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I. APPELLANT INFORMATION

1. Appellant:

Seniors United for Neighborhoods (SUN)
6815 Ravenna Ave NE
Seattle, WA 98115

Home: (206) 523-1161

Email: booksgalore22@gmail.com

In what format do you wish to receive documents from the Office of Hearing Examiner?

Email Attachment

2. Authorized Representative:

David Ward

Same address and other contact information as above.

In what format do you wish to receive documents from the Office of Hearing Examiner?

Email Attachment

Decision Being Appealed

1. Decision appealed: MHA FEIS
2. Property address: NA
3. Elements of decision being appealed.
Adequacy of conditions
Adequacy of EIS

1 **APPEAL INFORMATION**

2
3 **What is your interest in this decision?**

4
5 Seniors United for Neighborhoods (SUN) is an organization of seniors and those who support
6 seniors. We want to ensure housing stability for seniors and others wanting it; and to avoid the
7 displacement that will be caused by this Final Environmental Impact Statement (FEIS).

8
9 Health is another issue of concern for SUN and the increased traffic and traffic congestion,
10 increased pollution, and delays to emergency, fire, and police vehicles created by this FEIS will
11 create will have grave health impacts on seniors as well as others.

12
13 SUN is also concerned about the financial impacts from extensive growth extensive growth.
14 Many people have already been displaced because of these financial impacts that are
15 unaffordable to people on low and fixed incomes. These “upzones” which lead to more
16 expensive housing also are unnecessary since we already have more than sufficient capacity to
17 address growth into the next century without upzones, according to one City Councilmember.

18
19 These are just a few of the many concerns that SUN has about the devastating impacts that will
20 happen to Seattle citizens, old and young, with this FEIS.

21
22
23
24 **What are your objections to the decision?**

25
26 **Displacement and Unaffordability**

27 The FEIS fails to adequately or accurately assess direct, indirect, and cumulative impacts of the
28 proposal on Seattle's affordable housing stock. The proposal has substantially underestimated
29 loss of existing affordable units (directly, indirectly and cumulatively) accompanying the plan
30 while greatly exaggerating how many affordable units will be created by the plan. This is true on
31 both a city-wide and neighborhood specific level causing a significant net loss of affordable units
32 and more homelessness. The plan ignores the consequences on homelessness and increased
33 demand for services.

34
35 Data the city uses is either in error or wholly inadequate to capture this dramatic loss and in fact
36 obscures them. The displacement risk analysis is wholly inadequate and incorrect because it
37 downplays so significantly the loss of existing units caused by the proposal.
38 Further there is no adequate discussion of proper mitigation for these housing losses and net loss
39 of low cost units caused by the plan. The FEIS lacks an adequate discussion of mitigation tools
40 to guarantee preservation and at minimum no net loss of units caused by the plan There also is no
41 adequate discussion of alternatives that would prevent these losses - such as a limited growth
42 alternative curtailing upzones and raising the affordable housing requirement to achieve more
43 low cost housing production with less displacement and housing loss.

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46 **Pipeline Projects**

1 The FEIS failed to disclose the full range of pipeline projects (projects not yet completed). The
2 FEIS reported that it included all pipeline projects, but there were dozens it did not include,
3 which represent thousands of units. The FEIS is written as though these projects do not exist and
4 designed growth targets and need for new development as if these projects do not exist, when in
5 fact they have advanced significantly through most steps in the building permitting process.

6
7 The FEIS did not analyze the impacts of these additional projects and it did not present any
8 impact mitigation for these projects.

9 10 **Transportation**

11 The FEIS does not adequately disclose and analyze the significant traffic and transportation
12 impacts of the proposal or any of its alternatives. This includes traffic, public transportation,
13 safety, and parking impacts.

14
15 The FEIS does not adequately describe the existing environment with respect to traffic and
16 transportation impacts that will be affected by the proposal. The FEIS fails to adequately
17 describe the principal features of the environment for each neighborhood that would be affected
18 by the alternatives including the proposal under consideration.

19
20 The FEIS does not adequately disclose and analyze the significant traffic and transportation
21 impacts of alternatives including the proposed action. The discussion of impacts does not
22 provide adequate disclosure and analysis of the actual impacts for each neighborhood throughout
23 the entire study area that will occur as a result of this proposal. Environmental impacts on traffic
24 and transportation will not be evenly distributed or similarly defined throughout the City, yet the
25 FEIS evaluates them as if they would be. The FEIS ignores that traffic and transportation impacts
26 will be different in the various neighborhoods and urban villages that are impacted by the MHA
27 proposal. The FEIS should have included an examination of the impacts that are unique to each
28 neighborhood in order to adequately assess their intensity and significance.

29
30 The FEIS does not adequately discuss reasonable mitigation measures that would significantly
31 mitigate the traffic and transportation impacts of the proposal. To some degree, the mitigation
32 measures discussed will not mitigate the impacts and to another degree, the FEIS fails to include
33 other mitigation measures that could be implemented to mitigate the impacts. The FEIS does not
34 adequately discuss reasonable mitigation measures that would significantly mitigate the impacts
35 for each element of the environment that are unique to each neighborhood. The FEIS does not
36 indicate what the intended environmental benefits of mitigation measures would be.

37
38 SUN adopts and incorporates by reference, as its own, each and every issue raised and/or
39 objection set forth in the Notice of Appeal filed by Seattle Coalition for Affordability, Livability,
40 and Equity (“SCALE”). Each such objection will remain an objection of SUN until and unless
41 SUN or the Hearing Examiner affirmatively dismisses such objection with respect to SUN.

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46 **What relief do you want?**

1 Appellant seeks a determination that the MHA EIS is inadequate, contrary to law, and invalid.

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3 Appellant requests that the Hearing Examiner require new EISs be prepared for each individual
4 Urban Village and for the commercial and multi-family parcels around them that were included
5 in the current EIS—and that those EISs adequately determine the full range of impacts for those
6 Urban Villages, surrounding areas, and the City as a whole and demonstrate significant
7 mitigation for those impacts.

8

9 Appellant further requests that those EISs incorporate the full range of known site specific
10 pipeline projects in their analysis, examine the impacts and demonstrate mitigation for those
11 impacts, and to determine the number of additional units, if any, that would need to be built to
12 house the expected number of people that the Comprehensive Plan has determined will be
13 moving to Seattle by 2035.

14

15 Additionally appellant requests that those EISs each use a range of alternatives that will create
16 substantially more affordable housing than the current proposals.

17

David Ward 11/27/17