Introduction

The proposed zoning and land use changes (MHA, HALA, 2035 Comprehensive Plan, etc.) are an unprecedented shift of policy. They will force significant housing cost and traffic increases as well as reduced open space, tree canopy, and classroom space for thousands of Seattleites. For this reason, the EIS must be *comprehensive* in the scope of issues it addresses; *thorough, accurate, and honest* in examining those issues; and *extensive* in mitigating them. This is necessary for the affordability and livability for those who live here now and those who arrive in the future.

With that in mind, we propose the following requirements for the MHA-R EIS scoping.

Overview

There are four critical elements that must be the basis of the EIS scoping:

Examine All Neighborhoods Separately

The Central Area, U District, Rainier Beach, Ballard, Lake City, Eastlake are all vastly different. Each of the 37 urban villages/centers has different issues and therefore each should be examined individually and separately. Areas outside the urban villages/centers must also be examined separately. Failure to examine each of these areas separately would give an inaccurate picture of the diversity of Seattle residents/communities and the impacts on their lives/neighborhoods.

There Must Be More and Broader "Action" & "No Action" Alternatives than Proposed

The City says it is likely to consider only two action alternatives, both of which would include the proposed increase in allowable height and floor area. This does not give the range of options necessary to provide real alternatives.

We recommend the following instead:

- The "No Action" alternative be limited to current projects currently existing in the pipeline (files) at OPCD (Office of Planning & Community Development), whether projected, planned, or permitted.
- One action alternative use only the types and amount of building developed in each urban village/center's neighborhood plans prior to 2014 for the current (not 2035) Comprehensive Plan. Hundreds of people collectively spent thousands of hours developing these plans. So far the City and developers have not honored these plans.
  In addition, this alternative will limit itself to the growth targets beyond which development was supposed to be discouraged or halted and new development was supposed to go to other urban villages/centers. Already numerous urban villages/centers have exceeded their 2024 growth targets, some substantially (Ballard already exceeds four times its growth target). In those situations, current completed or permitted projects may be included, but nothing more.
  This alternative will show that the City is willing to accept the will and decisions of its citizens.
- Another action alternative would use current zoning, without any upzones. The City already has zoning for 228,000 units and projects the need for only 70,000 units through 2035, making the upzones unnecessary.

- The final action alternative would analyze full buildout with upzones (including development that may exceed 70,000 units) that are proposed or passed with current legislation (HALA, 2035 Comprehensive Plan, U District upzones, etc.). It would be the only alternative that would use proposed expanded urban village/center boundaries and include development of single family zones and units.
- In addition to the small (3-7%) planned current levels of affordable housing, all alternatives should use 15%, 20%, 25%, and 30% affordable housing in their analysis. Affordable in this context means providing affordable housing for those under 30%, 30-50%, 50-60%, 60-80% AMI in proportion to the current need by each economic level. Use suggested policies/solutions in *Solutions for Seattle's Housing Emergency* (a report written by affordable housing advocates, City council staff, and others and organized by State Representative Frank Chopp) for estimates of how much money or housing each item could generate to help get to those levels.
- As mentioned above, all these alternatives should examine each EIS item both in each urban village/center.

The Scoping Notice Must Reflect Reality with More Accurate Language about Height & Floor Increases
- The scoping notice as it currently reads says that proposed height and floor area increases are "slight." In the U District alone, heights are proposed to go to 240' and 320' from 85' or less.

Determine Current Situation for Baseline
To determine what the future action or no action alternatives will be, it is essential to understand the current situation for all urban villages/centers and on all of the critical issues. These include:
- Affordability: Displacement, Homelessness, Gentrification
- Transportation: Traffic, Congestion, Parking
- Environment: Open Space, Tree Canopy, Utilities
- Public Services: Schools, Community Services, Public Safety

Institutional Overlays, Include U District
- Institutional overlays create significant urban village/center impacts and those impacts must be considered among other impacts in urban village/centers.
- Include the University District in the MHA EIS since their previous EIS did not address many of the EIS issues that are necessary (including those listed above among others).

Affordability

The reason for MHA (Mandatory Housing Affordability) is to ensure affordable housing, but without a thorough understanding of what units are currently affordable, it's not possible to accurately determine the gain or loss of affordable housing from the massive changes caused by MHA and other City policies.

For each block of each urban village/center under all alternatives: *[Note: block level recording is necessary because even within urban village/centers there can be significant differences in housing stock, costs, etc.]*

Create Current and Pipeline Inventories
- Number of housing units: single family, duplex/triplex, other multifamily, mixed-use
- Number of bedrooms in each unit
- Number of multi-bedroom units occupied by a family
- Number of units occupied by more than one unrelated tenant
- Number of people in each family or household
- Price per unit and price per bedroom

- Percent and number of units that are affordable (30% of income or less) at 30%, 50%, 60%, 80% AMI
- Percent and number of units at full market rate
- Year building was built
- All above for projects in the pipeline (planned, proposed, or permitted)

Displacement
- Single family units replaced by multifamily units (including duplex and triplex)
- Affordable residential units lost and at what income level (30%, 50%, 60% 80%)?
- How many units are one-for-one replacements (same price, same size, same number of bedrooms)?
- How many small businesses will be displaced?

Homelessness
The Chicago Policy Review shows that there is a 15% increase in homelessness for every $100 increase in median rents. Given this fact:
- What will be the increase in median prices? (immediately after construction, expected 3, 5, 10 years after construction completion)
- How many *households* will be displaced?
- How many *people* will be displaced?
- How many *families* (at least one parent/guardian and one child) will be displaced?

Gentrification
For those urban villages/centers where gentrification applies, such as the Central District, that have lost significant numbers of low income people and People of Color, determine:
- Number of new residents over previous five years and their average income
- Number of low income people who have left each gentrification area
- Average rent prices over each of the last five years
- Impact on small business within ¼ and ½ mile of 23rd Ave during the time of construction and street disruption there

Corporate Impacts on Less Affordable Housing
Large companies, either based in Seattle or moving here, have caused much of the significant recent rise in rents both through extensive rent/lease/ownership of commercial office space and by hiring large numbers of highly paid employees.

To address this cause for the rise in rents, it is necessary to determine this level of corporate growth. Some essential methods to accomplish this include:
- Identify the top 20 companies in terms of office space and number of employees over the last five years and projected over the next five years.

For each of these companies find for the last five years and projected for the next five years:
- Square footage they rent/lease/own in Seattle
- Number of employees
- Address and name of buildings

Multifamily Apartment Sales & Development
Multifamily apartment sales prices have skyrocketed in recent years, further leading to increased rental prices. For each multifamily sale in Seattle over the last ten years, list:
- Sale price and previous sale price
- Seller and buyer
- Urban village/center location
- Address of building
- Name of building
- Number of units
- For mixed-use buildings: number of residential units and square footage of commercial space
- Whether apartments or condos (or converted to condos)
- Single family units that became multifamily units

Environment
For each block of each urban village/center under all alternatives:

Tree Canopy
The City of Seattle has not inventoried the city's tree canopy and therefore cannot determine how much of its tree canopy is being lost through development.
Tree canopy is critical for creating cleaner air, for reducing CO_2, for absorbing water and sewer runoff, to provide shade, to provide bird and other animal habitat. It is therefore necessary to determine the current level of tree canopy and the impacts of losing it.
Therefore establish:

Current Inventory
- Number of trees by type (deciduous, coniferous; cedar, maple, plum, etc.)
- Trunk diameter for each tree
- Crown spread for each tree

- Replacement trees must be measured using the same measurement method: trunk diameter and crown spread only

Trees Lost with Development
- Which trees will be lost through development
- Measure level of loss to:
  - CO2
  - Absorption of water/sewer runoff
  - Shade
  - Bird, other animal habitat

CO2 & Other Greenhouse Gas Emissions
Estimate increase in CO2 and other greenhouse gas emissions from:
- Demolition of old buildings
- Construction of new buildings
- Vegetation loss
- Increased population

Open Space
Many areas of the City already have insufficient open space and the proposed policy changes mostly will either not increase that open space or will decrease it.
- What will be done specifically to increase open space in various urban villages/centers?
- What areas of open space will be eliminated or reduced under current City proposals and current projects in the pipeline (planned, proposed, permitted).
- Indoor areas or areas on private property that are not available 24/7 cannot be included as open space.

Green Factors
While large developments cause greatly increased heat and problems with the natural environment, green factors, such as green roofs can have some benefits.
- Determine the increased level of heat and other environmental detriments to these development projects.
- What green factors will be included with these developments and specifically what amount of benefit will they provide.

Neighborhood Character
How will each alternative change the look of each urban village/center? For example:
- How many single family homes will be converted to duplexes, triplexes, other multifamily?

- How much open space, parkland, may be lost?
- How many people will lose views so that others gain them?
- What areas will have less public access to water?

Shadowing
- Determine size of shadows throughout the day for each project
- Determine locations where new construction will block units with residential solar collectors (depriving those units of expensive methods to save energy) and the costs to residents of those units.

Wind Tunnel Effects
Proposed highrise units create forceful wind tunnel effects. Estimate the specific effects that these highrise units will create.

Impervious Surfaces
Impervious surfaces cause significant urban temperature rise and carry pollutants and biological contaminants into our waterways, poisoning fish, wildlife, and us. They will create, and/or be a result of, less lawn, fewer and smaller trees, less setback, lotline to lotline development. Determine the level of effect that impervious surfaces will have on the above and any other effect on nature or people.

Construction Impacts
Address the specific level of impacts during and after construction of:
- Noise
- Dust
- Streams, wildlife habitat

Utilities
Seattle is already out of legal compliance with Combined Sewer Overflow (CSO) and greatly increasing building will make this worse. How much will the new building increase CSO and how will the City come into compliance with their legal obligations on CSO?
What is the level of increased usage and pollution from increases in:
- Drinking water
- Water runoff
- Natural gas
- Sewage treatment
- Garbage collection
- Surface water management

Radio Frequency Radiation
Estimate increase in RF radiation from increased cell phone towers and smart phones on every unit

Historical, Architectural
There are many historical and architectural treasures in Seattle, both within urban villages/centers and outside those boundaries.
- What specific steps will be taken to protect these historic buildings and prevent their destruction with new developments?

Archeological, Cultural Resources
With greater excavation depths required for taller buildings, there is increased potential for finding/disrupting culturally sensitive resources.
- What precautions will construction companies take to limit this potential disruption?
- What will they do if these resources are found?

Floodplains, Coastal Resources
- Impacts of new development on Puget Sound and other waterways
- Future effect of rising sea levels on development along Puget Sound?

Public Services

Seattle should have concurrency, where the schools, roads, etc. match the number of people living in that area, but we are woefully lacking in this regard (though if we had had developer impact fees as other cities have that would have relieved or eliminated that shortfall).
Adding thousands of new people will only exacerbate these problems, especially if we don't now institute impact fees.

Schools
- How many schools and classrooms are we now short for our current residents?
- How many more schools and classrooms would we need to accommodate the new growth?

Population
To help determine the need for schools and other social services (such as senior centers, community centers, etc.) it is necessary to know the population of each neighborhood and the race and age of that population.

Public Safety
Firefighting
Taller buildings, especially highrises and skyscrapers, cause complications and increased problems when trying to protect people and property. Trying to mitigate these problems also requires special equipment. Current City plans call for more highrises and in more areas of the city, creating further problems.
We therefore should determine:
- Current number and adequacy of firefighter and EMT staff
- Current number and adequacy of equipment used for highrises
- Availability and location of that equipment and staff
- Amount of additional staff and equipment needed
- Increased response times due to taller buildings and more congested roads, topography, etc.
- Current weaknesses in fire protection: weak water pressure, insufficient fire hydrants, etc.
- Weaknesses that will increase with greater density and population

Police
- What is the average national level of crime with cities of similar density increase as the City proposes Seattle reach?
- How much will police response be delayed in different urban villages/centers due to increased population, density, congestion?

Transportation

Traffic
- Level of Service (LOS) and traffic delays at major intersections during AM and PM peak hours (3 hours), peak hour (1 hour), and 24 hour
- Number of vehicles on each block of major arterials AM, PM peak hours and peak hour
- Number of vehicles at AM, PM peak hours and peak hour, daily
- Number of vehicles at AM, PM peak hours, peak hour, daily at each freeway entrance ramp

Congestion
According to the Texas Transportation Institute, Seattle is already 3rd worst nationally in its Travel Time Index (difference between travel time at peak compared to no traffic). This will get substantially worse with large

population increases. Measure the following under each alternative:

- Increased travel delays (AM, PM 1 and 3 hour peaks, daily) on freeways and arterials after full buildout
- Increased pollution citywide and each urban village/center
- Impact on both car and freight movement
- LOS and travel delays during construction

Parking

- Amount of parking on each side of the street
- Breakdowns of 24 hour unrestricted, commercial, 3 minute load zone parking on each block
- Number of RPZ spaces available
- Number of RPZ zone stickers made available.
- Number of units and bedrooms on each block
- Number of vehicles registered on each block
- How many more cars will be on the block under each alternative
- What level of income will be needed to rent these new units? When considering the immediately above bullet point, consider that those with greater incomes own more cars

Light Rail
Negative Impact on Affordability
Light rail generally increases property values. For instance, one report sponsored by the City (from Heartland) said it would take an $80,000 income to live in one of the U District highrise towers that could only be built with the increase in land values that light rail would create. Examine:

- Increase in land and property values within ¼, ½, and 1 mile of each Link light rail station
- Small businesses that lost their businesses along the Link light rail line, especially along Martin Luther King
- Increase in higher rent businesses and residential buildings along the light rail line.

Little or No Congestion Relief
Sound Transit's 1999 FEIS (Final Environmental Impact Statement) said that Seattle's Link light rail would have 110,000 passengers a day, but that even with that large ridership, there would be less than a 1% reduction in traffic and that traffic delays at 75% of intersections along the route would increase.

Ridership on Link has never approached 110,000 daily riders and has generally been one third or less of that number, so congestion relief is likely even less than that small amount they expected.

Alternative Transit Options
Numerous transit options are cheaper, provide more congestion relief, and don't create negative impacts on land and property prices. Two of these to include in alternatives analysis include:
Commute Trip Reduction
Commute Trip Reduction is an inexpensive state program that requires jobsites with more than 100 employees to encourage those driving alone to find other ways of getting to work. Even in the early 2000s this program was taking over 20,000 cars off the road a day (compared to less than 500 with Link). Examine the effects of expanding this program, for example, such as making the requirement 100 jobs on a block, to determine its effect.

Expanded Vanpool/Carpool System
In the early 2000s, WA state, mostly because of Puget Sound, had 15% of all vanpool use in the country. They took thousands of people off the road and the cost was minimal. Examine how expanding how this system could be used would further reduce congestion, and not create higher land values which make housing affordability more difficult.