

## Doug McIntyre

---

**From:** Patience Malaba <patience@housingconsortium.org>  
**Sent:** Friday, July 31, 2020 10:15 AM  
**To:** EIS  
**Subject:** Comments on the Scope of the EIS for the Amendments to the Comprehensive Plan and Municipal Code intended to address transportation level of service standards population and housing, and transportation elements-Agency File No. POL2020-00331  
**Attachments:** HDC Comment Letter on Scope of Sammamish Concurrency Capital Facilities Plan EIS July 28 2020.pdf

[CAUTION - EXTERNAL EMAIL]

Hi Sir/Madam,

The Housing Development Consortium of Seattle-King County (**HDC**) is a nonprofit membership organization consisting of 180 private businesses, nonprofit agencies, and public partners who are working to develop affordable housing across King County and who are dedicated to the vision that all people should live in a safe, healthy, and affordable home in a community of opportunity. Thank you for the opportunity to comment on the scope of the Environmental Impact Statement (**EIS**) for the City's concurrency standards update. We offer comments specifically on the EIS alternatives, land use plans and policies, population and housing, and transportation elements of the environment.

Attached is our letter.

Best,

**Patience Malaba**

Director of Government Relations and Policy (Pronouns, She/Her)  
Housing Development Consortium of Seattle-King County  
1326 5<sup>th</sup> Avenue, Suite 230  
Seattle, WA 98101  
O: (206) 682-9541  
C: (425) 245-6000  
[www.housingconsortium.org](http://www.housingconsortium.org)

Please be aware that email communications with members of the City Council, City Commissioners, or City staff are public records and are subject to disclosure upon request.



**HOUSING  
DEVELOPMENT**  
*consortium*

July 28, 2020

Transportation Level of Service & Capital Facilities  
Environmental Impact Statement (EIS)

Attn: David Pyle

City of Sammamish

801 228th Ave SE

Sammamish, WA 98075

Dear Mr. Pyle,

**Subject: Comments on the Scope of the EIS for the Amendments to the Comprehensive Plan and Municipal Code intended to address transportation level of service standards and capital facilities needs, Agency File No. POL2020-00331**

The Housing Development Consortium of Seattle-King County (**HDC**) is a nonprofit membership organization consisting of 180 private businesses, nonprofit agencies, and public partners who are working to develop affordable housing across King County and who are dedicated to the vision that all people should live in a safe, healthy, and affordable home in a community of opportunity. Thank you for the opportunity to comment on the scope of the Environmental Impact Statement (**EIS**) for the City's concurrency standards update. We offer comments specifically on the EIS alternatives, land use plans and policies, population and housing, and transportation elements of the environment.

**Housing Development Consortium  
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101  
206.682.9541 | [www.housingconsortium.org](http://www.housingconsortium.org)



**HOUSING  
DEVELOPMENT**  
*consortium*

First, as you consider alternatives in the EIS, we urge you to ensure that the action alternatives vary in approaches to adjusting Level of Service Standards (**LOS**) and concurrency management, prioritize equitable transit-oriented community development, and identify specific transportation projects necessary to meet the identified LOS standards. We further urge you to fully analyze the impact each alternative's proposed LOS standard will have on housing affordability to ensure the Comprehensive Plan includes policies to effectively mitigate these impacts. It is vitally important that the City compare the alternatives based on their impacts to enable an array of housing choices that meet the housing needs of low- and moderate-income Sammamish households. In setting forth the pattern of residential and commercial growth over the 20 years, the Comprehensive plan plays a tremendous role in determining whether Sammamish residents of all incomes can find affordable homes near their work, school, transit, and other services.

HDC recognizes that this is for a non-project action, but that does not relieve the City of the responsibility to analyze the alternatives based on the foreseeable potential impact of future transportation improvements after adoption of the proposal which could conceivably require demolition on the current sites described in B.8c. The Determination of Significance suggests that neither the non-project proposal nor transportation improvements that might be proposed after adoption of this proposal would directly provide housing units (B.9). While this may technically be the case, it overlooks the fact that there will be reasonably foreseeable indirect housing impacts based on the proposal that should be studied in the EIS. Considering this, we urge you to proactively recognize the importance of coordinating housing and transportation in long-range planning like this. Aligning residential growth with transportation access has tremendous environmental and social benefits. This form of growth can also place extreme upward pressure on housing costs. The EIS should include anti-displacement measures that will ensure development without displacement and identify innovative housing mitigation

**Housing Development Consortium  
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101  
206.682.9541 | [www.housingconsortium.org](http://www.housingconsortium.org)



**HOUSING  
DEVELOPMENT**  
*consortium*

measures in cases of demolition of various land uses that include single family residences, multi-family residences and commercial buildings. A strong awareness of these issues will help the city understand what policy solutions will be necessary to mitigate the impacts of a preferred alternative.

HDC agrees with the scoping notice that EIS should analyze impacts on the transportation system. The EIS should consider whether the amendments will induce demand and the impacts of that induced demand. The EIS should also consider whether the amendments include the level of service standards for transit routes required by RCW 36.70A.070(60(a)(iii)(B) and whether the amendments will aid achieving the level of service standards, the impact of the amendments on transit service, and whether the amendments will support densities sufficient to efficiently provide transit throughout the city.

We recognize that the non-project proposal would not directly cause the addition or elimination of any parking spaces. The EIS, however, should include analysis on ensuring the reduction of parking minimums for housing near future and existing transit and bus rapid ride hubs. The EIS analysis would also help inform the localized conditions and the nature of the individual future projects to factor in location, 15-minute walksheds and other factors for residential growth.

Thank you for the opportunity to comment on the scope of the Environmental Impact Statement. HDC is following this update very closely and will continue to engage our members throughout the process. Thank you for considering our comments. If you require additional information, please contact [patience@housingconsortium.org](mailto:patience@housingconsortium.org)

Sincerely,

**Housing Development Consortium  
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101  
206.682.9541 | [www.housingconsortium.org](http://www.housingconsortium.org)



HOUSING  
DEVELOPMENT  
*consortium*

*Patience .M. Malaba*

**Patience Malaba**

Director of Government Relations & Policy

**Mallory Van Abbema**

Policy & Advocacy Manager

**Housing Development Consortium  
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101  
206.682.9541 | [www.housingconsortium.org](http://www.housingconsortium.org)