



MHA Draft EIS Comments

Summary Points

Description of the Proposed Action and Alternatives

The Draft EIS proposes three zoning change alternative scenarios for study purposes. Alternative 1 offers no change. Alternatives 2 and 3 and their associated maps were developed to study impacts of two different urban village implementation scenarios. Both Alternatives 2 and 3 project significant growth and impacts for Crown Hill Urban Village (CHUV). Both alternatives studied would significantly expand the urban village boundaries. And both alternatives 2 and 3 project significant growth and impacts for CHUV. Both alternatives studied would significantly expand the boundaries, with additional housing and density having significant impacts on the infrastructure and livability of the CHUV community. *Note these maps are scenarios for zoning options, not final maps.*

Alternative 2 projects significant growth for CHUV, concentrating the majority of growth in the central areas within the Urban Village that are currently zoned commercial and under Alternative 2 would be rezoned neighborhood commercial with a height increase to 55 feet. The Alternative 2 maps more closely reflect extensive CHUV community feedback for the direction of desired growth in the community; replacing big box stores and parking lots with geared towards car culture with development with retail on the ground floor and housing above. Alternative 2 would result in an increased burden on existing infrastructure. Transit, schools, police and fire services will *require significant mitigations to accommodate new growth* within CHUV. Given the lack of light rail service, overcrowded buses, existing sewer and drainage problems, lack of sidewalks or safe pedestrian paths north of 85th, overcrowded schools, slow police response, and other critical infrastructure and service deficits; Alternative 2 is very likely to overtax an infrastructure and transit that's already under strain.

Alternative 3 would rezone a broader area of the urban village, and increase heights up to 75 feet. CHUV Committee for Smart Growth is concerned that Alternative 3, if implemented in CHUV, would exceed the ability of the City or private partners to mitigate the significant impacts of increased density. The Committee is also concerned about displacement of neighbors in Alternative 3, which takes a more aggressive approach to rezoning smaller, single family rental homes – particularly socioeconomically vulnerable neighbors living north of 85th street and seniors and those on fixed incomes or with mobility challenges.

Alternative 2 and 3 project that CHUV will absorb some of the heaviest growth of all the urban villages and be subject to many of the largest environmental impacts in the City due to upzoning and MHA implementation. Crown Hill Urban Village is designated a Residential Urban Village, but annotations on Appendix H maps show CHUV is assigned more M2 zoning changes under Alternative 2 than all but one of the six Hub Urban Villages. In Alternative 3 CHUV has more M2 zoning than most of the six Hub Urban Villages.

Implementation of either Action Alternative 2 or 3, or elements of either alternative, will require neighborhood planning and design guidelines. Mitigations for displaced small businesses and concurrent infrastructure investments in transit, schools, parks, drainage and sewer systems, sidewalks and safe pedestrian paths, a solution to slow police response times and other meaningful mitigations will be necessary to sustain a safe and livable community for all residents.

Housing and Socioeconomics

The classifications used to determine displacement risks and opportunities for growth in urban villages are overly simplistic. Many urban villages have disparate regions within the urban village boundary and yet are treated as a single entity. Crown Hill Urban Village (CHUV) is classified in the DEIS as High Opportunity/Low Displacement risk. This classification exaggerates opportunity and the capacity to handle increased growth while downplaying the fact that CHUV has populations with socioeconomic vulnerability who do have a high risk of displacement in the northeast region of the urban village. Crown Hill is borderline in all factors used to categorize urban villages. For example, the City's cut off for considering high displacement is 15% vulnerable populations; CHUV is at 14%.

Land Use

Growth projections used in the DEIS are unrealistically low. Seattle 2035 Comprehensive Plan Assumptions and Growth estimates that serve as a basis for planning are underestimated. Growth assumptions in CHUV, and potentially other urban villages improperly exclude current development in the pipeline, and therefore all Alternatives have unrealistically low growth projects. For example, assumptions applied to Alternative 1 conclude that CHUV will add only 700 new housing units by 2035. In June of 2017, the City of Seattle Permitting process identified 21 development projects already under permit that include over 600 new housing units. Alternative 1, 2, and 3 scenarios should be reassessed with growth projections that are in line with the development occurring now and readjusted throughout the DEIS for their impact.

Alternative 2 and 3 maps in the draft EIS maps both project that CHUV will absorb some of the heaviest growth and be subject to many of the largest environmental impacts in the City due to upzoning and MHA implementation. Crown Hill Urban Village is designated a **Residential** Urban Village, but annotations on Appendix H maps show CHUV is assigned more M2 zoning changes under Alternative 2 than all but one of the six **Hub** Urban Villages. In Alternative 3 more M2 zoning than all but two of the six **Hub** Urban Villages.

Aesthetics

The DEIS ignores impacts of converting Residential to Commercial. The final EIS must evaluate those impacts on displacement and environmental impact.

The DEIS fails to acknowledge the SEPA Cumulative Effects Policy. The Policy addresses the phenomenon that "a project or action which by itself does not create undue impacts on the environment may create undue impacts when combined with the cumulative effects of prior or simultaneous developments; [and] may directly induce other developments, due to a causal relationship, which will adversely affect the environment." The Final EIS should address the cumulative effects and comply the SEPA policy.

If the proposed revised thresholds for Design Review are accepted as noted on page 3.120, significant portions of Urban Villages being rezoned to low-rise would no longer require Design Review. The study needs to address the aesthetic impact of decreased design oversight for LR development in **each individual Urban Village**.

Seattle Municipal Code should mandate Neighborhood-specific guidelines for all Urban Villages prior to implementation of any MHA Action; as noted they "identify priority design issues and seek to ensure that new development is compatible with specific local neighborhood character," and thus are crucial to support Seattle 2035 Comp Plan Land Use Goals. Only half of the urban villages in the study area currently have neighborhood design guidelines. A detailed Crown Hill Neighborhood Plan and Crown Hill neighborhood-specific urban design framework and guidelines are needed to address and mitigate land-use impacts on neighborhood-specific character under all Alternatives.

Development needs to comply with City of Seattle Right of Way requirements. Neither of the DEIS Action Alternative complies with minimum pavement widths for moderate-to-high levels of development on non-arterials streets.

Transportation:

The DEIS transit analysis and mitigations are inadequate to address in the increasing need that will come with growth. In light of the reduced parking requirements for new development in Urban Villages, there will naturally be significant increases in use of transportation systems other than personal vehicle. For example, the Metro D line boarding was studied at Ballard, but NOT at transit stops serving CHUV. Information in this figure for the D line is misleading, as the figures show NO difference in the Passenger-Load-to-Crowd-Threshold ratio between Alternatives 1, 2 and 3 on the D, apparently relying on the assumption that Metro/King County will have the resources to increase bus service to alleviate crowding.

Historic Resources

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

Biological Resources

The DEIS does not evaluate the impact of tree removal and replacement with impermeable surfaces in areas that will experience acres of rezoning from single family to RSL zones. Nearly all of the single-family properties are categorized as 5,000 feet by MHA. Tree removal for lots under 5,000 square feet is exempt from the city's tree ordinance; meaning there are no protections for these trees whatsoever in the DEIS. Additionally, there is no mitigation strategy for Piper's Creek watershed, which is at the base of Crown Hill and is impacted by runoff from CHUV.

Open Space and Recreation

According to Seattle Parks Department maps, Greenways are by definition considered walking corridors. Greenways developed in areas without sidewalks are not providing **any** mitigation for pedestrians.

Public Services and Utilities

The DEIS does not address the inequitable quality and content of services provided to the various urban villages throughout the City. In CHUV, for example, no substantive mitigation for the impact of growth on various essential utilities is meaningfully addressed. Poor public safety due to overlong police response times will not improve with added growth. The impact of growth on Station #31, the second busiest fire station in the city, is not addressed at all in the mitigation strategies suggested under public utilities. Public utilities that address drainage and flooding in much of the community are subpar, with flooding and open culverts the norm north of 85th NW. The only school in CHUV, Marcus Whitman Middle School, has 16 ancient portables outside the original school structure. It was not referenced at all in the DEIS.

Air Quality and Greenhouse Emissions No Comments

Alternative 2 and 3 maps can be downloaded here. <http://crownhillurbanvillage.org/wp-content/uploads/2017/08/CHUV-EIS-maps-060817.pdf>

Full Draft EIS Comments from the CHUV Committee for Smart Growth can be viewed and downloaded here: <https://drive.google.com/file/d/0B9EwM-o5PD4SWGnLb0dvbTdyemM/view?usp=sharing>