoidable issues, we need to make sure that there is a "red line" beyond which developers and investors, with their massive structures, are excluded, UNLESS there is shown a respectful appreciation of the special characteristics which make our neighborhood unique.

Thank you for your dedication to the citizens of Seattle and for your endless hours of work and research, listening to a variety of interest groups in order to formulate this document.

Sincerely,
The Langhans Ladies: Aila (mommy), Aileen, Wendy, Kathy (sisters)

`

5215 19th Avenue NE
Seattle, WA 98105

June 9th, 2014

Department of Planning and Development
City of Seattle
Attn: Dave LaClergue
700 5th Ave., Suite 2000
PO Box 34019
Seattle, WA 98124-4019

Dear Mr. LaClergue:

As residents of the University Park Addition since 1955, the Langhans family is quite concerned about the U District Design Environmental Impact Statement (DEIS). Over these past decades, our neighborhood has witnessed many indications that lead it be skeptical of the City's support for our single family neighborhood. Since the downzoning of our University Park Neighborhood to the single-family zoning, the city has repeated ignored the many violations of code that have been occurring in our community. **And, while the University Park Neighborhood is not officially addressed through this study, our family is concerned that any increased density in the study corridor will spill over to adversely impact the adjacent neighborhoods, such as ours.** So, a major fear of ours is that developers and investors will slowly absorb random chunks of property in these various family neighborhoods and quietly increase the density in those homes through illegal remodels, additions, and internal alterations. Eventually the continuity of single family homes will no longer exist and the present zoning will no longer reflect reality. And, that new de facto situation would then necessarily provide ammunition to developers to demand higher density zoning. Even your own report confirms that the Department of Planning and Development also believes that this will be inevitable. SO, although the city is asking us to support this grand scheme as a way of increasing density in the University District while securing the family neighborhoods, there is nothing in the plan that even superficially promises to respect the integrity of our community. There is only one statement providing a glimmer of hope*: "Single family Areas: Monitor the SF 5000 residential zone. Maintain a regular program of inspections for code violations. Explore a conservation overlay district that addresses demolition, new construction, and major alterations".* And even this is purposefully vague. How are you going to implement these inspections? Will you require absentee landlords to obtain short-term licenses upon passing stringent inspections? What does it mean to "explore"? Shouldn't you have already explored the 'conservation overlay district' concept and provided us with how it will be implemented and utilized?

1

After attempting to consume this detailed tome, our family has the following issues to present to the City of Seattle:

- The City seems passively content to designate an issue to be a NON-ISSUE, simply because it has pre-determined that it is unable to address that issue. For example, here is what is stated about open spaces and recreation facilities: *"Because the growing deficiencies in supply and type of open space are the same with or without zoning changes these deficiencies are not considered impacts for purposes of this EIS."* SO, because the city failed to take on the responsibility of seeking positive and meaningful solutions to that issue through the various alternatives, it chooses to ignore the problem entirely as irrelevant. To borrow a quote, "What difference, at this point, does it make?" 2

3 We are also concerned about how the city tries to minimize issues simply by dismissing them thusly: *"…there may be some abrupt transitions in building height and scale as new development in-fills around the existing smaller scale buildings. While noticeable as the area develops, it is likely that these impacts would be limited in magnitude and duration."* Can you really promise that?

- The city seems to passively accept the inevitable – the potentially negative impact caused by the proximity of higher density zoning adjacent to single family communities. Specifically: *"Older existing single-family residential areas may be affected over time by increased development and density around them, resulting in pressure for conversion or demolition…that could damage integrity of individual buildings and the character of the street."* Although the city seeks our approval of this proposed plan, it makes no effort to reassure us of its commitment to support and protect our fragile community and its uncertain future. This ambivalence only increases our insecurity, as families are not attracted to a neighborhood that is in constant flux due to forces outside its control. 4

- This plan is filled with concepts of community –friendly growth using height limits, setbacks, open space, pedestrian and bicycle friendly streets and streetscapes, and other public amenities. But, these concepts are presented in vague terms that make them unenforceable and easily negotiated by equally vague incentives. In the end, a creative developer could negotiate his way into bypassing those very design standards that are supposed to provide a positive transition into a higher density neighborhood. 5

- This plan is filled with the following words of non-commitment: 'would' and 'should'. Is this intentional? "'Should' signifies something you ought to do or something that is a good idea or that something that may happen." "'Would' is used to indicate what could potentially happen in the future or when giving advice or when making a request." Neither word reflects a mandate or requirement, just a hopeful wish. (www.yourdictionary.com) 6

- This project appears to be only an exercise required by city law, not a sincere effort to create a livable, vibrant, safe, and healthy University District by addressing its ever-increasing density, along with the accompanying tensions, social problems, and other growing pains. If the City of Seattle were truly committed to the ideal goals contained in this proposal, it would consider a moratorium on the present hectic and seemingly random growth and construction until the formal law has been finalized. In that way, the City could be proactive in its efforts to prevent the urban blight that is the result of its present lackadaisical attitude toward our neighborhood. Just consider one of the goals of both alternatives 1 and 2 under 'Artistic Renditions of Changes from Various Viewpoints'*: "To help maintain the pedestrian character on designated Green Streets, landscaped setbacks would be required on both sides of Brooklyn Avenue NE and NE 43rd and 42nd Street. Widened sidewalks would be required on NE 45th and 50th Streets."* These streets are already so cluttered with a menagerie of structures and parking lots that I am not sure the city can turn the clock back to fulfill these proposals. So, why were they being proposed in the first place? Including them in the plan may make everyone feel good, but are they realistic or just fantasy? 7

So if any proposed change is to be meaningful, the city must (not should) halt all permits of major impact, while it addresses present and future issues, in order to eliminate or ameliorate their impact. While taking a deliberative and contemplative approach to the entire process of creating this document may be considered a noble concept, any delay in finalizing the plan will definitely be viewed as "open season" by developers and investors, inviting them to bypass the new restrictive regulations contained therein, by accelerating their own plans and maximizing their profits untethered. By the time this proposal is actually finalized and enacted into law, there may no longer be any real opportunity to realistically alter the trajectory of growth in the University District. Furthermore, we fear that the identity of our single-family neighborhood could be lost forever. 8

In conclusion, the Langhans family is unable to support either Alternative 1 or Alternative 2, although we are not satisfied with the status quo, either. So, what do we expect from the City of Seattle? 9

1. A strong commitment to our family neighborhoods and their future existence 10

2. A set of design standards that will provide a sense of community, that will limit the impact of increased density, and that will respect the historical uniqueness of the University District: These standards should be specific and enforceable, NOT merely suggestions that can be circumvented by another set of unspecified, vague incentives that benefit the developer over the permanent residents. These standards should also encourage builders to respect the architectural uniqueness represented by the older homes, apartments, business storefronts that have gracefully survived the onslaught of 'planned obsolescence'.

10 cont.

3. **Efforts by the City of Seattle to honestly recognize the University District as a permanent neighborhood, not as a random collection of individuals, mainly transient in nature, with no special identity or character:** A part of this process should be the City's efforts to attract permanent residents, especially families. When our family was growing up on 19th Avenue NE, the region boasted that children could walk from Kindergarten through college. But, if families don't have a sense that their needs and goals are met in our community, they will bypass the University Park neighborhood when selecting a home in which to raise their children. That creates a self-defeating cycle, which can only lead to a more uncertain future for our neighborhood.

Thank you for allowing us to address our concerns. We appreciate your dedication to the citizens of Seattle and the residents of the University District.

Sincerely,

The Langhans Family: Aila, Aileen, Wendy, and Katherine
206-522-0203
aileenmargaret@yahoo.com

15 PS: Our family is relieved that the city is so concerned about the preservation of "regional forest and farmlands" that it is included in the incentive program. But don't you think it is a little too late? Decades ago, the last remaining farmhouse (known to us) was summarily destroyed and replaced with a condominium complex. That amazing home was situated, in all of its grandeur, near Ravenna Park.

Letter # 62

From: Penny Lewis <plewis4040@msn.com>
Sent: Thursday, June 19, 2014 8:14 AM
To: LaClergue, Dave
Subject: Upzoning the Univ. District

Mr. Laclergue

I am writing to comment on the process for planning for the future development of the University District--within walking distance of my floating home on Portage Bay.

1 Currently there is much construction underway and according to what I have read, this has moved the U District to 94% of its 2024 growth target. What is being built now is already changing the feeling of this unique community. I cannot imagine what this area would look and feel like if the height limit was extended to 340 foot limits. A workable community depends on not only places for people to live and work, but also to thrive--shop and take care of the necessities of life within walking distance of their residences.

Does it not make sense to take a deep breath, get a feel for how things are progressing and working in this student dominated community, allow small businesses thrive instead of fleeing before of moving head long in allowing a small city with tall towers develop? Let's wait a bit before making decisions that are hasty and will certainly change the dynamic and diversity now present in this community forever.

Penny Lewis
Portage Bay resident

Letter # 63

U DISTRICT URBAN DESIGN
Draft EIS Public Hearing May 20, 2014

City of Seattle
Department of Planning & Development

Draft EIS comments are due by June 9, 2014

Please let us know your comments about the Draft EIS:

~~Based on the public co~~

1 Generally, I am in favor of alternative #1 and may be with some improvements.
After listening to some of the public comments, I think Alt#1 can ~~have form~~ bring diversity to the community, but should add emphasis on open spaces and ways to alleviate parking.
Where the city can, open spaces (parks, community spaces, etc.) should be developed just like with the Green Street program.
With Alt #2 and no change, I think these will either be too big of a change or with no change, developers ~~will~~ will continue to just ~~cont~~ build to the student housing market either way.

2 Alt #1 has potential, but I guess the EIS should address some specific design guidelines.
As a young developer and resident myself, if possible I would like to help the U District Partnership if more input is needed.

Please fill in your contact information below. ☒ Please add me to project e-mail list.

Name Anson Lin Phone 206-313-8848

E-mail AL367@CORNELL.EDU

Address 3909 51st Ave NE
Seattle, WA 98105

Alternate formats provided upon request: 206-684-4466, **TTY Relay: 711**

Letter # 64

From: lukoff@gmail.com on behalf of Benjamin Lukoff <benjamin@lukoff.us>
Sent: Friday, June 20, 2014 12:24 PM
To: LaClergue, Dave
Subject: U-District comment

Hello,

1 Of your two alternatives, I prefer #2... if I'm reading things right, it concentrates higher buildings in a smaller area, as opposed to #1, which has lower maximum heights but rezones more of the U-District.

2 I do hope that the city takes into consideration the nature of University Way and does something to maintain its walkability and mix of affordable businesses, as well as its historical aspects.

Thanks
Ben Lukoff

--
Benjamin D. Lukoff ÷ lukoff@gmail.com
Seattle, Washington, USA
LinkedIn ÷ Twitter ÷ Facebook
Writing ÷ Photos

Letter # 65

From: Todd MacDermid <tmacdermid@gmail.com>
Sent: Thursday, June 19, 2014 7:16 PM
To: LaClergue, Dave
Subject: University District Urban Design feedback

Hi Dave, I noted at http://seattle.gov/dpd/cityplanning/completeprojectslist/universitydistrict/whatwhy/default.htm that you were taking comments on the EIS, and wanted to chime in. Of the three options, I'd most be in favor of option 2, as it seems to integrate the best with the light rail station we're building. Option 1 would be my fallback, but it seems a waste to bring light rail to an area and not upzone it. 1

Thanks for taking my input.

Todd MacDermid
509 W Olympic Pl Apt A
Seattle, WA 98119

Letter # 66

From: N. Machida <nhmachida@gmail.com>
Sent: Monday, June 23, 2014 12:35 AM
To: LaClergue, Dave
Subject: Re: A Note In Favor of Alt. 2

To be clear, this comment is referring to the U-District planning and urban design efforts.

On Mon, Jun 23, 2014 at 12:33 AM, N. Machida <nhmachida@gmail.com> wrote:
I think Seattle has the potential to surpass lauded cities such as San Francisco at junctures such as these. Instead of becoming a formally inert matrix of stagnancy due to capping building heights in much of the city, Seattle should allow for the free market to build as tall and as dense as the market will bear, especially around grade separated Link stations. Grade separated Link stations should be the seeds for new supplemental high rise downtowns in the City of Seattle. The U-District and Northgate are good starting points, but there need to be more.

If the market only allows for a handful of 18-25 story buildings, then very well, at least 30+ story ones are allowed in the future. There can be the mix of tall towers, some breathing room, and the residential mix of apartment buildings and single family homes. Otherwise, capping everything at 160 would allow the neighborhood to become a completely homogenized matrix of difficult to redevelop medium density buildings. All the easily buildable sites like parking lots and low rise buildings will be used up and then rents are going to skyrocket when the quantity of mixed use square footage demanded outstrips the supply possible under less ambitious plans than Alternative 2.

The U-District deserves to attract a Downtown Bellevue level of investment and high rise concentration at the very least. It is a responsibility of Seattle as a culture to allow for as much density as the market would like in the City proper, in order to slow the growth of demand for subdivision houses at the perimeter of the metro area, as well as dependence on the automobile. Alternative 2 would best address those environmental and social concerns.

1 **I strongly urge the adoption of Alternative 2**, despite the organized and loud complaints of neighborhood groups who prefer the preservation of the status quo. The reality is that this planning decision is going to have a much larger impact on the generations following that of the neighborhood groups.

Strive!

Letter # 67

From: Andrew Martin <am1982@gmail.com>
Sent: Friday, June 20, 2014 10:20 AM
To: LaClergue, Dave
Subject: No up zone

1 I'm lodging a comment on the u-district zoning plan. Having read through the three options I can only say that anything other than keeping the current zoning plan is too intense and overbuilds a lovely neighborhood. I lived in the u-district for five years and think these proposals gut it.

Sent from my iPhone

Letter # 68

6/18/2014

City of Seattle Department of Planning and Development
Attn: Dave LaClergue
700 5th Ave., Suite 2000
Seattle WA98124-4019

Dear Mr. LeClergue,

I am writing to comment on the U District Urban Design Draft Environmental Impact Statement (Draft EIS).

1 I fully believe that the EIS objectives are in the best interest of everyone in the University District. It provides a better integration of land uses with the neighborhood's future light rail station and supports equitable communities with a diversity of housing choices.

I fully support this plan as it is written, and am writing to let you know that you can count on my support in any action surrounding this plan.

2 Attached is a letter I received from my neighbor. The statements in yellow are completely erroneous, and have no basis in reality. I know you cannot do this, but I recommend a circular file for his document.

Thank you for your work.

Sincerely,

Andrew McMasters
Artistic Director
Jet City Improv
5510 University Way NE (building owner and Business Owner)

cc. Diane Sugimura, DPD

PS: a former board member of this organization works at the DPD. Dean Greenleaf. He can tell you more about our work in the community if you need more information.

1/2

The Up-zone of the 'Ave north of N.E. 55th St.

The DEIS, at pages 2-18 and 2-20 and map p. 1-4 and 1-5. proposes to up-zone the easterly blocks on the 'Ave from N.E. 55th St. to N.E. Ravenna Blvd from 40' to 65'. It gives no reasoning for the change nor any analysis of the impacts. It just plops the up-zoning there; when community input was sought during the framework, I spoke against it and those in attendance voted to remove it from the rezoning map. It was not requested by any of the owners in the 5500 block of the north 'Ave.

The University District Community Council opposes the up-zone of the block. There is no precedent for putting a 65' zone directly across from single family zoning as the proposal would do. See map p. 1-4 and 1-5. Elsewhere the DEIS has NC '40 or R-1 across from single family zoning. Ibid. In Alternative 2, the NC 65' would jut out like a spear between the SF 5000 on the west and the LR 3 on the east. The current NC 40' corresponds with the zoning on a similar stretch of Roosevelt Way N.E. left untouched by the proposal. The up-zone belies the DEIS' claim at page 1-7 of compatibility for the up-zoning as a whole; it there states that "abrupt transitions in building height, density and intensity" " would likely be limited in magnitude and duration as the area redevelops." Rather, the block up-zone would make these up-zoned areas of the north 'Ave stand out like a rooster's comb.

The half mile walkshed surrounding the transit station stops just north of N.E. 52nd Street on the 'Ave. Framework Study, p. 12. The 5500 Block is north of the boundary.

In my 5500 block, there are five ownerships. Four of the five took action based on the downzone to NC 40' from NC 65 in the 1998 University Community Urban Center Plan:

1) The south corner is an apartment house built in the 1920's with an adjacent lot used for tenant parking. It is the sole property that is unchanged.

2) After the downzone, Mr. Denault sold the Historic University Theater at 5508 University Way N.E. The new owners remodeled the premises with historic preservation moneys from government grants and arts funding. It is not a City Landmark, but could be. It should be listed alongside the other properties eligible for historic designation in the Historic Properties Section, Table 3.4-1.

3) Our Vagrant Records Studio at 5512 produces sound recordings for local musicians. The studio was built about a dozen years ago using designs by famed acoustician Richard White. The down-zoning made building higher impractical. It also reduced the assessed value of the land and our property taxes by 15-20%.

4) To our north is the Andy Shiga Garden, a P-Patch on a double lot, leased by the City until 2018. The owners in Taiwan had applied for a building permit for a larger apartment house covering both lots. After the downzone they allowed their application to lapse.

5) The north corner is a story wooden apartment house built in the 1920's. Several years ago, a fire from one of the units burned a major section of the structure. The owner had insurance and chose to repair the damage rather than build anew. He reasoned that under the zoning this was the highest and best use of the premises.

Changing the zoning now bushwacks the owners, who acceded to the City University Community Urban Center plan and is very unfair to them.

It is also a very bad idea for the public: It will increase property taxes --- our land values went down 15-20% on the downzone fifteen years ago. That puts pressure on the owners to sell.

- The City loses if the Shiga Garden is forced out. The Shiga Garden is part of the City's P-Patch program; it maintains a table and benches for residents to relax under the shade of a madrona tree. The DEIS does not even acknowledge that the up-zoning will impact the Shiga Garden or **identify any alternate location for it. It needs to do so.**

- It adds tax expense and thereby decreases the life of the Historic University Theater. City policy is to preserve historic buildings. Unfortunately, the DEIS ignored its historicity although its front used to proclaim it.

- The up-zone jeopardizes our studio and the services it provides.

These tax increases are on top of a proposed assessment by a proposed business improvement area that adds expenses to the owners without corresponding benefit. The University District needs some low-rise structures, like our block, to break the canyon effect of the proposed mid- and high rise buildings and serve as a reminder of what the 'Ave was like and a transition to the residential district further north. Retaining the existing zoning focuses growth around the Sound Transit station, one of the objectives of the Framework Study, and it avoids leap-frogging of spot up-zoning in the peripheral areas north of N.E. 55th St. outside the urban center.

The DEIS needs to drop the up-zoning for the north 'Ave. inasmuch the DEIS sets out no benefits from that particular up-zone. It is far better to avoid doing injury than to try to mitigate the damaging impact afterward.

* * * *

NOTE: You can expect a 15-20% increase in your property taxes unless you write in a comment to The City of Seattle on its draft environmental impact statement ("DEIS") objecting to its proposed up-zoning of our block from NC-40 (Neighborhood Commercial-40 foot height limit) to NC-65 (Neighborhood Commercial-sixty five foot height limit. This tax increase will be in addition to the annual assessments that the City is proposing through its business improvement area. A copy of my comment follows. It gives the address for commenting. The deadline for comments comes June 23, 2014.

JB
Your neighbor to the north

Jorgen Bader
6536 – 29th Ave. N.E.
Seattle, WA 98115

June 14, 2014

Diane Sugimura
Director of Planning and Development
700 – 5th Avenue # 1900
P.O. Box 34019
Seattle, WA 98124-4019

Attn: Dave LeClergue
Urban Designer

RE: Draft Environmental Impact Statement
University District Urban Design Alternatives
Dated April 24, 2014

Dear Designer LeClergue:

* * * *

Letter # 69

From: Nigh, Peter <pnigh@amazon.com>
Sent: Thursday, June 19, 2014 8:50 PM
To: LaClergue, Dave
Subject: Support for UW rezone alt 1

Dave,

I want to thank you for taking the time to listen to the community on such an important issue as the UW rezone.

1 I support alternative 1 as it spreads the increased density across a wider area. While I would love to see 340' limits next to the future light rail station, a wider density footprint will help push rents down, not only in the U district, but across the city.

To put this in perspective, I have been in Seattle since 1985, and I have never seen such change in the city. Mass transit will impact this city more than I-5. That is where we are. If we get this right and put people in livable communities next to transit, we can make a difference in people's lives and reverse the suburban trend of the last 20 years.

Again, I support alt 1, and you should too.

Thanks for reading.
Peter

Letter # 70

COMMENTS: Draft EIS – University District Urban Design Alternatives; May 20, 2014

Shirley Nixon
4540 8th Ave. NE #2305
Seattle, WA 98105

1 People like me view the University District as a place to live that happens to be near a University. But my sense is that this DEIS views the District as the University's fiefdom : real estate owned or controlled by one dominant group. How ironic that the UW campus itself is excluded from the study area; yet the UW's interests seem to be ruling the outcome. The interests of those of us who do not attend classes or work at the University – or the interests of future citizens who might want to own permanent homes or raise families here - are given short shrift.

It is as if the whole U District Planning process is geared toward making this a destination attraction for short timers: young renters and students who can endure tight unattractive surroundings for a relatively short time because they plan to move out in a few years, or worker commuters who might arrive by light rail and leave at night to actually live their lives elsewhere.

I would like to describe for you some of the permanent residents who are neighbors at the University Plaza Condominiums, and then show you some pictures to better illustrate what is meant by our desire that the planning process and DEIS better address goals that include nurturing and supporting a family-friendly, age-group diverse, and environmentally sensitive University District that will attract and retain permanent residents

Others from University Plaza's Civic Affairs Committee who are present tonight will speak more specifically to livability concerns raised by the DEIS.

I am submitting four images as attachments to these comments to help illustrate my points.

2 1: Architect's rendering from 1970, showing his sketch of the proposed University Plaza Condominium development that now stands south of NE 47th Street at the corner of 8th Ave. NE. The U Plaza property encompasses the rough equivalent of 12 city lots, and has a total lot size of approximately 50,700 square feet. The footprint of the 23 story residential tower is approximately 8,030 square feet, which means that that the tower covers less than 16% of the lot. An outdoor swimming pool and cabana, a 26-space visitor parking lot, 26 resident parking spaces in car-ports, and expansive landscaping and yards setback from 15 to 25 feet of all sidewalks comprise the remainder of the property. Hidden from view is a two-level underground parking garage with spaces for 110 cars. There are 136 individually-owned condominium apartments in the University Plaza Tower, occupied by residents who range in age from infants of two months of age to a half dozen or more in their 90's. Families are attracted to the large two, three and four bedroom units. Singles and young couples tend toward purchasing the one bedroom units as their gateway into home ownership. In short, University Plaza houses a diverse and vibrant intergenerational community: the exact type of community the U District Planners claim to want to attract and retain.

3 2. Photo taken on a sunny day from the Roof of University Plaza (6 PM on April 14, 2013). The camera is pointed eastward to the blocks between NE 47th and NE 45th Streets. The shadow of the narrow pillar of the University Plaza tower is clearly seen reaching past 11th Ave. NE and shading the north portion of what has now become the 8-story Ava apartments. The point of this picture is that even though the tower casts a long shadow, it is not a long, wide shadow. The building is tall but thin. The generous open spaces at ground level on the University Plaza Property allow the sun to shine on University Plaza's immediate neighbors.

4 3. Photo taken in September 2013 of Ninth Ave. NE, between NE 47th St. and the University Playfield, taken from a 23rd floor residential balcony. It illustrates the pleasant pedestrian-friendly and inviting streets and sidewalks, shaded by mature trees, with views into spacious yards of the neighborhood homes. The ability to walk safely and enjoyably to and from the Playfield is important to the young families as well as the older adults who call University Plaza home.

5 4. Photo taken May 11, 2014 of the same area as Photo 3 (Ninth Ave. NE between 47th St. NE & the Playfield). It shows the aesthetic damage done to a neighborhood when developers are allowed to remove mature vegetation and yard space and build up against sidewalks and alleys with minimal set-backs. Code and programmatic changes are needed to require or incentivize set-backs and reduce the bulk and lot coverage allowed for new structures. These measures should not be tied to "affordable housing" goals, as appears in all DEIS alternatives. But rather, the bulk, lot coverage, and open space regulations should be tied to mitigating the adverse environmental impacts to the neighborhoods and present and future residents.

Thank you for considering these comments, and for making the comments and the pictures part of the record.

Sincerely,

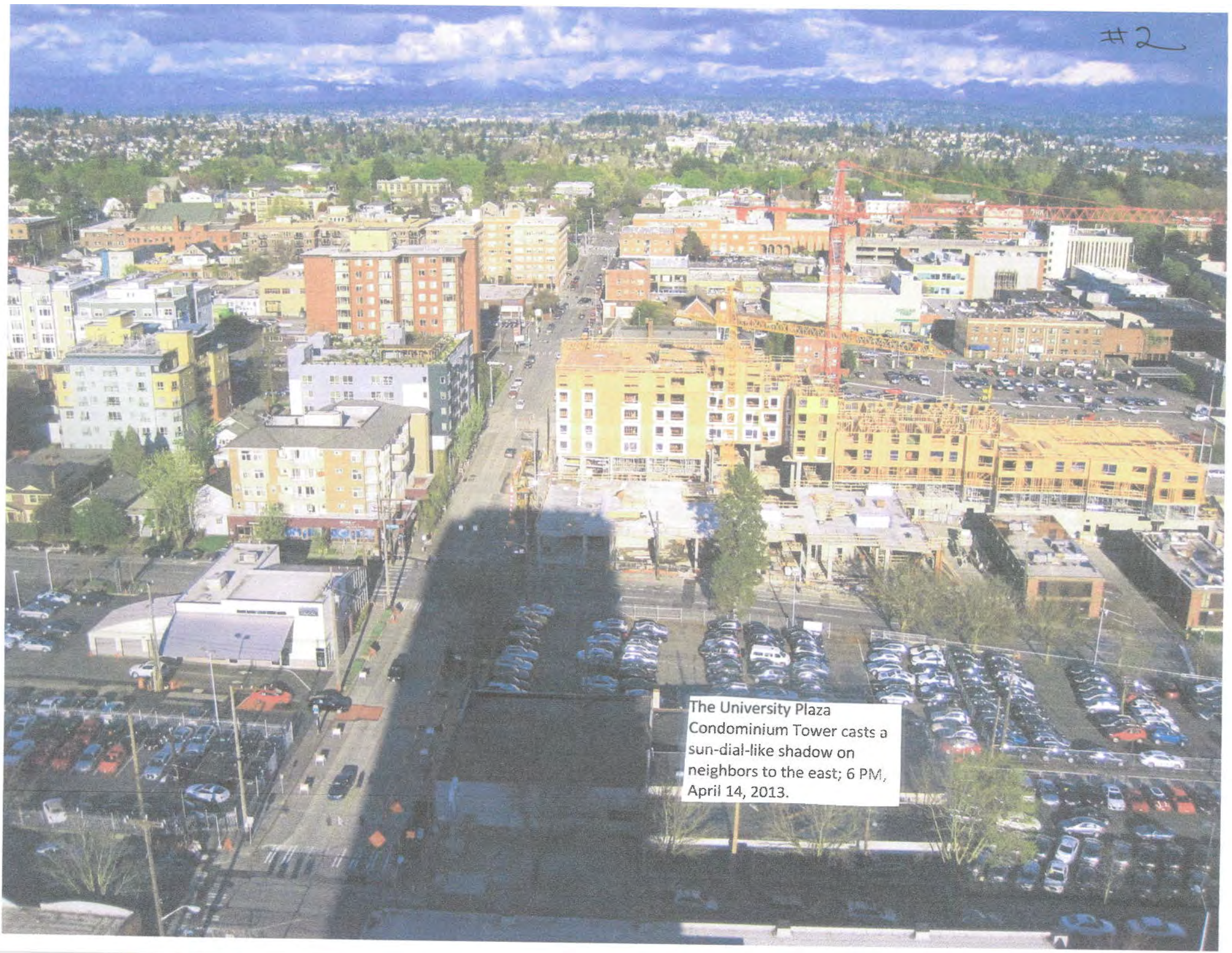
Shirley Nixon

#1

1970: Architect's rendering of University Plaza Condominiums, NE 47th St. between 8th and 9th Ave NE.

Note the tower's small footprint (8030 sq. ft.) that covers less than 16% of the lot. Amenities include an outdoor swimming pool and cabana, an underground parking garage (each unit with a parking space), a 26-parking-space visitor lot, and landscaped lawns and grounds set back at least 15 to 25 feet from sidewalks. In May 2014, approximately 200 residents ranging from 2 months old to 90-plus in age call University Plaza home. There are 136 condo units: 3 four BR, 20 three BR, 67 two BR, and 46 one BR.

#2



The University Plaza Condominium Tower casts a sun-dial-like shadow on neighbors to the east; 6 PM, April 14, 2013.

#3

Ninth Ave. NE, between NE 47th & NE 48th St. with University Playfield seen at top of page; Sept. 2013. Demolition is beginning on the first home of three to be leveled to make way for nine new structures on the original three lots. Note the tree canopy along the street and alleyway, and pleasant yards and open spaces.


#4
Ninth Ave. NE "Nine-Plex" built on three lots where single homes originally stood. Dense lot coverage; mature trees & vegetation gone. Photo taken May 11, 2014.

Letter No. 61 LANGHANS, AILA, AILEEN, WENDY AND KATHERINE

1. **Impacts on adjacent neighborhoods.** As noted in the comment, the Draft EIS analysis considers the potential for impacts to adjacent neighborhoods in sections 3.1 (Land Use), 3.3 (Aesthetics), and 3.4 (Historic Resources). The referenced mitigating measure for single family areas is excerpted from the Historic Resources analysis. All mitigation in the EIS is presented as presented as a possible measure that could be adopted by the City. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.
2. **Open space.** The Draft EIS concludes that the U District does not meet some of the open space standards established by the Comprehensive Plan and that the deficit may increase as the neighborhood grows. However, because the EIS considers the impacts of different development patterns of a constant amount of growth, the deficit is not an impact of the proposal. This is not intended to suggest that the open space deficit is not a concern for the study area. As stated in the Draft EIS, "…existing and projected deficiencies clearly support the acquisition and development of additional open space and recreational facilities to serve the study area." Please see the discussion of open space and recreation in Draft EIS Section 3.7.
3. **Height transitions.** The excerpted statement is from a discussion of potential land use compatibility impacts in the area roughly between NE 50th Street and NE 43rd Street. The discussion concludes that in this area, abrupt transitions in building heights could occur with infill development. However, because the area already a densely developed urban area with a mix of low- mid- and high-rise development, this is not likely to be a significant impact.

4. **Single family communities.** The excerpted statement is from the discussion of potential significant impacts in Draft EIS Section 3.4 (Historic Resources). The Draft EIS acknowledges that the potential for impacts to single family areas in two areas in the northern part of the study area is a potential significant impact of the proposal. The mitigating measure referenced in Comment No. 1, this letter, is intended to address this potential impact.
5. **Design amenities.** Please see the response to Comment No. 1, this letter.
6. **Mitigation measures.** Please see the response to Comment No. 1, this letter.
7. **EIS purpose.** The purpose of an EIS is to disclose information about significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts. Please refer to WAC 197-11-400. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. The mitigating measures identified in the EIS are intended to mitigate impacts identified in the EIS. Ultimately, the City of Seattle has the discretion to decide whether to incorporate some or all of the identified mitigation into the final proposal.
8. **Development moratorium.** A development moratorium has not been proposed by the City and is not considered in the EIS.
9. **None of the alternatives.** The comment is noted.
10. **Expectations.** The comments are noted.

Letter No. 62 LEWIS, PENNY

1. **Planning process.** The comment is noted.

Letter No. 63 LIN, ANSON

1. **Support Alternative 1 with improvements.** The comments are noted.
2. **Specific design guidelines.** All mitigation in the EIS is presented as a possible measure that could be adopted by the City. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council

adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.

Letter No. 64 LUKOFF, BENJAMIN

1. **Support Alternative 2.** The comment is noted.
2. **University Way character.** The comment is noted.

Letter No. 65 MACDERMID, TODD

1. **Support Alternative 2.** The comment is noted.

Letter No. 66 MACHIDA, N.

1. **Support Alternative 2.** The comment is noted.

Letter No. 67 MARTIN, ANDREW

1. **Support Alternative 3.** The comment is noted.

Letter No. 68 MCMASTERS, ANDREW

1. **Support EIS objectives.** The comment is noted. It should be noted that the purpose of an EIS is to disclose information about significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts.
2. **Comment reference.** It should be noted that all comments received during the public comment period for this EIS have been included and responded to in this Final EIS.

Letter No. 69 NIGH, PETER

1. **Support Alternative 1.** The comment is noted.

Letter No. 70 NIXON, SHIRLEY

1. **Planning process.** The comments are noted.
2. **Rendering of University Plaza Condominium.** The photo and description of this development is noted.
3. **University Plaza Condominium shadow.** The photo and comment regarding the shadow cast by the building is noted.
4. **Development standards.** The photo and comments regarding development standards are noted.

Citizen Comment Letters 71-80

Letter Number	Name (Last, First)	Agency/Organization
71	Nostdal, Zach	
72	Nowicki, Gayle	The Gargoyle Statuary
73	Nowicki, Gayle	The Gargoyle Statuary
74	Nulty, Brigid	
75	Oakes, Leila W.	
76	Orr, Mike	
77	Pagel, Martin	
78	Peter	
79	Pigotti, Gerry	Gibraltor
80	Pong, Paul	

Letter # 71

From: Zach Nostdal <nostdal@gmail.com>
Sent: Thursday, June 19, 2014 5:41 AM
To: LaClergue, Dave
Subject: UDistrict Urban Design feedback

Dave,

1 Of the three options, I prefer option two, creating a high rise zone.

I also prefer option one over option three.

Zach Nostdal

Letter # 72

1 I support leaving the buildings on the Ave at the heights that currently exist and build the necessary towers around the Ave. The U-District should be an extension of the UW - one of the most beautiful and cultured college campuses in the U.S. with a rich historic value.

2 We should work to maintain the historic integrity of the Ave and its existing buildings and to maintain and restore the retail core that has always made the U-District unique.

3 Buildings that are 160-340 feet tall along the Ave will make the neighborhood a dark, sterile and cavernous environment that is not inviting to visitors, students, residents and businesses.

4 Please build around this historic area and work with small businesses, not against them.

* enough sterile buildings already!
* create aesthetic design guidelines for further density, not the same shit.
* encourage and support group living in older houses through mother-in-law apts., etc.

Gayle Nowicki
The Gargoyle Statuary
4550 University Way NE
Seattle, WA 98105
206-632-4940

3 * I support Alternative 3 - of no action until we know what the impact of the Transit station will be + act accordingly

Gayle Nowicki

Letter # 73

From: Gayle Nowicki <gargayle@gargoylestatuary.com>
Sent: Monday, June 23, 2014 11:17 PM
To: LaClergue, Dave
Subject: U District Urban Design

Hello Dave,

1 I own and run Gargoyles Statuary, a small business but vital business on the Ave. We have been in business for twenty-one years and am very concerned about the development in the U District especially on the "Ave". I have sent letters in the past and have attended two of the EIS meetings and at the last meeting I decided not to speak but turned in my notes instead, I sincerely apologize that they were rough. I notice that there is little if no concern for the historic integrity and multitude of small & family run businesses in any of the three plans. It seems that we are expendable in the eyes of those putting together these plans.

2 I strongly urge the city & developers to build around the Ave and leave the current zoning as is on the Ave. I ask you to please consider maintaining the retail core from 42nd to 50th on University Way. The "Ave" is a long standing Historic neighborhood and retail area and is one of the most unique in Seattle. It definitely could use some fine tuning and upgrading of some of the more worn down buildings but the beautiful old buildings and many of the retailers on the Ave. Help to make Seattle a richly diverse and unique environment. We are completely loosing the unique & historic character in other neighborhoods where this rather heartless development has happened and is happening like Ballard, Capitol Hill, and South Lake Union...where people are unhappy with the lack luster, sterile, and flavorless architecture that has replaced "history". It would be wonderful to show that Seattle still does value small business and work with them instead of against them by showing that development can happen while maintaining the community's historic spirit & architecture. Simply offering these increased building heights is virtually a gift to property owners from the developers with no consideration for the businesses that have fought hard to keep their doors open and establish vital relationships with our customers and community.

3 The vacancy levels in the new buildings up North on the Ave., the Lolthlorian between 47th & 50th and the other new and generic building up north of 52nd should be an indication that we should wait to rip down buildings just to pad the developers pockets and see how the Rapid Transit actually affects us in our Neighborhood. The U District is a real community of merchants, residents, and students and that should be considered with all of this development hitting the area. I am in favor of bringing more people to the neighborhood but not taking away the history and unique flavor of our community. As a long standing small business I have been a important part of the U-District's history and feel very passionately that the small merchants will be able to withstand this massive development and growth of the UW.

Thank you for hearing my plea. I love my neighborhood and it's breaking my heart to think it could be completely defaced and replaced for the needs of wealthy developers and the UW. We are a neighborhood not a downtown business district, please help us maintain this.

Sincerely,

Gayle Nowicki

Gargoyles Statuary
4550 University Way NE
206/632-4940

Letter # 74

From: Brigid Nulty <bbcbkn@gmail.com>
Sent: Thursday, June 19, 2014 3:16 PM
To: LaClergue, Dave
Subject: U-district

1 Alternative 1!!

Please favor Alt 1 for the redesign of the U-district.

-B

Letter # 75

From: LW-Oakes <leilawo@gmail.com>
Sent: Monday, June 23, 2014 9:03 PM
To: LaClergue, Dave
Subject: Option 4- UDistrict

Greetings Mr. Laclergue;

Thank you so much your work on the subarea planning of the UDistrict thus far. I would like to submit some
1 comments on the options for the University District Urban Design Framework (UDUDF). In particular my support for a mixture of the proposed options, known as **Option 4 a combination of all three alternatives**, thinking about stepping heights from the centre of the station. Having a mixture of building typologies in addition to uses, heights, and spaces may prove for a more vibrant and bustling area- choice for example. I am not sure of the level of City of Seattle's discretion during development review on Type 2 applications, however if a developer presents a very good/fitting proposal/housing type that could attract different types of buyers should the City not consider this, people from all walks of life this could certainly mix incomes, that is the best option- mid-rise development accented with towers in a stepped fashion, skinny townhouses (row housing) could be a great young family option. I will put in a disclaimer that have not read the plan in detail.

2 Portions of Option 2 for towers/high-rise development is certainly a way we could go optimally if amenity areas are carefully preserved for people to live, work and play in the same area (the very downtown of Seattle is fairly built up but I would state that until recently visitors in the evening are less than other areas of the city with a mix of buildings, it is in parts empty past 6 pm, really because there's lots of tall uninviting buildings, as you move outward the ID and Pioneer Square do attract more activity due to amenities and to think of it probably 6 storey buildings), IF station area development it performed correctly towers could work. But towers can fall into the category of becoming unfriendly and without character without being accented by unique buildings and key destinations (i.e. clusters of towers in Missasuga, Ontario, Canada where everyone still drives) with character
3 and pedestrian scale as seen in Capitol Hill, West Seattle, and parts of the Central District. The option to "do nothing" **is certainly not the way to go**, as the area has a potential to accommodate some of the region's anticipated growth in a neat way and connect people to the UW for night lectures/festivals/conferences, why not locate new housing near educational facilities, a great place for students and boomers who want to live an urban lifestyle, take classes, go to pubs, leisure classes, community centres and restaurants and possibly reduce the number of cars per household.

Thank you for your time and consideration. I realize this is after the 5 pm deadline, many apologies! I hope this is a balanced and rational assessment of the Options.

Best Regards

Leila W-Oakes
--
1200 Western Avenue
Seattle, WA

Letter # 76

From: Mike Orr <sluggoster@gmail.com>
Sent: Sunday, June 22, 2014 9:04 PM
To: LaClergue, Dave
Subject: U-District Urban Design comment

I wish to comment on the three zoning alternatives for the U-District.
I lived in the District for 14 years at 56th & University Way, 4 years in the UW dorms, and for 33 years I have extensively shopped and transferred buses in the District, and I might move there again after U-District Station opens.

1 I prefer the 340' core in Alternative 2 and the higher peripheral zones in Alternative 1. This is the same as "Alternative 4" proposed by The Urbanist.
http://www.theurbanist.org/2014/06/19/choose-alternative-4-for-the-university-district/

(My apartment was in the northeast corner of the Alternative 1 rezone.)

2 If Alternative 4 is unfeasable, I prefer Alternative 2 as a fallback, in order to put the most housing units and jobs within a couple blocks of the Link station, and hoping that a future rezone would upzone the periphery.

I would recommend looking to Vancouver BC as a model for urban village zoning, especially the New West Minster, Columbia, Metrotown, and Surrey Central skytrain stations. That allows the largest number of people to live near rapid transit and have the most destinations within walking distance.

3 As a side note, there have been suggestions for an open plaza at U-District station. I do not support this. Put the open space anywhere else in the District, but not next to the station. Seattle has few housing units available near rapid transit stations, especially after the stunted rezones in Roosevelt and Beacon Hill. We can't afford to exsclude another station-adjacent highrise block out of commission.

Thank you for your consideration.

--
Mike Orr <sluggoster@gmail.com>

Letter # 77

From: Martin Pagel <mjpagel@gmail.com>
Sent: Saturday, June 21, 2014 3:22 PM
To: LaClergue, Dave
Subject: Provide Feedback on U-District Urban Design

http://seattletransitblog.com/2014/06/19/provide-feedback-on-u-district-urban-design/

1 I support highrises, it leaves more current housing in tact which also allows for future growth. High rises also avoid dense boxes like in dense Ballard and provide for dense walk-centric core.

Martin
4540 45th ave ne

Letter # 78

From: danepeter@gmail.com
Sent: Thursday, June 19, 2014 8:36 AM
To: LaClergue, Dave
Subject: Udistict Alt 2

Hello,

1 I support the university district rezone alternative 2. This brings growth closest to the light rail station, encouraging a higher rate of transit use - helping the environment, reducing congestion, and providing a higher ROI on light rail. In addition the higher buildings will have better views from the homes and offices and add visual interest for people looking at the university district.

Thank you for the opportunity to comment.

Peter
Seattle 98122

Sent from my iPhone

Letter # 79

GIBRALTAR

1525 4th Ave
Suite 300
Seattle, WA 98101

PHONE 206 367.6080
FAX 206 367.6087

June 9, 2014

VIA U.S. MAIL

Seattle Dept. of Planning and Development
Attn: Dave LaClergue, Urban Designer
700 Fifth Ave., Suite 1900
P.O. Box 34019
Seattle, WA 98124-4019

Re: Comment on Draft EIS for the U District Urban Design Alternatives

Dear Mr. LaClergue:

My company, Gibraltar/Persus Capital Partners ("Gibraltar"), recently purchased the University Manor apartments at 1305 N.E. 43rd Street, which is in the heart of the U-District and just one block from the light rail station scheduled to open in 2021. Gibraltar is a local, Seattle company and our strategy is to buy and hold properties as long-term investments. Accordingly, we plan to be invested in the U-District for many years and are very interested in the changes that will come to this area over the coming decades.

1 As you know, our region is investing over $20 billion in our light rail system with the aim of supporting and increasing the vitality of the Puget Sound economy, reducing traffic congestion, reducing carbon emissions, and creating healthy and connected communities. The success of these smart growth strategies and the success of our light rail system generally will depend on the number of users who are riding the rails and filling the fare box. Consequently, the area surrounding the light rail stations is where significant density is most important. For those reasons and the reasons described in more detail below, Alternative 2 is the best of the alternatives presented in the Draft EIS. We urge the City to select Alternative 2 as the preferred alternative.

Many of the existing and planned light rail stations are in areas lacking adequate infrastructure and a clearly defined sense of place. This is not true of the University District, where the University of Washington is the dominating force in the neighborhood, drawing tens of thousands of students to campus and the surrounding businesses every day. If density makes sense anywhere among the many light rail stations being developed throughout the region, it makes sense in the U-District.

1 cont. Not only does the UW draw a large student population, but it also is a major employer. Moving UW students and employees to and from campus will continue to be a challenge as the university continues to grow. By accommodating more housing, offices, and services near campus and near transit connections, more economic, environmental and social benefits can be achieved. Those benefits are well documented in existing literature and new studies are released regularly affirming the benefits of compact, dense, and walkable neighborhoods.

2 Currently, the U-District contains several residential buildings and a number of retail establishments largely concentrated along University Way NE and major arterials. While the neighborhood recently has seen a number of new residential developments, it continues to lack commercial office space. More office space would provide greater opportunities for synergy with the University of Washington and would increase the market for residential and retail uses, as many office workers would choose to live and shop in the neighborhood.

3 The University of Washington is a world-class university with a bright future. The U-District's future will be shaped by the City's decision in this important process. While the neighborhood has been growing in recent years, it has never fully realized its potential. But now, with light rail only a few years away and the UW, the City, and the community very focused on the plan for the future, this is the City's opportunity to encourage the type of density needed to support our new, multi-billion dollar light rail system and to support the continued success of the University of Washington and our regional economy. Please adopt Alternative 2 as the preferred alternative.

Very truly yours,

Gerry Pigotti

Letter # 80

June 17, 2014

Attn: David LaClergue
Department of Planning and Urban Design

Re: University District Urban Center Draft Environmental Impact Statement

Mr. LaClergue,

TMUD Holdings LLC and Evergreen Lodging LLC are writing this letter together in strong support of Alternative 2 as proposed in the University District Urban Design Draft Environmental Statement (DEIS). As property owners with a long family history in the University District we have seen the neighborhood go through different waves of change. For years, the district has struggled to attract a diverse cross section of retail, commercial uses, and jobs. The delivery of light rail to the University District in 2021 dramatically changes the equation for how the neighborhood can grow and attract smart development and innovation. Moreover, with a world class University at our doorstep the University District deserves to be the next great Seattle neighborhood.

1 Over the last years, TMUD Holdings LLC has watched the growth of the *University District Partnership* with great interest. We are encouraged and agree with their vision for the University District as described in their *Strategic Plan*, which calls out for a *Vibrant, Innovative and Diverse* community. We strongly believe that the implementation of Alternative 2 is a critical step in making sure that this vision becomes a reality. Alternative 2 allows for greater concentration of development near light rail and maintains the bones of the district's character while still allowing for the appropriate mix of housing and building options that can enhance pedestrian connections. Furthermore, Alternative 2 provides the right amount of flexibility to encourage innovation, foster economic development opportunities and attract business that will provide much needed local direct and indirect jobs.

2 TMUD Holdings LLC and Evergreen Lodging LLC are invested in the growth of the district. We are currently developing a Residence Inn Hotel with 2 restaurants on the ground level located on the corner of 11th and 45th. The project is projected to create a total 484 direct and indirect construction and operational jobs. Once completed the 2 restaurants will create 66 jobs with the hotel providing 87 direct jobs. These are jobs that can be training and advancement opportunities for UW students and for those who are engaged with social and religious services in the University District. As more projects get out of the ground similar job numbers will follow with the net result being more positive action and investment in our neighborhood.

3 We encourage the Department of Planning and Urban Design to take immediate action in recommending Alternative 2 to the Seattle City Council. We welcome additional opportunities to discuss our support and vision for the University District.

Sincerely,

Paul Pong

TMUD Holdings LLC

Evergreen Lodging LLC

Letter No. 71 NOSTDAL, ZACH

1. **Support Alternative 2.** The comment is noted.

Letter No. 72 NOWICKI, GAYLE

1. **Keep current building heights.** The comment is noted.
2. **Historic integrity.** The comment is noted. Please see the discussion of historic resources in Draft EIS Section 3.4.
3. **Building heights.** The comment is noted.
4. **Work with small business.** The comments are noted.

Letter No. 73 NOWICKI, GAYLE

1. **Historic integrity.** The comment is noted. Please see the discussion of historic resources in Draft EIS Section 3.4.
2. **Keep current zoning.** The comment is noted.
3. **Keep U District character.** The comment is noted.

Letter No. 74 NULTY, BRIGID

1. **Support Alternative 1.** The comment is noted.

Letter No. 75 OAKES, LEILA W.

1. **Support Alternative 4.** See response to Letter No. 28, Comment No. 2.
2. **Support for portions of Alternative 2.** The comments are noted.
3. **Do not support Alternative 3.** The comments are noted.

Letter No. 76 ORR, MIKE

1. **Support Alternative 4.** See response to Letter No. 28, Comment No. 2.
2. **Fallback support for Alternative 2.** The comment is noted.
3. **Plaza at U District station.** The comment is noted.

Letter No. 77 PAGEL, MARTIN

1. **Support highrises.** The comment is noted.

Letter No. 78 PETER

1. **Support Alternative 2.** The comment is noted.

Letter No. 79 PIGOTTI, GERRY

1. **Support Alternative 2.** The comment is noted.
2. **Need more office space.** The comment is noted.
3. **Support Alternative 2.** The comment is noted.

Letter No. 80 PONG, PAUL

1. **Support Alternative 2.** The comment is noted.
2. **U District growth.** The comments are noted.
3. **Support Alternative 2.** The comment is noted.

Citizen Comment Letters 81–90

Letter Number	Name (Last, First)	Agency/Organization
81	Reay-Ellers, Andrew	
82	Reid, Brent	
83	Reimers, Milton A.	Schwabe, Williamson & Wyatt
84	Rice, Fred	
85	Sahabu, Preston	
86	Salomon, Andres	
87	Schmitt, Michael E.	
88	Smyth, Jim	
89	Sommers, Amy	
90	Soules, Scott	Soules Properties, Inc.

Letter # 81

From: Capt. Andrew Reay-Ellers <capt_reayellers@yahoo.com>
Sent: Thursday, June 19, 2014 8:35 AM
To: LaClergue, Dave
Subject: U-District Urban Design -- DEIS Comments

Dear Mr. Laclergue--

I understand that you are accepting comments on the U-District Urban Design DEIS. After reviewing the materials, it would seem the most vital factor are the potential zoning changes -- of which the DEIS provides 3 alternatives, the last of which is the "no change" option.

1 I strongly believe that the university district; the city of Seattle; and the region as a whole will all greatly benefit from substantial development immediately adjacent to the new transit station, and by allowing additional growth in the surrounding area.

As such, I support the large ("highrise") transit-oriented-development zoning (300'+) in the blocks immediately adjacent to the station site as described in Alternative #2; but I would also encourage the adoption of upzoning the surrounding area to mid-rise as shown in Alternative #1. This is especially true in the area west of the station area -- currently zoned "lowrise", yet dwarfed by the existing built environment (Interstate 5 and the Ship Canal Bridge).

regards--

Andrew Reay-Ellers

Letter # 82

From: Brent Reid <brent@contactrcs.com>
Sent: Wednesday, May 21, 2014 7:33 AM
To: LaClergue, Dave
Subject: University District EIS

Dear Mr. Laderque,

1 As an 8 year homeowner in the University District, I am writing today to comment on the proposed changes in the university district. I understand there are 3 alternatives for changes in building height and density. I would like to see buildings constructed at the 300' to 400' heights in the core of the university district first and foremost. I have travelled around the world and some of the most successful mass transit examples I have seen have massive development at the transportation nodes. What is happening around Tukwila station or Othello station just is not going to make a big impact on the user base. It is kind of like the shopping mall, if you have a bunch of stores like See's Candies, Halmark Cards, and Foot Locker, the malls would be almost empty. But you add in a Nordstrom or a Best Buy, both retail behemoths and everyone can survive. The point is the system needs something BIG. Our land is limited within the city, if we don't build big here, then in 20, 30, or 40 years we will have to build big in places that are probable best left small.

2 Additionally, I believe that current height limits from the ship canal to NE 50th should be increased to 110'. There are very little in the ways of views to be blocked, it would be great for the University to attract business partners, and it would allow for an alternative for business finding it hard to afford South Lake Union.

Please allow for the most dense and highest possible structures to be developed in the University District.
Sincerely,
Brent Reid

Letter # 83

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MILTON A. REIMERS
Admitted in Washington
Direct Line: 206-407-1572
E-Mail: mreimers@schwabe.com

June 23, 2014

VIA E-MAIL
VIA MESSENGER

City of Seattle, Department of Planning and
Development
Attention: Dave LaClergue
700 5th Ave., Suite 2000
Seattle, WA 98124-4019

Re: Comments on Draft EIS evaluating potential map and text amendments to the Comprehensive Plan and Land Use Code to allow for greater height and density in the University District
Our File No.: 126962-194351

Dear City of Seattle Department of Planning and Development:

I am writing on behalf of U District Advocates to comment on the U District Urban Design Draft Environmental Impact Statement (Draft EIS) which evaluates proposed amendments to the Comprehensive Plan and Land Use Code to allow for greater height and density in the U District study area.

1 Each of the proposed alternatives set forth in the draft EIS fails to comply with the Growth Management Act, the Seattle Comprehensive Plan, the U District Urban Design Framework Study, and the University District Park Plan. The Draft EIS evaluates two alternatives which propose to add more height and density in the University District without making allowances for additional parks and open space. The City must revise the proposed upzone to consider an alternative which complies with the authorities set forth above and sets aside additional public open space to meet the needs of the growing number of residents and workers in the University District. For example, the City should, as part of the proposed upzone, consider an alternative which creates a centrally located park at the core of the U District, possibly above or adjacent to the University District light rail station. Moreover, the proposed upzone directly affects what is done with the property above the University District light rail station and the Draft EIS should include analysis of the alternative uses of that property, including a public open space and transit oriented development, in order to avoid "piecemealing" the entire project.

1 cont The City must amend the Draft EIS to consider alternatives which incorporate additional public open space and parks in the University District, including a public open space above the University District light rail station.

2 **The Draft EIS fails to comply with the Growth Management Act and Seattle Comprehensive Plan**

The proposed upzone fails to comply with open space and recreation requirements set out in the Growth Management Act (GMA). With the passage of the Growth Management Act, RCW 36.70A, in 1990, the Washington State Legislature sought to create a method for comprehensive land use planning involving citizens, communities, counties, cities, and the private sector that would prevent uncoordinated and unplanned growth.

The GMA, RCW 36.70A.020(7), requires counties of a certain size and growth rate, and the cities within them, to adopt comprehensive plans and development regulations which are guided by 14 goals. The County's actions must be consistent with the goals and requirements of the GMA. *See King County v. CPSGMHB*, 142 Wn.2d 543, 561, 14 P.2d 133 (2000) (local discretion is bounded by the goals and requirements of the GMA). Among the 14 goals of the GMA, includes:

> (9) Open space and recreation. Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.

As required under the GMA, the City of Seattle adopted a Comprehensive Plan of its own which establishes goals for open space and recreation facilities both inside and outside urban villages. The Seattle Comprehensive Plan includes goals for the total supply of open space, along with goals for specific types of facilities, and the distribution of open space. The Seattle Comprehensive Plan's goals include:

- One acre of Village Open Space per 1,000 households (within the urban center);
- One acre of Village Open Space per 10,000 jobs (within the urban center); and
- One acre of "Breathing Room Open Space" per 100 residents (citywide).

As it is now, there is a deficit in the acres devoted to open space in the University District. There are currently 6,137 households and 6,332 jobs in the University District. Based on the current number of households and jobs in the University District, there should be at least 6.77 acres of open space and recreation. Yet, the actual open amount of open space – 3.85 acres – falls far short of the goal. This amounts to a 2.9 acre deficit of public open space in the University District.

The open space deficit is only projected to get worse in the next 20 years. In 2035, the Draft EIS projects that there will be a total of 10,037 households and 11,132 jobs in the University District. The Draft EIS also projects there will be 6.04 acres of open space in 2035. Yet, based on the number of households and jobs, there should be 11.15 acres of open space to

2 cont meet the goals set forth in Seattle's Comprehensive Plan. The open space deficit is projected to increase to 5.1 acres in the University District under this scenario.

3 With regard to its growth projections, the City assumes the same growth rate in employment and housing for all three alternatives, including the no action alternative. "Population and household growth estimates are consistent across the alternatives." *See* Draft EIS p. 1-10 (Population, Employment, Housing). "Employment growth estimates are consistent across the alternatives." *See* Draft EIS p. 1-10 (Population, Employment, Housing). Under the City's analysis, the permissible height and density under each of the three alternatives makes no difference in the growth in employment and housing. This is illogical and each of the alternatives should be reexamined to understand their impact on growth in employment and housing in the coming years.

4 No matter what the exact growth figures are, the City cannot stand by idly while the open space deficit increases between now and 2035. As part of the proposed upzone in the University District, the City must consider an alternative which sets aside additional open space and parks to meet the requirements set forth in the GMA and the Seattle Comprehensive Plan. For example, the City should evaluate whether the property above the University District light rail station should be set aside as a public open space, instead of transit oriented development. A public open space above the University District light rail station would provide approximately 0.9 acres of additional, public space in the University District and close the gap in the projected deficit for public open space. It would also be an important gathering place for residents to take part in public markets, concerts, socializing, and other community opportunities.

The Draft EIS fails to adhere to the express goals of the University District Park Plan and U District Urban Design Framework Study

5 The Draft EIS also ignores the express goals of the University District Park Plan and the U District Urban Design Framework Study which have called for additional open space for the neighborhood.

The 2005 University District Park Plan ("University Plan") sets forth the open space goals and priorities of the University District based on community input. Of the highest priority for the neighborhood is a "centrally located park, approximately one-half acre, in a high-volume pedestrian area with current or projected multi-family mixed-use buildings; this type of park should be designed to accommodate a variety of recreation uses." The University Plan specifies the general location for such a park as being "in the vicinity of Brooklyn Avenue between NE 43rd and NE 47th streets to develop a central multi-use park."

In the 2012-2013 U District Urban Design Framework Study ("U District Study"), the University District reaffirmed its support for a centrally located open space on or near the Sound Transit light rail station planned at NE 43rd Street and Brooklyn Avenue NE.

The U District Study was a multi-year effort by the City, University of Washington, and residents of the University District. It addresses all the elements of a Growth Management Plan sub-area and discusses up-zoning in the University District and integral elements as part of that,

5 cont including more parks and a public square. The U District Study addresses long range planning for the University District and any amendments to the Land Use Code must comply with the study.

6 The proposed upzone must recognize the need for additional open space, as studied and prescribed in the University Plan and U District Study. It is civically and legally unacceptable for the City to ignore the University District's express priorities to ensure there is adequate public open space to meet the need of the growing housing and employment population. The proposal set out by the U District Advocates to locate a public open space above the University District light rail station accomplishes exactly what is called for in the University Plan and U District Study – the creation of a centrally located park in a high-volume pedestrian area which can accommodate a variety of public and recreational uses. The City must consider an alternative which carves out such parks and open space as part of any Draft EIS proposing amendments to the code to allow for greater height and density in the University District.

The Draft EIS must consider an alternative which sets aside public open space in the University District

7 The Draft EIS acknowledges that the increasing public open space deficit associated with the proposed upzone is a "potential adverse impact" but disregards its obligations under the GMA, the Seattle Comprehensive Plan, the 2005 University Plan, and the 2012-2013 U District Study by suggesting that open space and recreation "cannot be considered because they are not part of the proposed zoning change." In fact, the City is required to consider public open space in order to ensure the community is growing in all the right ways. The City must do something about this growing deficiency in open space and parks by considering an alternative which sets aside additional public open space and parks as part of the proposed zoning change.

Under SEPA, the EIS must evaluate, not only the proposal and the no-action alternative, but also other "reasonable alternatives." WAC 197-11-786; WAC 197-11-440(5). A reasonable alternative is a feasible alternative course of action which presents options in a meaningful way for decision-makers.

RCW 43.21C.030 requires that an EIS include a reasonably detailed analysis of a reasonable number and range of alternatives. *See also Weyerhaeuser v. Pierce County*, 124 Wn.2d 26, 873 P.2d 498 (1994). "The required discussion of alternatives to a proposed project is of major importance, because it provides a basis for a reasoned decision among alternatives having differing environmental impacts." *See Weyerhaeuser*, 124 Wn.2d at 38. "Pursuant to WAC 197-11-440(5)(b), the reasonable alternatives which must be considered are those which could 'feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." *See Weyerhaeuser*, 124 Wn.2d at 38.

The alternatives section of the EIS must describe the objectives, proponents, and principal features of reasonable alternatives, including: the proposed action with any mitigation measures; describe the location of alternatives, including a map, street address and legal description; identify phases of the proposal; tailor the level of description to the significance of environmental impacts; devote sufficiently detailed analysis to each alternative so as to permit a

7 cont

comparison of the alternatives; present a comparison of the environmental impacts of the alternatives; and discuss benefits and disadvantages of reserving implementation of the proposal to a future time. *See Weyerhaeuser*, 124 Wn.2d at 41. Conclusory statements concerning sites examined in the site selection process failed to meet requirements in WAC 197-11-440(5)(c) for evaluating alternatives in an EIS. *See Weyerhaeuser*, 124 Wn.2d 26.

As in *Weyerhaeuser*, an EIS discussion of alternatives "plainly does not" comply with its requirements if it merely makes "brief, conclusory descriptions" and there is "no useful comparison of the environmental impacts of the alternatives." *Weyerhaeuser*, 124 Wn.2d at 41-42. In the *Weyerhaeuser* case, the Supreme Court affirmed the trial court's invalidation of the conditional use permit in light of the inadequate EIS because it failed to adequately consider the alternatives. *Weyerhaeuser*, 124 Wn.2d at 42.

In this case, the Draft EIS only considers an upzone, an even bigger upzone, or no upzone at all. It fails to consider any reasonable alternatives which address the need for additional public open space as part of proposed amendments to allow for greater height and density in the University District. As part of any changes to the zoning in the University District, the Draft EIS should evaluate an alternative which sets aside additional public open space to meet the goals and priorities of the GMA, the Seattle Comprehensive Plan, the University Plan, and the U District Study.

It is critical that consideration of additional public open space occur as part of any zoning changes because once additional construction fills-in throughout the University District, it will only become more difficult to locate and acquire property which can serve as a public open space or park.

As part of any supplemental alternative, the Draft EIS should specifically include consideration of a public open space in the heart of the University District, above or adjacent to the University District light rail station. By requiring additional park and open space as part of the zoning change, the City can close the gap in the growing public space deficiency in the University District.

8

The Draft EIS should include analysis of the property above the University District light rail station to avoid "piecemealing" the project

The Draft EIS proposing changes to height and density directly affects what will come of the property above Sound Transit's University District light rail station and should include analysis of the potential uses of that property in order to avoid "piecemealing" the project.

WAC 197-11-060(3)(b) provides: "Proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental document." WAC 197-11-060(3)(b) further provides: "Proposals or parts of proposals are closely related, and they shall be discussed in the same environmental document, if they: (i) Cannot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them; or (ii) Are interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation."

8 cont "Piecemealing" with public works projects is the practice of reviewing smaller segments of an overall, larger public works project in order to avoid the preparation of an EIS on the project as a whole. *See Concerned Taxpayers v. Department of Transporation*, 90 Wn. App. 225, 951 P.2d 812 (1998); *see also Cady v. Morton*, 527 F.2d 786, 795 (9th Cir. 1975).

9 The GMA, Seattle Comprehensive Plan, University Plan, and the U District Study each identify public open space as a priority. Each of the alternatives set forth in the Draft EIS fail to consider setting aside additional public open space to accommodate the growth in housing and employment in the coming years, to include consideration of a public space above the University District light rail station. The Draft EIS also neglects to analyze the proposed transit oriented development above the light rail station. Any proposed upzone in the University District closely relates to what will be done with the property above the University District light rail station. Without detailed analysis of each of these alternatives, additional public open space in the neighborhood and transit oriented development above the light rail station, it is impossible to know the cumulative impacts of these Draft EIS alternatives. To avoid piecemealing the project, the Draft EIS should evaluate alternatives above the light rail station.

10 In conclusion, the alternatives considered in the Draft EIS are limited and fail to adequately consider the need for additional public open space, especially in light of the projected growth in employment and housing over the next 20 years. The City must amend the Draft EIS to consider alternatives which incorporate additional public open space and parks in the University District, including a public open space above the University District light rail station.

Regards,

Milton A. Reimers

MRE:rmr

Letter # 84

From: D. Fred Rice <david.rice.mail@gmail.com>
Sent: Thursday, June 19, 2014 9:27 AM
To: LaClergue, Dave
Subject: Comments on draft EIS for U District

Mr. LaClergue,

I am writing to comment on your two alternatives for the U District urban design as described in your department's summary EIS document.

1 I'm generally in favor of any proposal that will increase Seattle's housing supply as much as possible and accommodate as many affordable units as possible.While the summary pointed out there would be more affordable units overall with the alternative 2, it wasn't clear from the summary which alternative would allow for more housing overall.

Kind regards,
Fred Rice

Letter # 85

From: Preston Sahabu <sahabp@uw.edu>
Sent: Thursday, June 19, 2014 7:57 PM
To: LaClergue, Dave
Subject: Comment on the UDUF

Hello Mr. LaClergue,

As a UW alum and current resident of the University District, I am looking forward to increased urbanization in my area. My preferred provided option would be Alternative 2, as it focuses development around the light rail station, which will become a major transit hub in the not-too-distant future. 1

However, I believe that the UDistrict can do better. Proposed by The Urbanist Editorial Board, "Alternative 4" combines the neighborhood-wide approach of Alternative 1 with the central core of Alternative 2. This option fully embraces businesses opening in the shadow of the University, while simultaneously anchoring them with density to provide more affordable housing. 2

A more detailed case for Alternative 4 is presented below:
http://www.theurbanist.org/2014/06/19/choose-alternative-4-for-the-university-district/

Thank you,
Preston Sahabu

Letter # 86

From: Andres Salomon <dilinger@queued.net>
Sent: Monday, June 23, 2014 7:26 PM
To: LaClergue, Dave
Subject: UDistrict rezone

Hi,

1 I'd like to suggest The Ave becoming a pedestrian plaza as part of any future UDistrict plans. Wheeled users (buses, cars, bikes) are already forced to travel very slowly. This results in frustration for drivers. I rarely see someone driving on The Ave who looks happy; typically they look frustrated and stressed out as they're waiting. I know many bicyclists who avoid The Ave as well, as other routes are faster.

The Ave's business district gets plenty of foot traffic. Pick a random day during the school year, and you'll see many more students on foot than you will see cars. Buses can be rerouted to 15th. We already do that on Saturdays for the farmer's market (north of NE 50th). We also shut down The Ave for the yearly street fair. It's way past time that we cut off access to cars and made it a pedestrian plaza.

Letter # 87

Michael E Schmitt
5035 8th NE
Seattle 98105

June 21, 2014

Dept of Planning and Development
City of Seattle
Mr. David LaClergue

In Re: University District Draft EIS

Dear Sir,

I have reviewed the draft EIS, and based on my understanding of it and of facts on the
1 | ground I believe that Alternative 3 (no action) is by far the most preferable.

2 | The defects of various proposals for up-zoning are numerous, but it seems questionable from the outset whether they are even necessary to accommodate population growth, which section 3.2.2 in the EIS itself acknowledges. Additionally, one fact the EIS does not seem to address at all is that it is largely a matter of policy to what extent population will increase. If we pave the way, more will come. Maintain the status quo, fewer will. HOW MANY DO WE NEED? Increased population means increased problems, all kinds of environmental degradation first among them. Or is it the case that property developers, the U of W and the City itself smell increased profits in increased density? A real EIS would address these issues.

3 | I paid particular attention to Section 3.4 of the EIS, since it deals more closely with impacts to our stock of classic architecture. I note in recent years with increasing dismay the demolition of 100-year-old houses all over the city, especially here in the U district where I live. It seems this Section minimizes or ignores the continued destruction of until-now intact rows of gracious homes, primarily in the Craftsman style, together with their mature gardens, trees, and shrubs. “Craftsman” is well-named, for not only do these houses exemplify the Arts and Crafts movement in style, but they show the skill and heart of those who built them. Once gone, no amount of money can ever replace them, for not only are the forests gone which once furnished their quality materials, but so are the skills of their builders, together with the builders themselves.

Section 3.4 mentions the *possibility* that these losses will increase; the *possibility* that the new construction would degrade ~~t~~he architectural context for older structures, even the *possibility* that the City could establish a Historic District here, as it has already done in the International District and in the Public Market, to name two. But strangely, the Section then concludes that there would be no unavoidable adverse impacts to historical values under either up-zoning proposal. This is either illogical, cowardly, or both!

4 One has only to walk south from my address on 8th or 9th NE to see what happens when new monster buildings are wedged into formerly intact rows of old homes. They tower above everything else and introduce a jarring modern esthetic into a context that does not support it. Add to this the unavoidable parking shortages and increased traffic congestion (it seems to me the relevant Section of the EIS, 3.5, also vastly underestimates these potential problems), and one must feel insult, heartbreak and outrage.

5 An honest development proposal would first of all protect still-existing historical buildings, and seriously consider the establishment of an Historic District, not give an almost-certain green light to aggressive over-development. If it is too much to expect significant down-zoning, at least we should push for a moratorium on up-zoning!

Yours,

Michael E Schmitt

Letter # 88

From: Smyj <smyj@comcast.net>
Sent: Monday, June 23, 2014 10:20 AM
To: LaClergue, Dave
Subject: U District Urban Design Comments

1 Alternative 2 is more desirable due to the more build-able heights. Too short and developers have no incentive to build at all. A major transit confluence should maximize the adjacent SF and provide the needed density.

2 I would like to see LR3 around the perimeter where there is LR1 and LR2 now. Many of the single family homes are actually occupied by several unrelated people now. It would be better to regularize that situation with purpose built dwellings. More apodments! And no parking minimums.

3 I live in the Latona neighborhood and would like to see more density west of I5. Future effort?

Regards
Jim Smyth

Letter # 89

From: Amy Sommers <amylsommers@gmail.com>
Sent: Saturday, June 21, 2014 8:04 PM
To: LaClergue, Dave
Subject: University District planning

Hi,

1 I am writing to express support for Alternative 4 for the planned redevelopment of the University District. Let's be bold and come up with a plan that has long- lasting and positive impact.

Amy Sommers
Sent from my iPad

Letter # 90

From: scott.soules@frontier.com
Sent: Monday, June 23, 2014 3:26 PM
To: LaClergue, Dave
Subject: U District Comment Period Extended to June 23

Hello Dave- We appreciate the time and effort spent by all who have participated in the U District planning and draft EIS process. The opening of a light rail station in the middle of the U District is one of the most significant events to happen in the neighborhood and presents an opportunity to enhance the area as an urban center.

We have the following comments on the Draft EIS:

1

1. We agree that increased density around transportation stations in urban areas is a strategy that has been used successfully in many cities throughout the world.
2. We like the idea of fewer tall, elegant towers in the 300' range better than more buildings in the 160' range.
3. We believe the maximum height on University Way ("the Ave") should be 125' as the current height of 65' and one of the proposed heights of 85' have not been enough to spur much redevelopment. We believe a 160' height limit is too tall for the Ave. Because of the fragmented ownership of properties on the Ave, it is unlikely many taller buildings would be built, even with 125' zoning.
4. We suggest that buildings built off of the Ave have the option for townhouses on the street level instead of commercial space, as there is often little demand for that space on secondary streets and residences at street level would be an enhancement.

Thank you.

Scott Soules
Soules Properties, Inc.

From: University District Urban Design [mailto:dpdmailer@seattle.gov]
Sent: Tuesday, May 27, 2014 1:32 PM
To: scott.soules@frontier.com
Subject: U District Comment Period Extended to June 23

Letter No. 81 REAY-ELLERS, ANDREW

1. **Support Alternative 2.** The comment of support for Alternative 2 with adoption of upzoning of the surrounding area to mid-rise as described in Alternative 1 is noted.

Letter No. 82 REID, BRENT

1. **Increase building heights to 300' to 400' in the core.** The comment is noted.
2. **Increase building heights to 110' from Ship Canal to NE 50th Street.** The comment is noted.

Letter No. 83 MILTON REIMERS (SCHWABE, WILLIAMSON & WYATT)

1. **GMA compliance.** The comments are noted. Specific comments about each asserted non-compliance issue are provided in subsequent comments in the letter and addressed individually below.
2. **GMA compliance.** The comment repeats the planning requirements of the Growth Management Act and is acknowledged. Section 3.7 of the Draft EIS acknowledges the existing and projected deficit to the open space area target, as calculated from the goals of Seattle's Comprehensive Plan. This expanding deficit is a product of residential and job growth in the neighborhood, which will continue even under the no action alternative; therefore, it is not an impact of the proposed action. The proposed zoning would include development standards and incentives to create new open spaces in the neighborhood, potentialy decreasing the open space deficit in comparison to Alternative 3 ("no action"). The Draft EIS also identifies a range of mitigations that would help move toward meeting the Comprehensive Plan's open space goals for urban centers.

   The comment regarding the need for additional parks and open space is acknowledged. The Draft EIS analysis itself clearly identifies a need for additional parks and open space in the U District to accommodate the 2035 growth target consistent with Seattle's adopted levels of service; please refer to Draft EIS Section 3.7.2 for the full discussion. Please also refer to the response to Letter No. 1, Comment No.3 and the following paragraph for additional information about the process for addressing identified facility needs.

   An EIS does not provide parks or any other facilities; it is a disclosure document which identifies impacts and needs and suggests a range of

measures that decision makers can consider in making choices that would address deficiencies or problems. Similarly, the Draft EIS itself is not required to plan, site or design future parks and open spaces. The process for addressing facility needs–as set forth in the GMA, other state laws, and the City's Comprehensive Plan–is to plan and program capital facilities needed to accommodate growth through the facility planning, capital budgeting and CIP processes. The University Community Neighborhood Plan explicitly defers to the Comprehensive Plan's Capital Facilities element regarding the provision of capital facilities (Seattle Comprehensive Plan, page 8.173). The U District Urban Design Framework does not identify capital facilities per se, although Principle 3 implicitly recognizes that providing and connecting existing and planned parks and open spaces will extend over a decade.

3. **Growth projections.** Please refer to the response to Letter No. 6, Comment 2.

4. **Alternatives and open space.** The comment is acknowledged. As noted in the response to Comment No. 2 this letter, the Draft EIS clearly identifies a goal for additional parks and open space in the U District, and this analysis provides decision makers with information they need to plan for additional facilities. A range of possible park facilities are identified as mitigation measures. Including specific facilities within an EIS is not required for the non-project zoning and regulatory actions that are the focus of the Draft EIS. As specified in the SEPA Rules, it is appropriate for a programmatic EIS to identify subsequent actions that could be taken by other agencies as a result of the non-project proposal (WAC 197-11-442(3)). Planning for parks and open space is the responsibility of a separate city agency and follows established procedures.

5. **Plan consistency.** The comment is acknowledged. There is no inconsistency related to the Urban Design Framework or the Parks Plan, and the EIS alternatives do not foreclose opportunities to implement relevant goals and priorities. Section 3.7.1 in the Draft EIS specifically references the long-standing community interest in a central open space, both from the 2005 Park Plan and the more recent Urban Design Framework. The zoning and regulatory actions considered in the Draft EIS–namely height, intensity and design—are not intended to be all-encompassing and do not constitute a plan per se. They are, rather, important but selected aspects of the U District's future growth and are related pieces of the multiple land use and facility decisions that will be made through different City decision making processes, including the

Comprehensive Plan, the annual budget and CIP, and ongoing parks planning. These separate processes will include future decisions about park locations and designs.

6. **Open space.** Please see the response to Comment No. 5.

7. **Open space impact.** As the comment acknowledges, the Draft EIS does identify the potential parks deficiency as an impact, and therefore does consider the impact. The Draft EIS also notes that increased demand for parks and open space and the potential parks deficiency are related to housing/population growth in the U District, and not to the actions which are the subject of the EIS alternatives, i.e., zoning, development standards and design standards. The estimated housing growth considered is a proportion of citywide 2035 growth, and the 2035 planning estimates/targets for the U District are based on estimates in the Comprehensive Plan Update; they are not a result of rezoning. The zoning alternatives are examining how that growth could be accommodated, organized spatially and designed.

   The comment cites several provisions of the SEPA statute (RCW 43.21C), the SEPA Rules (WAC 197-11) and case law (*Weyerhaeuser v. Pierce County*) regarding the purpose, function and content of EIS alternatives. The lead agency concludes that the Draft EIS complies with relevant requirements for alternatives for a non-project action; refer to WAC 197-11-440 and 197-11-442(2). It is noted that the Weyerhaeuser decision involved a project action (a conditional use permit) and an entirely different decision making context. While the comment expresses a preference for an alternative that includes site specific park locations, this desire is outside the scope of the proposal identified by the City and evaluated in the U District EIS.

8. **SEPA compliance.** Under all Draft EIS alternatives, the area including and surrounding the planned light rail station would be zoned for a mix of uses; alternative uses, therefore, are implicit within the zoning code classification. The term piecemealing is used in SEPA to refer to actions that are inappropriately divided into smaller pieces so as to avoid environmental review. That is not the case here. A specific, hypothetical use of a specific site is independent of the area-wide zoning action that is evaluated in the EIS; they involve different decision makers and decision-making processes and they do not constitute a single course of action. The effects of alternative non-project land use actions are evaluated in the EIS; per WAC 197-11-442(3), future uses of individual sites are not discernable at this time and site specific analysis is not

required by SEPA. Any future park proposals, and any specific future uses of the building above the light rail station, would constitute an independent site-specific project or projects that could be subject to subsequent project-specific SEPA review. This sequence of environmental review–from broad, non-project action, to site-specific project action–is known as "phased review" and is explicitly permitted by the SEPA Rules (WAC 197-11-060(5).

9. **Open space.** Please refer to the previous responses in this letter.
10. **Alternatives.** The comment is noted.

Letter No. 84 RICE, FRED

1. **Support increased housing supply.** The comment is noted.

Letter No. 85 SAHABU, PRESTON

1. **Support Alternative 2.** The comment is noted.
2. **Support Alternative 4.** See response to Letter No. 28, Comment No. 2.

Letter No. 86 SALOMON, ANDRES

1. **The Ave as a pedestrian plaza.** The comment is noted. The concept of University Way NE as a pedestrian plaza is not proposed or evaluated in the EIS.

Letter No. 87 SCHMITT, MICHAEL

1. **Support Alternative 3.** The comment is noted.
2. **Upzones and capacity.** As noted in the comment, the Draft EIS describes that current zoning provides adequate capacity to accommodate the planning estimate for growth assumed in the EIS analysis.

3. **Historic resources.** Draft EIS Section 3.4 (Historic Resources) describes mitigating measures that could be implemented to mitigate potential impacts. The conclusion that there are no unavoidable impacts is based on the fact that mitigation is available to reduce or eliminate impacts.
4. **Growth impacts.** The comment is noted. It should be noted that the impacts described in the comment are related to growth under existing zoning, described as Alternative 3 in the EIS.
5. **Historic district.** The comment is noted.

Letter No. 88 SMYTH, JIM

1. **Support Alternative 2.** The comment is noted.
2. **Expand LR3 zoning.** The comment is noted.
3. **Latona neighborhood.** The comment is noted.

Letter No. 89 SOMMERS, AMY

1. **Support Alternative 4.** See response to Letter No. 28, Comment No. 2.

Letter No. 90 SOULES, SCOTT

1. **Increased density and building heights.** The comments regarding increased density and building heights are noted.

Citizen Comment Letters 91-101

Letter Number	Name (Last, First)	Agency/Organization
91	Stewart, John	
92	Timberlake, Craig M. and Steve Aleinikoff	
93	Whalen, David	
94	White, Alex	
95	Wight, Steve	LCA/IPG patents
96	Wilkins, Steve	
97	Willis, Darin, and Don Schulze	U District Parking Association
98	Wilson, Debra	
99	Wilson, Ruth	
100	Wirth, Judith	
101	Woelfer, Karl	

Letter # 91

From: John Stewart <stewartj@seanet.com>
Sent: Monday, June 23, 2014 1:43 PM
To: LaClergue, Dave
Subject: University District Urban Design comments

Greetings,

Thank you for the opportunity to provide comments on the proposed University District Urban Design guidelines.
1 Although much of the media coverage appears focused on the upzone requests, I think the larger issue here is transportation, specifically pedestrians, and the street-level experience of the neighborhood.

The U District as it exists today is characterized by a mix of small storefronts (particularly on "The Ave" and connecting streets) of a type almost never seen in contemporary construction. In conversations with friends who own/operate small businesses, one of the biggest frustrations with contemporary architecture is the odd dimensionality (and high rents) of the street-level spaces. Lots of folks would love a
3-500 sq. ft. space with a relatively narrow frontage but depth.
Unfortunately we don't build much of that anymore.

To me, the key to any successful future for Seattle is going to be the street-level experience. If we're 4 or 6 or 8 or even 16 or 20 stories up, that's not very interesting from the perspective of the person on the ground, whose eyes will rarely go up that high anyway. From an urban diversity perspective, in my experience the really tall buildings tend to be either extremely expensive housing or office space anyway, and I'd argue we already have a lot of both of those things in Seattle as things stand now.

2 Desired increases in residential population and jobs need to be accompanied by investments in the transportation network. We are fortunate that much of the U District is already part of Seattle's sidewalk network (and kudos to DPD for noting the gaps and sub-standard sidewalk stretches), as well as relatively proximate to the Burke-Gilman Trail. I would argue the study should also account for pedestrian connectivity to the University Bridge in more concrete (no pun intended) terms; this is also a crucial pedestrian, not just bicycle, connection to and from the U District. As noted, the current pedestrian connections north of the bridge are sub-standard and need improvement to make it easier for pedestrians to access the core of the U District and the area under suggestion for heightened development.

3 It is also clear to me that the future light rail station on Brooklyn will drive even more pedestrian activity in the neighborhood. This is a good thing, but also needs to be taken into account when planning land use around the station.

I would urge that any green streets, woonerfs or other pedestrian-focused street design be *very* carefully contemplated. Learn from the mistakes made on Bell Street (lack of coordination by City departments, trying to do too many things at once) and be sure to consider the land use around the street, not just the street itself, in the planning process. I realize DPD does not own the right-of-way, but again, City departments really need to work closely together on these issues.

4 I would also urge that any new retail spaces be constrained wherever possible for smaller sizes and narrower storefronts. Pedestrians looking for destinations love to stroll down streets like this (see Pike Place Market) and we know that streets that are pedestrian and bicycle friendly are good for merchants as well.

5 So all of this leads me to the conclusion that while I don't have a strong preference in favor of Alternative #1 or Alternative #2, preserving the existing feel of "The Ave" matters, as a historic bridge to what the U District has been, and because it preserves many of the small retail spaces that make the neighborhood an interesting place to be. We should

5 cont. not be substantially upzoning any of these blocks, and any upzone needs to carry strict conditions to preserve the feel of the current streetscape. Instead, I would urge thinking seriously about focusing upzones toward the western edge of the U District (closer to
*I-5) where there is much less important to preserve, but folks are still within walking distance of the light rail station.

Sincerely,

John Stewart
2419 E Spring Street
Central District, Seattle

Letter # 92

Dave LaClergue, Urban Design
City of Seattle Department of Planning and Development
700 Fifth Avenue, Suite 1900
P.O. Box 34019
Seattle, Washington 98124-4019

Re: *Draft EIS and 4522 15th Avenue NE. Seattle, Washington 98105*
Parcel #: 882390-2315

Dear Dave:

We have reviewed the draft EIS issued on April 24, 2014. We are disappointed that our property is not included in the defined re-zoning district and do not understand why none of the proposals include an alternative for such inclusion. We run a long standing dental business and have been a part of the U-District business community for three generations. We feel that our property, like the other businesses located west of 15th, should be included in the re-zone proposal.

We request that consideration be given to include our property in the re-zone boundary and re-zoned from our current NC240 to match whatever is approved on the west side of 15th Avenue NE (i.e., Mixed Use 160' under Alternative 1 or NC3 85 under Alternative 2).

Thank you for your consideration.

Sincerely,

Craig M. Timberlake, DDS

Steve Aleinikoff, DDS

Cc: Diane Sugimura, Director
City of Seattle, Department of Planning and Development

Letter # 93

From: David Whalen <davidwhalen@gmail.com>
Sent: Thursday, June 19, 2014 12:15 PM
To: LaClergue, Dave
Subject: University District rezone

Hello,

1 I am a long-time area resident and Seattle native who will be relocating to the University District this year. As a proponent of rail-transit and urban livability, I strongly encourage you to support The Urbanist's 'Alternative 4' as outlined here:

http://www.theurbanist.org/2014/06/19/choose-alternative-4-for-the-university-district/

2 My secondary recommendation would be for alternative 2, as it maintains the possibility of corrective zoning in the future, unlike alternative 1.

3 Neighborhood character is established by the streetscapes and urban design that occur below 30 feet, regardless of the height of the buildings. The additional density provided by the greater upzone will create more social capital, transit ridership, economic growth, and simultaneously reduce car-dependency and GHG output. The Ave is in need of more residents and a greater variety of residents to provide 24-hour activation, eyes-on-the-street, and reduced crime.

Please consider this proposal. Thank you,

-David Whalen

Letter # 94

From: Alex White <misterwhite@gmail.com>
Sent: Monday, June 23, 2014 12:29 PM
To: LaClergue, Dave
Subject: U-District Urban Design

1 I have reviewed the proposed alternatives for upzoning for future density in the University District, and would like to express my support for the Alternatives (1 and 2) that increase density in the neighborhood. Between these two, Alternative 2 is preferable, as high-rise development will accommodate the jobs and residences that make more efficient use of the new light rail station. Additionally, new towers will NOT be out of place in the Seattle neighborhood with the two tallest buildings outside of downtown.

However, the larger area covered by the expanded upzone in Alternative 1 is desirable on its own merits, with respect to the increased footprint of improved densities. Pairing the increased density of the neighborhood zoning in Alternative 1 with the core density in Alternative 2 is a VERY attractive option, and in fact it appears the two go hand-in-hand with helping the University district accommodate the coming population and jobs to one of Seattle's most vibrant and well-connected neighborhoods.

2 Thank you for your time spent in consideration of my comments and feedback. As a decades-long Seattle resident, I feel it is of critical import to lend my voice to the coalition of residents, current and future, that welcome the prosperity that comes with growth and density, rather than to the voices that seek to shut out newcomers and push them outside the city to the detriment of Seattle, as well as the region. It is in ALL our interests to ensure we can accommodate, equitably, future growth. This means adding density, and I see no better place for this than in the neighborhood already blessed with the connectivity, employment opportunities, and cultural dynamism, necessary to make it a success!

Regards,

Alex White

Letter # 95

From: Steve Wight (LCA) <swight@microsoft.com>
Sent: Thursday, June 19, 2014 5:56 PM
To: LaClergue, Dave
Subject: U.District upzone

Hi Dave,
I understand you're gathering public comments on the up zone alternatives for the U. District.

I lived in the U. District while attending law school at the UW in early 90s.

1 I am in favor of a more aggressive up zone of the U. District that would ensure that the billions of tax payer dollars of investment in the U. Link light rail provides a full return on investment to the public and tax payers of the region. The efficiency of transit and urban density reinforce each other. Just as with the up zone for the Roosevelt station area, it is only appropriate that the U. District also experience an up zone so that growth is accommodated in locations where good transit is provided.

2 Of the options presented, it is apparent that the prediction of additional units provided with the proposed up zones are not all that significantly larger than that of the no zoning change alternative. I would therefore back the "fourth alternative" proposed by the Urbanist blog (see, http://www.theurbanist.org/2014/06/19/choose-alternative-4-for-the-university-district/), which combines both the taller buildings up zone of alternative 2 and the larger area up zone of alternative 1.

3 With appropriate tower spacing, there is no reason to believe high rise towers would be unsightly or out of character in this neighborhood, especially in view of there already being high rise buildings in the U.District and provision of adequate pedestrian corridors and preservation of "the Ave" itself. When appropriately designed to provide "pedestal" heights matching that of adjoining low/mid rise buildings, appropriately spaced high rise towers would not detract or
4 produce any undesirable urban canyon effects. Further the area stretching west towards I-5 is not a single family residential zone and should be fully up zoned for multi family housing that will allow more students and residents to live in comfortable walking distance of both the university and transit to the city. In addition to more housing, it is highly
5 desirable to allow more office and business space in the U. District that would enhance the ability of a world class university like the U.W. to produce more off shoot new businesses and start ups, which benefits Seattle's economy and job market.

Thank you,

Steve Wight
Sr. Attorney, IP counsel

LCA | IPG patents

Tel: +1 425.421.2115 **Cell**: +1 503.781.4238 **Fax:** +1 425.936.7329 **Email:** swight@microsoft.com

Letter # 96

Steve Wilkins
PO Box 45344
Sea., WA 98145
bfriendly@nocharge.zzn.com

Dave LaClergue
700 5th Ave, Suite 2000
PO Box 34019
Seattle, WA 98124
dave.laclergue@seattle.gov

RE: Comments, DEIS evaluating increased height and density in the U District neighborhood

Dear Mr. LaClergue,

1 The massive zoning upgrades and density increases outlined in the Draft Environmental Impact Statement "DEIS" need to be tied to: Infrastructure Improvements, Public Open Space, Public Square, Public Services, Access to Views and Sunlight, Elementary School, Affordable Family Housing and Mitigation of Transportation and Parking impacts. The failure of this document to address any of these issues points to the need to dismiss it as inaccurate and demand a resubmission that mitigates these identified issues.

2 This failure can be read in the language of this document:

> "Significant impacts associated with the proposal are not anticipated"
> "No significant unavoidable adverse impacts to public services are anticipated"
> "No significant unavoidable adverse impacts to plans and policies are anticipated"

3 This document reads as if it provides compliance with regulations. However it only complies with one of the two levels required for SEPA analysis. Impacts to the environment need to be addressed. It is not sufficient to state that there are 'no significant anticipated impacts' or that if problems arise in the future there 'may' be ways to deal with them. Mitigating measures must be stated and evaluated to demonstrate that impacts will be below significant levels that require mitigation.

4 Once zoning changes are in place builders and property owners will be free to profit from this windfall without obligation or concern to neighborhood needs. Promises and postponed mitigations only show a failure of this DEIS to adequately address important issues. Promises that negative impacts 'could' be handled 'down the line' by yet to be identified 'incentive zoning' programs is not policy but wishful thinking. One only needs to look at the failed 'promises' of the University Community Urban Center:

- No building setbacks
- No parking solutions despite raised rates and RPZs
- No public open space
- Boxy structures built sidewalk to side walk, eliminating views and pedestrians pathways (UW West dorm construction eliminated views of the ship canal)

5 Comments submitted by Neighborhood Community Councils during the Scoping EIS were all summarily ignored in favor of ruling that mitigating measures will not be needed: "No significant unavoidable adverse impacts to plans and policies are anticipated." The issues raised in the following submissions need to be addressed:

5 cont

- University District Community Council (10/7/13)
- Ravenna-Bryant Community Association (10/1/13)
- University Park Community Club (10/6/13)
- CUCAC (October 2013)
- Northeast District Council (10/8/13)

6 When it comes to addressing the need for public open space in the University District "UD" this document finds: "these deficiencies are not considered impacts for purposes of this EIS." It goes on to state that possible mitigation could be provided by: "Improved access to campus for the public for the purposes of public access to open spaces." It was clearly stated during the U District Urban Design Framework process by Dave LaClergue (DPD) that the University of Washington "UW" campus could not be considered as public open space when it comes to addressing the deficit of public open space in the UD. This is another error in this document.

7 Much ado was made that the behind closed doors property exchange between Sound Transit and the UW for the 'above ground air rights' would be mitigated through the University District Livability Partnership, this was not the case. The decision to build over the Sound Transit station by the UW is pictured in Figure 3.3-5 (Source Sound Transit, 2013) showing no mitigation of use which should have been imperative given the use of public funds in the property exchange and public input. It shows a squat six story building, built to the sidewalk, with no open space.

8 There is no evaluation of public comments requesting that the re-zone be confined to the original TOD overlay of the ¼ mile walk shed. There is no comparative analysis of City wide neighborhoods sharing the burden of growth (height and density) suggested in this DEIS. Open space considerations (Village Open Space) are given for defined distances outside the UD boundaries yet the City is excluded from density analysis. To avoid another failure in analysis this DEIS needs to address both of these issues.

9 If the City is to give away density increases in the UD they need to be tied to preservation of what is left of the single family areas and roll back zoning changes granted in our up zone to Urban Center. This 'urban' creep should stop at 47th Ave NE on the South and Roosevelt Way on the East. Residents in this area currently enjoy expansive views of the skyline and tree canopies where the predominate height is 30.' If 160' to 340' foot buildings are allowed they will shadow and block these open air views.

10 Which map of existing conditions is correct? The published 'existing zoning' depiction from the U District Urban Design Framework (6/20/13) or the Alternative 3 image depicted in the Draft EIS (4/24/14)? Are both wrong? During the only public comment period for this DEIS (5/20/14) a slide was presented (UDF:Building Height) which was the same as the 6/20/13 publication.

11 Furthering this confusion are the different sketch-up techniques used for Alternative 1 & 2 and Alternative 3. The Alternative 3 overlay covers the street locations making it impossible to read. In Alternatives 1 & 2 the street locations are clearly visible. It would be less confusing if the acronyms for zoning designations were published in a format that would make it easier to review height changes. I recommend a table in the Appendix defining acronyms, listing heights and include 'fudge factors' for changes in height permitted by 'incentive zoning.'

12 It is pretty easy to see that there will be a more than a tripling of existing heights (450% in places) with this rezone yet I read: "Land use compatibility impacts for the No Action Alternative would generally be as described under Impacts Comment (common?) to All Alternatives." To again quote this DEIS: "Significant impacts associated with the proposal are not anticipated." It is impossible that massive zoning changes like

12 cont those proposed will take place with no specific impacts or needed mitigating measures. This is one of the more glaring errors in this document.

13 There is no economic analysis of the actual costs to the neighborhood and City for infrastructure maintenance or expansion, public services or cost of repairing roadways damaged by heavy truck traffic and construction. This analysis needs to be done and mitigating measures must be spelled out make this DEIS a document that will allow informed decision making and intelligently guide growth in the University District.

Significant economic impacts need to be addressed. What is the cost to the neighborhood and City due to failure to assess development fees? What will be the cost to Real Estate Tax Income from the continued expansion of the UW into the neighborhood? There is no analysis of the ongoing economic impact of the Multi Family Tax Exemption.

14 A suggested mitigation through the expansion of the 'incentive zoning' program is not evaluated or spelled out. There is no analysis of the cost of an 'incentive zoning' program expansion. What is the true cost of these economic giveaways to public funds in each of the proposed Alternative scenarios? Give-away incentives for setbacks, income, greenness and height should also be tied to creation of a public square. Because of a 'green roof' the current VW dealership expansion is side-walk to side-walk. There is no parking for their two hundred employees.

15 There is a complete failure in this analysis for mitigation needed to handle increased demands on roadways and parking that will come with increased density. This document states "demand already exceeds supply" but only suggests that the RPZ program and raised parking rates 'can' mitigate this problem. In reality, these programs are another example of failed policy. Apodments are permitted for residents who won't need cars yet residents are being issued RPZ permits. In my SF5000 Zone 10 RPZ there is minimal enforcement of the two hour parking limit and that is after calling to ask for enforcement. Instead of solving parking problems the RPZ program has had the unintended consequence of back yards being converted into parking lots. Related SMC's for illegal parking go unenforced despite continued requests for enforcement (SMC 11.70.200 & 11.72.351). The failure of current parking mitigation programs cannot be looked to as solutions for a neighborhood in transition from Urban Center to Transit Center. Failure to provide mitigating measures to these identified problems is yet another failure of this document.

16 Massive zoning upgrades need to be tied to: Infrastructure Improvements, Public Open Space, Public Square, Public Services, Access to Views and Sunlight, Elementary School, Affordable Family Housing and Mitigation of Transportation and Parking impacts. The only mitigation this document offers is a huge giveaway to builders and property owners.

In conclusion, the failure of this document to spell out any mitigating measures under any of the alternatives studied points to the need to dismiss it as inaccurate and demand a resubmission at such a time that it addresses these issues and allows sufficient time for public comment.

Sincerely,

Steve Wilkins
6/17/14

cc: Ed Murray, Susan McLain, Tim Burgess, Jean Godden, Sally Clark, Mike Obrien, Nick Licata, Sally Bagshaw, Bruce Harrell, Tom Rasmussen, Kshama Sawant, Diane Sigimura

Letter # 97

From: Darin Willis <darinw@udpa.org>
Sent: Monday, June 23, 2014 3:15 PM
To: LaClergue, Dave
Cc: Don Schulze
Subject: U District Draft EIS Comment

Hello Dave,
We appreciate everyone's time and effort spent on drafting the EIS for the University District. We think the light rail station that will be coming into the heart of U District will help to revitalize and enhance the area.

1 As one of the largest property owners in the University District we feel that that options 1 and 2 or better yet, a blend of the two options, would be best for the U District. Increasing the height limits in the area could help with redevelopment and potentially bring in new businesses and residents to the area. The current height limits on University Way NE at 65' or increasing them to 85' would not encourage any new development on "the Ave" and could lead to a continued stagnation of the types and quality of businesses located there.

2 We also feel that a change to allow residential units at street level, off of University Way NE, would also be welcome. Currently there is little demand for retail off the Ave and encouraging the ability to allow housing at street level may help with the redevelopment on those streets as well.

Thank You

Don Schulze
President, UDPA
don@shultzys.com
206-228-5431

Darin Willis
General Manager, UDPA
darinw@udpa.org
206-527-7006

Letter # 98

From: Debra Wilson <msdlwilson@gmail.com>
Sent: Monday, June 2, 2014 7:42 PM
To: LaClergue, Dave
Subject: U District Urban Design

I wanted to comment on the options for development in the U District. I have lived in the neighborhood for 17 years, but worked at the University for ten years quite some time ago, so the U District is definitely my home.

1 In my opinion, the best alternative would be for taller towers (however, not taller or as tall as the Safeco building) and a focused development plan.

There is already a lot of building going on in the U District, which is important in a fast growing city like Seattle. I strongly believe we need to provide more in-city housing (affordable) rather than spreading out to the suburbs – which causes more traffic. There was recently a story on NPR (maybe even a local KUOW story) that talked about the need for upward growth.

2 There was another piece on NPR (again, maybe a KUOW story) that discussed what made a neighborhood more people-friendly – smaller, older buildings or newer, taller ones. Hands down, the smaller, older buildings won out because they often house one-off smaller businesses and give the area a community feel. I remember when the Ave had a neighborhood feel. It hasn't felt like that for a really long time. The neighborhoods that do have that feel are Wallingford, Fremont, Madison Park, Phinney Ridge, Ballard.

3 So I guess the best is to balance between building up, while maintaining as much of the smaller and older neighborhood storefronts as possible – and add open space for pedestrians.

I'm very excited to see how it all turns out. I sure hope planners keep in mind that we have a wonderful opportunity here to make the U District a vital neighborhood. The U District should be a premiere neighborhood in Seattle.

Thanks

Debra Wilson

Letter # 99

Deborah Munkberg

From: Ruth Wilson <ruthnwil@yahoo.com>
Sent: Thursday, June 19, 2014 4:05 PM
To: LaClergue, Dave
Subject: U. District Heights

Hi Dave,

1 I am very concerned about the proposed increase in height limits in the U. District. This is definitely a step in the wrong direction. We need to let in the sunshine, preserve the landscape, and not give in to developers.

Thank you.

Ruth Wilson
4046 30th Ave. W.
98199

Letter # 100

To: Dave LaClergue, Urban Designer
City of Seattle, DPD
700-5th Ave., Suite 11900
Seattle, WA 98124

CC: Mayor, City Council

Re: Comments on U District DEIS

1 As a board member of RNA and long-time resident of the neighborhood, I have spent many hours reading and analyzing the DEIS and have found it generally lacking in specificity as to impacts, lacking in meaningful mitigation and lacking in current data on which to base assumptions. In other words, totally inadequate for a study area of this size and one which is already negatively impacted by current growth in this area, Seattle and the Region. I agree with the comments being submitted by RNA but am also sending my comments regarding the Transportation Section.

2 Given the inadequacy of the DEIS and because it is not in compliance with SEPA, the DEIS needs to be redrafted and resubmitted and a second public comment period must be provided for further comments and recommendations.

3 We are for quality density, where development is accompanied by benefits and amenities to the community. We are against 340 foot buildings as growth can be achieved without this out of scale development and negative impacts.

4 We are a neighborhood as described in Section 3.4.3 of the DEIS, which talks about "the intact neighborhood and religious properties that together create a distinct neighborhood within the city and that <u>these properties will be used to inform the nature of new and infill development".</u> We only wish that were true but this certainly has not been evident in regard to current development.

5 We do not want to be another downtown business district. To remain a viable neighborhood necessary infrastructure and amenities must be provided to balance growth and provide for a safe and sustainable community. These improvements are costly and will not be provided

5 cont without a legal structure that requires them, such as impact fees that are required in other cities, such as Bellevue. These fees must only be applied to improvements in the U. District.

6 The DEIS states that there are many deficits in the study area: parking is over capacity; parks and open space are severely lacking and the worst in the city; police can't meet current demand, particularly due to a young, student population, we need additional Seattle Fire Department services, an elementary school to meet the predicted high rate of growth of students in the north end and family oriented housing for couples and single parent households. The DEIS also clearly states that "increasing roadway capacity to meet current and future demand in the U District is undesirable and cost prohibitive".

7 We cannot support any of the alternatives described in the DEIS until a new, more accurate and informative DEIS is provided. However, the DEIS does clearly state that Alternative 3, the "No Action" Alternative provides more than enough housing and space for business to meet the goals of the City with fewer negative impacts than the two Action Alternatives. Thus, until more information is available, my neighbors and I are supporting Alternative 3.

8 The following are specific requests:

1. Rewrite the DEIS to comply with SEPA;
2. Provide another comment period with current date and analysis;
3. No upzoning around the University Playground and University Branch Library;
4. Provide more open space with specific ideas as to where and how to fund them. We have been working on this for years but still have only one major park, University Playfield, which is quite small;
5. Preservation of single family zoning and homes;
6. Complete a current survey of historic buildings and expand the age and range of buildings for landmark status and including historic homes;
7. Realistic parking options, including requiring more parking for multi-family buildings and different RPZ areas for SF, L1 and L2 neighborhoods and multi-family housing;
8. Concrete ideas for increasing transit service and reducing transit times;
9. Development fees for roads, public services, an elementary school, infrastructure and historic evaluation and preservation;

8 cont

10. An overpass over I-5 dedicated to buses, bikes and pedestrians would encourage alternative forms of transportation and dramatically increase safety;
11. Hire an independent transportation expert, who will also work with the community, to review transportation studies, basic assumptions used and compile more recent data to discuss current conditions, predict future impacts of increased development and provide concrete ideas for limiting traffic congestion. <u>This is an absolute priority.</u>

9 DEIS sections were reviewed and analyzed by community members, with recommendations for further study and mitigation of negative impacts and are included with the letter from the RNA Board and members. I have included the Transportation section as that is the one which I spent the most time researching and writing with the help of Jeannie Gorman, also a long-term resident and attorney in the neighborhood.

Sincerely,

Judith Wirth, RNA Board Member and past president
5023-8th Avenue NE, Seattle, WA 98105
206-632-1924
jgwirth@clearwire.net

to: Dave LaClergue, Urban Designer

DEIS TRANSPORTATION SECTION

10 The U District is a truly unique Seattle neighborhood. We have a sustainable mix of shopping, business, education, medical, religious, services and residential uses. We are in the middle of the city, serve as a hub for transportation for thousands of Seattle residents to access these services and facilities and absorb tens of thousands of transient students every school year. No other neighborhood deals with these unique stresses. We residents of the U District pride ourselves on dealing gracefully and creatively with the numbers of students, patients, congregants and homeless that utilize this area. We do it while embracing ethnic and economic diversity and sustaining an urban, healthy and livable neighborhood. Students, professors, patients and congregants leave but the homeowners and long-term renters of the U District remain. We maintain our houses and lawns, plant traffic circles, organize trash cleanups and serve as the mainstay to an otherwise shifting neighborhood. Our commitment to maintaining this vitality and the historic homes of the U District makes this the desirable neighborhood it is today.

We understand the inevitability of growth and as our neighborhood plan and the No-Action Alternative prove, are willing to accept our share. However, the City's Urban Center plan shifts a disproportionate amount of growth on our neighborhood, putting more and more pressure on homeowners and long-term renters. The City must consider the impact of towering apartment buildings with no lot-lines, no green space, no amenities and transient residents on quality of life for residents and businesses alike. Long-term residents are a mix of older, younger, active and disabled and even families with small children. Any changes must take into account varying degrees of mobility and activity, both in terms of building and traffic.

According to the DEIS, all the alternatives provide **MORE THAN SUFFICIENT CAPACITY** in the study area to accommodate both the residential and employment growth estimates. (3.2 5) **Even Alt 3, no action** provides, 2,706 more capacity than the 3900 the City is using as a baseline.

11 **TRANSPORTATION** 3.5

We are not engineers or urban planners; we are concerned residents who live here and know the problems we encounter daily leaving and returning to the U district. The analysis of traffic and transportation impacts associated with the three alternatives in the DEIS are woefully inadequate, especially in regard to Alternatives one and two. Further increasing density in the area, along with increased growth in Seattle will certainly exacerbate transportation problems, despite the claims in the DEIS stating there will be no significant impacts. We are baffled by the EIS' apparent conclusion that Seattle can increase almost twice the number of new residential units and 3-4 times the number of jobs in the area and end up with the same number of trips across all modes of transportation. Dramatic differences in density will generate differences in trips for all modes, not almost identical numbers.

12 Please provide information on the analytical approach, data and assumptions used to reach this surprising conclusion. We also question the use of the MDX traffic model rather than the Institute of Transportation Engineers methodology and rates, which is the industry standard for determining trip generation data. Does the MDX model have a track record that shows it can accurately predict the future, especially in twenty years?

SINGLE OCCUPANCY VEHICLE (SOV) GOAL:

13 Increased density will create increased traffic, whether by bus, car or bicycle. The goal of 70% non-SOV travel in the U District Urban Center (UDUC) does not take into account the aging population, the disabled and families with children. Also, Seattle is a region with a high percentage of outdoor pursuits that draw a younger population who also need vehicles to get to recreation areas. Alternative 3 would still meet the City's mode split goal of 70% non-SOV. According to the DEIS (3.5-44) the auto mode share percentage would decrease compared to 2015, but the absolute number of auto trips would increase by roughly 12% without needing the density levels of the Action Alternatives.

14 We are also wondering how the City expects to ensure that the projected transit mode split can be achieved, considering our Region's inability to adequately fund transportation infrastructure and transit service. A recent letter by the Federal Transit Administration's Rick Krochalis to the Puget Sound Regional Council questioned the region's ability to provide the funds necessary to implement the Transportation Improvement Plan. Transit service is being cut due to lack of funding, yet future transportation plans are based on a dramatic increase in the transit mode split. The letter indicated that the federal government may no longer accept the region's certification without guarantees that the funding to implement our Transportation Plan is actually available, potentially threatening the City's ability to receive federal funds for future projects. Please explain how the City would ensure that the funding to support the transit service required to meet the projected transit mode split goal will be guaranteed.

TRAFFIC STUDY

15 The most telling statement in the traffic study is that "...from both a policy and feasibility perspective, increasing roadway capacity ...is undesirable and cost-prohibitive (3.5-70)Thus the study only considered non-auto mode mitigation, a minor part of the problem The study does not quantify in any way the efficacy of the types of proposed mitigation and it does not discuss any implementation strategies other than "possible" impact fees, changes to the City municipal code and additional monitoring of parking etc.

16 The traffic study in the Draft EIS is woefully inadequate. The City has used limited data to analyze current conditions and, thus, makes general projections about future growth based on inadequate data from a regional model. Much of the data is based on information from 2006 to 2010, too old to be accurate. Existing traffic, 3.5-2; parking data 2010, 3.5-19.

17 The DEIS shows only two areas of congestion projected for 2015, Roosevelt Way and 11th Ave, both from 45th to 50th. This is inaccurate. 50th westbound is so congested from 9th Ave to the southbound 1-5 onramp that it is impossible to a) access the left hand lane from west of Roosevelt, and (b) impossible to travel through each intersection from Roosevelt to the 1-5 onramp. Often access to the 1-5 southbound onramp is blocked by the quantity of travelers heading eastbound on 50th, gridlocking U district traffic from Roosevelt (or 11th) to 1-5. Again, we need more comprehensive and current data on traffic congestion as any increased density in the U District will negatively impact already deteriorating traffic conditions.

18 Transit service is already inadequate(3.5-7) and 20% of VMT is at LOSF (3.5-45) with Roosevelt and 11th NE predicted to be at LOSF by 2015 and this is with Alternative three, the No Action Alternative.

PARKING

19 The City's DEIS acknowledges that demand for parking presently exceeds supply. Seattle DPD (3.5 49; 3.5-57) Increased density will exacerbate this problem. Also, much of the discussion was based on a 2010 parking study. Current data must be used to analyze impacts for the UDUC and also for the region as we now know Seattle is one of the fastest growing areas in the country. Lack of parking also impacts many small businesses in the area. For example, one business near Trader Joe's rents the drive-ways of nearby residents for their customer's cars.

20 There is inadequate parking even with the RPZ's and increased enforcement. Residents on unregulated streets are routinely unable to park in front of or near their homes. Again no meaningful mitigation is offered. We have two proposals to help alleviate this problem. First, make all residential streets in the UDUC into RPZ's. Second, restrict the availability of RPZ permits outside of single family areas and limit the number of permits per household.

Another solution is to require all new developments to provide adequate parking for its residents. This requirement has recently been abandoned to the detriment of the residents who live here all the time. Developers who build, guarantee occupancy and who than leave our neighborhood have no stake in addressing the problems they create. Nor do the residents of these complexes, as they tend to be transient.

SAFETY 3.5 - 35

21 Again, the data is inadequate. The study projects data from January 2010 to September 2013 to represent 2015. That is ludicrous given the rapid growth in the region and UDUC. Also, the study needs to use a multiplier to project the actual numbers of accidents as many, undoubtably, were not reported.

Based on this faulty assumption, the DEIS states there are no high accident locations in the study area. Using the study definitions (see chart on 3.5 - 37 Annual Collision Rates), there were eight locations that were in the 5-7 accident range and eight locations in the 4-5 accident range, both of which denote high accident locations.

21 cont

Pedestrian and bicycle collisions are shown on 3.5-38 and again two locations show 5 to 7 accidents and six show 3 to 4.

MITIGATING MEASURES 3.5.3

22

This document offers almost no mitigation measures and apparently doesn't think they are necessary, despite the proposed increase in density and the inability to improve roadways in the area. The DEIS claims that the "*proposed mitigation packages (3.5-4) would reduce the magnitude of all the identified impacts of the rezone alternatives to less-than-significant level, therefore there are no significant unavoidable adverse impacts to transportation".* This, despite the City's acknowledgement that there are "*unavoidable adverse impacts to transportation" (3.5.72)* Yet the DEIS embraces the increased density and upzones in the UDUC, particular in reference to Alternatives one and two. An example of this bias can be seen in the language used throughout this document, such as using "Deficiencies of No Action Alternative (3.5-43) and than describing "Impacts of Action Alternatives". Also the use of words such as "could" and "potential" which tell us nothing.

Some of the proposed mitigation measures, such as the requirement for more active transportation demand management on the employer side are very difficult to implement for the small local businesses that make the U District the lively place it is today. Requiring more active TDM measures from employers would favor large companies and corporations, threatening the economic fabric and character of the study area.

23

No adverse impacts is the most egregious statement we have ever seen in a DEIS and uses sophistry in an absolutely indefensible manner. We are demanding that the City pay for an independent transportation expert, who will also work with the community, to review this section, the studies used, more recent data and the basic assumptions used to make such outlandish statements., before proceeding with this DEIS process. We also want more discussion about who defines what is acceptable.

Letter # 101

From: Karl Woelfer <karl.woelfer@gmail.com>
Sent: Monday, June 23, 2014 12:57 PM
To: LaClergue, Dave
Subject: U District Urban Design Draft Environmental Impact Statement

Dave LeClergue, Planner
Department of Planning and Development
700 5th Avenue
Seattle, WA 98124
(sent via email to dave.leclergue@seattle.gov)

Dear Mr. LeClergue,

1 The two proposed "Action Alternatives" in the DRAFT Environmental Impact statement for the U District Urban Design Alternatives are flawed solutions to a problem that does not exist. Zoning today is allowing for construction and increased density all throughout the University District, with zoning changes being made on a project-by-project basis.

There is no desire by the U District neighborhood groups to do away with current zoning and encourage redelopment *where none is needed*, nor is there any desire to displace small independent businesses and affordable housing.

From your document, Alternative 3 Land Use Patterns "...existing zoning allows for greater intensity than is currently found in the study area" and from Housing Affordability Significant Impacts Housing Supply "All of the alternatives accommodate a supply of housing above the growth estimates.

The "No Action" alternative should be the adopted alternative for the Final EIS.

Sincerely,

Karl Woelfer
resident, University Heights

Letter No. 91 STEWART, JOHN

1. **Importance of street level experience.** The comments are noted.
2. **Transportation network.** The comments are noted.
3. **Green streets.** The comments are noted.
4. **Small scale retail.** The comment is noted.
5. **Preserve the Ave.** The comments are noted.

Letter No. 92 TIMBERLAKE, CRAIG M. AND STEVE ALEINIKOFF

1. **Include properties west of 15th Ave NE.** The comment is noted. The EIS study area does not include property west of 15th Ave NE.

Letter No. 93 WHALEN, DAVID

1. **Support Alternative 4.** See response to Letter No. 28, Comment No. 2.
2. **Secondary support for Alternative 2.** The comment is noted.
3. **Street-level character.** The comment is noted.

Letter No. 94 WHITE, ALEX

1. **Support Alternatives 1 and 2.** The comments are noted.
2. **Accommodate future growth.** The comments are noted. Please note that the EIS assumes the same planning estimates for growth between all alternatives. The difference between the alternatives is the overall distribution and pattern of development.

Letter No. 95 WIGHT, STEVE

1. **Support aggressive upzone.** The comment is noted.
2. **Support Alternative 4.** See response to Letter No. 28, Comment No. 2.
3. **Tower spacing.** The comment is noted.
4. **Area west of I-5.** The comment is noted. The area west of I-5 is not included in the study area evaluated by the EIS.
5. **More office space.** The comment is noted.

Letter No. 96 WILKINS, STEVE

1. **EIS analysis.** Through its review of potential impacts to land use; population, employment and housing, including housing affordability;

aesthetics, historic resources, transportation, open space and recreation; public services and utilities, the Draft EIS addresses the topics identified in the comment.

2. **Significant unavoidable adverse impacts.** The sections of the EIS that address significant unavoidable adverse impacts are intended to identify significant impacts which cannot be mitigated. In the case of this EIS, where significant impacts are identified, mitigation strategies are identified to address impacts. The conclusion that there are no unavoidable impacts is based on the conclusion that mitigation is available to reduce or eliminate impacts.

3. **SEPA analysis.** SEPA's requirement for an EIS on a non-project area-wide legislative proposal is limited to a general discussion of the impacts of alternative proposals (WAC 197-11-442(4)). The EIS meets this standard.

   Seattle's adopted SEPA policies and procedures set forth the relationship of proposed actions (project and non-project) that are subject to SEPA to adopted plans, policies and regulations (SMC 25.05.665). This provision acknowledges that many environmental concerns have been incorporated into adopted City codes and development regulations. It further states that where city regulations have been adopted to address an environmental impact, it is presumed that such regulations are adequate to achieve sufficient mitigation.

4. **Mitigation.** The purpose of an EIS is to disclose information about significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts. Please refer to WAC 197-11-400. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.

5. **Scoping.** The scoping process for issues to be considered in the EIS is established by the SEPA Rules. The process is described in Draft EIS

Section 2.4 and summarized in Appendix C. DPD reviewed and considered all comments that were received during the comment period. Issues which were included in the scope correspond to SEPA elements of the environment (WAC 197-11-444). Of the topics listed in the comment, open space, housing, traffic and parking, public services, utilities, and aesthetics are addressed in the EIS at a level of detail appropriate for a programmatic document. Applicable mitigation is identified for each of these topics.

6. **Open space.** The UW campus is not included in the EIS assessment of public open space in the study area and the potential mitigating measure does not propose to include the campus in the calculation of public open space.
7. **Transit center illustration.** The referenced illustration is a rendering prepared by Sound Transit and intended to provide a sense of building mass, but not to establish design character, amenities, pedestrian improvements, etc.
8. **EIS analysis.** It is acknowledged that the EIS study area and alternatives extend beyond the ¼ mile walkshed around the future transit station. However, the EIS analysis does not limit or preclude a future policy decision by the City to limit the rezone area to the ¼ mile walkshed. Regarding the comment related to a citywide comparison of neighborhoods, this EIS considers a proposal and alternatives for alternative ways to organize growth physically and spatially within the study area. The proposal does not seek to accommodate increased levels of growth beyond those planned for in the City's Comprehensive Plan. Therefore, a citywide comparison of neighborhood growth levels is not applicable.
9. **Single family areas.** The comment is noted.
10. **Existing zoning map.** The map for Alternative 3 is an accurate "existing zoning" map as of the time of publication.
11. **Existing zoning map.** The existing zoning map for Alternative 3 was revised in Chapter 1 and Chapter 2 to be more legible.
12. **Land use compatibility.** In evaluating impacts, the Draft EIS analysis includes a discussion of impacts common to all alternatives as well as discussions of impacts specific to each alternative. In the case of land use, the Draft EIS includes discussion of specific impacts under each of the action alternatives that addresses potential land use compatibility impacts of increased building heights both within and adjacent to the study area. Please see Draft EIS Section 3.1 for the complete discussion and the response to Comment No. 2, this letter.

13. **Mitigating measures and economic analysis.** Regarding the cost of mitigating measures related to infrastructure and public services, the EIS discloses impacts and mitigating measures appropriate for a programmatic document. The purpose of an EIS is to disclose information about significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts. Please refer to WAC 197-11-400. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. DPD, the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.

    As described in the Scoping Summary, the EIS does not include an economic analysis of the alternatives. As described in WAC 197-11-448, SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible considerations of a decision. Rather it focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.

14. **Incentive zoning.** The comment regarding incentive zoning is acknowledged. The EIS identifies the general direction of potential implementation measures at they exist at this time, which is consistent with the requirements of SEPA; please refer to the response to Comment No. 13 above. More detailed information about proposed incentives and regulatory programs will be developed in a subsequent phase of discussion regarding the proposal.

15. **Parking.** Parking mitigation discussed in the Draft EIS include enhancement of travel demand management programs, establishment of parking maximums, incentive zoning provisions to encourage car share and bike share programs, encouragement of use of electronic guidance systems, establishment of an area-wide transportation management

partnership organization, updating the municipal code and Director's Rules related to transportation management plans and changes to the Residential Parking Zone (RPZ) program.

16. **Mitigation.** The comment is noted. Please see the response to Comment No. 13, this letter.

Letter No. 97 WILLIS, DARIN, AND DON SCHULZE

1. **Support for Alternatives 1 and 2.** The comments are noted.
2. **Street level residential use.** The comment is noted.

Letter No. 98 WILSON, DEBRA

1. **Towers and focused development.** The comments are noted.
2. **People-friendly neighborhood.** The comment is noted.
3. **Balanced option.** The comment is noted.

Letter No. 99 WILSON, RUTH

1. **No increased height.** The comment is noted.

Letter No. 100 WIRTH, JUDITH

1. **SEPA review.** The comment makes general comments about the adequacy of the Draft EIS but does not provide specific comments. The comment also references the comments by the Roosevelt Neighborhood Alliance (RNA); please see responses to Letter No. 4 from the RNA.
2. **Redraft EIS.** The proposal is a non-project action and the level of analysis contained in the EIS is consistent with SEPA's requirements for a non-project EIS; please refer to WAC 197-11-442(4). The Draft EIS will not be rewritten. Additional information and corrections to the Draft EIS are provided in Chapter 3 of this Final EIS.
3. **Support quality density.** The comments are noted.
4. **Neighborhood character.** The comment is extracted from the introduction to the mitigating measures section that describes the contribution that historic buildings make to neighborhood character. The referenced text states that the low rise streetscape of University Way NE, collection of distinguished masonry apartment buildings, civic, community and religious properties and the intact neighborhoods all work together to create a distinct neighborhood in the city. It further states that

these properties should be used to inform the nature of new and infill development.

5. **Infrastructure and impact fees.** Please see the response to Letter No. 4, Comment No. 8.
6. **Neighborhood needs.** The comments are noted.
7. **Alternative support.** The comments that none of the alternatives can be supported without additional information and interim support for Alternative 3 are noted.
8. **Specific requests.** Responses to the specific requests noted in the comment letter are provided below.
    1. *Rewrite the Draft EIS. The proposal is a non-project action and the level of analysis contained in the EIS is consistent with SEPA's requirements for a non-project EIS; please refer to WAC 197-11-442(4). The Draft EIS will not be rewritten. Additional information and corrections to the Draft EIS are provided in Chapter 3 of this Final EIS.*
    2. *Another comment period. In response to public request, the City provided an extended comment period on the Draft EIS and an additional comment period is not required and will not be provided.*
    3. *No upzoning around the University Playfield and Library. The options for maintaining existing zoning around the University Playfield and the University Branch Library is shown as part of Alternative 2 and Alternative 3.*
    4. *Open space ideas. Draft EIS Section 3.7 describes potential impacts associated with the proposal and alternatives and identifies a range of mitigation measures that could address identified impacts. Please note that Final EIS Section 3.2 includes an update to findings related to open space.*
    5. *Single family zoning and homes. Alternatives 2 and 3 leave the existing single family zones intact with no change. Alternative 1 leaves the majority of the existing single family zones intact, with two exceptions: (1) the Blessed Sacrament Church property and (2) an existing retail/multifamily*

development near NE Ravenna Boulevard/Brooklyn Avenue NE. See Draft EIS Chapter 2 for a more complete description of the proposal and alternatives.

6. *Survey of historic buildings. Please refer to Draft EIS mitigation measures for recommended additional survey and inventory work to augment the 1998 and 2002 studies.*
7. *Parking options. A parking analysis was completed in the Draft EIS, please see Letter No. 4, Comments No. 67 and 68. It should be noted that the purpose of an EIS is to disclose information about significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts.*
8. *Transit service. An analysis of transit service was completed in Draft EIS Section 3.5. It should be noted that the purpose of an EIS is to disclose information about significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts.*
9. *Development fees. Please see the response to Letter No. 4, Comment No. 8.*
10. *I-5 overpass. The Draft EIS includes a pedestrian/bicycle crossing at NE 47th Street over I-5 as a potential mitigation measure. Please see Draft EIS Section 3.5.*
11. *Independent transportation analysis. The analysis was prepared by qualified transportation planners and engineers using a methodology and approach that was reviewed and approved by the City. Because of this, the City does not believe that additional independent review is necessary*

9. **Draft EIS revised based on RNA comments.** Please see the response to comments in Letter No. 4, Roosevelt Neighborhood Alliance.

Letter No. 101 WOELFER, KARL

1. **Support Alternative 3.** The comment is noted.

4.2 Public Hearing

Section 4.2 of this Final EIS contains public comments provided on the Draft EIS during the May 20, 2014 public hearing.

Each comment provided at the public hearing is provided a response. Distinct comments are numbered in the margin of the hearing transcript.

Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted. Comments that address substantive EIS issues are responded to with an explanation of the issue, a correction or other applicable reply.

U DISTRICT URBAN DESIGN DEIS PUBLIC HEARING

6:30 p.m.
Tuesday, May 20, 2014
1415 Northeast 43rd Street
The University Temple Methodist Church
Seattle, Washington

BRANDICE L. PIVAR, CCR
NORTHWEST COURT REPORTERS
1415 Second Avenue, Suite 1107
Seattle, Washington 98101
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www.northwestcourtreporters.com

MR. LACLERGUE: Our first commenter is Steve Steczina, and second commenter will be Reginald Thomas.

MR. STECZINA: Hello, my name is Steve. And I just wanted to mention that I think that we have the opportunity to plan for the future more now than we have in the past for Seattle.

I think Alternative 1 speaks best toward planning toward the future -- higher density spread out a little bit more. It seems to be a fair alternative compared to maybe not doing anything to help the transit situation. We need to have more density to support that transit station, and we can achieve that density better by dispersing development. 1

And with that dispersed development, there's probably a greater opportunity to provide for more modest-priced housing. High-rises will probably be more expensive housing. And the lower rise and mid rise alternatives seem to produce a better range.

Also, the amenities that you can provide when you have mid rise versus low rise is better for the residents; you can provide more onsite amenities, because you can afford to go a little bit higher. And you can afford, then, to provide that for them when you might not be able to.

Also, there are areas in the U District that

1 cont have development low rise. And probably people aren't really aware that much of this area 30 years ago was already zoned high-rise. And so the zoning was brought down from high-rise to mid rise and low rise. And that just created a situation where you couldn't really plan well for the station that is coming.

And so we want to have the density. In order to do that, we should plan for as far ahead in the future as possible instead of planning for today and for the short run. Thank you.

MR. LACLERGUE: Thank you very much.

Reginald Thomas is next, then Kate Robinson after that.

MS. MUNKBERG: I just wanted to mention that I am watching the time that people are speaking. And if you come up and speak and I hold up the yellow, that means you got about a minute; if I hold up the red, that means you've hit your three-minute mark.

MR. LACLERGUE: Reginald Thomas?

Okay. Kate Robinson.

2 MS. ROBINSON: Hi, my name is Kate Robinson. I'm the co-owner of Café Allegro, Seattle's oldest espresso bar, located right here in this very alley. I'm a graduate of the UW, and worked in the U District for over 14 years. I'm also a resident of Ballard.

2 cont

I purchased Café Allegro four years ago out of my deep connection for the café community and uniqueness of the neighborhood. I'm drawn to the cultural, social, economic, educational, and generational neighbors the café attracts. Folks come from all over the city, state, and world to visit us and to participate in our community.

As a businessowner and citizen, I am in support for the U District becoming an urban village center; more importantly, addressing the impact. I look forward to creating relationships with new customers and newcomers.

Relationships and the connections we have with each other, to me is what makes a community successful. I'm concerned raising height restrictions and giving developers who do not have a connection to the community, free rein in our neighborhood. And I'm afraid that will have dire consequences.

In order for the future of the U District to survive and thrive, developers, the City, businesses big and small, landowners, and residents all need to work together. Everyone's concerns need to be addressed, including but not limited to the need for affordable multifamily housing, public spaces, social services, the need for an elementary school, and the

protection of the business who make the U District truly unique. 2 cont

At this time, I support no action be taken until better analysis of the economic, socioeconomic, and environmental implications are studied. It would be a shame to see the U District become another unaffordable, homogenous neighborhood, where businesses like Café Allegro would be priced out. We have full intention of being in this funky alley for at least another 40 years. Thanks for your time and good luck. 3

MR. LACLERGUE: Thanks, Kate.

Next up is Alex Dejneka.

MR. CAMPBELL: Can the PA be moved up? When people are up at the microphone, I can barely hear them. Too much echo or something. Can we just speak in the hall? I don't know if we really need a mic.

MR. LACLERGUE: I think if we get a little bit closer to the mic, maybe that'll help.

MR. DEJNEKA: My name is Alex. I'm a latecomer to this process because I was out of the area for a while. And I own a property at the very north end of The Ave, just south of Ravenna. And I would like to propose that the entire north end of The Ave be designated the same way. We have a property on the west side -- excuse me, the east side of The Ave. And 4

4 cont that's zoned L3. Across the street from us is NC-40. Our property has a restaurant, which is grandfathered because of the downzoning a few decades ago.

Next to us, there are properties which were built to the sidewalk, to the side property line, to the alley. And both sides of The Ave there behave the same, but they're designated -- zoned differently. And so this is self-serving, but my intention is that the last block of The Ave should be designated the same way on both sides of the street. And that's it.

MR. LACLERGUE: Thanks, Alex.

Next up is Anson Lin.

5 MR. LIN: Hi. My name is Anson Lin. I grew up pretty much in the U District, and right now I'm a resident and developer in the area with my family. Briefly, I just want to state my opinion that I'm in favor of Alternative 1. It allows for organic growth and expansion of the area. In my mind, it'll look a little bit more like South Lake Union versus kind of like downtown. I like the mid rise there, in kind of the way it's being developed right now.

When you zone it pretty much to allow for towers, like, there's no going back. This will pretty much block the sunlight for a lot of the other developments in the area. So Alternative 1 allows for

5 cont an even playing ground for all businesses in the area. And something where there's, like, a new energy code that requires larger mid rise buildings to have, like, solar panels, for example -- we have towers blocking sunlight, so it kind of allows for lack of energy -- since we are kind of trying to prove sustainability in the area too.

Yeah. Kind of my vision, I have -- as I've grown up, I've seen a lot of tech start-ups and stuff in the area, so I think allowing for the mid rises in Alternative 1 kind of allow for office spaces for kind of smaller businesses to be married with, like, the University and the students. So we get exposure versus having to commute downtown, where there are a lot of start-ups down there, having a global resource area in the University District for that. Thank you.

MR. LACLERGUE: Thanks, Anson.

Next up is Shilo Murphy.

6 MR. MURPHY: My name is Shilo Murphy, and I'm the executive director of the People's Harm Reduction Alliance, which is the needle exchange program that Bob Quinn started 24 years ago in the neighborhood. I am also a former homeless person in this neighborhood. And I'm very concerned that the high-rises and the mid-level buildings will start pricing the neighborhood

out.

6 cont I feel like the City talks a lot about affordable housing when it's really not actually affordable to the low-income folks. I lived on the streets of this neighborhood and desperately called this neighborhood home, and I wanted to make sure that I stayed in this neighborhood that I grew up in and raised my kids in the neighborhood, and I fear that the City doesn't care about this neighborhood. In fact, in my experience, it doesn't. And it just dictates what it needs and wants of this neighborhood, and it doesn't allow this neighborhood to dictate its needs and wants.

And the UW may want those towers, but that doesn't mean the neighborhood wants those towers. And so I just hope you remember that this is the U District. And I will quote Bob Quinn, our founder, that said that the University District is our city, and Seattle is our suburb.

MR. LACLERGUE: Thanks, Shilo.

Dennis Christianson.

7 MR. CHRISTIANSON: Hi, my name Dennis Christianson from Vancouver, British Columbia. I'm a permanent resident of the U.S. I'm also am architectural consultant of Rolluda Architects here in Seattle. And our firm has taken on for the past year

7 cont

and a half, what we call a core study area in the downtown, which is a nine-block area around the station.

And we wanted to see in that nine-block area, what the differences were between no change in zoning, Alternative 1, Alternative 2, and the Alternative 3. And basically we have found that it really makes a big difference in all of these different scenarios if you turn the focus on the issue that people have been talking about against high-rises or for high-rises.

An example might be, you have to really look at the floor-plan size. And an example of a 160-story building that is tall, slim, and elegant is like the dental tower, which is on Brooklyn Avenue right now.

One of the things that we think might be missing in this study area is a combination of townhouses and towers so that you have a combination of higher buildings and lower buildings side by side, because they are different building types.

Right now the planned scenario is to have everything in one area, one height; everything in one area, one density. I think we need to have a mix of that, particularly in the core area. Thank you.

MR. LACLERGUE: Thanks, Dennis.

Steve Wilkins.

8

MR. WILKINS: My name is Steve Wilkins. I'm a long time -- oh, bad. I have an echo -- resident of the University District and homeowner. I feel this document is such that I'm being pitched a used car. They tell me it runs great, it doesn't burn oil, it gets a thousand miles per gallon. Think about being sold a used car as I repeat the comments from the DEIS.

Significant impacts associated with the proposal are not anticipated, no significant unavoidable adverse impacts to public services are anticipated, no significant unavoidable adverse impacts to plans and policies are anticipated. These deficiencies are not considered impacts for the purpose of this EIS.

To use a sports analogy, this document is a punt. The Department of Planning and Development, landowners, developers hope to keep the ball and run with it, leaving the neighborhood out of the game with no public square, no elementary school, no expanded public services, no infrastructure improvements, no mitigation for damaged roadways from construction and heavy truck traffic. The only mitigation this document offers is a huge giveaway to builders and property owners.

I would like to remind this audience, once

8 cont these zoning changes are put in place, there will be no mitigation. One only needs to look at the failed promises of our change to an urban center. No building setbacks; no parking solutions despite raised rates and RPZs; no public open space; boxy structures built sidewalk to sidewalk, eliminating the use of pedestrian pathways; westbound expansion eliminating views of the Ship Canal.

9 There is no economic analysis of the cost to the neighborhood of the real estate tax giveaways of the multifamily tax exemption, of the failure to asses development fees, nor the removal of properties and tax rolls as the UW expands into the neighborhood.

In conclusion, the failure of this document to address any of these issues points to the need to dismiss it as inaccurate and demand a resubmission. Thank you.

MR. LACLERGUE: Thank you.

Next is John Fox.

10 MR. FOX: My name is John Fox, coordinator of the Seattle Displacement Coalition, a 37-year housing and homeless advocacy group. We've had offices here in the U District for over 25 years. We will submit written comments and more detailed technical objections in writing. Right now I want to give you more

10 cont

generally a personal reaction to the proposed upzones and the assessment of those upzones.

To put it bluntly, if the City Council moves forward and approves either of these high-rise options, whether it's 150- or 340-foot towers through the heart of the U District, over time it would irrevocably destroy the physical and social character and affordability of this community.

Under either option, it's nothing more than a blueprint for gentrification and displacement, including a loss of the small business character that we now see on The Ave. The proposals, in fact, seem to be intentionally designed for that very purpose. The DEIS misrepresents and downplays the land use and housing impacts that such a disparity between existing uses and these kinds of capacities would have across the heart of the community. Not just demolition of a few structures in the wake of the high-rises that are built, but the impact on property values across the area, on land avenues that will drive up rent and over time force the displacement and loss of hundreds and hundreds of low-income units across the district.

11

Instead of providing any reasonable risk assessment of those losses or vulnerability for change assessment, this document waxes on about filtering,

11 cont

quoting what sounds like directly from an Econ 101 textbook. Throughout the coalition survey history, as we accelerate the rate of growth and development in communities, and especially with upzones aimed at doing that, it simply and has always been accompanied with higher rates of displacement, gentrification, increased rents. We're seeing that already in the U District and across Seattle.

Since 2009, we've been breaking records for new construction as we have here. And last year, rents went up 8 percent. Some of the highest rent increases in the country we're seeing. Accompanying rates of growth we have here, is a direct result of growth. This document fails to acknowledge that.

12

In closing, if the -- and if either of these two options are implemented, the district as we know it, its unique mix of lower density affordable homes, townhomes, three-story apartments; its rich social, racial, and economic diversity; its the unique blend of affordable small businesses; first generation immigrant shops serving young and old, all these things are at grave risk if either of these upzones are improved.

I love the district. I walked these streets in 1965. I went to college here. I've lived in this district for 22 years. Our offices are here for

12 cont 25 years. This is my home. And I will fight, and our organization will fight tooth and nail to make sure that these two proposals are not approved. And we will work collectively, as we are doing now, to toss out any elected official in 2015, when we move the district election, who supports either of these proposals.

MR. LACLERGUE: Okay. Next we've got Jim Stockdale.

MR. STOCKDALE: I'm Jim Stockdale. I'm

13 representing the committee from the University Plaza Condominium, the second tallest building in the University District.

My family and I moved to this part of the world in 1970. And at that time, our good friends told us the place to live was Shoreline, and so we settled there for 2 1/2 years. No sidewalks, tough to get in to my work, which was for 25 years here in the University District. And my wife went to work on her Master's degree, and there some kind of problem with the schools -- the kindergarten's closed, and they were short for classes. And finally my wife says, "We've got to move."

And so we did. And we have lived in what we thought was the University District until we saw this new plan. We've lived in the University District for

13 cont

42 years. My wife and I lived on 16th Avenue Northeast between 47th and 50th, but that's not in the University District on this map.

In the last 15 years we've lived at the University Plaza. And that's kind of an amazing place, because, yeah, it started with the citizens and the City, and I say rightfully so, who demanded in 1975, that you're not going to build this thing like they're being built today; you're going to have some setbacks. You're going to move that building back, and it's not going to take up much of that property in percentage figures.

So on three sides of that building, there are significant setbacks. You can't get close to the sidewalk, really. In fact, people come by and we see them stretched out on our lawn, taking a nap, and they're on the other side of the building and having a picnic on our lawn, and there are no signs that say "Keep Off," because we're a neighborhood.

I'm here to talk about neighborhood, which is what our people feel that they're a part of. And from the street side, you got big trees, plants; we park probably 140 automobiles. More than that, because we have guest parking at our condominium. And most of the people go by there and hardly notice there were cars

13 cont

around; they're all shielded with trees and bushes and keep us looking something like a neighborhood.

Well, there's a little Puget Sound Business Journal that came out. And one of the items was, I mean a big item, about what's going on in here in the district. The subheading was, "Several powerful players are working to turn the U District into the next hot spot." I translate that as basically business, and University business.

I wish this long and detailed article could have had as a subtitle, "The university district will be turned into the next great neighborhood." Thank you very much.

MR. LACLERGUE: Thank you.

Shirley Nixon, please.

14

MS. NIXON: My name is Shirley Nixon, and I live at University Plaza Condominiums, that's 4540 Eighth Avenue Northeast, and I'm a neighbor of Jim Stockdale.

People like me view the University District as a place to live that happens to be near a university. But my sense is that this DEIS views the district as the University's thiefdom, real estate owned or controlled by one development group. How ironic that the UW campus itself is excluded from the study area,

14 cont

yet the UW's interests seem to be ruling the outcome.

The interests of those of us who do not attend classes or work at the University, or the interests of future citizens who might want to own permanent homes or raise families here are given short shift. It is as if the whole U District planning process is geared toward making this a destination attraction for short-timers -- young renters and students who can endure tight unattractive surroundings for a relatively short time, because they plan to move out in a few years. Or worker commuters who might ride by light rail, and need design to actually live their lives and enjoy their lives elsewhere.

I would like to describe for you some of the permanent residents who are neighbors at the University Plaza Condominiums, and then show you some pictures to better demonstrate what is meant by our desire for the planning process and DEIS to better invite roles that include nurturing and supporting a family friendly, age-group diverse, and environmentally sensitive University District that will attract and retain permanent residents.

Others from the University Plaza Civic Affairs Committee who are present tonight, will speak more specifically to livability concerns raised by the DEIS.

15 I am instead submitting four images as attachments to these comments to help illustrate my point.

Attachment No. 1 is an architect's rendering from 1970, showing the sketch of the proposed University Plaza Condominium development that now stands at 47th Street and the corner of Eighth Avenue Northeast. The U Plaza property encompasses the rough equivalent of 12 city lots and has a total body height of approximately 50,700 square feet. The footprint of a 23-story residential tower is approximately 8,030 square feet, which means that the tower covers less than 16 percent of the lot. An outdoor swimming pool and cabana, 26-space visitor parking lot, 26 resident parking spaces, hidden carports, expansive landscaping and yards as Jim talked about, shield all of this from view and help the views of neighborhoods and make this a neighborhood.

The University Plaza has a diverse and vibrant intergenerational community: our youngest is two months old; our oldest members are over 90.

Photo No. 2 was taken on a sunny day from the roof of the University Plaza at 6 p.m., on April 14, 2013. The camera is pointed eastward, and the shadow of a narrow pillar of the University Plaza has -- it shows what it shades. The point of this picture is,

15 cont that even though the tower casts a long shadow, it is not a long, wide shadow. The building is tall but thin; the generous open space of the ground level of the University Plaza property allows sun to shine on University Plaza's neighbors.

I see that I'm getting a red signal, which means I've spoken too long. And fortunately, I did include a copy of my comments and the pictures so I would ask that they be included, the pictures also, in your record. Thank you.

MR. LACLERGUE: Thanks, Shirley.

Sue Alden is next.

And, Shirley, I can take those, if you want me to.

MS. NIXON: I already gave them.

MR. LACLERGUE: Oh, you did? Thanks.

16 MS. ALDEN: I'm Sue Alden. I'm a retired architect, fellow in the AIA. I've lived around the University District in Seattle all my life. I lived back East a few years, but I live here because of what we have in this area.

I live in the University Plaza as the previous two people said. And I think they covered most of the things like that. But we do have onsite parking. What I'm going to be talking about for my share of the talk

16 cont

is parking for residential use.

We have one space for every unit in a secured garage; we have other spaces for visitors and short-time resident parking. And I did a survey for the RPZ on Eighth Avenue Northeast, and checked the residential units around that lot. And every single family residence had parking for each person in that building off the alley, and I see nothing in this DEIS that covers the requirement for parking for housing units.

And if you don't have parking for your housing units, they're going to get an RPZ, and they'll park on the street. The houses that were interviewed for the RPZ were replaced by another condominium across the street from our building; they provide one car space for each unit.

There's a new building that has gone up just south of them, which of course is a more modern-type building. They provide less than 50 percent of the residents with a parking place. So the other residents are going to the -- 170 residents, half of them, would be 135 or something. Anyway, they'll lose their RPZs and clog the streets once that building is finished. And this is going to happen throughout this area if this parking is not resolved.

16 cont

Presently, the City has no parking required in our area, no parking at all. And I guess the people who did the DEIS were unaware that there was no parking required, and they said one thing they were going to do is try to reduce the parking requirement. There is none.

And this is Seattle, and it's the Northwest. It's not New York City, where there's nothing to go to if you go out of the city, or Chicago, which is about the same. Here we have the Sound, we have lakes, we have mountains, we have forests. And from the time I was on campus back in the late '40s/early '50s, we would go out every weekend backpacking, hiking, climbing mountains; later I was kayaking. And people are going to need their own car to park and to carry a kayak and carry backpacks to their car parking.

So I don't know what the City plans to do, but I would like to have them consider what they can do for mitigation or whatever, but any housing in this area is required. Don't leave it up to the developers; they don't care. They may have to provide something to be able to sell their units, but there is no City requirement that they need to provide parking. That's a very small part of the whole thing, but we are in Seattle. We're not in some other urban area, which has

no place to go and get out with space, light, and so on.

16 cont

Also, the DEIS only covers the outside environment around the building. I think we should consider what's in the building, the people who live there in this housing, and provide their needs, such as inside parking and space to look out at, not across the 20-foot alley into somebody else's bedroom window. Thank you.

17

MR. LACLERGUE: Thank you.

Brendan Coleman, please. Brendan Coleman.

MR. COLEMAN: My name is Brendan Coleman, and my wife and I have lived in the University District as owners and residents for the past 15 years.

When I was out in the lobby today, I noticed that there were about 20 placards up, and only one of them dealt with housing. And as Sue mentioned in her talk, the DEIS seems to be concerned completely with the external part of the building -- what it looks like on its outside -- as if the University District was just a place to visit and not a place to live. It's what's inside the buildings that makes it a liveable community neighborhood.

18

The multipage document that you guys produced looks wonderful. I like, especially, the executive

18 cont

summary of the first three pages. But unfortunately, it goes all downhill after that. Section 1.3, specifies seven objectives, all of them veils. They are wonderful, but unfortunately, the rest of the document does not do it justice. I wanted to read two objectives.

Objective 3: Provide a more diverse neighborhood character by providing a mix of housing types, uses, building types and heights.

Objective 5: Increase height density to achieve other goals, such as providing affordable housing, increasing the variety of building types in new developments, and supporting economical communities with the diversity of housing choices.

19

What we refer to as the U District is actually a neighborhood, a neighborhood that happens to be adjacent to a university, a neighborhood that is community where people live, all kinds of people. The kinds of people living in the community is primarily determined by the kinds and sizes of housing available in the community.

There was a movie on many years ago, saying, If you build it, they will come. I turn that around and say, If you don't build it, they won't come. What I'm talking about is building liveable housing for a

19 cont variety of people -- old and young; students, nonstudents; single people, families.

The University District is quickly becoming a large rental district of temporary residents who will be here for four or five years, and then when they move on to the next stage of their life, they'll will move to Shoreline, the Eastside, or Federal Way.

20 The object also needs to increase the variety of types of buildings. And most of these buildings are rental buildings. The community is owned by landlords, not by the residents.

The urban design of the U District should not be just focused on making the district look nice and a nice place to walk through. To be in a real community, it needs to be a nice place to live. Please make it a nice place to live.

MR. LACLERGUE: Thank you.

Judy Worth.

21 MS. WORTH: I'm Judy Worth. I've lived in the University District for about 35 years, and have been involved in neighborhood and land-use issues. I've had to revise my comments, because other people have said the same things, but better.

So first of all, I am asking to extend the comment period. It took many people many months to

21 cont

prepare this document. Community members do not have the money or staff to help us evaluate this report or the data in it as businesses or perhaps the University does.

22

Following up on the previous comments: We have worked extremely hard over many years to preserve the diverse housing stock and improve amenities in the area. Those involved in trying to improve living conditions are primarily homeowners or long-term renters. We do -- or at least we did used to have more long-term renters until their houses were torn down.

The DEIS talks about increasing in density, but talks not about the diversity that is proposed in Principle 3. The density increase we are seeing is small apartments with little setbacks or green space aimed at 18- to 29-year-olds who, as it's been stated, will move on.

The current average size is 858 square feet, hardly large enough for families or the higher income professionals that the University and other businesses say they wish to attract.

Principle 5 sets out a targeted diversity of residents provision in housing choices. And we do already have that in our area, and we value it -- older homes, older apartment houses and things like

22 cont University Plaza.

I think that the discussion about mitigation 23 was very accurate. I saw on one of the boards that mitigation for lack of open space was to employ strategies for public open spaces as is City policy. Well, that has not gotten us very far so far. We have very, very few open spaces in the district.

And other mitigation efforts seem to be equally lacking. Thank you.

MR. LACLERGUE: Thank you, Judy.

Mark Griffin.

MR. GRIFFIN: My name is Mark Griffin. I'm the 24 president of Roosevelt Neighbors' Alliance, but I'm just presenting my viewpoint here.

My wife and I are residents; we've got a ten-month-old baby daughter. And my perspective as someone who has a young family, is that we're not a very diverse neighborhood as far as having families. We've got a lot of very young people; there's been references to people who are transient. And then we've got a group of people that are older, who have been around a while. And we don't have a lot of infusion of younger people come in, and I think that's the character of this being truly University's district. And that's kind of my concern moving forward from here,

24 cont is that the type of growth we are seeing right now is basing it on expansion of either student housing, or it ends up being an expansion on kind of the transient, younger housing, where people are only going to be there a couple years and then they're going to move on. We're not really seeing an establishment of that young urban family that I think is vital for the city and vital for greater sustainability long-term.

25 And to that end, I personally support greater density. But I support the higher, the much higher density closer to that core station. And I discourage, personally, the stuff that is more of low-rise spread out. And I think that's because in this particular location, what we are seeing right now is just a whole bunch of tear-down-and-build student housing, tear down and -- take an existing house, expand on it, and also make it student housing. And it's the antithesis of making it a diverse neighborhood.

26 I think that we've seen through the University Plaza, a situation where, you know, we can have single family housing, existing housing across the street from higher density. And I'm not suggesting the University Plaza has more worth than a single family. I would say the growth that we are going to require to absorb, we need to do so closer to the station. But we should

look vertically rather than horizontally out. So that's my concern there. 26 cont

I also have a concern about the parking. I think we need to take a look at splitting up the RPZ. We've got an RPZ that overlaps from single family and really low density zones into higher density zones. They're not required in higher densities to provide any parking. That flows over into single family zones. There is no mechanism for breaking that up. If the City is going to be requiring people to -- or allowing developers to build housing without any parking, that's an encouragement for people not to have cars, then they should back that up by ensuring they can't just sneak around the rule and park in front of single family homes. 27

We need to add more parks to the neighborhood. We're already dramatically underfunded; we're underrepresented. And I think that it would be nice to include in that reference to the suggestion that we build a cap over I-5 between 45th and 50th. Obviously, not a short-term goal, but something that's a longer term goal constructability-wise. It's not as expensive as most people would think. 28

I think a lot of what the University Plaza residents said had a lot of merit and thought, and I'm 29

29 cont going to talk to them later, because I think they've got a lot of great ideas. Thanks.

MR. LACLERGUE: Thanks, Mark.

Tom Yellen. Tom? No?

Pat Amo?

30 MR. AMO: Hi, my name is Pat. I bought a house in the University District almost 30 years ago. And there's not very many single family homes. I'm right on 43rd, a couple blocks down from the Blue Moon Tavern. I know because I am a night owl, and I'm up in my room, up in my office at, oh, two in the morning, when the bars let out and all the students come down and start kicking over the garbage cans.

I don't know how to do it, but the main thing that I see that needs to be mitigated is the giant sucking sound of the University drawing in so many transient students which, in turn, draws in hundreds of landlords who come to this area because it's a great way to make a living -- buy up a really cheap building or build a new building, putting up the cheapest materials, maximizing whatever the zoning says you can use and put students in there. And the students are too busy; they don't care. Nothing against the students. I live here because of them; I like having them around. But anybody who doesn't have long-term

30 cont roots in the area is just simply not going to take care of things.

31 So I don't know which alternative route would be better. I'm of the do nothing is not an viable alternative for me. It's been said to be happy for it, but I would go as diverse as possible in size and also use. I would intersperse mixed-use throughout the neighborhood and avoid as much as possible putting mixed-use in blocks. I'd like it interspersed.

32 And most concerning -- and nobody has mentioned this one, so I'll just spend a second on it -- is the open space. The woman just before me kind of talked about it. But it sounds like it's just going to be written off and nothing's going to done about the open space. And one thing it really needs in the neighborhood, because even students have dogs, is we need a dog park, one or two at least. And they don't have to be large. A lot of inner cities have little pocket dog parks; Washington Square in Manhattan is one good example. And we really need it in the neighborhood. Thank you.

MR. LACLERGUE: Thanks, Pat.

Jordan Bader.

33 MR. BADER: I am co-owner of 5512 University Way Northeast, and I would like to make three points:

33 cont First, I think it's 2-18 and 2-20 propose to upzone the easterly blocks on The Ave from Northeast 55th Street to Northeast Ravenna Boulevard from 40 feet to 65 feet. This is a desktop planners's idea; it was not requested by any of the owners on our block. There is no precedent for putting a 65-foot zone directly across from single family zoning. Elsewhere, it is NC-2 or R1, and the University District Community Council opposes the idea.

In my 5500-block, there are five ownerships; I'll mention three: The historic University Theater is at 5508. It was remolded in the last decade using historic preservation monies from government grants. It is not a city landmark, but it could be.

Our favorite record studio at 5512 produces sound recording for local musicians. The studio was built 12 years ago, and was designed by the then acoustician Richard White.

To our north is a Shiga garden, a double lot leased by the City until 2014. The upzoning is proposed with no discussion in the document. It is like a pork barrel item slipped into a big budget.

Upzoning will increase the property taxes. And our land values went down 15, 20 percent 15 years ago with the downzone. The higher taxes put pressure on

the University to sell.

33 cont

The City loses if the Shiga garden is forced out. The DEIS does got even mention the jeopardy put on it or identify any alternative locations. It needs to do so. It adds drastic expanse, and thereby reduces the probable life of historic University Theater; that contradicts City policy to preserve historic buildings. And the upzone, by putting higher taxes, will reduce -- increase costs and reduce the competitiveness of our building.

34

Secondly, second point is, the DEIS isolates upzoning from the plan as a whole that it is supposed to implement. The urban design package includes a series of measures, and an important element is open space. By focusing simply on the upzoning, it is not considering the package as a whole, nor allowing the mitigation measures that should be a part of the package being considered as part of the whole. A very important one the public wants is a public square on top of this Sound Transit station. That is not even mentioned in the EIS.

The State Growth Management Act requires concurrency. Concurrency means you put in the infrastructure at the same time that you authorize the growth. There is nothing like that here. "Requires"

34 cont is very important. All this document says, is you may consider these measures. That is inadequate.

35 And the final point is, that if this document is indifferent to the plight of the handicap, particularly the people in society who require a car to get around, where will the people with that handicap go? How can they live here if you have no requirement for parking whatsoever, or even a consideration? You don't discriminate by denying people who require cars to have a place to park their car. You keep them out that way.

MR. LACLERGUE: Thank you.

Doug Campbell.

MR. CAMPELL: I thought I signed up last.

MR. LACLERGUE: And after Doug, Matt Fox.

36 MR. CAMPBELL: I'd also like to focus a little bit on this article from the Puget Sound Business Journal. I think it gives us a lot of clarity on what's at stake here with the EIS. And I really wasn't prepared to talk quite yet.

The article points out -- first of all, the article has a headline, which says, "The University District is largely nondescript and uninspiring."

Now, I don't think that 's the University District that I know. The University District is the

36 cont

only neighborhood in Seattle that I know of that's had three books written about it.

And the other thing that the Puget Sound Business Journal talks about is why the University of Washington wants to see the neighborhood rebuilt.

Folks, the challenges are immense, long-time landowners have little or no interest in selling, Class A office space is scarce, and the City must agree to rezone virtually the entire neighborhood.

Now, why must the City agree to rezone virtually the entire neighborhood? The article goes on, primarily to describe the University's need for Class A office space. There is virtually no rentable Class A office space in the neighborhood.

The neighborhood that I want to be a part of probably could use some politics; it probably could use some Class A office space. The neighborhood I want to be apart of, I don't mind having the University grow into the neighborhood and become a better citizen of the neighborhood. But what I see happening here is the desire of office space without a desire to actually grow the neighborhood as a neighborhood. The upzone proposes various mitigations but offers no assurances of those mitigations.

37

The fact that the growth target shows an

37 cont increase of 4,000 residents in all three of the proposals, should tell us that the upzone proposal is not going to get us any different kind of housing than the kind of housing that we've been getting for the last 40 years, which is more of that temporary style housing. It's probably not housing for families; it's probably not housing by permanent residents who would like to have things like public spaces, elementary school, et cetera.

So I urge opposition to the upzone until those community benefits are in place. And I urge resistance to higher heights until we find ways to build a residential community. Thank you.

MR. LACLERGUE: Thanks, Doug.

Matt Fox?

MR. FOX: My name is Matt Fox. I'm the

38 president of the U District Community Council, and I'm one of the co-chairs City/University Community Advisory Committee. My comments today, though, are strictly my own.

I was offered to be on the board of the U District Livability Partnership, but when I saw that the DPD and the UW were effectively teaming up to rewrite the neighborhood plan, I kind knew what we'd get. And this is the plan we got, so I didn't

38 cont participate, because I knew I'd be wasting my time.

Something that gets over is called that no

39 action scenario in the DEIS, no action. In fact, the neighborhood did do a neighborhood plan; it was done in anticipation of a light rail station. Light rail station is ten years late, but that's not the neighborhood's fault. Great fixed loss in the neighborhood for an upzone.

And, DPD, some of this might sound familiar to you, you promised things like setbacks. They promised those for the environment zones, they promised open space, they promised adequate parking. And pretty much from the moment the ink dried on that last line, DPD has been actively trying to abrogate every promise they made to get the last upzones implemented.

Just to speak to the DEIS, the DEIS is failing

40 in Alternative 1, in that the City's -- all three zoning scenarios generate the same amount of growth. I think that on its face it should come with infrastructure, but doesn't. The comprehensive plan we're under now is going to focus all the growth of the city into urban villages and urban centers and protect our lower density neighborhoods. And instead, what we've gotten is growth in urban centers and villages and in other neighborhoods. And that's exactly what's

40 cont going to happen if we allow the DPD as is currently proposed, to upzone to 125, 340 feet without any mitigation in place. And all the mitigation is, is a pretty thin promise, at that.

41 It's true, there's no mention of a pretty wide range supported proposal to do a plaza in the Sound Transit Station. I don't think that is mentioned.

I think that there could be some good things that could come out of the initial zone right around the station, and I could even maybe support a tower if it led to set aside the city block for a park. But as it stands now, there's no guarantee of any of that happening. All we're going to end up with is all this growth with none of the amenities.

42 The current plan also likes to wish cars away. The Seattle Department of Transportation likes to say traffic volumes are down in the city. Has anyone here noticed the traffic times, travel times have gotten shorter in the city as a result of this? No. Right. Travel times have gotten exponentially worse, and anyone with eyes to see and a brain can interpret that. I have a choice, I guess, between believing in SDOT or choosing my own eyes on that one.

43 DPD also assumes that by focusing development around the station, that will protect other areas in

43 cont

the neighborhood or it won't happen, development won't happen, development won't happen with this upzone. And that's not true. You have a property owner who is going to build has high as he can build because he doesn't own property in the core of the neighborhood. People who own throughout the neighborhood will build to the heights you allow them to.

44

And in fact, DPD is already giving out upzones right now. And in fact, they're doing upzones that totally violate all the terms of the neighborhood plan, things like -- we're supposed to have transitions between zones. There's the low-rise zones, who DPD is allowing zones of 65 feet -- to 65 feet on the east side of 15th, which by the way, you have to take the No Action Map because the map has that zone wrong.

That's a problem. I mean, there's no transition here. A single family homeowner across the alley of a 65-foot building, that doesn't seem like much transitioning. DPD promises spaces between these new towers -- 60 feet between 125-foot towers, 100 feet between the bigger ones. Well, if you're standing at street level and all the buildings are 65 feet, and then you got a couple -- every hundred feet, you've got a 340-footer, and every 60 feet, you've 120-footer, when you're at ground level, that's all going to look

44 cont the same. It's going the look like a wall.

45 I guess I'll submit fuller comments in writing here. But in the meantime, no action. There's been lots of action going on. DPD acknowledges that it doesn't need any of these upzones to meet its own growth-planning goals. We need mitigation in place first.

46 And the comment period should definitely be extended on this. I don't think you've gotten a letter from CUCAC yet, but CUCAC is asking for an extension of the comment period. And I think this is a lot to chew on for people. 340-page EIS is a lot of reading, and not a lot of us are versed in this. So I would strongly encourage you to extend that comment period. Thank you.

MR. LACLERGUE: Thanks, Matt.

John Bennet.

47 AUDIENCE MEMBER: This is a letter that John wrote. He was not able to attend. He's an architect: Dear Dave, I was very disappointed in your Draft EIS document that was recently made available for the public review. Besides being very long and rambling, and quite frankly, difficult to understand in many parts, it seems odd that over and over they keep saying that none of the three targeted zoning options would

47 cont have any significant differences in impacts to the area. Considering the great potential differences in density of buildings and populations therefrom, this analysis is just plain wrong.

48 The DEIS indicates that because there's little or no difference in projection for community needs for things like public open space among the three options, there is little need for these things to be considered in the EIS.

It further appears to make the point that there are at least three public park spaces that will well serve the area no matter which option is selected. None of these parks is very close to the epicenter of the light rail station and the result of the gentrification.

Is open space in close proximity to the light rail not important to the City? Is serve space for location not going to be any different with 360-foot high buildings or 65-foot buildings? This seems to me to be a major flaw in the whole rational of the EIS.

49 This potential upzone will have majorly different impacts on the area than if it is basically left as is. Unless the EIS can realistically show how zoning will be able to mitigate in some effective manner the different needs for light, space, serve

space for the station, education facilities, et cetera, for the three options, John Bennet, as a citizen, will not support the conclusions and goals of this document.

49 cont

This EIS should be revamped in a way that will effectively and realistically address the needs of the University District community, the quality, people-oriented development along any potential upzone. This is our future. Sincerely, John Bennet.

MR. LACLERGUE: Thanks, John.

Okay. Our last commenter who is signed up is Doris -- oh, wait a minute. Do I have another page? No, that's the last one. Doris Brevoort.

MS. BREVOORT: I'm Doris Brevoort. I'm a massage practitioner with New Seattle Massage. We've been on The Ave since 1981, in two different locations on The Ave, and we inhabit the upstairs of one of the older buildings between 45th and 47th. I'm not going to speak too specifically right now, but I will be providing more comments in writing.

50

I just wanted to say that I hope that the process of upzoning would be postponed until a very distinct plan can be made with neighborhoods considering the exact areas of the upzone and the mitigations that have already been noted tonight, including open space, the possibility of saving space

50 cont

for an elementary school if this neighborhood continues to grow. I have been an educator for 25 years for Seattle Schools, and I know the school district keeps closing schools and opening schools because everything keeps changing. I hope that the demographics of the University District can be taken into account and room saved for education.

Also, I do agree with the people who have made the comments about parking, that if new housing that has density is planned, it's important to require parking per unit. And I'm a person who rides the bus. But the people who need parking also need a place to put their bicycles, you know.

Anyway, it's very hard to find parking on The Ave, anywhere right around the University District, for people who come to our business or for people who work for our business. Almost everything is zoned two hours, and that doesn't work. So I know that that's going to become an issue.

I was involved with the Central District Madison-Miller Urban Village Planning in the 1990s. And I just want to thank everybody who's working on this from every point of view. It's gruelling, and people have all kinds of ideas. But it's a wonderful process for people to stand up and dialogue together.

50 cont So thank you very much for your time.

MR. LACLERGUE: Thank you very much, Doris.

Can I see a show of hands for people who didn't sign up for comments but are interested in commenting? Okay. One, two, three, four -- there's another page? Okay. I apparently did not check.

51 MS. GRAFIAS: I am a resident of University Plaza and also a resident of University District for -- since 1978. I lived for over 23 years on 19th Avenue in the University Park area. Now I live down in the flat, in the University Plaza Condo. And I've been active all this time; you may be surprised. But I think I'm speaking for the senior senior citizen.

I'm 97 years old, and probably the only one that age here, but I'm still interested in the community. And I have a degree many years ago, over 50, I guess, in urban planning. I'll try to read this as quickly as I can.

Oh, I want to thank the planners for deleting the request for 75-story and 65-story buildings from the alternatives. But I do want to say that the planners of the DEIS are obviously completely out of touch with Seattle's evergreen heritage of unique neighborhoods, and has more or less stated a plan for developing a comprehensive plan that has attracted

51 cont profit-seeking developers from the East Coast to buy up Seattle neighborhoods and redesign them to high density. Although, high density is not really mentioned in this DEIS.

52 These are the neighborhoods. These unique neighborhoods that we have are the neighborhoods that have nurtured, and the schools have nurtured, the plethora of technical and -- I'm trying to say entrepreneurial, accomplishments that this city has. It's amazing, you know. We are really amazing, what has come out of this city and that came out of these neighborhoods. It does make a difference what the environment and culture is in the development of children and young people and what kind of people they become.

MR. LACLERGUE: Mary, I sound different up here. I hate to cut you short, but I think we have several other people who want to comment also. So do you have one final point? I'll be happy to take your written comments.

53 MS. GRAFIAS: Well, yes, I'll give you my written comments. But I want to particularly say a few things about open space.

The Parks Department has done a study of needs for open space. And it can be seen, it's listed here,

53 cont

we are very short on open space.

And an other remark about University Playground: It was developed by the University neighbors for a family park. They took a muddy field and worked hard raising money, hands-on to make it the beautiful park that it is. But now the last few years, it's becoming oriented towards adults. And this is because families are having to leave the area. The shortage of single family homes has driven up the price, and now they're being priced out.

And what is going on now right in the neighborhood around the park has the neighbors, especially just adjacent to the south of the park, they're in a turmoil because of the three lots that have already been allowed, allowed for some reason, to build three townhouses, property line to property line, and tearing down these beautiful Craftsman houses that were there. And it's going to go on, and people are deciding whether they want to continue to live adjacent to those buildings.

And aside from the shortage -- you've got to let me say this -- I'm also going to talk about trees. I've taken a lot of pictures of the trees, and they're included in my plan here. And on 50th, it's recommended that 50th become a service-oriented street,

53 cont

to serve both north and south residents -- south-north and south of 50th. And there are very few single residents left on that street. And I imagine this kind of supposing that they will disappear unless they can incorporate into another purpose, like so many of the older houses here.

It's not uncommon in the University District to see a big, old house behind a storefront. The trees on 50th, some of them are just gorgeous; I call them "trophy trees." And they're on private property, some of them. Something has to be done to save all of the mature trees in the University District from now on.

We have this horrible example of ignoring the importance of trees. Twenty or more trees were removed from 11th Avenue between 45th and 50th, and on 47th in the same area.

MR. LACLERGUE: Thank you. Thank you, Mary. Would you like to give me your comments? Thank you very much.

And for the record, that was Mary Grafias.

Is there another list that's circulating we don't have that has people that want to speak? I misunderstood before.

So let's start with the gentleman in the orange shirt, because I saw your hand go up first before. Did

you want to comment? And if you could, please state your name when you come up.

MR. ELLISON: Hello, my name is Richard Ellison. I've live in the Ravenna-Wedgewood area. I am supporting the no action alternative. 54

I've lived in Seattle since '81. UW area has some tall buildings. It has the old -- it's got the Safeco Tower, that's a big building. And then there is an old folks requirement home, public home, that's a big building. And they're great. They're isolated; they're just for special services. And they're big. And you're asking to go higher than that? That's not high enough for you; you want even more bigger buildings. And I don't understand this. So I'll just continue.

You got campus views. Beautiful open campus, beautiful buildings, big trees everywhere. What we're getting right now in the new development is, we're losing our green spaces, the public spaces. The new modified construction, like the picture right behind that screen of yours, I'm scared. I don't want to see the U District looking like that. I walk out of gorgeous campus, and I see this?

What I'm asking is, are you trying to make it Bellevue-like? Big buildings come in, big offices

54 cont buildings: Welcome to the new Bellevue. No, I do not want this.

55 You'll cut the few trees that are there down. I appreciate this lady talking about the trees, because I actually had an appeal against the development in the late '80s, where they tried to -- or did remove ten single family homes and an apartment building, and replaced it with two huge apartment complexes. That was along 21st Avenue Northeast. And they removed 25 huge trees. And one of the trees they removed, or going to remove, was called Chinese Privett, and it was the tallest tree the Northwest. It was actually Seattle's first bonded protected tree. The city council did that. It went through an appeal: first before the hearing examiner, and then to the city council. That's how the appeals ran back in the day.

That tree is now gone. The property has changed hands a few times, but that tree is gone. And most of the trees basically are gone in new development. You put new trees on the street and it's a little -- there's this sort of a green-solving requirement that you have; they don't preserve the big trees.

And the development that has gone through the whole community, basically has lost all the big trees.

55 cont And now with the development of the Roosevelt light rail station, we're losing a lot more big trees. And DPD has done a very poor job of protecting trees when it comes from regulations and things people to do. And it sounds really nice, but it's not working.

56 So the point is no -- why do you need to raise the limit? The limit right now is very huge, one of the Safeco Tower buildings. And you're not protecting the existing infrastructure as far as the green infrastructure is concerned. And there is a long history of loss in our community. We don't want to see it changed in that fashion.

57 Smart world, yeah. Save the trees. Beautiful buildings around these old, special trees, lots of open space, that's what we want guaranteed that we've not gotten out of the University in the development of things on this campus sometimes even, and definitely not from DPD. Thank you.

MR. LACLERGUE: Thank you, Richard.

Dr. Islam, looked like you wanted to make a comment.

58 DR. ISLAM: I am going to speak up. My name is Dr. Aminul Islam. I am from one of the oldest countries of the world. I came to the University of Washington College in 1986.

58 cont I used to walk late at night. The reason why: I come from the poor country. And there are many students out at night. I used walk at night from Brooklyn Street alone. I have nobody hurt me. I have money and many goods, good dress. But now it is too bad. I live in the University District. I am --

MR. LACLERGUE: Sorry. Could you speak into the microphone a little bit more?

59 DR. ISLAM: I am afraid to come out of the house in the dark, although I live in this community, University District. I love this country. I fled my own country, where I grew up, because this is the best country in the world.

Now, which I saw from 1986 to 2014, it is high crime. And now at night in the University District, if you walk after dark, then you can see what I mean.

My safety thing is this. The criminals perhaps scared of me because of this. I have no armed security. I have food, water, clothes, some books, and this. I showed to the police department, because I am in the rental business. I have some bad tenants right now.

I run into the University of Washington students, and they told me they are afraid to walk out on the street today because of the activity. And all

59 cont

of the -- most of the students -- there are over 40,000 students at the University of Washington. I have no idea about this year.

We have to provide authorization to build in the neighborhood. We are a neighbor of the University. Our good neighbor is the University of Washington, where the students, thousands of students are coming every year.

So thank you UW. You are trying to accommodate all the beautiful students coming, 30,000 every year in this, our neighborhood. I am extremely lucky to live in this neighborhood.

But main thing, you know, by increasing the height, and putting low -- I saw this in the 45th Street and Brooklyn Avenue, they're really three levels. And after that, I saw this every day I come to work, because I'm walking too --

MR. LACLERGUE: Dr. Islam, sorry. I'm going to cut you short, but --

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DR. ISLAM: I request of you -- because you are getting higher priority tenants including myself, would you request the city to get many security cameras, which I saw in England? In 1980, I went in the University of Scotland-Glasgow for postgraduate studies, and this helps. I would not know the

60 cont

camera -- I am afraid.

MR. LACLERGUE: Thank you. Thank you. Thank you. Thank you, sir.

DR. ISLAM: We are paying higher property tax.

MR. LACLERGUE: Okay. Anybody else in the back there? Yes, sir, in the shirt, blue T-shirt. Again, state your name. Thanks.

61

MR. SHAFER: Yes, my name is Tom Shafer. I didn't prepare any comments, but I'll try to be coherent.

I am the president of The Wayfarer Cooperative in the 4700-block of 15th Avenue Northeast. We own and occupy a beautiful historic 1923 building there. I've been the president -- I've lived there for 20 years; I've been a resident of the University District for 35 years. And I think that reasonably qualifies me as a spokesman for kind of an underrepresented group, which is people who consider the University District our home.

And like a lot of other people who have spoken this evening, I'm pretty disturbed about the pro-development frenzy in progress right now. Matt Fox referred in his comments to the recent upzoning of the east side of 15th Avenue Northeast and 4700-block. Our building was one victims of that upzoning. We

61 cont

presented our comments to the hearing examiner; the hearing examiner recommended denying that rezoning. Our pro-development city council ignored that recommendation and went ahead with the upzoning. And this seems to be very much the theme for the University District as a whole.

I, too, read the recent article in the Puget Sound Business Journal, which made it appear as if the recently-arrived-from-Utah president of the University of Washington considers himself king of the University District, and therefore the future of the University District ought to be in accordance with his visions. And for those of us who live in the neighborhood and consider it our home, this is all very disturbing.

MR. LACLERGUE: Thank you.

Nancy?

MS. BOCEK: Hi, I'm Nancy Bocek. Did you want my address?

MR. LACLERGUE: No, that's okay.

62

MS. BOCEK: Well, I am actually not prepared to speak tonight about the DEIS. Although sitting, listening to everyone -- and I appreciated everything I've heard -- it's really helped me understand where my mind was thinking.

I'm a long-time resident of the Roosevelt -- of

62 cont

the University District. I also have been involved with the Roosevelt Neighbors' Alliance for many years. My husband and I have raised our two children here. Now one of them is back home and living with us while he has his first real job after college. So he may move into the District, too, if he has an opportunity.

But what I need to say to you is kind of addressed to these people, too, because I've been learning from them, and I would like them to learn from me what my concerns are. And I've passed that on to Dave, and people reviewed this. So they know what I'm after.

63

But my concern is about the old homes that we're going to be losing in this process. I lived in the University Playfield. And the neighborhood around there is a lot of old single family homes that are zoned L1 and restricted L2. And those, as Mary Grafias pointed out, are being torn out to be replaced with quite an amazing development.

So what I want you to guys to understand is, we're going to lose those houses. And we're going to lose that kind of lifestyle which is not a single family lifestyle. Many of them are multifamily homes. But there are some single-family-home people there with children and have raised families like I have. And it

63 cont

is a diverse population; it is a kind of diverse style of housing which this DEIS calls for. And what I feel is maybe missing in this DEIS is, they include the single family neighborhoods in our area in the study area, but those neighborhoods aren't actually in the urban center. Although, the area of small houses we have remaining on the park are an urban center currently.

And so they are a kind of housing that is not actually being called for in this DEIS, that I can tell. I haven't done a thorough study of it yet. I want to save these houses. I hope that you and your various groups will support me and the neighborhood alliance in that.

This travesty of low rise, I'd like to have you all think about what you see when you go around town. Those three properties on Ninth Avenue that's near Trader Joe's, just blocks from the park, you walk past them: Those are three single family homes. One of them was a charming -- a 30-year resident rented there. He offered a strong offer to the landlord, but the landlord refused to sell it to him, because they sold all three in a row, tore down all three of these houses. In fact, my niece lived in one, and she was heartbroken and devastated to leave it.

63 cont So they broke up a community. Those three houses had people living in them that were part of our community. And I'm kind of angry about this, actually, because what happened was, it's legal to subdivide those properties into three parcels so there's nine.

Now, when you're talking about low-rise zones, you're not thinking that you're actually are going to get three times, legally by the City, lots. So I want you all to realize what you're getting when they are zoning low rise.

MR. LACLERGUE: Nancy's, time's up. So final point.

MS. BOCEK: Thank you very much.

MR. LACLERGUE: Thank you.

Cory.

64 MR. CROCKER: Can everyone here me from this distance? Is that all right?

My name is Cory Crocker, and I represent the U District Square. And overall from our review, we've determined the planning accommodations for open space, affordable housing is a better course. Affordable housing and schools are insufficient and not ready for action. Therefore, we strongly urge to adopt a third, no action option, especially since the City has determined that all three options could accommodate the

65 cont

anticipated increase of density with same impacts.

With that policy of strong and intensive zoning and development they need for the necessary amenities for a livable urban village center, there is no incentive for the district citizens to relinquish control of our common areas.

We strongly support increased density, and welcome them to our neighborhood, but only if it addresses the distinct deficits of the course. Recent developments in South Lake Union and Ballard illustrate disastrous products of developer urban strategies. So my prime focus and our architectural theme focus is on public open space, so I'll focus on that.

But the strategies to address the repeatedly identified deficits in open space are so politically attended, that it showcases the sheer power of developers to influence the council and City. Seattle will forever remain a second-rate city as long the short-term profits drive the selfish development interests.

We need community citizens along with our air rights and refuse to grant access to developers and property owners who repeal this, of privately owned public space, festival streets, and second class access to our own public university's campus.

64 cont So we must not allow the building of our district to get in the way of the building of our community. So we're asking for more time. Thank you.

MR. LACLERGUE: Thanks, Cory.

Okay. Is there anybody else who would like to speak who hasn't spoken yet this evening? Yes, ma'am.

MS. GASTINEAU: Hi, my name is Lora Gastineau, 65 and I've lived in this neighborhood at the same address for 22 years, which is right next to Christie Park.

One person mentioned tonight wanting a dog run. And apparently they won't put one in at Christie Park. They recently destroyed a house that was next to the park to expand the park. They want to take another house and expand the park further; however, the Parks Department told me that it could be another ten years before they have the budget to do anything with that space. So now we just have a lot with grass on it.

So when I'm seeing all of these 66 post-developmental buildings, I'm concerned with what we can do right now with what we actually have and problems we actually have in this neighborhood before we leap forward to letting developers come in and tear the place up and put giant high-rises up.

67 We have the parking issue in the neighborhood, which other people have brought up. My building was

67 cont

built in 1926, so it did not come with parking. I don't have a choice but to find other parking. And the City will not zone our block for a residential parking zone. So until that gets addressed, I mean, I'm going to have to go with Option 3.

I don't see why all of this needs to be pushed through when there is a laundry list of issues that this neighborhood needs to contend with first. Thank you.

MR. LACLERGUE: Thank you.

Thank you all for coming this evening. Thank you for sticking it out. And thank you, also, for all of the input and your thoughts. This really is helpful to us.

I guess in summary, it's clear what we're hearing a lot of: We're hearing a lot of concerns about a mix of housing types, finding housing options for a wide variety of residents. I heard that in a lot of people's comments. And also a lot of comments about open space, schools, trees, and trying to address some of those quality-of-life issues before or at the same time as land-use issues. Obviously, there were other things that people touched on, and we'll get into responding more with the final EIS.

I guess the one closing point that I would like

to make: just a clarification on the process. I think what is really important for everybody to understand is, the EIS, even the final EIS is now our proposal. It's not a recommendation that we're sending to city council; it's a step toward a recommendation.

And the EIS has a specific boundary around what it is that we are supposed to analyze before we can write a recommendation. So a lot of the concerns that have been raised about, Well, you talk about the zoning, you talked about it in kind of a wishy-washy way in the EIS, and we don't know what it's going to be. Point taken. And that will definitely be a concern going forward if the EIS were all there were, and if that's what we're sending to the council.

After the EIS completed in late summer, DPD, my department, will be drafting and bringing to the public a draft recommendation before we send it the city council. There will be another public process. I'm sure many of you will be involved in that, and we'll have more conversation about it.

But each step as we go along, we're going to be getting more specific about, how do we move forward with these points that people are bringing up? Then in early 2015, we will be transmitting some kind of recommendations to the council. And they will have

their own public process, and you will have the opportunity -- after we've had a discussion with our department, you'll have the opportunity to talk to city council about whatever it is that's going forward.

So, please, keep bringing us your concerns. My contact information is on the Web site. I would love to have more detailed conversations with you guys. If people want more information, we don't have time for that this evening, but I'm happy to talk to you one-on-one if you give me a call.

Thanks a lot, and stay tuned. We have your email addresses, so you'll be notified as the process moves forward. And I'll be around for a little while for people who have further questions. Thank you.

(Comments concluded at 8:34 p.m.)

Responses to Public Hearing MAY 20, 2014

1. **Support Alternative 1.** The comments are noted.
2. **Support community connections.** The comments are noted.
3. **Support No Action Alternative.** The comment is noted.
4. **University Way zoning.** Under Alternative 1, the west side of University Way NE would be zoned NC3P 65 on the blocks to the north and south of NE 56th Street. The east side of University Way NE would be zoned MR north of NE 56th Street and NC3P 65 south of NE 56th Street. Under Alternative 2, the west side of University Way NE would be zoned NC3P 65 north and south of NE 56th Street. The east side of University Way NE would be zoned NC3P 65 south of NE 56th Street and the LR3 zoning would remain unchanged north of NE 56th Street. Under Alternative 3, there would be no changes to existing zoning. Please see Draft EIS Chapter 2 for a complete description of the alternatives.
5. **In favor of Alternative 1.** The comments are noted.
6. **Affordable housing.** The comments are noted.
7. **Supports mix of different building types.** The comments are noted.
8. **EIS analysis and mitigation.** The Draft EIS identifies mitigating measures for all elements of the environment appropriate for a programmatic EIS. The purpose of an EIS is to disclose information about significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts. Please refer to WAC 197-11-400. The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan and Land Use Code. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. The Seattle Department of Planning and Development (DPD), the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation or funding capital improvements. In addition, the type and magnitude of mitigation may vary depending on the alternative that is identified as the preferred option to move forward. For these reasons, mitigation is presented as a range of measures that DPD could recommend that the City Council consider.

   Regarding the conclusion of no significant unavoidable adverse impacts for specific elements of the environment, this conclusion is

reached when there is mitigation is available to reduce or eliminate impacts.

9. **Economic analysis.** As described in the Scoping Summary, the EIS does not include an economic analysis of the alternatives. As described in WAC 197-11-448, SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible considerations of a decision. Rather it focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.
10. **Gentrification and displacement.** The comments are noted.
11. **Displacement and affordability.** As described in the Draft EIS, housing affordability is a complex issue influenced by a number of factors including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the number of affordable units developed in the study area.

    With respect to potential impacts of the proposed action, the area-wide analysis in this EIS focuses on two key questions: (1) does the existing regulatory framework (Alternative 3, no action) or the proposed new regulatory framework (Alternatives 1 and 2) expand the potential supply of housing above the likely market demand; and (2) does the existing regulatory framework Alternative 3, no action) or the proposed new regulatory framework (Alternatives 1 and 2) expand the potential use of housing affordability tools. The discussion concludes that all three alternatives accommodate a supply of housing above the growth estimates established by the City and that the excess supply should help reduce the upward pressure on rents. Use of incentive zoning to create affordable housing units is contemplated under the action alternatives and expansion of other strategies, such as the MFTE program, could further address the housing affordability challenge.

    Regarding the concept of filtering, please see the response to Letter No. 6, Comment No. 16.
12. **Opposed to action alternatives.** The comments are noted.
13. **Community character.** The comments are noted.
14. **Long-term residents.** The comments are noted.
15. **University Plaza Condominium character.** The comments are noted. The photographs referred to in the comment can be found in Letter No. 70, Shirley Nixon.

16. **On-site parking.** The comments are noted. Please see the discussion of potential parking impacts and mitigation measures in Draft EIS Section 3.5.
17. **Interior impacts.** The proposal does not include any proposed changes that would impact interior building character.
18. **EIS objectives.** The objectives identified in the Draft EIS are noted.
19. **Housing diversity.** The comments are noted
20. **Building variety.** The comments are noted.
21. **Comment period.** The original 45-day comment period was extended an additional 14 days to allow for additional comment.
22. **Housing diversity.** The comments are noted.
23. **Open space mitigation.** The comments are noted. Please see the proposed open space mitigation in Draft EIS Section 3.7.
24. **Housing diversity.** The comments are noted.
25. **Support greater density.** The comments regarding preferred location for increased density are noted.
26. **Focus density vertically.** The comments are noted.
27. **Parking.** The comments are noted. Please see the discussion of potential parking impacts and mitigation measures in Draft EIS Section 3.5.
28. **Parks.** The comments are noted. The Draft EIS does include a bicycle/pedestrian bridge over I-5 on NE 47th Street as a potential mitigation measure. This is also a project identified in the Seattle Bicycle Master Plan.
29. **Closing comments.** The comments are noted.
30. **Student housing.** The comments are noted.
31. **Increase diversity.** The comment is noted.
32. **Need open space.** The comment is noted. Please see the open space analysis in Draft EIS Section 3.7 and revised in Final EIS Section 3.2.
33. **No support for upzones at north end of University Way NE.** The comments are noted.
34. **Proposal and alternatives.** As described in the Draft EIS, the proposed action consists of text and map amendments to the Seattle Comprehensive Plan and Land Use Code to allow greater height and density in the U District study area. Mitigation described in the EIS includes measures that may be incorporated into the proposal to help address identified impacts. The Urban Design Framework, along with other City policy and planning documents, have helped to inform the proposal and the mitigation described in the EIS.

Regarding mitigation, please see the response to Comment No. 8, above. With respect to concurrency, Seattle Municipal Code 23.52 establishes transportation concurrency requirements, consistent with the Washington Growth Management Act. The proposed considered in this EIS would not change these requirements.

35. **Handicapped parking need.** The comments are noted. The City is not proposing to change standards for handicapped parking as part of this action. If a building includes parking, a portion of that parking must be set aside as ADA accessible stalls. Further, the proposal does not include a prohibition on parking. The commenter may be referring to the City's policy of not requiring a parking minimum in urban centers—under this policy, many developments still elect to provide parking.
36. **Puget Sound Business Journal article.** A copy of the referenced Puget Sound Business Journal article was not provided with the comment and was not considered in preparation of the EIS.
37. **Planning estimate for growth.** The housing and employment estimates were held constant under the alternatives for two reasons: (1) because they are consistent with the estimates that are being used for the U District in the Comprehensive Plan update, and will therefore be consistent with the assumptions in the Comprehensive Plan; and (2) by holding the amount of growth constant, the analysis can more easily isolate the impacts of different zoning configurations, development and design standards, which are the essence of the proposed action. Comparisons among alternatives are more difficult to discern when there are multiple variables to take into account.
38. **U District Plan.** Please see the response to Comment No. 34, above.
39. **Neighborhood Plan.** Please see the response to Comment No. 38, above.
40. **Growth estimates and mitigation.** Please see the responses to Comments 37 (growth estimates) and 8 (mitigation), above.
41. **Plaza at Sound Transit station.** The proposal is a non-project action that is considering alternatives for an area-wide rezone, development standards and comprehensive plan amendment. A plaza over the future light rail station is not part of the proposal and a non-project EIS is not required to evaluate individual projects or individual sites that could be proposed for some type of redevelopment (WAC 197-11-442(3)). Future project proposals for specific sites by individuals or other agencies, such as an open space over the planned light rail station or in another location, would be subject to project-specific SEPA review when such an action is planned or proposed. It should be noted that community

interest in a plaza at or near the Sound Transit station is discussed in Draft EIS Section 3.6, page 3.7-6.

42. **Transportation.** The comments are noted. Draft EIS Section 3.5 provides a thorough analysis of existing transportation conditions, potential impacts of the alternatives and applicable mitigation measures.
43. **Building heights.** The comments are noted.
44. **Transitions between zones.** The comments are noted.
45. **No action.** The comments are noted. As noted in the comment, the Draft EIS describes that current zoning provides adequate capacity to accommodate the planning estimate for growth assumed in the EIS analysis.
46. **Comment period.** The original 45-day comment period was extended an additional 14 days to allow for additional comment.
47. **Environmental analysis.** SEPA's requirement for an EIS on a non-project area-wide legislative proposal is limited to a general discussion of the impacts of alternative proposals (WAC 197-11-442(4)). The EIS meets this standard.
48. **Open space.** The Draft EIS concludes that the U District does not meet some of the open space standards established by the Comprehensive Plan and that the deficit may increase as the neighborhood grows. However, because the EIS considers the impacts of different distribution of a constant amount of growth, the deficit is not an impact of the proposal. This is not intended to suggest that the open space deficit is not a concern for the study area. As stated in the Draft EIS, "…existing and projected deficiencies clearly support the acquisition and development of additional open space and recreational facilities to serve the study area." Please see the discussion of open space and recreation in Draft EIS Section 3.7.
49. **Alternatives and impacts.** It is acknowledged that many environmental impacts identified in the U District EIS—such as for parks and public services, for example - are driven by population and, therefore, are related to the amount of growth assumed in the alternatives, rather than to building height, intensity or design. This is a fact which corresponds to how some levels of service are established and how impacts are typically measured in EIS analysis. Applicable mitigation measures are shown for each element of the environment. Please see also response to Comment No. 8 regarding mitigation.

50. **Postpone action.** The comment is noted. The City is committed to working with the community to ensure opportunities for meaningful input and discussion of issues. The EIS provides information, in the form of environmental analysis and mitigating measures, to help inform this discussion.
51. **Evergreen heritage.** The comments are noted.
52. **Neighborhood culture.** The comments are noted.
53. **Open space and tree retention.** The comments are noted.
54. **Support No Action Alternative.** The comments are noted. Draft EIS Alternative 2 would propose the tallest building heights, with a maximum of 340 feet in the core of the study area. This is roughly equivalent to the height of existing UW Tower, which is approximately 320 feet in height.
55. **Tree retention.** The comments are noted.
56. **Keep height limits.** The comments are noted.
57. **Tree retention.** The comments are noted.
58. **Introductory comments.** The comments are noted.
59. **Personal safety.** The comments are noted.
60. **Security cameras.** The comment is noted.
61. **Development frenzy.** The comments are noted.
62. **Introductory comments.** The comments are noted.
63. **Single family character.** The comments are noted.
64. **Support No Action Alternative.** The comments are noted.
65. **Dog run not allowed.** The comments are noted.
66. **Concerned about high rises.** The comments are noted.
67. **Parking.** The comments are noted. The comments are noted. Please see the discussion of potential parking impacts and mitigation measures in Draft EIS Section 3.5.

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