

## Reference #: HX-L-25-4

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### Appeal Details

**Address:** Citywide  
**Decision Elements:** SEPA;

**Interest:** The Hawthorne Hills Community Council (HHCC) is filing an appeal to the Final EIS for the One Seattle Comprehensive Plan Update on behalf of the council and the neighbors we serve. The appeal of the EIS is because we believe the EIS is inadequate. The document fails to capture the road changes needed to address parking and transportation growth resulting from the zoning change. The absence of any information about auto ownership and use, and therefore parking and traffic impacts, is notable. Responses to comments that were made on the Draft EIS were also not satisfactory in response to requests for analysis of parking, in our opinion. The Final EIS states the following in response to comments regarding parking analysis for the Draft EIS: "Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers." In addition, the following was another unsatisfactory response to a comment. Response to Comment 311-1 (page 4-109 of FEIS) Parking: "While the City will continue to actively manage its onstreet parking supply as well as consider whether changes to parking requirements are appropriate, parking is not a required element for SEPA documents and therefore is not explicitly studied in this EIS? SEPA regulations may not require a parking analysis from a regulatory standpoint in the EIS, but SEPA is designed to provide disclosure on overall impacts from a proposal and we believe this EIS merits this analysis. There should be an analysis included because parking and use of the streets does impact the environment that the proposed new density is planned for us as residents. It should have been analyzed.

**Objections:** Disappointed by the lack of details in the Draft EIS, we decided to start doing our own analysis with a transportation planning consultant and an architect and the findings are concerning. We believe that approval of these zoning changes would be tantamount to sanctioning a transportation crisis that would ripple through our entire neighborhood. The lack of analysis of parking and street use impacts due to zoning changes results in an EIS that does not meet adequacy. The best way to understand the level of impact these zoning changes will have is by zooming in on a single street. Let's start by zooming in on NE 56th Street, between 40th and 43rd Ave NE. Using the proposed FAR (floor-area-ratio) limits and LR3 zoning, this street would allow upwards of 137-units and would generate a demand for approximately 203 vehicles, based on the area's documented average of 1.48 vehicles per household (for households up to 2 persons, typical of new apartments). This information is from the most recent census data in the American Community Survey for our neighborhood's census tracts. Also worth noting that MR1 zoning is proposed on the south side of the block, which would generate even more parking, so this estimate is conservative. As is, the street can only legally support 20 on-street parking spaces. It's important to take into account driveways, intersections, passing needs, and garbage pickup. With only 89 planned parking spaces (69 dedicated plus 20 street spaces), we're facing a catastrophic overflow of 114 vehicles – equivalent to six entire blocks of curb space. Some might argue that proximity to public transit will alleviate these concerns but census data tells a different story. Current transit usage in the area sits at just 10.9% for work trips, less for all other trips across the day, and the infrastructure to support increased ridership simply doesn't exist. Route 65 offers only four trips per hour, while Route 79 provides merely hourly weekday service. This problem gets worse when we start zooming out. The above analysis shows that for every 12 ft of LR3 curb space, 1 car will need to park on the street. For the NE 65th St FTR there is over 12,000 ft of curb space along NE 65th Street, between Sandpoint Way NE and 35th Ave NE that will be rezoned for LR3. This will create over 1000 cars that will need to find parking at full capacity. This is over 60 city blocks of cars. It's crucial to understand that while work commutes might be manageable through walking or cycling (which actually outpace transit usage three to one in our area), work trips represent only 20% of daily travel needs. The remaining 80% – shopping, healthcare, family obligations, and social activities – often necessitate vehicle ownership. This explains why even single-person households in our area maintain nearly one vehicle per household (0.97), while two-person households show even higher vehicle ownership rates.

**Desired Relief:** HHCC respectfully requests that the Hearing Examiner require that the EIS include an analysis of parking, auto ownership, street improvements and uses due to parking needs, and overall impacts to residents. We outlined many concerns. In addition to those already stated, the FEIS failed to analyze how the plan aligns with the county's plan. Our analysis shows that it does not align with the Metro's Transit Development Plan for 2023-2028 which includes no service improvements for the Bryant/Hawthorne neighborhood. The plan may not align with the Metro Transit Development Plan for 2023-2028. The City and County will also need to change streets and roads to ensure that traffic flows are not affected by streets lined with cars. Without substantial improvements to public transit service and a realistic parking strategy, approval of these zoning requests would be tantamount to sanctioning a parking crisis that would ripple through our entire neighborhood. The

FAR limits and the relaxed parking requirements are just not viable. We understand that the EIS addresses concepts for amended codes including reducing or eliminating residential parking minimums citywide. Section 1.4.9 and Section 2.4. Parking and urban form are topics in Section 3.6. While eliminating parking minimums may be pursued by the City, the Final EIS states that it does not include an analysis of its effects in Section 3.10 Transportation because it is not a specific proposal of the Preferred Alternative and amendments to remove parking from development to not have to be analyzed under SEPA. See RCW 43.21c.450. We also understand that as part of the Preferred Alternative and associated Phase 1 legislation the City is addressing parking reform per SB 6015 for residential development. See Appendix J. However, HHCC believes that even though SEPA doesn't "require" the study of parking in the EIS, SEPA does have the overall spirit that impacts should be disclosed in an EIS so that public is aware and can c

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## Contacts

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## Uploaded Material

1. **HHCC Attachment A.docx**  
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HHCC Attachment A to Appeal

HHCC would also like to add requests during the additional analysis that are included in the attachment.

1. The Bryant Neighborhood Center and NE 65<sup>th</sup> St. FTR, from 37<sup>th</sup> Ave NE to 57<sup>th</sup> Ave NE, should be removed from the One Seattle Plan

2. MR1 zoning should be removed as a new zone type.

3. Any proposed NR zoning should only be up-zoned to LR1.

4. Amend parking requirements to reflect actual car ownership:

All NR parking space requirements should align with HB 1110 (1 parking space/unit on lots less than 6,000sf and 2 parking spaces/unit on lots greater than 6,000sf) or alternatively a minimum of 1.48 parking spaces/unit including ADU's.

Or alternatively, a **Resident Parking Permit (RPP)** system should be enacted, to mitigate the impact of residential highly developed lots on adjacent minimally developed lots, allocating street parking permits to all lots based on their actual street parking footage. This would ensure high density developers meet resident parking needs versus leaving the residents and neighborhood to cope with parking shortages and encroachment on other lots parking frontages. And along with the RPP system an effective enforcement system must be adopted to have the system function.

An example of a Resident Parking Permit system is with the US average car length of 14.7", a lot with 30' of street parking footage (50' total street footage less 10' driveway and 5' clearance on each side) would be allocated 2 street parking permits ( $30' \text{ frontage} / 14.7' = 2.04$ ).

All LR and MR zoning should require 1 off-street parking spot per unit parking requirements should align with HB 1110 (1 parking space/unit on lots less than 6,000sf and 2 parking spaces/unit on lots greater than 6,000sf) or alternatively a minimum of 1.48 parking spaces/unit. Or alternatively the adopted Resident Parking Permit System above.

5. The proposed FAR changes should be reduced by 50%

6. All setback requirements should only change as to align with HB1110

7. Lot coverage maximum should remain below 40%.

8. Any proposed LR or MR zoning changes should only happen on major corridors where the curb-to-curb street width less bike lanes is  $\geq 40\text{ft}$ .