



Mandatory Housing Affordability Environmental Impact Statement Proposed Scope Comments

The Crown Hill Urban Village Committee for Smart Growth requests that the Scope for the City Mandatory Housing Affordability EIS analyze the following questions and concerns regarding the impact of increasing density and housing capacity on our neighborhood, Crown Hill Urban Village (CHUV) and similar Urban Villages around the city.

Given there are already sixteen new housing developments in process in Crown Hill Urban Village and every neighborhood around the city is experiencing a building boom, we request that all analysis include the current projects under development in calculations of density and growth models, in addition to the projected growth that would come after the re-zones and upzones.

We also request that the city analysis present scenarios where growth exceeds projections, given that other neighborhoods have seen their growth dramatically exceed projections years earlier than planning anticipated.

In addition, we would like the analysis to break out meaningful future planning information and mitigations for specifically for Crown Hill Urban Village, in addition to a more general analysis that looks at the city as a whole.

In Crown Hill Urban Village, we anticipate that the planned density and additional housing capacity will impact our environment and community significantly. The City is proposing a large Urban Village boundary expansion into single family areas. Additionally, much of the area within the current Urban Village that would be upzoned is largely single family. *The City's current projections to increase Crown Hill Urban Village's housing density by 50% impacts thousands of current residents, hundreds of properties and dozens of local businesses, as well as strains the fundamental infrastructure, transit, roads, schools and other basic needs of a community.*

Specifically, we would like an analysis around the following concerns before rezoning or upzoning to make sure added capacity is feasible, safe, identifies limitations of growth and the necessary mitigations. We believe good preparation and planning will foster growth beneficial to everyone – current residents and our new neighbors.

1) Analysis of increasing density and housing capacity on **stormwater drainage and sewer system** citywide needed to meet estimated growth, as well as projections if growth exceeds estimated levels. Specifically in Crown Hill Urban Village, SPU mapping shows clusters of hotspots of flooding and sewer failures within the Crown Hill Urban Village boundaries that are slated for upzoning –

particularly North of 85th street. These cause extensive flooding during heavy rains that impact neighbors and limit mobility. An *SPU map produced August 12, 2016 entitled Crown Hill Flooding/Sewer Issues and shared with us by Councilmember Mike O'Brien is attached.*

2) Analysis of increasing density and housing capacity on **electrical and power capacity** to make sure the infrastructure is adequate to meet increasing demands. This comment would apply citywide.

3) Analysis of increasing density and housing capacity on **pedestrian safety and mobility in residential areas of the city that currently do not have sidewalks.** In particular evaluate safety and mobility for our most vulnerable neighbors – seniors, the disabled needing ADA access to urban village amenities and children getting to and from school.

Specifically in Crown Hill Urban Village, evaluate pedestrian safety in areas north of 85th streets that have no sidewalks. Many of these streets are lined by open culverts that fill with water during heavy rains, limiting a pedestrian's ability to safely avoid cars and traffic as they walk in the street without a safe separation from traffic. As our community grows and more residents rely on walking for their mobility, safe pedestrian walkways are crucial to public safety and access to basic services. We received several comments on our Community Survey about the need for ADA accessible walkways and concerns about children's safety while walking.

4) Analysis of increasing density and housing capacity on **pedestrian safety at street crossings on major arterials citywide.** In Crown Hill Urban Village, this analysis should include the seven-lane 15th Avenue NW, Holman Road and 85th Street, the intersection of 80th and 15th, and lack of signalized ground crossings from Mary Ave N to 6th Ave N.

5) Analysis of increasing density and housing capacity on **public transportation capacity** generally - and bus service specifically – citywide. Specifically in Crown Hill Urban Village, current bus service is over capacity, slow and not adequate to meet current needs with the existing peak demand. We would like an evaluation of the level of bus and other transit service necessary to meet current service demands as well as anticipated future demands up to our projected growth levels. Bus service is the primary means of public transportation for most people in CHUV, and will likely remain the only option given lack of future light rail service to our neighborhood. We would like to evaluate what additional transportation alternatives might mitigate the expected transit bottleneck in our neighborhood.

6) Analysis of increasing density and housing capacity on **police response times and other emergency services rapid response ability citywide.** Specifically, right now in Crown Hill, *police response to 911 calls are the slowest in the City at 12 – 14 minutes.* Additional growth and subsequent demand will likely slow response times even more. Please evaluate basic public safety mitigations necessary to lower 911 response times to safer levels, and maintain safer, faster response times as our community grows. Evaluations should include not only police, but also fire and EMS

response. Slow police response times to 911 calls was the largest concern expressed in our community survey.

7) Analysis of increasing density and housing capacity on **school capacity and classroom size**, and the ability of students to attend local schools citywide. In Crown Hill Urban Village current school planning will place new school capacity in parts of the neighborhoods separated by major arterials. Specifically, Crown Hill analysis should also evaluate **safe access to walk to local schools** as current routes will likely necessitate crossing major arterials, and there will be a need for school capacity located where students can safely access their schools.

8) Analysis of increasing density and housing capacity on available parking for residents who need and/or rely on cars. In Crown Hill Urban Village and other neighborhoods without sidewalks, cars park along the streets and angled out into the roads, limiting access through the streets. The EIS should specifically evaluate the impact new construction without parking spaces will have on available street parking. In particular, **analyze the ability of large emergency service vehicles like fire trucks and ambulances to access homes and get trucks and equipment in and out of neighborhoods** to respond to emergencies.

9) Analysis of increasing density and housing capacity on **traffic congestion along major arterials and increased traffic diverted to side streets** in residential areas – citywide. In Crown Hill Urban Village, please specifically look at traffic along 15th and Holman, and 85th Street heading East at the intersection of 15th Ave where traffic backs up and drives cars onto residential streets and through access alleys.

10) Analysis of the impacts of increased building heights and size on adjacent streets to identify what **design standards would create the most appropriate building relationships** as taller buildings along arterials abut neighboring low rise buildings and smaller residential homes. Consider especially the impact on neighbors' access to light, privacy, auditory disturbance, green space, building access, and waste storage -- as well as general neighborhood aesthetic and spatial cohesion.

11) Analysis of impacts of increased residential development on **local, small businesses citywide**. In Crown Hill Urban Village, specifically address the design standards and planning needed to include affordable commercial spaces to mitigate the loss of our small and locally-owned businesses, while creating additional pedestrian-friendly retail and office space.

12) Analysis of impacts of increased residential development on current rental units, *including single family homes that are rented and often house three or four individuals sharing a home*. **Please include Crown Hill Urban Village in displacement analysis conducted by the city**. We have many single family homes that are currently rented which are at risk of redevelopment. We fear the current City displacement analysis miss-represents the true displacement risk in Crown Hill – perhaps due to aggregation of data over a large, income-diverse area and omission of single-family rental homes from calculations.

13) The **Growth and Equity Analysis that is serving as a driver for many resource decisions and zoning changes should be refined** to more accurately reflect the realities of Crown Hill Urban Village. Displacement risk is likely much higher in some sections of the urban village (north of 85th St.) than others. The aggregate designation of “Low Displacement Risk” does not reflect the differences within the Urban Village. Policies assuming low displacement risk may adversely impact disproportionate populations within Crown Hill Urban Village. We request that the EIS explore displacement risk in CHUV by geographic sub-region, as well as evaluate the displacement numbers of renters living in current single family homes at risk of displacement.

14) Review and refine the Growth and Equity Analysis (2016) and factors that influence Crown Hill’s classification as a “High Opportunity, Low Displacement” Urban Village. **Census data shows that Crown Hill Urban Village has one of the fastest growing rates of racial diversity in the city** – we believe in part because our community is still relatively affordable. The current Growth and Equity analysis does not consider the future growth and needs of Crown Hill Urban Village as we continue to become more diverse, and we request the EIS look at future growth trends to make sure density and housing capacity equitably meet the needs of our growing, diverse population.

15) **Crown Hill Urban Village is currently categorized as a “Very Good Transit Service” area** in the Seattle 2035 Comprehensive plan, the Growth and Equity Analysis and related HALA documents. The Growth and Equity Analysis groups Residential Urban Villages with “Very Good Transit Service” together for planning purposes and for future resource allocation and investments, and considers these locations more desirable for future growth and related zoning decisions.

Most Residential Urban Villages designated as “Very Good Transit Service” areas already have or will receive nearby light rail service. These include Roosevelt, North Beacon, Greenlake, Columbia City and Aurora-Licton Springs. *Only Crown Hill Urban Village and 23rd and Union – Jackson lack light rail access.* **There is a tremendous difference in transit capacity and desirability of areas that have light rail, and those that only have overcrowded bus service.** Crown Hill Urban Village’s nearest light rail center will not open for 20 years and will be located over 30 blocks south. Growth and demand will arrive years in advance of the nearest rail.

We challenge the current designation that Crown Hill Urban Village has “Very Good Transit Service” by any comparable measure to other Urban Villages with light rail. We have significant transportation capacity challenges – riders being left behind from full busses demonstrate transit capacity is significantly lower than needed to meet current demand, much less future growth. And we will not benefit from current or future light rail within the next twenty years, and then will still rely on the bus to connect to the nearest station.

We request that the EIS evaluate the impact of growth and increased housing capacity on areas with no light rail and the differences between bus service only

with bus and light rail services to *inform more accurate designations of transit capacity and interventions necessary to handle the mobility needs of residents.*

Thank you for your consideration of these comments for the Mandatory Housing Affordability EIS Proposed Scope.

Sincerely,

Crown Hill Urban Village Committee for Smart Growth

CrownHillUrbanVillage.org

Info@crownhillurbanvillage.org

Enclosed: Seattle Public Utilities Flooding/Sewer Issues Map