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BEFORE THE HEARING EXAMINER
FOR THE CITY OF SEATTLE

In the Matter of the Appeals of)	Hearing Examiner File:
)	W-17-006 through
WALLINGFORD COMMUNITY)	W-17-014
COUNCIL, ET AL.)	
)	EXHIBIT 1 TO
Of Adequacy of FEIS Issued by the)	FRIENDS OF RAVENNA-COWEN (W-17-008)
Director, Office of Planning and)	MOTION FOR PARTIAL SUMMARY
)	JUDGEMENT

RESPONDENT'S ANSWERS TO APPELLANT'S
REQUESTS FOR ADMISSIONS

EXHIBIT 1 TO FRIENDS OF RAVENNA-COWEN'S
MOTION FOR PARTIAL SUMMARY JUDGMENT 1

FRIENDS OF RAVENNA-COWEN
JUDITH E. BENDICH, WSBA# 3754
AUTHORIZED REPRESENTATIVE,
1754 NE 62ND ST., SEATTLE, WA 98115
206-525-5914

1 **Request for Admissions No 2.** *The map at Exhibit A to these Requests has dotted lines that show*
2 *the proposed Roosevelt Urban Village expansion.*

3 **Answer:** Deny. Though the map in question does have dotted lines that show a potential village
4 expansion, such lines do not delineate a specific proposal.

5 **Request for Admissions No. 3.** *The draft 2035 Comprehensive Plan proposed that the Roosevelt*
6 *Urban Village be expanded to include (as indicated by dotted lines adjacent to the map of the*
7 *Roosevelt Urban Village at Exhibit A to these Requests) the area between NE 65th St. and NE*
8 *62nd St. and between the eastern side of 15th Ave. and 17th Ave. NE, except for a few lots due*
9 *south of NE 65th St. on the east side of 17th Ave. NE. [The dotted lines also include Cowen and*
10 *Ravenna Parks to as far as 20th Ave. NE on the east and areas to the south and southwest of the*
11 *Roosevelt Urban Village, but this Request pertains only to the area described above, before this*
12 *bracket.]*

13 **Answer:** Deny. The July 8, 2015 Draft 2035 Comprehensive Plan and the Mayor's
14 Recommended Plan from April 2016 both included a citywide Future Land Use Map (FLUM)
15 with dotted lines for "Potential Village Expansion," including a dotted line around the area
16 described. Such lines do not delineate a specific proposal.

17 **Request for Admissions No. 4.** *The reason given in the draft 2035 Comprehensive Plan for*
18 *including the area described in Req. No. 3 above and Exhibit A to these Requests (the expanded*
19 *Roosevelt Urban Village Map) was that the area is within a "full ten-minute walking distance" of*
20 *the future Roosevelt light-rail station.*

21 **Answer:** Deny. Neither the text of the July draft plan nor the Mayor's April 2016 recommended
22 plan specifically identify "full ten-minute walking distance" from the frequent transit as the
23 reason for the identification of the potential village areas. However, the City acknowledges that
the concept of an approximate ten-minute walk to frequent transit was used as an estimation for
the potential village expansion areas and was used to explain the potential urban village
expansion areas to the public during community engagement.

Request for Admissions No. 5. *A "full ten-minute walking distance" was determined by using*
and/or applying an algorithm.

Answer: Admit.

Request for Admissions No. 6. *The 2035 Comprehensive Plan submitted to the Seattle City*
Council by Mayor Murray deleted the expansion of the Roosevelt Urban Village map (shown on
Exhibit A to these Requests) from the 2035 Comprehensive Plan.

Answer: Deny. The Future Land Use Map in the Mayor's recommended plan submitted to the
City Council in April of 2016 included the dotted line for the potential expansion of the
Roosevelt Urban Village. The map shown on Exhibit A was not part of the Mayor's
recommended plan submitted to City Council in April of 2016.

1 **Request for Admissions No. 7.** *As part of a Future Land Use Map ("FLUM") of the Roosevelt*
2 *Urban Village, the proposed 2035 Comprehensive Plan that Mayor Murray submitted to the*
3 *Seattle City Council included the area between NE 65th St. and NE 62nd St. and between the*
eastern side of 15th Ave. and 17th Ave. NE.

4 **Answer:** Admit

5 **Request for Admissions No. 8.** *The Seattle City Council did not adopt and did not include the*
6 *area described in Request 2 No. 7 above in the final 2035 Comprehensive Plan the FLUM of the*
7 *Roosevelt Urban Village (see the 2035 Comprehensive Plan adopted by the City Council, at*
8 *http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2580242.pdf).*

9 **Answer:** Admit

10 **Request for Admissions No. 9.** *Exhibit B, attached hereto, is a true copy of the map of the*
11 *Roosevelt Urban village adopted in the final 2035 Comprehensive Plan approved by the Seattle*
12 *City Council and the Mayor.*

13 **Answer:** Deny. The map in question, attached as Exhibit B to the Request for Admissions, has a
14 different page number than the map in the final 2035 Comprehensive Plan (282 instead of 283).
15 OPCD acknowledges that the extent of the Roosevelt urban village boundary shown on the map
16 attached as Exhibit B to the Request for Admissions is the same as that included on the citywide
17 FLUM within the Land Use Element of the final 2035 Comprehensive Plan.

18 **Request for Admissions No. 10.** *The 2035 Comprehensive Plan adopted by the Seattle City*
19 *Council and signed by Mayor Murray does not include any expansion of the Roosevelt Urban*
20 *Village beyond its original boundaries.*

21 **Answer:** Admit.

22 **Request for Admissions No. 11.** *As originally proposed, LU 7.3 of the 2035 Comprehensive*
23 *Plan states:*

*"Consider allowing redevelopment or infill development of single-family areas inside urban
centers and villages, where new development would maintain the low height and bulk that
characterize the single-family area, while allowing a wider range of housing types such as
detached accessory units, cottage developments or small duplexes or triplexes."*

Answer: Deny. The July 8, 2015 Draft 2035 Comprehensive Plan does not include the language
in quotes above, nor any policy LU 7.3. The Mayor's April 2016 Recommended Plan includes a
version of LU 7.3 that is different than the quoted language above. The City does acknowledge
that the quoted language in Request for Admissions No. 11 appears to come from a version of
the plan as amended by a City Council amendment, that was considered by the Council before
final adoption of the Final 2035 Comprehensive Plan.

1 *Request for Admissions No. 12. Before the Seattle City Council adopted the 2035*
2 *Comprehensive Plan, the Seattle Planning Commission requested the Council to change the*
3 *word "inside" to "near" so that LU 7.3 would state: "Consider allowing redevelopment or infill*
4 *development of single-family areas near urban centers and villages, where new development*
5 *would maintain the low height and bulk that characterize the single-family area, while allowing*
6 *a wider range of housing types such as detached accessory units, cottage developments or small*
7 *duplexes or triplexes."*

8 **Answer:** Admit.

9 *Request for Admissions No. 13. The Seattle City Council did not adopt the language requested*
10 *by the Seattle Planning Commission described in Request No. 12 above.*

11 **Answer:** Admit.

12 *Request for Admissions No. 14. The 2035 Comprehensive Plan adopted by the Seattle City*
13 *Council and approved by Mayor Murray does not include the language proposed by the Seattle*
14 *Planning Commission (see Request No. 12 above), but includes the language stated in Request*
15 *No. 11 above.*

16 **Answer:** Admit.

17 *Request for Admissions No. 15. Ravenna Park is an Environmentally Critical Area.*

18 **Answer:** Admit that according to the City's GIS mapping data, several types of ECAs are
19 mapped within Ravenna Park.

20 *Request for Admissions No. 16. The Seattle Department of Construction and Inspection*
21 *identifies Ravenna Park as an Environmentally Critical Area ("ECA") on its GIS map (see*
22 *[http://seattlecityigs.mgps.arcgis.com/apps/webappviewer/index.html?id=f822b2c6498c4163b0cf](http://seattlecityigs.mgps.arcgis.com/apps/webappviewer/index.html?id=f822b2c6498c4163b0cf9908e2241e9c2)*
23 *9908e2241e9c2).*

Answer: Admit that according to the City's GIS mapping data, several types of ECAs are
mapped within Ravenna Park.

Request for Admissions No. 17. Ravenna Park is adjacent to but is not within the proposed
MHA FEIS Roosevelt Urban Village expansion area.

Answer: Deny as to Alternative 2. Admit as to the Preferred Alternative and Alternative 3.

Request for Admissions No. 18. The southern border of the Roosevelt Urban Village proposed
MHA FEIS expansion is NE 62nd St.

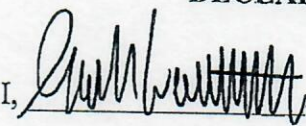
1 DATED this 16th day of January 2018.

2 PETER S. HOLMES
3 Seattle City Attorney

4 By: s/Jeff Weber, WSBA #24496
5 s/Daniel B. Mitchell, WSBA #38341
6 Assistant City Attorneys

7 *Attorneys for Respondent*
8 *Seattle Office of Planning and Community*
9 *Development*

10 **DECLARATION OF RESPONDENT**

11 I, , certify and declare on behalf of the City of Seattle Office of
12 Planning and Community Development under penalty of perjury under the laws of the state of
13 Washington as follows:

14 I have read the foregoing Friends of Ravenna-Cowen's First Request for Admissions and
15 the answers and responses thereto, know the contents thereof, and believe the same to be true.

16 Executed at SEATTLE, Washington this 16th day of JANUARY, 2018.

17 Name: GEOFF WENTLANDT

18 Title: SENIOR PLANNING MANAGER

CERTIFICATION OF ATTORNEY

I, Daniel B. Mitchell, the undersigned attorney for the City of Seattle, have read the foregoing Friends of Ravenna-Cowen's First Request for Admissions and Answers thereto and they are in compliance with CR 26(g).

DATED this 16th day of January, 2018.

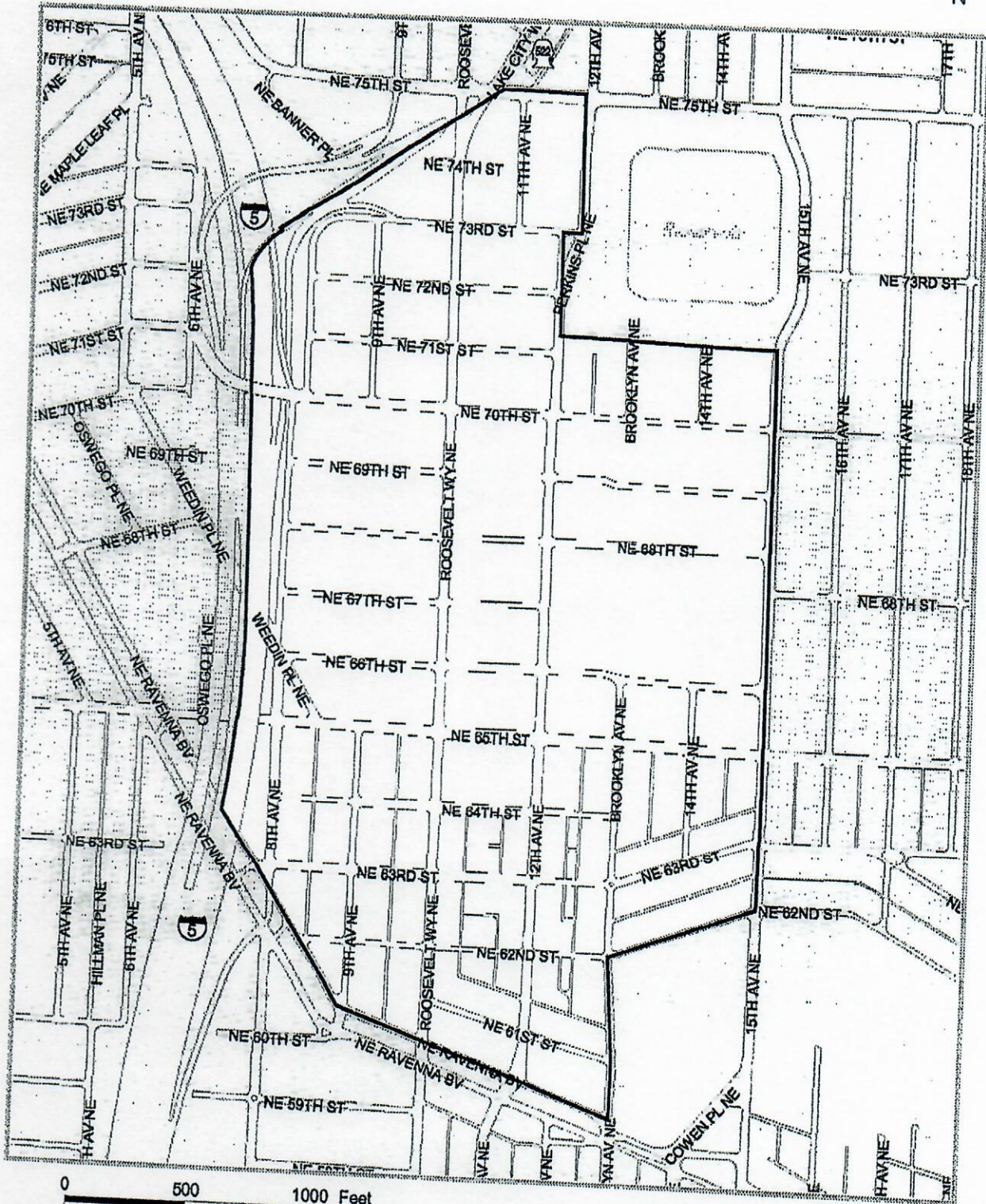
Name: Daniel B. Mitchell

WSBA # 38341

Attorney for City of Seattle

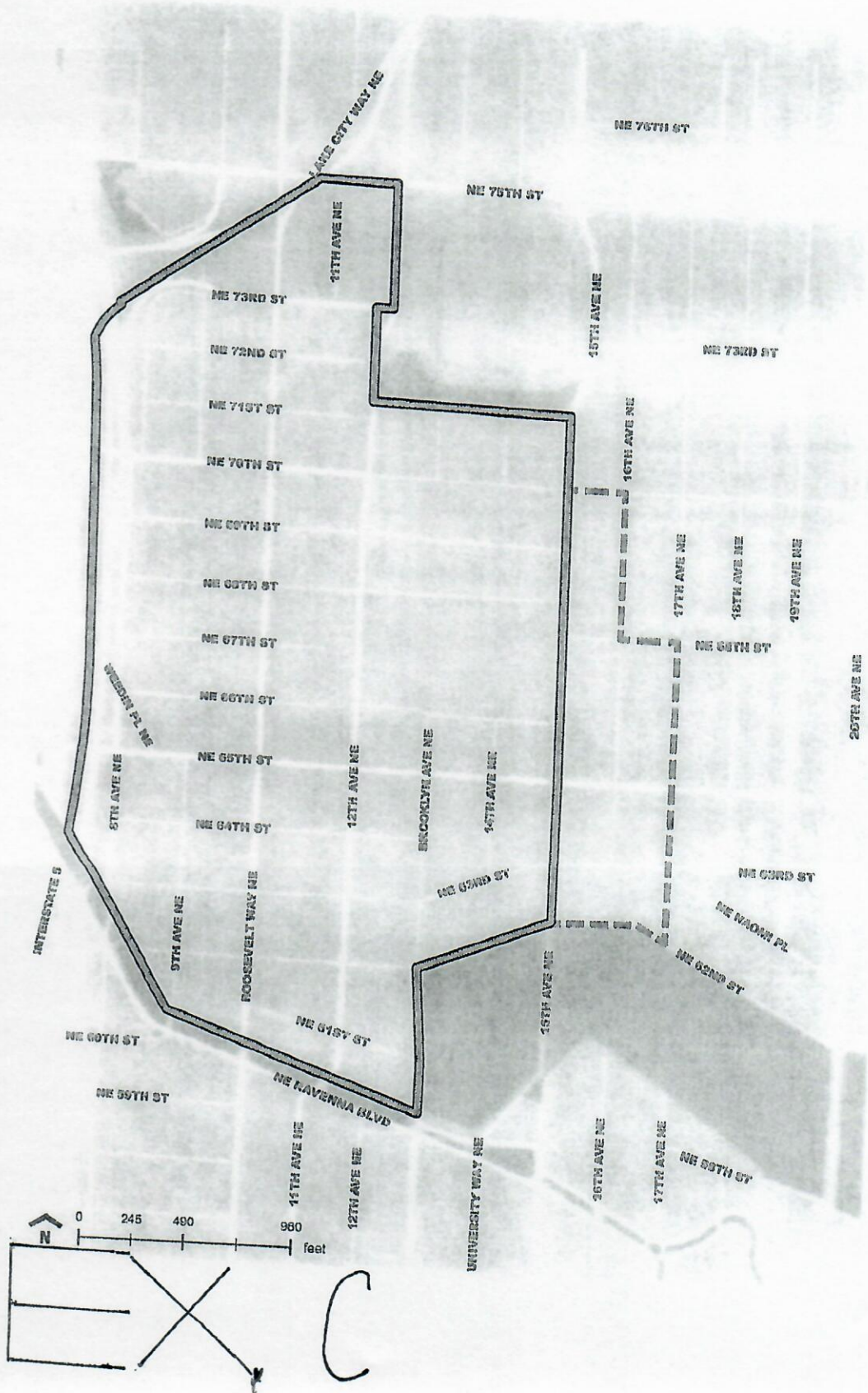
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ROOSEVELT
Residential Urban Village



EX B
Neighborhood Plans Roosevelt

VILLAGE BOUNDARY
EDGE OF PAVEMENT



Roosevelt Preferred Alternative

Under the Preferred Alternative the Roosevelt Urban Village would expand by 14 acres. The expansion area is the approximate 10-minute walkshed from the light rail station that is scheduled to open in year 2020.