Bob Jacobs SEPA Letter   .

My major problem with this DNS is that it hides very significant potential impacts behind its non-project status. Sure, there are no immediate impacts from the plan per se, but there are cummulative impacts it would unleash by allowing "up to 950 additional, primarily market rate, infill development housing units in existing neighborhoods". Furthermore, the reality is that these added units would not be spread evenly across the city's low density housing zone areas. Neighborhoods that will be unaffected or very lightly affected include (1) subdivisions completed over the past 20 or so years, during which time minimum lot sizes have been repeatedly reduced, leaving little space for free-standing ADUs, (2) subdivisions with HOA restrictions that limit construction to single-family detached houses, and (3) areas of high property values that make conversions and replacements prohibitively expensive. That leaves older, lower income areas as targets and specifically properties characterized by large lots with small, inexpensive houses which lend themselves to being torn down and replaced by multiplex structures that would be newly permitted in these areas. These are primarily on the eastside, northeast, and northwest. The bottom line is that impacts will concentrated in a limited number of neighborhoods, and will therefore be more likely to have significant effects on those neighborhoods and their city services.

This includes the entire range of impacts that this SEPA checklist claims will not be affected in the categories of (1) neighborhood factors like noise, loss of green space, loss of tree cover, and loss of solar energy capacity, (2) environmental factors like increased impervious surface area, groundwater levels and quality, and stormwater runoff, and (3) public service impacts like school capacity, street capacity, parking, sewer and water infrastructure, and stormwater conveyance capacity, some of which are already overburdened.

I especially want to call attention to claims that structures will not be demolished and residents will not be displaced. The checklist says clearly that the intention of these policy changes (9c) is to add primarily market rate infill housing in existing residential areas, a primary effect of which is demolition and displacement.

Another problem with the checklist responses is that they confuse likely actual impacts allowed impacts with . This is apparent in comments

regarding view blockage, impacts on plants and marine life, the amount of impervious and hard surfaces, etc. A SEPA checklist is supposed to deal with impacts on the community, not impacts relative to regulatory limits, which is a very different matter.

A similar problem exists relative to items like 16d which states there will be no change in "available utilities", but does not mention impacts on these utilities.

Item D6 is similarly problematic in that it responds to a question about negative impacts on transportation or public services and utilities by saying that existing providers will continue to provide services, but not mentioning the potential impacts on those providers.

Item 6 appears to be erroneous when it states that there would be no impact in parking requirements. The proposed ADU changes definitely include such changes.

Item 15 states that there would be no increased need for public services like fire, police, transit, and schools, when in fact such increases would result from the increased population that would reside in the new "housing options".

A final concern not mentioned in the DNS is the fact that the "housing options" changes would, per state law, not be appealable under the GMA and SEPA. "Compliance with democratic norms" is not a listed criterion of course, presumably because it is generally understood that in democracies citizens are able to challenge illegal actions by their elected officials. To state that appeals will not be allowed is to take a step away from democracy and toward authoritarianism. This is intolerable. This proposal should not be pursued unless a way can be found to allow normal appeals.

Submitted by:

Bob Jacobs