

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeal of

Hearing Examiner File:
MUP-18-029 (CU-W)

SHANNON MARTIN, ET AL.

Department of Reference:
3029687-LU

from a decision issued by the Director,
Seattle Department of Construction and
Inspections

STATEMENT OF ISSUES

I. Preamble

Holy Names, a private school, founded at its present location in 1907, is located in the center of a quiet residential neighborhood on Capitol Hill in Seattle. It sits in extremely close proximity to the neighboring residential homes which were established during this same historic period of time. The homes surround the school on 4 sides by narrow streets. The streets are thin and the interaction between neighbors, students, and school employees, is daily. Both the school and its neighbors have grown together over the years and maintained an intimate relationship of symbiosis and support, which is required in such a close setting. The school, through its written publications, mission statement, public statements, and website frequently stresses the importance of its being a “good neighbor” and “steward” for the neighborhood. It has stressed the value of this relationship, recognizing the importance of getting along and working together on any common issues with which we are confronted. Indeed, it is hard to imagine one thriving without the other on any sustainable basis.

When we learned at a public meeting to which we were invited, that the school was considering building a 5-story underground parking garage, veritably in our laps, by tearing down the existing gym, and replacing it with a 5-story deep underground garage for cars, and that the school also intended to black top the beautiful park and green space used by neighbors on the north side of the school so that an additional large surface parking lot could replace the park, we were deeply dismayed. We sought to engage the school following the meeting on these issues. In April 2018, we presented the school with a petition signed by 100 families (many more have added their names and support since), opposing both the garage and plans to eliminate the park. The text of the petition read as follows:

Petition summary and background	We, being good neighbors of Holy Names Academy, earnestly oppose the present planned construction of a multi-level parking garage on the site and the erasure of the beautiful park on the north side of the school, which is deeply valued green space. We believe both proposals are inimical to our neighborhood.
Action petitioned for	We believe the plans will introduce additional vehicle traffic to our area, will result in additional congestion, are over scale, will be a blight, especially on the north end of the property where the cherished, revered, and historic park will be paved with a parking lot, will cause unwanted noise and lighting on adjacent homes, will bring noxious fumes and construction and wreak havoc in the adjacent area during and after a lengthy period of construction, and is plainly contrary to environmentally conscious policy of encouraging less driving, not more. We, the undersigned, oppose the current plans and wish our voices to be heard and respected. If the school cares about the neighbors as it professes, we ask that its current plans be reconsidered, that additional inclusive discussion be held, and that rational alternatives be pursued.

We thought, in earnest, based upon our knowledge of the school and its values, and the long history of cooperation between us, that the school would engage with us on this important issue. We thought they would now understand that there was deep opposition to the plans by those who would be most impacted by it. Instead, to our surprise, the school simply chose to ignore it. There was zero effort to meet, zero effort to work together and find common ground, zero effort to engage. In fact, there was the opposite of what one would expect from a good and caring neighbor, the opposite of the kind of example a school of the reputation, stature and goodness of Holy Names should be setting for the neighborhood, for its students, and for itself.

As a result of this failure, we discussed this matter among the consortium of neighbors, and determined that the only course to pursue was to appeal, which is what we have done. It is not something we wanted. It takes time, money, and angst. However, we believe very much in our purpose, and that we are indeed looking out for the neighborhood and for the environment. We believe our concerns should in fact be the concerns that prevail, because regardless of law, they are what is most important – Getting along, working together in a sustainable way, protecting our environment in the short and long term, making sacrifices, and finding common solutions. Without acting to protect and elevate these values, which actually should be at the top of all of our agendas, the rest is meaningless.

II. Statement of Issues

Synopsis

In essence, we believe the City has been misled and acted upon incomplete information as to any perceived need for this construction, as to the facts surrounding it, and as to the impact it would have. We believe that this contributed to the decision by the City to erroneously approve the project without requiring a full environmental review (DNS) and without adequate

consideration of the facts. On behalf of the consortium of neighbors, we believe this was in error, and that the approval should be revoked on this basis. We believe that for reasons set forth below, a full environmental study is required by RCW 43.21C.

Details

(a) Need

Background and context are essential to consideration of any construction project which all parties, including the City, recognize and acknowledge will elevate greenhouse gas emissions, and cause other environmental hazards, in the short-term and long-term.

As stated by the City in its letter, dated 11.29.18, approving the project:

“Long-term or use-related impacts are also anticipated as a result of approval of this proposal including: greenhouse gas emissions.”

“Operational activities, primarily vehicular trips associated with the project’s energy consumption, are expected to result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming.”

In this regard, we would like to point out that we believe we are dealing with a manufactured crisis regarding the supposed rationale for this construction project. We live here. We park surrounding the school. We spend more time here than anyone. And the current system in place at the school of having parents drop off their kids in the morning, or having driving students park on the surrounding streets where there is free residential parking, and having the faculty either park in one of the many parking spaces currently available on school property, or on the adjacent streets, is working just fine. There is no sudden lack of space. The zoning has not changed. Public transit availability and other methods of easy transport, including bikes, have only increased. The school is NOT under any kind of threat. The parking is occurring in the same manner as it has for all of its years, without incident or complexity. Indeed, the traffic study, which the school commissioned, found that there is adequate existing parking for students, the school, and the neighbors.

“The parking counts that were collected, combined with field observation conducted by Heffron Transportation staff, indicate that there are unused parking spaces typically available on most blocks within the vicinity of the school during weekdays when classes are in session. This indicates that HNA-generated parking is not currently constrained by available on-street supply; those who drive and park are typically able to find a space within a block or two of the school.”

Heffron Transportation Study, p. 17.

Nor is the school's longevity under any kind of threat. In truth, parents and students do not make their decision whether to go to Holy Names based upon the parking that is available. They choose Holy Names because of the academic reputation of the school, its excellent faculty, and perhaps because of the beautiful building and existing grounds which surround the school. The constriction project, if carried through, would have an undeniable negative environmental impact without any significant countervailing need or value. Further, it would lessen the school's aesthetic attractiveness and long-term historic value, not add to it. In addition, as further described below, it will introduce additional driving and congestion in the area. And it would increase gas emissions. The lack of benefit is plain.

(b) Impact on Existing Traffic of a 5-Story Garage

To support its efforts to avoid full environmental review, the school hired Heffron Transportation Inc., to generate a report and analysis, which concludes, quite incredibly, that "no new vehicle trips will be generated by this proposal." We find this stunning in its conclusion, and absurd in that it ignores reality and common sense.

The school is proposing to build a 5-story underground garage which will accommodate 246 vehicles. The school will, of necessity, be incentivized to fill the lot on a daily basis. At the same time, the school has been resolute in stating that they will continue to encourage student and parents to carpool and they expect parents will do so. If that is true, then you are necessarily causing additional traffic to the school, because the carpools are not abating, and the underground lot is being filled. Clearly, students and faculty are filling it. At the initial meeting where the neighbors were made aware of the school proposal, the school stated that currently approximately 10% of its student body drive and that the school actively works to encourage other forms of transportation by students and staff – to include metro buses, light rail, dedicated buses, and car pools. All of this incentivizing is, and will be, completely undermined if the 5-level parking garage is built.

In truth, what will occur as a result of the new garage is that parents will now have the option of giving one of their vehicles to their kids, so that the kids can now drive to school. This is what will occur. We all know it. There will be less carpooling. There will be less utilization of public transport by students and faculty alike. There will be more individual driving. There will be more cars. There will be more greenhouse gas and other noxious emissions, and there will undoubtedly be more traffic in the area surrounding the school and in the adjacent neighborhood.

We believe the statement by Broderick Architects, repeated throughout its SEPA submission, that "there are not new vehicle trips generated from this proposal" is simply false. We believe the City's report fails to consider and acknowledge this increase in trips and cars in violation of WAC 197-11-960, Item 14f (traffic).

In addition, there is no reason to expect that parking in the area immediately surrounding the school will be any different than it is today were the garage to be built. Especially in front of

our homes. We know this. The students and other visitors to the school will simply have a choice. Do we park in the 5-story underground garage where our ingress and egress will be impacted by countless others, or do we park on the surface street across the street. This is an easy choice for anyone interested in saving a moment in time, as we all are. The surface parking wins. It is quicker and it is easier. The school has suggested that it will tell students to only use the garage. Even if it did, students only halfway listen to such things, and teachers and visitors to the school, including those at sporting events, will no doubt do what is most convenient for them. Who wouldn't? So there is no reason to expect that as a result of the project there will be any less congestion around the school. None.

What other negative traffic results will assuredly follow? Well, currently those who do drive and park, scatter themselves on the neighboring streets in a way that is less concentrated, less dense, and easy to mix with existing traffic flow, and to come and go with ease. This project will disturb all of that. This project will necessarily produce a bottleneck on the streets immediately surrounding the school, as 240 or more cars seek to enter in the morning and depart in the afternoon during busy hours of the day. The Heffron report and City approval report fail to take into account the way school-related parking is presently disbursed in a very natural way throughout the neighborhood which serves to mitigate the traffic impact for arriving and departing vehicles. There will be increased congestion and traffic in the neighborhood on a daily basis as a result of the underground garage. In addition, 21st Ave East, the street on the front side of the school, was recently designated a "greenway" by the City. This project will undoubtedly increase the traffic in and around that "greenway" during busy hours of the day where there is much foot and bike traffic.

In addition, it is important to note that the intersection of 23rd and Aloha Street is perpetually a community concern for potential car vs. pedestrian collisions, as there is much foot traffic of commuters, including Garfield, Lakeside and U Prep students, crossing 23rd at Aloha for the #43 bus stop (which also serves metro charters for Lakeside/U Prep) on a daily basis. Cars approach Aloha Street at 30 mph, and the Heffron study acknowledges that congestion at this intersection will worsen (graph, page 25 of Heffron report) with the construction of the garage. This additional congestion poses a danger, which was not adequately considered, and is not justified.

We believe there was a failure by the City to fully consider the above impacts on existing traffic levels and to protect the citizens as is its mandate in violation of WAC 197-11-960, Item 14 (traffic). Accordingly, we believe the matter should be remanded for a fuller and more objective analysis.

In addition, we believe the City should have played heed and respect to "Seattle's Comprehensive Plan, Urban Villages Element," a city guidance document, which states that the goals of the plan are to "reduce the reliance on cars for daily trips and decrease the amount of fossil fuels burned and the amount of greenhouse gases emitted," as well as to "make transit and other public services convenient for more people and therefore make these services more efficient." Holy Names' plans appear to us to be antithetical to the stated missions of the City, and contrary to the interests and well-being of the neighborhood. Other schools, private and public, promote use of public transit by providing discounted or free ORCA cards, promoting

carpools and bike commuting and by providing shuttles and charter buses. There are several public bus lines in close proximity to the school, including the #43 on 23rd Ave East, the #12 on 19th Ave East, and the #10 on 15th Ave East, in addition to the light rail which stops on 10th and John Street. Even those private schools which have built some additional parking, have done so on a far smaller scale than what Holy Names is proposing. Holy Names' 246 space parking lot to be built on 5-subterranean levels is significantly out of scale compared to these projects.¹

In sum, the proposed garage will deter carpools and public transport and propel additional single occupant vehicle trips, inconsistent with the Master Plan of the City, and will add additional traffic, congestion, and greenhouse emissions to the surrounding neighborhood.

We believe there are better solutions, even to projected and futuristic parking problems, than to construct a massive underground parking so close to single family dwellings. We have been here for the same period of time as the school and we are entitled to the same quiet enjoyment of our homes and lives. We do not want additional localized traffic congestion and other negative environmental outcomes. We believe that any steps taken should be in-line with the stated mission of the city (to promote use of public transit and enhance green spaces) and that the solutions should be in harmony with the neighborhood and not create harm and enmity to the people that have lived happily side by side and supported the school for all these years.

(c) Failure to Consider Historic Significance, Existing Neighborhood Use, and Blight of North Proposed North Parking Lot

As if it were not enough to build a 5-story parking garage on the south side of the school to accommodate 246 vehicles, the school also plans to simultaneously replace the existing green space park at the north end of the school, with a black top parking lot so that it can park many buses currently parked elsewhere at this location. This park spans the entire length of the block between 21st and 22nd Avenue East bordering Aloha. It is very scenic, contains a large green space, prayer grounds, American flag, and is home to many trees and bird species.

For a variety of reasons, we as neighbors object to the proposed elimination of this green space, and find this decision by the school particularly troubling and hurtful. In addition, we believe the materials considered by the City and its report contain material omissions regarding the park, its history, and its utilization, which should cause that aspect of the project to be reconsidered.

¹ For example, Seattle Prep, which has its own campus and occupies a much larger geographic space than Holy Names, with the same approximate number of students (grades 9-12) as Holy Names, has a single two story garage which houses approximately 75 spaces, and a very small area for buses (spaces for 6 buses). The rest of the parking at Seattle Prep is neighborhood parking. The Bush School which also has a large campus, and entertains a much larger student body (Kindergarten through 12) than Holy Names, has an onsite parking garage with approximately 120 spaces on only one level, and limited parking for buses. The rest is on-street parking. Currently, Holy Names has a parking lot to its east which contains several parking spaces, in addition to current space for at least 10 buses. They also have several spaces of perimeter parking on the east side of the gym. Holy Names' proposal to add an underground parking area to hold nearly 250 additional spaces is out of kilter and excessive as compared to these other projects.

First, the report fails to consider and acknowledge the historic significance of the park. The park is an historical adjunct of the main building which was part of the original vision and construct by famed Seattle architects Breitung & Buchinger in 1906, whose short-lived partnership created this Seattle landmark. It has been carefully preserved over the years with few exterior changes to the school or grounds. The school retains the exterior and interior in its original condition and including its scenic north park on the north side of the school property. Seattle historical archivists indicate the site has changed very little since its inception, other than the removal of part of the north tower required by a 1965 earthquake. See, <https://pauldorpat.com/seattle-now-then-archive/2007-01-14-holy-names-on-capital-hill/> (“A century of greening on the Holy Names Academy campus has half-draped the full figure of architects Breitung & Buchinger Capitol Hill landmark, with trees” “a Baroque Revival plant that has changed very little since the ‘real photo postcard’ photographer Otto Fresch recorded it almost certainly in 1908. The big exception is the tower at the north end of the school, on the left. While the earthquake of April 29, 1965 did not collapse the tower it did weaken it so that it was removed.”). The north park has existed since the school’s inception as reflected on the architectural designs, plans, and drawings visible in historic archives at the University of Washington.

Currently, the green space contains a large green area covered by grass, and a prayer space with a tall cement statute of *Ave Maria*, dated 1954, surrounded by rose bushes and cement benches in a semi-circle for people to sit, congregate, meditate, and pray. The prayer garden is arranged in a large beautifully sculpted circle of built-in brick with a brick path leading to it. The north park contains 17 mature trees. These trees provides habitat for many species of birds. In addition to the prayer space, and green lawn, the park contains a tall United States flag hoisted on a large flag pole at its center, which is a firm reminder and symbol of our country and its heritage – surely a valuable civics lesson for young people and for us all.

The park has been there since the school’s inception. The park is part of the school’s original aesthetics and design. This subject deserved discussion and attention in the materials under consideration by the City. However, such historic significance was neither recognized nor acknowledged. We believe this failure violated the spirit and letter of WAC 197-11-960, Item 13, concerning historic preservation. The issue was not adequately considered and addressed, and there was no effort to demonstrate less destructive alternatives.

In addition, the report by the architects and City ignores the extent to which the park is currently utilized by the neighbors and has been for many years as recreational space. In this regard, the statement by Broderick Architects in its SEPA submission that “the project should have zero negative impact on recreation opportunities” is totally false and misleading. Yes, it is private property but for years the community has been invited and welcomed by the school to frequent and enjoy this space. Indeed, this has been part of the together relationship and symbiosis between the school and its neighbors for decades. It has been something we enjoy together, with the grace and contribution by all concerned. Our children grew up playing in this park, learning to throw a ball or Frisbee in the park. Neighbors use the park on a daily basis, and especially weekends, to play catch with their children and their dogs. Folks walk blocks to enjoy it and are seen enjoying it. It is a welcome sight, very busy especially during summer months, and its serenity provides a respite from noise and the busyness of our modern society. It is

tranquil. The birds speak loudly there and are welcoming. The park is a reminder of things that are good and peaceful and to be preserved in life. Things that give life quality. Moreover, it is not just the neighbors who utilize the park. Students use it as well as do visiting alumnae. Students are seen regularly congregating there, cavorting there, and eating lunch there during the warmer months. Alumnae utilize the space as well, and several of us neighbors have shared the space with them, and heard their stories of their use of the park when they were students, and entertained their request for a casual photo of them at the location. It is an attraction point for the neighborhood -- a beautiful quiet space of green grass and trees, where you can sit on the outside steps of the school and see nature at its best. It is indeed quite scenic and serene, a large part of what makes Seattle special, and its value is especially significant at a time when we are facing environmental threat and increased elimination of such green spaces in our city and neighborhoods. We, as neighbors, desperately wish to see this current habitat and space preserved.

Against this background, we find it so sad and alarming that a forward-looking school, which values common endeavor, and considers itself an environmental steward, would propose to destroy it, black top it, and create a habitat for buses, as well as introduce an unsafe environment for its' students and neighbors as crime in and around surface parking lots is well documented in Seattle.

In addition, perhaps we missed it, but where in the City's report is there any consideration of the environmental impact of replacing this green space with large school buses and other such vehicles, where the vehicles will be housed not only for a few hours, but on a 24-hour basis? The parking lot will have been turned into a surface level parking garage. Where is the analysis of the fumes that will be emitted? Where is the consideration of the blight such a surface parking lot will create at the center of a residential neighborhood? Or of the impact this would have on the existing bird population who will be living on top of a number of parked buses?

The City's report fails to adequately consider the historic significance of the park, the prevalent and existing neighborhood use of the space, the blight of the proposed north parking lot as a home for buses, and potential impact on wildlife, all in violation of WAC 197-11-960, Item 10 (aesthetics), 12 (recreation), 13 (historic and cultural preservation), and 5 (wildlife). Not only should the blight be apparent to anyone as you are eliminating green space and replacing it with a designated habitat for buses in the center of a neighborhood, but you are eliminating an "informal recreational" space, and you are displacing an "existing recreational use" per WAC 197-11-960, Item 12, without even acknowledging in a forthright way that this is what is indeed happening.

It bears repeating that one of the stated missions of the City's model plan is to preserve green spaces and enhance the natural environment. Destroying the green space and making a black top parking lot for cars and buses does exactly the opposite. It will only be a blight on the school and community and will increase pollution (gasoline, diesel fumes and emissions) and noise. Accordingly, it should have been more fully considered and should not have been permitted.

(d) Failure to Consider Existing Natural Habitat and Impact of Construction

The school is located on an established bird migratory path where birds arrive at the heights of the tall trees surrounding the school, rest and eat, and then fly from those tall trees down to the Arboretum. We watch this on a daily basis. As a result, the area of homes adjacent to the school, and especially the park on the north side, are rich with birds. Species regarded by the State of Washington as threatened such as the American Bald Eagle², as well as “at risk” Cooper’s hawks participating in the Seattle’s Cooper Hawk Study program³ have been observed to frequent and utilize this flight pattern where we live. This migration route is not identified in the SEPA checklist as it should have been and as required by WAC 197-11-960, Item 5c. There is no specialized knowledge on this issue set forth as to the potential impact on habitat of the construction and elimination of green space.

The SEPA information supporting the authorization submitted by Broderick Architects fails to identify and accurately depict the diversity of wildlife and habitat surrounding the school and which will be negatively impacted by the construction.

In response to the SEPA checklist inquiry regarding wildlife, wherein the submission is to:

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include: birds: hawk, heron, eagle, songbirds, other: mammals: deer, bear, elk, beaver, other: fish: bass, salmon, trout, herring, shellfish, other

The applicant’s response is: “*birds: songbirds*”. No threatened or endangered species are identified. In addition, no migration pattern is identified or acknowledged.

In fact, some of the yards immediately adjacent the school have received certificates from the Washington Department of Fish and Wildlife as part of its *Backyard Wildlife Sanctuary Program* and are active sanctuaries for many varieties and species of birds. Over the course of this past year, 29 different species of birds have made their homes on the grounds surrounding the school, including:

1. American Goldfinch
2. House Finch
3. Pine Siskin

² http://birdweb.org/birdweb/bird/bald_eagle

³ <http://parkways.seattle.gov/2015/10/06/volunteers-complete-10-month-study-on-seattles-coopers-hawks/>; http://birdweb.org/birdweb/bird/coopers_hawk

4. Black Capped Chickadee
5. Chestnut Backed Chickadee
6. Spotted Towhee
7. American Robin
8. Redbreasted Nuthatch
9. Bushtit
10. Annas Hummingbird
11. Darkeyed Junco
12. Stellers Bluejay
13. Northern Flicker
14. European Starling
15. Song Sparrow
16. House Sparrow
17. Golden-Crowned Sparrow
18. White Crowned Sparrow
19. Audubon Yellow Rumped Warbler
20. Wilson's Warbler
21. Bewick's Wren
22. Coopers Hawk
23. American Crow
24. Black Headed Grosbeak
25. Mallard Duck
26. Brown-Headed Cowbird
27. California Scrub Jay
28. Barred Owl
29. Bald Eagle

In addition, the area of the school and the adjoining properties are home to various mammals, including rabbits, raccoons, and families of squirrels which reside in the tree canopies and many are fed by the neighbors.

There has been no assessment of the likely impact on the bird or mammal populations in the surrounding habitat which will result from this 2-year period of construction, and the displacement resulting from the defacement of the north park and elimination of habitat. Birds in particular play a significant ecological role in our own survival. As with other native organisms, birds help maintain sustainable population levels of their prey and predator species and, after death, provide food for scavengers and decomposers. Many birds are important in plant reproduction through their services as pollinators and seed dispersers. Anna's Hummingbirds, of which there are many surrounding the school on a year round basis, are very important pollinators, which contributes to plant life, fresh air, and human sustainability.

All the parking lot and garage contribute to is an acknowledged increase in greenhouse emissions, cast most directly at the neighboring homes, their occupants, surrounding trees, wildlife, and the quiet enjoyment of our lives.

- (e) Failure to Consider Overall Impact of Increase in Greenhouse Gas Emissions

Throughout the SEPA submission, Broderick Architects suggests we need not be concerned with environmental emissions and other construction hazards because no new trips are being generated. An example of this is Broderick's statement: "Post-construction vehicle exhaust would be similar to pre-construction conditions, as there are not new vehicle trips generated from this proposal". As previously discussed, this premise is false. There will indeed be additional traffic and congestion in the long-term as a result of this project.

While the City's report acknowledges there will be an increase in greenhouse gas emissions caused by this construction project, which will be long-term, the report fails to place such increase in any context or perspective, or make any effort to quantify what this impact will be and how we will be impacted. It fails to posit and consider what the combined impact of increased traffic to the neighborhood and erasure of habitat will mean. It fails to consider the increase in congestion and emissions from the sustained 24-hour operation of a commercial sized parking garage with ongoing fans and lighting in the core of a residential area, and as well, the consequences which flow from the elimination of green space through the paving of the north parking lot and the concomitant elimination of habitat. This total impact is what needs to be understood acknowledged, and considered so that less harmful solutions can be identified, and we fail to see how that can be accomplished without an environmental impact study. Indeed, we would think this would be the purpose of such studies – to protect us and our City from unwanted results which may degrade our environment, hurt our people, and which could have been avoided through more active diligence.

We have grave concerns about the pollution generated by a 2 year, potentially longer, construction project with excavation of a 5 story deep pit in direct proximity to our single family homes. When the school recently completed a very small project by comparison, building a small pavilion in a corridor between the school and the gym, our homes shook repeatedly, and were blanketed by dust. That project was minuscule to what is now being proposed. This is a densely populated neighborhood and Holy Names is surrounded by homes on four blocks. The city report acknowledges that: *"Operational activities, primarily vehicular trips associated with the project's energy consumption, are expected to result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming."* We do not believe adequate steps have been taken to quantify or mitigate this harm.

(f) Failure to Consider Construction Impact on Streets Adjacent to School

The streets immediately adjacent to the school, 21st Avenue East and 22nd Avenue East are already in disrepair and in degraded state, having potholes, cracking, areas where water quickly pools, and areas where the original red brick which paved the street is currently exposed. These streets are not at all designed to tolerate and accommodate the presence of very large and heavy industrial trucks using them to carry dirt repeatedly and execute other industrial job related functions over a continuous span of time. We know that our streets where we park and which abut our homes will be hurt and further eroded, if not destroyed by the project, yet we see no steps of any kind being required to be undertaken by the school to prevent such impact or restore such streets following the conclusion of any building project. We believe that this failure

to consider in detail the requirements of this 5-level excavation in the center of a residential neighborhood, requiring the removal of a very large amount of dirt and repeated coming and going of heavy trucks taking over the area for a lengthy period, and failing to require any improvements, violates WAC 197-11-960, Item 14d.

For all of the above reasons, we respectfully believe the decision by the SDCI, dated 11.29.18, fails to adequately consider the extent to which the proposed construction is “detrimental to the public welfare”. We believe the statement that such construction is unlikely to have any “probable significant adverse environmental impact” is based upon faulty and incomplete information. We believe a full environmental review should have been undertaken and is warranted.

Respectfully submitted,

Appellees,

Shannon Martin
Bill Gildea
Pat Griswold
Kate Pollock
Josh Pollock
Ron Friedman
Lili Sacks
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Liz Nichols
On behalf of a Larger Consortium of Neighbors